

DESIGNING A COORDINATED INTAKE AND REFERRAL (CIR) SYSTEM FOR CIVIL LEGAL SERVICES IN THE DISTRICT OF COLUMBIA

Input from Legal Services Providers and Allied Organizations

September 2022



Submitted to

DC Bar Foundation

655 New York Avenue NW, 6th Floor
Washington, DC 20001

Prepared by

NPC Research

Portland, OR 97214

Colin Holloway, Ph.D.

Kelly Jarvis, Ph.D.

holloway@npcresearch.com

jarvis@npcresearch.com



CONTENTS

- Introduction..... 3**
 - Context and Purpose of the CIR System 3
 - Process for Developing the CIR System 4
 - The Request for Design Feedback and Input (RDFI) Process 4
 - This Report 5

- Synthesis of Input from Legal Services and Allied Organizations 6**
 - The CIR System as a Beneficial Service 6
 - CIR System Accessibility and Efficiency, Service Approach, and the CIR Navigator Position 7
 - Accessibility and Efficiency 7
 - Recommendations for Accessibility and Efficiency 8
 - Service Approach 9
 - Recommendations for CIR Service Approach 11
 - Role of CIR Navigators..... 11
 - Recommendations for Navigator Staffing and Training 14
- Creating a User-Centered System..... 15
 - The Intake Experience..... 15
 - Recommendations for Enhancing the Intake Experience..... 17
 - The Importance of Accurate Referrals..... 18
 - Recommendations for Making Accurate Referrals..... 19
 - Designing an Efficient Case Routing Process 20
 - Recommendations for Designing an Efficient Case Routing Process 22
- Potential Impacts on Existing Legal Services 23
 - Legal Services Provider Interest in Participation 23
 - Maximizing Benefits to Participating Organizations..... 23
 - Integrating the CIR System with Existing Intake Networks 25

Recommendations for Maximizing Benefits to Participating Organizations.....	26
Integration with the Broader Service Community.....	27
Recommendations for Integrating the CIR System into the Broader Service Community	28
Conducting Outreach and Marketing the CIR System	29
Outreach and Marketing Strategies.....	29
Marketing Messages.....	29
Recommendations for Conducting Outreach and Marketing the CIR System	30
CIR System Administration and Ongoing Evaluation	31
CIR System Staffing and Location	31
Recommendations for CIR Staffing and Location	32
Assessing CIR System Performance and Impact	32
Recommendations for Assessing CIR System Performance and Impact	33
Community Input and Recommended Resources	34
Soliciting Community Input.....	34
Other Available Resources	34
Recommendations for Soliciting Community Input and Other Information	34
Summary	35
Appendix A-1	36
Appendix A-2	37

INTRODUCTION

Civil legal problems are pervasive in the United States, especially among low-income households.¹ These problems are often entwined with critical livelihood issues, like housing stability, family relationships, and income, and they have the potential to seriously impact people’s lives. While many people experience civil legal problems, few receive legal help to address them. One reason for this discrepancy is the often insurmountable challenge of finding an appropriate legal services provider. Establishing a single point of entry for legal services—a coordinated intake and referral (CIR) system in which multiple legal services providers participate—can streamline people’s access to legal help.

CONTEXT AND PURPOSE OF THE CIR SYSTEM

With more than 50 civil legal services providers in the District of Columbia, finding legal help can be a daunting task. It is a complex system in which legal services organizations offer different levels of assistance, address different legal areas, use different eligibility criteria, and operate with different capacities. Many community members never reach the door of a legal services provider to get the help they need. Even lawyers and other professionals can experience challenges referring clients to the appropriate assistance. Because of this lack of clarity, legal services organizations receive many calls from people whom they cannot assist, either because the legal problem is not in an area they serve, the caller is not eligible for their services, or the problem is not a legal one. The complexity of the system makes it very difficult for District residents to find the right assistance to address their civil legal problem and puts additional strain on legal services intake staff.

To address this dilemma, the DC Bar Foundation (DCBF) is spearheading the design and development of a user-friendly, secure, accessible Coordinated Intake and Referral (CIR) System for people with civil legal needs in DC. The CIR System (the “CIR” or the “System”) will serve as a single point of entry to connect District residents with a legal services provider that can offer appropriate assistance. The System will entail a dedicated phone line and website that can be used by people seeking legal help (“applicants”). A customized web application will handle the collection and storage of intake information, routing cases to appropriate legal services organizations, sending automated notifications that a referral has been initiated, and confirming case placement with the legal services organization. The System will be staffed by trained CIR navigators who will conduct intake screenings with applicants, monitor the technology-enabled process, and ensure applicants are connected with an appropriate service provider. The CIR System will *coordinate* intake among legal services providers to streamline the process for applicants—it will not *centralize* intake, nor will it replace existing intake processes at legal services organizations.

¹ Legal Services Corporation 2022 Justice Gap Report: <https://justicegap.lsc.gov/the-report/>

Process for Developing the CIR System

The DC Bar Foundation has created a multidisciplinary team to design and develop the CIR System, including a technology partner to build the customized system and a research partner to integrate evaluation throughout the process. Building the CIR System involves 4 general phases:²

- 1) *Design*—Determination of the System’s parameters and functionality, including key staff roles, workflows and protocols, user-centered approaches, and specifications of the automated systems and technology components
- 2) *Development*—Establishment of key infrastructure and partnerships, building of the automated systems and technology components, and hiring of staff
- 3) *Pilot testing and refinement*—Rollout of the System to limited sites to test the workflow and the technology components, and to adjust and refine as necessary
- 4) *Rollout*—Rollout of the CIR System broadly across all participating organizations within the District’s civil legal aid community

Each phase includes an associated evaluation protocol to collect data to inform the work of that stage. As of this report, the initiative was in the *Design* phase, and the evaluation work focused on gathering information from key stakeholders to inform the CIR’s design. This work involved compiling input from legal services providers, allied organizations, and community members and clients. (A report³ summarizing the feedback from community members and clients is publicly available.)

THE REQUEST FOR DESIGN FEEDBACK AND INPUT (RDFI) PROCESS

As part of the CIR System’s design phase, the DC Bar Foundation solicited early input from legal services organizations and other civil justice system partners by releasing a “Request for Design Feedback and Input” (RDFI) in fall 2021. The RDFI outlined the purpose, scope, and core design elements of the CIR System, and gave interested parties an opportunity to provide feedback on the proposal and to offer suggestions for the System’s design, functionality, and implementation.

The RDFI represents a significant step in the CIR team’s information-gathering efforts, and the document aimed to cast a wide net by requesting input on several elements of the System design and implementation, including the structure of the coordinated intake process, the user experience, the logistics of referral and information transfer between partnering organizations, how the CIR System would integrate with existing intake processes, and how to communicate about the System to partners and to the community.

Respondents were given the opportunity to comment on all aspects of the design and operation of the CIR System and were asked to provide specific examples or resources that they felt may assist the CIR

² <https://www.dcbfoundation.org/coordinated-intake>

³ https://3ddb4979-d4c1-40ef-8b00-8c061c453377.usrfiles.com/ugd/3ddb49_858eab6d51e5444da63e2ee91a375c34.pdf

team during project development. A total of 21 responses were submitted to the RDFI, including 15 responses from 13 local legal services organizations, 3 responses from existing collaborative bodies related to access to justice,⁴ and 3 responses from other interested parties who operate within the DC legal services community.

This Report

This report summarizes the RDFI responses with the goal of translating the feedback and recommendations from the respondents into actionable guidance for developing a coordinated intake system that works for both legal services providers and District residents, especially those with low incomes and other vulnerabilities that make interaction with the legal system challenging.⁵ Recommendations are organized around the following key elements of the CIR System:

- CIR System as a beneficial service
- CIR System accessibility and efficiency, service approach, and the CIR navigator position
- Creating a user-centered system
- Potential impacts on existing legal services
- Integration with the broader service community
- Conducting outreach and marketing the CIR System
- CIR System administration and ongoing evaluation
- Community input and informational resources

The results presented in this report provide guidance for the current and ongoing work required to develop an effective coordinated intake process in the District of Columbia. As the CIR team continues through the subsequent project phases, the following recommendations can serve as a starting point for the type of collaborative efforts that will be necessary to develop a coordinated intake system that overcomes challenges, maximizes benefits, and meets the needs of DC residents.

⁴ For example, the DC Access to Justice Commission and the DC Legal Services Provider Consortium.

⁵ A companion report summarizes input gathered directly from legal services clients and community members through a series of focus groups. That report can be found on the DCBF website.

SYNTHESIS OF INPUT FROM LEGAL SERVICES AND ALLIED ORGANIZATIONS

Responses to the RFDI document were synthesized and a summary of the feedback is provided for each of the following topics: potential benefits of the CIR System, accessibility and service approach, prioritizing user experience, impacts on existing legal services, integration with the broader service community, outreach and marketing, System administration, and community input. Recommendations and other considerations, based on respondents' input, are offered for each topic.

THE CIR SYSTEM AS A BENEFICIAL SERVICE

Respondents highlighted the important role of a coordinated intake and referral process—one that is client-centered and easy to use—in surmounting some of the biggest barriers to accessing legal services in the District. Several responses pointed out that community members in need of legal assistance may have a hard time accessing a lawyer, may be unaware that they have a legally actionable issue, may not know who to call for legal assistance, or may have reservations about engaging with a legal system that they may not trust.

While they did not suggest that the CIR System would resolve all of these access to justice problems, respondents felt positively about its potential impact and thought that a single point of entry for referrals would make it easier for community members to connect with legal help. Some respondents further suggested that by simplifying the legal intake process, the CIR could:

- ✓ **Ease the burden of finding legal help** by providing a streamlined intake and referral service that connects people to attorneys quickly and efficiently,
- ✓ **Deepen community relationships** by offering a trusted service that helps people find appropriate legal help when they need it,
- ✓ **Expand access to justice** in civil legal cases by broadening the reach of legal services partners throughout the District.

While there were some different suggested approaches and anticipated challenges, respondents were overall encouraged by the positive impact that a well-designed, citywide coordinated intake system could have and offered thoughtful suggestions on how to maximize its potential as a beneficial service to the community. Suggestions were framed to help create an effective and user-centered System that prioritizes accessibility, employs high-quality navigators, connects applicants to a variety of legal services, creates a positive user experience, makes accurate referrals, and is shaped by guidance from community members whom the System is designed to benefit.

CIR SYSTEM ACCESSIBILITY AND EFFICIENCY, SERVICE APPROACH, AND THE CIR NAVIGATOR POSITION

Accessibility and Efficiency

Respondents indicated that the **accessibility** of the CIR System would be a significant factor for its success. If applicants experience the CIR as easy to access and helpful, they will be more likely to share it as a resource with friends and neighbors, which would help the System gain traction in the communities it is intended to serve. Respondents offered guidance about tailoring the CIR System to create a referral platform that is widely accessible for DC residents and noted the importance of addressing several System elements, including:

- **Multiple avenues to access the System:** Although the CIR itself is a single point of entry, the System should offer more than one way for an applicant to connect with a CIR navigator. In addition to providing access over the phone, the System should also have an easy-to-use website for users to connect online, allow applicants to connect via text or a smartphone app, and consider in-person options such as legal kiosks.
- **Additional barriers faced by vulnerable and historically marginalized populations:** To create a user-centered process, the CIR must incorporate design elements that consider the unique challenges faced by members of vulnerable populations. Specifically, the CIR team should consider the needs of older adults, people with limited English proficiency or limited literacy skills, survivors of sexual assault and domestic violence, the deaf community, people with low level of awareness of their legal rights, and individuals with any other type of circumstance or condition that impacts communication or comprehension.
- **Connection with non-legal services providers and allied professionals:** The CIR System should connect with local government agencies, courts, social services providers, and other community-based organizations to promote awareness of the CIR System among various client populations and increase their access to legal services through the CIR.
- **Search engine optimization (SEO) for internet searches:** Search engine optimization should be used to ensure that the CIR System's contact information comes up when people search for legal assistance or any civil legal topic in Washington, DC.

Respondents also underscored the importance of the CIR System being **efficient**—that is, connecting applicants with legal help quickly—and being responsive to applicants' needs. They offered suggestions about how the CIR could maximize efficiency and minimize applicants' potential frustration with the intake and referral process, such as the following:

- **Staffing level to meet service demand:** The CIR System must have adequate staff to handle the volume of calls and online intakes. Having sufficient staff will enable the CIR to more quickly

process referrals and to offer expansive hours of operation to accommodate applicants' work schedules and other scheduling constraints.

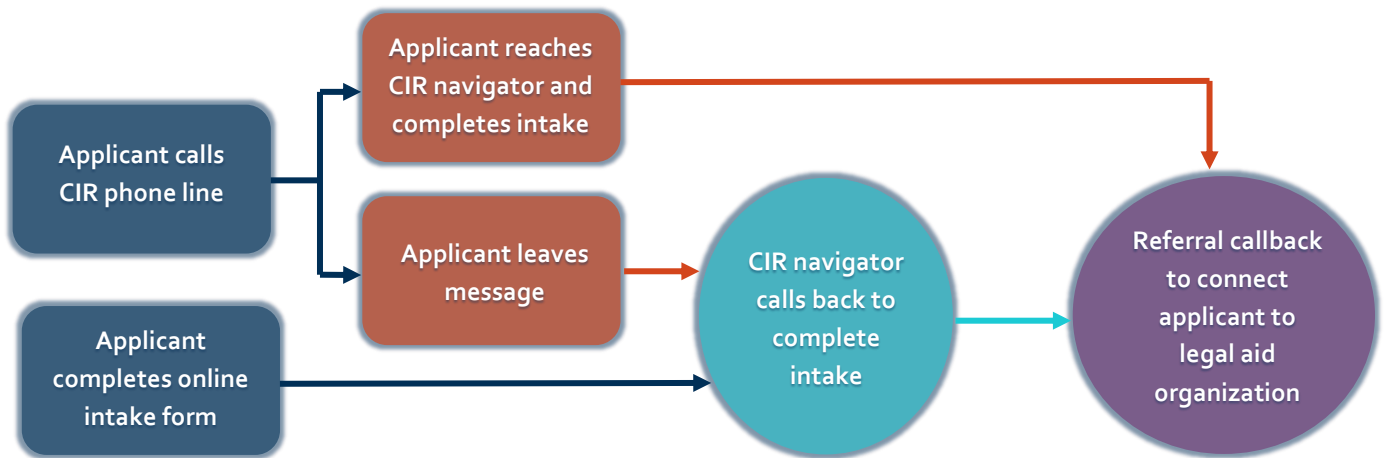
- **Addressing live calls:** The CIR System should work to minimize the amount of time applicants spend waiting on hold and, whenever possible, to answer calls live instead of requiring callers to leave a message and receive a call back.
- **Referral accuracy and process efficiency:** CIR navigators should prioritize efficient processing of referrals to connect applicants with legal help as quickly as possible. The CIR System can develop referral protocols that streamline the communication between organizations so that applicants do not wait too long for a referral response. Moreover, the referrals should be accurate so that the applicant is not being unnecessarily bounced from one provider to another, delaying the onset of legal assistance.

Recommendations for Accessibility and Efficiency

- ✓ Provide applicants with **multiple pathways to access the CIR System**, including:
 - A single phone line for applicants to call,
 - A website with an easy-to-understand online referral request process,
 - A phone number to text,
 - Smartphone applications,
 - In-person sites or kiosks.
- ✓ Be mindful of the additional barriers experienced by historically marginalized and vulnerable populations seeking legal help and **create a system that is easy for everyone to access**.
- ✓ **Engage a wide range of partners**, such as local government agencies, social services providers, and other community-based organizations, to integrate the CIR System into the broader service and resource community accessed by DC residents.
- ✓ Use **search engine optimization (SEO)** to maximize results of internet searches and make it easy for residents to search and find the CIR contact information.
- ✓ Adequately staff the CIR System with **enough navigators** to either **answer phone calls live** or **promptly return voicemail messages** left by applicants.
- ✓ **Minimize wait times** for applicants, including time spent on hold and time spent waiting for a callback from a navigator.

Service Approach

The CIR System is fundamentally a streamlined process for collaborative intake and referral. The proposed process involves the following steps:



Respondents expressed general agreement with the proposed CIR process, although some raised additional considerations, such as fast-tracking referrals from applicants who need immediate legal help and handling calls from applicants who are in emergency situations.

- **Applicants with immediate legal needs:** Respondents stated that the CIR System can expect that some applicants will reach out for legal assistance with an immediate need to connect with a lawyer, such as when they have a filing deadline, court date, or court-ordered event (e.g., eviction, benefits termination) that is imminent or recently lapsed. The CIR should incorporate protocols to assess the status of an applicant’s case, identify upcoming deadlines, triage priority calls for faster processing, and communicate the need for immediate review to the legal services provider receiving the referral.
- **Applicants who are in emergency situations:** Respondents suggested that the CIR System establish protocols for handling emergency calls from applicants who are in a mental health crisis or other potentially unsafe situation. Others recommended that the CIR navigators be prepared to offer contact information for crisis resources such as food, emergency shelter, domestic violence survivor support services, and other resources for safety emergencies. To support effective handling of these calls, CIR navigators should be trained in trauma-informed care and crisis management. One respondent also suggested that the CIR System establish protocols for identifying when it is necessary for a navigator to connect callers with 911.

Legal Advice and Information

The initial conceptualization of the CIR System does not involve capacity to provide **legal advice**. However, respondents were asked about their thoughts on the role of legal advice within a coordinated intake system.

While respondents acknowledged the utility of a legal advice hotline for people seeking quick answers to legal questions, they also highlighted some challenges inherent in providing advice in the

proposed CIR context. Many respondents noted that the CIR navigators, currently proposed as non-lawyer professionals (see section on Role of CIR Navigators), could not provide legal advice, pointing to restrictions on non-attorneys from doing so. If CIR navigators were able to provide advice, there is also the potential conflict between the advice provided by CIR staff and what applicants may hear from the attorney who receives their referral.

Respondents were broadly supportive of staffing non-lawyers in the navigator role (see section on Role of CIR Navigators), and they understood the complexity that would be introduced by incorporating legal advice into the CIR. That said, some respondents cautioned against limiting the CIR System to a referral service, pointing out that it would be uniquely positioned as a gateway to a range of legal services to meet a wide scope of applicant needs. Some suggestions on how to incorporate advice into the CIR included directing applicants to an existing advice hotline, establishing a way to identify applicants who need advice so that the legal services organization receiving the referral could respond to those cases appropriately, and staffing the CIR System with a limited number of attorneys who can take advice calls.

Respondents also suggested that CIR System be equipped to connect applicants with accessible and relevant **legal information**. As one respondent wrote, *“A high quality referral service should be an information service, not just a referral one.”* To incorporate legal information into the CIR System, navigators must be knowledgeable about available legal resources and able to identify the most appropriate resources for the case. Navigators could direct applicants to legal information either when that is the only legal need or when applicants could benefit from additional information while their referral is being processed. To support these tasks, navigators would benefit from training on how to identify legal information needs, the CIR’s technology system should guide navigators to find the right informational resources, and the CIR’s website should provide a clear pathway to legal information resources for applicants who connect online.

“DCBF should take this moment to be ambitious in its plan to ensure that this unprecedented effort results in a system that provides the maximum amount of help to District residents”

Recommendations for CIR Service Approach

- ✓ Create a way for applicants whose case has upcoming or lapsed deadlines to receive a **fast-tracked referral that is flagged for immediate review**.
- ✓ Establish **emergency protocols for navigators** to follow when an applicant appears to be in a crisis situation and in need of immediate help. Develop clear protocols for when navigators should connect callers to 911 or other emergency hotlines.
- ✓ Ensure that navigators have a comprehensive **list of social service and community (non-legal) resources** to which they can refer applicants in need. Ensure that the list covers an expansive array of service areas (e.g., food, housing, mental health, primary care, domestic violence services), is frequently updated, and includes crisis resources.
- ✓ Work with the legal services community to consider how **legal advice might be integrated into the CIR System in the future** in a way that does not create conflicts or cause unnecessary complexity for applicants.
- ✓ Work with community partners and participating legal services organizations to **explore opportunities to connect applicants to a range of legal services**, including brief legal advice and high-quality legal information.
- ✓ Train CIR navigators on **how to identify legal information needs** and available resources.
- ✓ Embed links to existing **legal information resources** in the CIR website.

Role of CIR Navigators

As the front-facing element of the CIR System, the navigators are a critical component of a user-centered program. Respondents offered their thoughts on staffing the CIR System with non-attorneys and what type of trainings the navigators should receive.

Employing Non-Attorney Navigators

The majority (86%) of respondents supported the employment of non-attorney professionals as CIR navigators. While some respondents cited concerns about the ability of non-attorneys to spot legal issues at a level necessary to make accurate referrals or offer helpful legal information to callers, most thought that it was more important that navigators be empathetic and client-centered than have a legal background. One respondent noted that the CIR navigators would benefit from having a background in case management or social work.

It was recommended that the CIR System provide legal support to non-attorney navigators in the form of access to legal information and sufficient training in legal issue spotting. Importantly, respondents thought that navigators should be supervised by an attorney who can address legal questions that come up during the course of intake, help discern legal issues in complex circumstances, and provide additional support.

Hiring and Retaining Navigators

Several respondents underscored how critical the navigators are to the success of the CIR and pointed to potential challenges in hiring and retaining staff that the CIR System coordinators should keep in mind. Some respondents felt that it would be challenging to provide the navigators with initial and ongoing training necessary to perform the work that is currently spread across several legal services organizations and to make appropriate referrals for a wide variety of legal matters. Additionally, there is a high turnover rate among intake staff at legal services providers, which is something the CIR System should be prepared to face with its navigators.

To help minimize these concerns, respondents emphasized that it is critical that the CIR System offer competitive and ample compensation and suggested that the CIR implement strategies to attract and retain high-quality staff. To help reduce concerns about turnover, the CIR System should hire highly motivated navigators who view the position as a profession, who like interacting with applicants and finding solutions to their legal issues, and who are committed to the CIR's underlying mission of connecting District residents to a legal services provider who can help them. The CIR can also cultivate a positive working environment for navigators by providing the appropriate supervisory support, training, space, and resources to help avoid or minimize burnout. For example, the CIR System might establish schedules in which navigators regularly perform other tasks that allow them to rotate away from applicant interactions for some portion of the week. Finally, one respondent recommended that the CIR communicate with legal services providers who have been able to retain long-term intake staff for best practices regarding this position.

Training Navigators

Respondents listed a range of topics on which they thought CIR navigators should receive training. Exhibit 1 displays these topics, divided into two general categories: legal knowledge (top section) and customer service skills (bottom section).

Exhibit 1. Recommended Training Topics for CIR Navigators

Legal Topics

Legal issue spotting

Knowledge of available resources providing legal information

Familiarity with the legal services organizations serving the DC community

Best practices for legal intakes, such as writing case fact summaries

Basic knowledge of legal ethics, confidentiality, and conflict of interest review

Instruction on how to look up cases and pull court dockets

Information on available “low bono” legal services

Customer Service and Other Topics

Trauma-informed care

Cultural humility, implicit bias, and racial equity

Empathy

Crisis management, including how to respond to applicants in a domestic violence situation

Managing lack of trust in the DC legal system

Sensitivity, including how to work with applicants with low legal literacy and how to ask potentially sensitive intake questions (e.g., income)

Recommendations for Navigator Staffing and Training

- ✓ Conceptualize the CIR System as a service on par with high-quality legal services programs and consider its staff positions as careers.
- ✓ Employ **non-attorney professionals to serve as CIR navigators** and employ an **attorney to supervise the navigators**.
- ✓ Seek to **hire highly motivated navigators** who are passionate about the CIR System's mission and who intend to stay in the position for more than a year.
- ✓ Provide **competitive salaries and benefits packages** for CIR navigator positions to attract and retain high-quality professionals.
- ✓ Create CIR staff schedules such that **navigators have some working hours in which they do not interact with applicants**. This approach will help modulate the pressure of the position and prevent burnout.
- ✓ Consult legal services providers with long-term intake specialists about best practices for hiring, training, supporting, and retaining navigators.
- ✓ Ensure navigators have knowledge of and ready access to **updated legal information** and other legal resources.
- ✓ Provide navigators with **training across a range of legal and customer service topics**:
 - Legal topics include legal issue spotting, best practices for legal intakes, legal ethics and confidentiality, and the full directory legal services providers serving the District.
 - Customer service topics include trauma-informed care, implicit bias, racial equity, empathy, crisis management, and domestic violence.
- ✓ **Retain the services of an experienced legal services intake specialist** who can help develop and implement a training curriculum for CIR navigators.

CREATING A USER-CENTERED SYSTEM

A recurring theme among responses was how important it is for the CIR System to develop a good and trustworthy reputation in the communities it intends to serve. Potential applicants are likely to consider what they have heard about the CIR before connecting with the service, so it is critical that the System leave users satisfied and willing to speak positively about their experience.

The Intake Experience

Respondents recommended ways that the CIR System could ensure that applicants have a positive intake experience, including how to structure the intake process to be considerate of callers and lessen their storytelling burden, how to manage concerns about applicant satisfaction with a system that offers a referral to legal services but not immediate legal assistance, and what data security protocols are instrumental to ensure applicant confidentiality and control over sensitive information.

Reducing Storytelling Burden

Respondents were asked to provide thoughts on how the CIR System could limit the number of times that applicants would need to explain their situation during the intake and referral process. They suggested protocols like allowing the **CIR System and partner organizations to share intake notes** (with the applicant's consent), **restricting the CIR intake questions** to only those that are necessary for the providers to make a referral decision, and **making accurate referrals** to limit the number of intake conversations the applicant must have.

Some respondents contended that the need for applicants to tell their story more than once is not easily avoidable, as attorneys (after intake staff) have to hear the case details before making a representation decision. To ease this experience, these respondents recommended that the CIR create a transparent and supportive environment for applicants who have to discuss a traumatic experience with more than one organization. By providing a supportive context, the CIR staff can reduce potential re-traumatization when they are not able to reduce the number of times that applicants explain their legal issue.

“Applicants will still have to share their story more than once, but it will be to a provider who is prepared to hear it and offer the right kind of support.”

To provide this support, respondents suggested that the CIR should **train navigators in empathy and trauma-informed care** so they can respond to challenging stories with the appropriate level of compassion and **set clear expectations** about the intake process so that applicants are aware of the potential need to retell their story at different junctures. Navigators can also **offer referrals for social service resources** to applicants who need extra support. Finally, when the case is routed, the CIR navigators should **inform the legal services organization receiving the referral about the applicant's situation** so that the organization's intake staff are knowledgeable about the case and prepared to be empathetic and appropriately responsive.

Managing Applicant Perception of the CIR System

According to respondents, part of the CIR's reputation will be tied to applicant expectations of the System and its ability to meet these expectations, which may not always be feasible. For example, some respondents cautioned that applicants who call the CIR phone line expecting to speak with a lawyer or receive immediate legal assistance may be dissatisfied with a referral-focused service. Other respondents expressed concern that applicants may feel like they have been forgotten during the referral review period. Finally, some respondents suggested that the CIR System and staff must be sensitive to how difficult it could be for an applicant to have their referral rejected.

To help address these potential challenges and to increase the likelihood that applicants have a valuable experience with and share a positive impression of the CIR System, respondents emphasized how important it is that the CIR navigators and promotional materials describe the CIR's purpose and process very clearly, so that applicants know what they can expect from the System. Specifically, respondents suggested clear communication about the following aspects of the System:

- **The CIR is a referral service:** The CIR System must clearly articulate its function to applicants to make them aware that the CIR is a *referral* service designed to connect applicants to legal services and that the CIR does not itself provide legal services.
- **The intake and referral process:** CIR staff must fully explain the intake and referral process to applicants, ensuring that they understand what will happen when. Applicants should know that the CIR System will connect them to a qualified legal services provider and that they do not need to reach out to an attorney directly.
- **The referral review process:** CIR navigators must be trained and prepared to explain to applicants why it takes time for legal services organizations to review a referral, that legal services providers cannot accept every referral, and that the CIR navigator will send an unsuccessful referral to another provider, if necessary. Navigators should also be clear with applicants that they cannot guarantee that an attorney will represent them.
- **Applicant follow-up:** Applicants should have a way to contact the CIR navigator to follow up on the status of their referral, and navigators should let applicants know how to do this.

Confidentiality Procedures

Respondents suggested procedures for the CIR System to ensure the confidentiality of applicant information and sensitive data. Recommendations focused on the importance of communicating data procedures to applicants and designing a secure data sharing system. Specific suggestions included:

- Inform applicants in a clear statement about what will happen to their sensitive information, including who it will be shared with and for what purposes.
- Have applicants provide their consent (verbal or written) for the CIR System to share their data with relevant parties during the referral process.

- Have CIR navigators sign non-disclosure agreements and undergo regular confidentiality training as a condition of employment.
- Use secure and/or encrypted information sharing platforms.
- Anonymize client data when possible and for system analysis or evaluation.
- Limit who has access to client information to only necessary staff.

Several respondents suggested reviewing the confidentiality and data security procedures used by existing coordinated intake networks in the District that are currently sharing data with each other and by organizations serving survivors of domestic violence and sexual assault (e.g., the National Network to End Domestic Violence). These existing collaborations may have good examples for strong procedures that can inform the CIR System.

Recommendations for Enhancing the Intake Experience

- ✓ Work with legal services partners to identify standardized intake and case routing procedures that **reduce the number of times an applicant has to tell their story**.
- ✓ **Limit the information collected** in CIR intake interviews to only the information that is necessary to refer the case effectively.
- ✓ Train navigators to use a **trauma-informed approach to interviews** and to relate to applicants with **compassion and empathy**, especially when applicants must tell their stories multiple times.
- ✓ Provide applicants with a **clear explanation of the intake and referral process** so that they know what to expect and offer information about **social services and support resources** in the community, when appropriate.
- ✓ Clearly **communicate that the CIR System is a referral service** so that applicants have accurate expectations of the System and will not expect CIR navigators to provide legal services or advice.
- ✓ **Fully explain the referral process** so that applicants know what to expect and **be up front about the referral review period** so that applicants understand the wait time between the CIR intake and the legal services organization contacting them and making a representation decision.
- ✓ **Enable applicants to follow up on their referral** during the period when they are waiting for a representation decision.
- ✓ Be transparent with applicants about **how the CIR System uses confidential data** and **obtain consent** before sharing applicant information.
- ✓ Ensure all **data transfers happen in a secure setting** and limit access to applicant information to only those staff who need it to process referrals.

The Importance of Accurate Referrals

Several respondents highlighted that a key element of a positive CIR user experience will be reducing (or eliminating) the frequency of clients being “bounced” from one provider to another before receiving services. To limit client bounce, the CIR System must make accurate referrals to legal services organizations that have the capacity and ability to take an applicant’s case.

Sufficient Intake Information

Respondents acknowledged that, when determining intake procedures, the CIR System must balance applicant burden with provider informational needs. The level of detail gathered at intake will require more time (and potentially more stress) from the applicant but may also aid in more accurate referral placements. The CIR will have to determine the minimal information necessary to make an informed referral decision and for the receiving legal services organization to conduct a conflicts check. Several respondents offered specific information to collect at intake; the basic fields of applicant name, date of birth, contact information, details of the legal issue, and information about the opposing party were the most common recommendations.

“There is nothing more frustrating for a client (and more likely to earn a referral service a bad reputation) than for the client to be sent to an organization for help and for that client to find that that organization could not in fact help.”

Precise Case Routing Procedures

Several respondents suggested ways to maximize referral accuracy, with a specific focus on designing the technology system to assist navigators in finding a legal services provider that has the necessary experience, ability, and capacity to take an applicant’s case. Specifically, respondents commented on the following aspects of the System:

- **Automated logic tree for making referrals:** An automated logic tree would review the specifics of the applicant’s case and identify a legal services provider with the appropriate expertise and capacity to take the case. As part of this system, the CIR team would need to develop a database that contains information about each of the participating legal services organizations, including eligibility criteria, services provided, and practice areas.
- **Updated provider capacity in the CIR database:** To assess whether a referral is appropriate, the CIR System will need to know if the legal services provider has the capacity to take a new case. Because provider capacity is fluid, organizations will need to regularly update their status in the CIR database so that navigators are able to base referrals on current information. Respondents agreed that, to ensure accurate referrals, updating capacity in the System must be a requirement for participating legal services providers.
- **Conflicts of interest:** It is possible that conflicts of interest may affect referral decisions differentially among providers. For example, some larger organizations, which have served

more cases, may have a higher referral rejection rate due to conflicts. When assessing providers' participation in the System, the potential for conflicts should be considered.

- **Applicants with multiple legal issues:** It will be necessary for CIR navigators to assess whether there is one legal services organization that can handle all of the applicant's legal issues or if the applicant will need multiple referrals. Whenever possible, having one organization help the applicant with multiple issues is preferred, as this approach eases burden on the client.

Navigators' Crucial Role

Some respondents cautioned against turning the CIR System completely over to an automated system and emphasized the importance of human beings managing the referral process. These respondents pointed out that the ability of the CIR navigators to spot legal issues in an applicant's story is critical to making an accurate referral, because applicants do not always know what their legal issue is or how to adequately describe it.

"The navigators are not simply fulfilling an IT function ... They will be responsible for evaluating potential clients' answers and making determinations about where to send them."

One respondent explained that some applicants might not know what type of legal help they need and that an automated system will not always catch situations where applicants are asking for an attorney specializing in a practice area that does not meet their legal needs. This respondent felt that substantial training would be necessary to get non-attorney navigators to the point where they could correctly identify legal issues during intake, and emphasized the importance of navigators being able to clearly understand the different types of legal problems, even when the applicant is mistaken about the type of lawyer they need.

Recommendations for Making Accurate Referrals

- ✓ **Identify a limited set of necessary questions to ask during CIR intake** so that navigators have the information needed to make an accurate referral without placing extra burden on the applicant.
- ✓ Implement **automated case routing logic** to direct navigators to the legal services organization best suited for the referral. This logic would review provider eligibility criteria, practice areas, and capacity for new referrals.
- ✓ Require participating legal services **providers to regularly update the CIR System database** with their organization's information and capacity for new referrals.
- ✓ Flag **applicants with multiple legal issues** and, whenever possible, refer them to a provider that can handle all of the issues.
- ✓ **Train navigators to spot legal issues** so that they can maximize the CIR System's case routing logic by correctly identifying an applicant's legal needs and locating the correct organization to receive the referral.

Designing an Efficient Case Routing Process

Creating a case routing system that enables participating legal services providers to efficiently receive, monitor, and communicate about CIR referrals is an important part of building a user-centered system. Respondents offered suggestions on how the CIR System can use protocols, communication strategies, and technology integration to create an efficient case routing process that best serves the needs of applicants and legal services intake staff.

Efficiency Through Protocols

Respondents offered several protocol recommendations on how the handoff from the CIR System to the legal services organizations could be efficient and avoid situations where applicants fall through cracks in the referral process, including:

- **Standardized and easy to follow referral and review protocols that apply to all participating legal services organizations:** The CIR System protocols should clearly identify when a case is referred from the CIR, set guidelines on who contacts applicants during the referral process, develop procedures for documenting work on referrals in a central location, establish a timeframe for legal services providers to review a referral, and outline a communication process between the CIR and the partner organizations.
- **CIR intake procedures that align with existing legal services intake:** The CIR System intake interviews should ask questions that align with providers' existing intake protocols (understanding that some cross-provider standardization will be necessary).
- **System to track CIR referrals:** The System should implement a referral tracking system that CIR navigators and legal services providers can use to monitor referral status, provide updates about pending referrals, and identify applicants who were referred through the CIR and who contacted partner organizations independently.
- **Redirecting referrals back to the CIR:** The System will need to establish clear protocols for legal services providers to redirect applicants whom they cannot serve back to the CIR for another referral placement.

Respondents also highlighted that swift communication between the CIR System and partner organizations will be critical to minimizing delays in receiving and reviewing referrals. Specifically, the CIR's referral platform could include an automated communication system which notifies intake staff at the legal services organizations of an incoming referral, sends a notification back to the CIR when the provider agrees to review the case, and sends another notification when the referral decision is made by the provider. When the provider takes the case, the system should automatically update the status, and when the provider does not take the case, the system should automatically route it back to the CIR navigator for referral to another organization. To further ensure good communication between the CIR System and legal services organizations, each partner organization should have a designated point of contact to communicate with the CIR staff as needed.

Several respondents also suggested that the CIR System establish a procedure to regularly audit referrals to ensure that no applicants have been lost in the pipeline. This regular review of pending referrals could be communicated to legal services partners who would investigate outstanding referrals and provide a status update.

Providing Technical Support to Participating Legal Services Organizations

Respondents highlighted the importance of reducing technological barriers to legal services provider participation by creating a system that is easy to learn, update, and troubleshoot. The CIR System should avoid service and administrative disruption by seamlessly integrating into the providers' case management systems and simplifying what existing intake staff need to learn to use it.

A technological system that expands existing intake and referral procedures and brings together several legal services providers across a wide variety of practice areas will also require regular maintenance to ensure that it stays functional and efficient. The System will need to regularly prompt legal services partners to update their information in the database so that CIR navigators have current information about the services provided by the participating partners and the resources necessary to make accurate referrals. Finally, since the CIR system will be highly customized, it will also be critical to provide clear guidance on who the legal services partners can contact for technical assistance and cross-platform compatibility questions.

Timeline for Reviewing Referrals and Responding to Applicants

Respondents were asked about a reasonable response time after receiving a referral from the CIR System. Most indicated that their organizations would be able to review a referral from the CIR, conduct a conflicts check, and respond to the applicant within 2 to 3 days.

Some respondents suggested that the CIR System incorporate procedures for communicating the review time to applicants so that they do not feel like their case has been lost in the referral process.

Recommendations for Designing an Efficient Case Routing Process

- ✓ Develop **standardized protocols for case referral and review** that outline the responsibilities and procedural steps of how the CIR System and partnering legal services organizations will collaborate on referrals. The same protocols should apply to all partnering organizations.
- ✓ Develop protocols to **meet administrative challenges** (e.g., sharing documents, tracking callers who contact both the CIR and a provider directly, onboarding partners, and sharing updated partner information to the CIR System, etc.).
- ✓ Ensure the **CIR intake interview is compatible with** the intake interviews used by providers and the gathered information easily comports to providers' intake systems.
- ✓ Establish a **streamlined method of communication about referrals** (e.g., a centralized referral tracking system) between CIR navigators and legal services intake staff.
- ✓ Establish protocols for **rerouting rejected referrals** to another legal services organization.
- ✓ Ensure that the **CIR technology system is easy to learn and update** and **provide a technical support resource** for intake staff at participating organizations.
- ✓ Investigate the extent to which the CIR System can integrate with legal services organizations' case management systems.
- ✓ Work with partners to determine and implement **a collectively agreed upon timeline for reviewing referrals** and communicating the status of a referral to applicants. Respondents indicated that **2-3 days** would be reasonable, and this proposed standard should be confirmed with the broader pool of participating organizations to ensure that all partners can adhere to the same process.
- ✓ Regularly **audit the CIR System to check for incomplete referrals** to ensure no applicants were lost in the process.

POTENTIAL IMPACTS ON EXISTING LEGAL SERVICES

While the primary focus of the CIR System is to positively impact District residents in need of legal help, respondents also provided feedback on how the System might impact the participating legal services organizations and the existing referral networks that operate in discrete areas of law (e.g., housing, consumer debt). Respondents considered logistical challenges that the CIR System will need to address to maximize its benefits for all users, both litigants and the legal services community.

Legal Services Provider Interest in Participation

Of the 13 legal services providers that responded to the RDFI, 8 indicated that they were interested in participating in the CIR System, 3 responded that they would potentially be interested, and 2 did not answer the question. When asked how providers could be encouraged to participate, some respondents suggested making CIR System participation mandatory for all DC Bar Foundation grantees and others recommended demonstrating how the CIR is beneficial to partners and their clients.

Maximizing Benefits to Participating Organizations

Potential Benefits of the CIR System for Legal Services Providers

Several respondents identified potential benefits of the CIR System for participating legal services organizations. Some benefits focused on **improvements in organizational efficiency**, specifically that the System has the potential to reduce the number of calls requesting services outside of an organization's practice area and thereby free up resources to expand or improve existing services. Some respondents also felt that the CIR System could **expand the reach of partner organizations** and help to bring in more clients.

"The CIR has the potential to provide a wealth of information on the civil legal needs in the District. Centralizing information about needs presented and the ability to serve those needs could provide valuable data ... [about] where to invest resources."

Other respondents pointed out that, as a systemwide entity, the CIR System would be able provide **data on community legal needs**. This type of data could help legal services providers identify emerging legal needs and existing service gaps, and to engage in advocacy to address these gaps. These data could help funders determine where to invest resources. In this way, the CIR System's potential impact extends beyond providing referral services and leans toward building a broader and more effective service community in the District.

Potential Challenges of the CIR for Legal Services Providers

Respondents also thought about ways in which the CIR System might negatively impact their organizations' existing intake procedures or add administrative burden to staff and attorneys. Some respondents worried that the **volume of referrals might outpace their capacity**, specifically that the CIR System's expanded reach would increase the number of calls or referrals so much so that any efficiency gains earned by coordinating intake would be negated. Some respondents expressed

concern about the **disruption to their existing intake protocols** and how the incorporation of a new referral structure may increase the administrative burden on their staff and attorneys. A few respondents expressed concern that their organization would be **expected to accept all cases referred by the CIR** or that they would be second guessed if they rejected CIR-referred applicants.

Some respondents highlighted that legal services providers vary in size, services, and practice areas, and that the participating in the CIR System may **disproportionately impact partner organizations** based on some of these characteristics. For example, one respondent suggested that smaller organizations without an existing referral hotline might benefit from CIR participation, as the CIR System would add intake capacity and provide a flow of appropriately triaged applicants; whereas larger organizations with more robust internal intake protocols may experience more challenges adjusting their processes to align with the CIR System. Lastly, some respondents indicated that their organization might **need additional funding** to hire more staff to adjust to the changes brought about by CIR System participation.

Suggestions to Address Challenges and Maximize Benefits

To help surmount these challenges and maximize benefits of participating in the CIR System, respondents provided recommendations about how to design and implement an efficient, accurate, fair, and unbiased case referral process. Specifically, respondents offered suggestions about the following aspects of the CIR:

- **System scope and integration with existing processes:** Respondents emphasized the importance of identifying and articulating program goals and engaging in thoughtful planning about how to introduce a large-scale referral system that does not unduly disrupt existing intake or referral processes that are working well.
- **Supporting efficiency and limiting redundancy:** Some respondents expressed concern about the CIR System creating inefficiencies. For example, implementing the CIR System would require applicants to complete an additional level of intake, and if applicants reach out to legal services providers directly after going through the CIR intake, there could be duplicated effort by providers. To mitigate these concerns, respondents suggested that the CIR System clearly communicate the coordinated referral process to applicants—so they do not contact individual providers after completing a CIR intake—and encourage cooperation and communication across providers to avoid duplicate efforts and system inefficiencies.
- **Equitable and trusted referral process:** Respondents noted that it might be challenging for the CIR System to develop equitable case referral procedures that do not favor some legal services providers over others. Specifically, one response expressed concern about developing a fair and non-competitive system of identifying which organization has priority when more than one can take a referral, while another emphasized the challenge of creating a shared intake system that partners can trust. To help address these concerns, respondents suggested that the CIR

establish a working group with legal services partners to incorporate provider voice into the System’s design and operation.

- **Allocation of additional resources:** Several respondents recommended that the DC Bar Foundation dedicate sufficient resources to the CIR System and provide legal services partners with additional grant funding to adjust staffing levels to accommodate the potential increase in case volume.
- **Learn from existing networks:** Several respondents recommended that the CIR System look to existing coordinated intake networks in the District (see next section) for models of intake, referral, case routing, and communication procedures that are efficient and effective.

Integrating the CIR System with Existing Intake Networks

Respondents offered thoughts on how the CIR System should integrate with existing and functional coordinated intake networks in the District, including the Landlord Tenant Legal Assistance Network (LTLAN), the Family Law Assistance Network (FLAN), the Victim’s Legal Network (VLN), and the Office of Administrative Hearings Legal Assistance Network (OLAN). Several respondents, some of whose organizations participate in these existing networks, encouraged the CIR team to incorporate these networks into the CIR referral process.

“I think providers will be very frustrated and disengaged with a change that actually made things harder for them when a prior system was working well.”

These respondents cautioned the CIR System against disrupting established protocols that are working well and suggested that the CIR navigators refer cases, when appropriate, to these networks and allow them to identify the best organization to take the case. In turn, these networks could send applicants whom they cannot serve to the CIR System to find an appropriate legal services provider. Some respondents pointed out that this level of coordination may require a standardized referral protocol jointly used by the CIR System and existing networks.

Some respondents summarized this vision by suggesting that the CIR System function as a “network of networks,” which would minimize disruption of existing effective structures, create mutually beneficial relationships, and expand overall service reach. This position was not universal, however, as a portion of respondents suggested that eventually these existing issue area networks could become redundant, and that the CIR System, if successfully implemented across all areas of civil legal practice, may at some point alleviate the need for them.

Recommendations for Maximizing Benefits to Participating Organizations

- ✓ Establish an early and consistent **feedback loop with legal services partners** to learn about any impacts that the CIR System implementation has on their call volume and related administrative burden that might require additional staff or funding to address.
- ✓ Work with legal services partners to establish an **equitable and transparent referral and case routing protocol**. Convene a **working group of providers** to:
 - Discuss the specifics of case routing and incorporate their input into the System design,
 - Develop clear and mutually agreed upon guidelines for receiving, reviewing, accepting, and rejecting CIR referrals.
- ✓ Conduct **regular analysis of CIR System data** to provide a communitywide perspective on emerging legal needs and potential service gaps. Share the results with the legal services community and allied groups.
- ✓ Learn from other coordinated intake and referral networks for **guidance on developing an effective and efficient** process for the CIR. Work with these groups to identify the best way to align their processes with the CIR System.

INTEGRATION WITH THE BROADER SERVICE COMMUNITY

Civil legal issues exist at the intersection of the law and life circumstance, often exacerbated by the experience of poverty. Understanding this reality, the CIR System will be most successful if it is well integrated into the broader service systems that impact DC residents. Respondents offered recommendations about how the System could contribute to the larger service community by collaborating with other (non-legal) service providers and community organizations. Specifically, the CIR System would receive referrals from social services organizations for clients who have legal needs and would provide CIR applicants with information about other available community and social services relevant to applicants’ presenting issues. Exhibit 2 summarizes respondents’ suggestions about the types of organizations that the CIR System should collaborate with to curate a more integrated service community. Some respondents named specific organizations and community groups, and these suggestions are included in Exhibit A-1 in the Appendix.

Exhibit 2: Allied Organizations and Entities to Coordinate with CIR System

Type of Organization or Service Sector
Other legal resources for applicants who do not qualify for legal aid (e.g., “low-bono” attorneys or private firms)
Financial assistance and benefit programs
Social service organizations to assist with other needs (e.g., housing, food, medical, etc.)
Community health clinics and medical providers
Mental health services
Family Success Centers
Service providers in the DC behavioral health system
Housing assistance providers and tenant advocacy groups
Educational centers (e.g., schools, libraries)
Worship centers and the faith community
Victim hotlines
Community groups (i.e., organizers, advocacy groups, labor unions)
Non-legal organizations with existing partnerships with participating legal services providers
Relevant government agencies
Relevant court-based services

Recommendations for Integrating the CIR System into the Broader Service Community

- ✓ Take an inclusive approach to **considering the sectors in the broader service community** of which the CIR System, and its applicants, are a part.
- ✓ Develop (or locate an existing) **comprehensive list of social service providers** and community resources that are relevant for applicants contacting the CIR System. Ensure CIR navigators are familiar with this list and keep it updated.
- ✓ Have **CIR staff conduct outreach** to a wide range of social services providers, community organizations, and government offices to ensure these allied professionals are informed about the CIR System and how their clients can use it to access legal help.
- ✓ **Leverage these relationships to expand the CIR System's reach** by having these organizations across the District advertise the CIR System as a trustworthy resource for legal assistance.

CONDUCTING OUTREACH AND MARKETING THE CIR SYSTEM

Respondents recommended outreach strategies and suggestions on how the CIR System should be advertised, including both locations to advertise and what to include in the messaging.

Outreach and Marketing Strategies

Several respondents provided recommendations for outreach strategies that focused on connecting with community organizations to help spread the word about how the CIR System can help DC residents who need civil legal services. These suggestions emphasized accessibility and stressed the importance of conducting outreach in person at locations where community members congregate (such as libraries, schools, and places of worship), as well as leveraging a broad range of media approaches (e.g., online, social media, newspapers, radio, flyers, mailers). These responses are shown in Exhibit 3.

“True access will require a very comprehensive public awareness campaign ... community knowledge takes hold very quickly through word of mouth.”

Word-of-mouth promotion will be a critical component to marketing the CIR System, and several respondents recommended that the marketing strategy focus on leveraging connections with community groups, legal and social services providers, court staff and judges, and government agencies, by requesting that these partners promote awareness of the CIR System among their clients and other community members.

One respondent underscored that to reach all community members, the outreach must be multi-lingual. Another respondent recommended that the CIR System hire staff from the communities who would use the System, thereby creating a personal connection to the applicants. Finally, one response recommended that the CIR team review the *Delivering Justice and Community Listening Project*⁶ reports for lessons about effective legal services outreach.

Marketing Messages

Respondents made suggestions about some of the key messages that should be included in CIR marketing materials. Ideally, marketing and outreach efforts would increase both awareness of the CIR System as an available resource and clarification about what the System does. Respondents thought it would be important to highlight that the CIR System is a single point of contact for legal services referral, that the CIR System does not provide legal assistance (so applicants will not be speaking with a lawyer when they call the CIR number), and that the CIR System is a free service, is not government-run, and is accessible for people who speak languages other than English.

⁶ <https://www.lawhelp.org/files/7C92C43F-9283-A7E0-5931-E57134E903FB/attachments/A4B5C44F-8B88-4B76-97A9-FF648F7C7EB9/clp-final-april-2016.pdf>

Exhibit 3: Strategies for Where and How to Market the CIR System

Where to Market the CIR System

Metro and other public transportation stops and routes

Community gathering places, such as schools, libraries, worship centers, and businesses

Financial assistance and benefit program offices

Court documents, including legal forms that litigants receive as part of their cases

Online advertising and social media

Traditional media, including television, newspapers, radio, etc.

Inserts in bills and mailings that community members receive

In-person information and outreach sessions

Flyers posted in community locations, apartment buildings, and other places applicants frequent

What Messages to Include in Outreach for the CIR System

The CIR System operates as a single point of entry for intake and referral to civil legal services

The CIR System is free to contact

The CIR System serves non-English speakers

The CIR System is not affiliated with the government

Applicants are not calling an attorney directly when calling the CIR System

Include a list of the legal services organizations to which the CIR System refers

Recommendations for Conducting Outreach and Marketing the CIR System

- ✓ CIR System managers should develop an **outreach and marketing plan**.
- ✓ Cast a **wide net when conducting marketing** and outreach. Place emphasis on community gathering places, public transportation, and commonly used government offices. Use a **multi-media approach** to advertisement. Support the power of **word-of-mouth** promotion.
- ✓ Make marketing materials available in **multiple languages**, using **layperson terminology**.
- ✓ Ensure **key messages that resonate with community members** (e.g., the CIR System is a free and fast way to find legal help) are included in all outreach efforts.
- ✓ **Learn from legal services providers** and existing intake networks about promising practices for conducting outreach and promoting use of the CIR System in the District.
- ✓ Gather **feedback from community members** about the best ways to market the CIR System.

CIR SYSTEM ADMINISTRATION AND ONGOING EVALUATION

In addition to non-attorney navigators who will do the work of conducting intakes and making referrals, the CIR System will require strong internal infrastructure, including staffing for System administration and a location for the System to operate.

CIR System Staffing and Location

Staffing

The initial CIR System concept proposed 2 full-time System managers who would oversee the System's operations, supervise navigators, conduct outreach and marketing, and build relationships with legal services organizations to encourage participation from as many providers as possible. Among respondents, there was no clear consensus on what would constitute a sufficient staffing level to administer the CIR System. However, a majority of responses cautioned that 2 full-time staff may not be enough and that the staffing level would depend on call volume, the number of navigators to supervise, and the extent of planned outreach strategies, all of which are currently unknown.

Location

Respondents were asked what type of organization would be best suited to host the CIR System, and their opinions were mixed. Some responses noted that the CIR System could be hosted by either a legal services organization or another type (non-legal) of organization. However, other responses indicated that only a legal services organization would be able to host the System effectively, with one respondent cautioning that a non-legal host organization may be vulnerable to subpoenas for client information (a condition from which lawyers and legal staff are protected). Another respondent suggested the opposite, saying that the System should be hosted by a non-legal organization because a legal services organization may have conflicts or other interests that would impact impartiality in the case routing process, which would result in unfair or inequitable referrals (i.e., some organizations "cherry-picking" certain cases or otherwise benefitting more than others). Another respondent also voiced this concern but thought that a legal services organization could avoid referral bias by implementing transparent and clearly defined case routing protocols.

Several respondents did not offer a specific recommendation about what type of organization should host the CIR System, but instead offered criteria for determining the host organization. Specifically, an effective host organization would have:

- Experience with legal intake, especially with the client community eligible for legal aid services,
- Established data security protocols and infrastructure,
- Enough space and infrastructure to support the CIR System managers and navigator staff,
- A location in the communities that the CIR System serves.

Two respondents thought that the ideal location to host the CIR System may not be an existing organization, but a new organization dedicated to the System. Another respondent felt that the CIR System may not need a centralized office if the managers and navigators could work remotely.

Recommendations for CIR Staffing and Location

- ✓ Collect data from legal services organizations about the number of intakes they receive each month (before the CIR System exists) and the number of intake specialist FTE needed to address this demand. **Use these data to estimate the potential CIR intake volume and staffing needs**, including the number of navigators and System manager FTE. These estimates will provide a starting point for System design and they can (and should) be revisited and revised as new information is available, such as after pilot test phases of the CIR System.
- ✓ Ensure that CIR System **managers have sufficient FTE** to both manage System operations and work on System expansion (i.e., engaging more legal services partners over time).
- ✓ Develop **written job descriptions** that clearly state the roles, responsibilities, skills required, and required tasks of each CIR staff position.
- ✓ Consider the necessary **criteria to determine the most appropriate organization to host** the CIR System (see points listed earlier in this section). Continue to work with legal services partners to refine these criteria, consider all possible options, and collectively identify the entity best suited for the role.

Assessing CIR System Performance and Impact

Respondents were asked to articulate indications that, from their perspective, would reflect that the CIR System was successful in its mission and generating positive impact. Responses clustered around a few different themes, including:

- **Community members are using the System:** A desired outcome would be that more community members are accessing legal help than before the CIR System was implemented and, as a result, there are fewer unrepresented litigants in court. Metrics might include monitoring the number of intakes (phone, online, in-person warm handoff), number of website visits and length of views, etc., over time, as well as monitoring the proportion of unrepresented litigants in various court divisions over time.
- **System is producing accurate referrals efficiently:** Desired outcomes would be that clients are less often “bounced” to a different provider and get legal help earlier. Metrics might include the rate of accurate referrals (completed versus rejected referrals) and the speed with which applicants get connected to legal help (time from intake to referral decision).

- **Applicants have a positive experience with the CIR System:** Desired outcomes would be that applicants report having a positive experience with the CIR System and are being connected to the legal services they needed. Data might include an applicant feedback survey that assesses satisfaction with the intake and referral process, satisfaction with the legal services they received (whether they got what they felt they needed), and perceived impact of the services on their ability to handle their case.
- **Legal services partners benefit from participation in the System:** Desired outcomes would be that legal services organizations see a reduction in the number of calls coming directly to them and especially those they cannot serve, alleviating pressure on their intake staff. Data might include regular discussions with partners to gather their feedback about their experience of CIR System participation.

Recommendations for Assessing CIR System Performance and Impact

- ✓ Develop an **evaluation plan that outlines key outcomes and measurement approaches** at each stage of the CIR System development and implementation.
- ✓ Identify **key performance indicators** that assess the System's functionality and reflect the intended referral process, such as intake volume, referral completion rate, referral rejection rate, incomplete referral rate, and reasons for rejections. Build these data elements into the CIR Database and create easy downloads to support regular System and performance monitoring.
- ✓ Monitor performance indicators for the System as a whole, **by area of law**, and **by legal services partner** in order to spot emerging legal needs in the community and to assess whether referral patterns are equitable across providers.
- ✓ Clarify **key impact metrics** and analyze them over time to assess the impact of the CIR System on legal services organizations, applicants, and the broader community. Incorporate quantitative data (e.g., numbers of people served and rates of unrepresented litigants in court) and qualitative data (e.g., feedback from providers and users).
- ✓ **Review data regularly and use evaluation results** to engage in consistent quality improvement of the System. Incorporate lessons learned into future operations, capitalize on what is working well, and adjust what is not working well.

COMMUNITY INPUT AND RECOMMENDED RESOURCES

Soliciting Community Input

Community input is essential to a user-friendly and user-centered design. When asked from whom the CIR team should gather input about System design, respondents mentioned several groups. Talking with potential system users was highlighted as necessary, and respondents suggested reaching out to current and former legal aid clients, community members who are managing mental health issues, and individuals from vulnerable or marginalized populations, such as older adults, people with limited English proficiency, survivors of domestic violence or sexual assault, and members of the LGBTQ community. Respondents indicated that they could support these efforts by reaching out to their client population, encouraging their clients to participate in focus groups, facilitating conversations with vulnerable populations, and advertising the CIR System through social media or other platforms.⁷

Respondents also recommended gathering input from local organizations or entities that work adjacent to legal services providers, such as the Language Access Coalition, relevant local government offices, social services providers, and other established community-based organizations. One respondent also felt it would be helpful for the CIR team to gather ongoing feedback from the steering committee of the DC Consortium of Legal Services Providers.

Other Available Resources

Several respondents also pointed to other sources of information that might help guide the design and implementation of the CIR System. These sources of information included other coordinated intake networks in DC and elsewhere, organizations with established protocols for connecting with clients from vulnerable or marginalized communities, access to justice initiatives across the country, and academic research or evaluation reports that explore coordinated intake best practices. A full list of resources is included in Exhibit A-2 in the Appendix.

Recommendations for Soliciting Community Input and Other Information

- ✓ **Continue to solicit community input** to inform System design. Prioritize input from individuals from **vulnerable and marginalized populations** to ensure the System is accessible to everyone.
- ✓ **Test early versions of the System with community members** and incorporate their input into the technology design and process implementation.
- ✓ Continue to gather **input from legal services providers**. Ensure that **intake specialists' expertise** and perspectives are included.

⁷ See the Client and Community Member Input Report: https://3ddb4979-d4c1-40ef-8b00-8c061c453377.usrfiles.com/ugd/3ddb49_858eab6d51e5444da63e2ee91a375c34.pdf

SUMMARY

The CIR System is an ambitious effort that has the potential to expand access to justice for District residents. The System aims to reduce the justice gap in DC by increasing residents' access to legal services through a simplified and user-centered process to connect people with attorneys when they need them. The CIR System also has an opportunity to create an efficient referral network that would benefit legal services organizations by streamlining community members' overtures for legal help through a single point of access that will triage cases according to providers' eligibility criteria and capacity. As envisioned, the CIR System proposes a substantial shift in the way that community members will access legal assistance, which will have a ripple effect on providers' existing intake and referral procedures. As such, legal services providers and other allied organizations in the civil justice system have a vested interest in the design, implementation, and ongoing administration of the CIR System. The responses to the Request for Design Feedback and Input released by the DC Bar Foundation, summarized in this report, have generated a substantive list of thoughtful recommendations and considerations for the Foundation and the CIR project team to incorporate into the System's development. These recommendations also provide a launching point for ongoing conversations with the legal services community, whose participation and engagement with the CIR System will be crucial to its success.

APPENDIX A-1

Exhibit A-1: Respondents' Suggestions for Other Organizations, Associations, Government Offices, and Community Groups to Connect with the CIR System

Service Organization	Access Link
Children's National Health Center	https://childrensnational.org/
DC Behavioral Health Association	https://www.dcbbehavioralhealth.org/
DC Coalition Against Domestic Violence	https://dccadv.org/
DC Community Resources	http://dc.openreferral.org/
DC Hospital Association	https://dcha.org/
DC Primary Care Association	https://www.dcpca.org/
DC Survivors and Advocates for Empowerment (DC SAFE)	https://www.dcsafe.org/
Housing Counseling Services	https://housingetc.org/
Interfaith Council of Metropolitan Washington	https://ifcmw.org/
Latino Economic Development Center	https://www.ledcmetro.org/
One DC	https://www.onedconline.org/
The Child Support Division of the OAG	https://cssd.dc.gov/
The Family Court Self-Help Center	https://www.dccourts.gov/services/family-matters/self-help-center
The Mental Health Access Line	https://dbh.dc.gov/service/access-helpline

APPENDIX A-2

Exhibit A-2: Respondents' Suggested Resources to Support the CIR System Design and Implementation

Resource	Type of Resource	Access Link
Justice for All Initiative	Access to Justice (ATJ) Resources	https://www.ncsc.org/jfa/guidance-and-tools/jfa-components
Community Listening Project	Access to Justice (ATJ) Resources	https://www.lawhelp.org/files/7C92C43F-9283-A7E0-5931-E57134E903FB/attachments/A4B5C44F-8B88-4B76-97A9-FF648F7C7EB9/clp-final-april-2016.pdf
Delivering Justice Report	Access to Justice (ATJ) Resources	https://dcaccesstojustice.org/assets/pdf/Delivering_Justice_2019.pdf
Washington Clear Online Final Report	Evaluation Report of Online Intake and Triage System	https://lsc-live.app.box.com/s/qccmauynfnm981y03j5mh3wdpf40uko
Michigan Advocacy Program Evaluation Report	Evaluation Report of Online Intake and Triage System	https://lsc-live.app.box.com/s/fs14104dwf99sgwquo4duuw4meaqwp29
Coordinated Advice & Referral Program for Legal Services (CARPLS)	Example of Coordinated Intake and Referral	https://www.carpls.org/
Michigan Guide to Legal Help	Example of Legal Information Resource	https://michiganlegalhelp.org/guide-to-legal-help
Illinois Legal Aid Online	Example of Legal Information Resource	https://www.illinoislegalaid.org/
Massachusetts Legal Resource Finder	Example of Legal Information Resource	https://masslrf.org/en/home
Self-Represented Litigation Network	Navigator Training	https://www.srln.org/taxonomy/term/754
National Network to End Domestic Violence	Templates for Client Confidentiality	https://www.techsafety.org/confidentiality-templates
Confidentiality Institute	Templates for Client Confidentiality	https://www.confidentialityinstitute.org/



ABOUT NPC RESEARCH

NPC Research provides quality social services evaluation, policy analysis, research, and training. We are dedicated to improving the effectiveness of human services offered to children, families, and communities.

For more information see npcresearch.com