

Grant Proposal Report to Commission from Task Force

Recommendation: Do not fund

Legal Applicant: Alpha Legal Foundation

Project Name: Maine JusticeCorps

- Category:** AC Formula -- Standard
 AC Formula – Rural State
 AC Competitive
 Other Competition

- Type:** Planning
 Operating
 Fixed Amount
 Cost Reimbursement
 Ed Award Only

- Applicant type:** New (no prior AC experience)
 Re-compete (# of yrs: __)

Proposed Dates: 01/01/2024 to 12/31/2024
Submitted request is for Yr [1]

Federal Focus Area: Economic Opportunity

Commission priorities: Workforce development

Local Share Required in Budget: Yes No

Source of Funds detail required: Yes No

Requested Resources: Funds and Slots (*indicates sections with calculation errors)

	CNCS		Local Share
Operating			
Member Support			
Indirect (Admin)			
CNCS Award amount	\$196,000	Total Local Share (cash + in-kind)	\$205,000
% sharing proposed			
% share required	n/a		
Cost-per-member proposed	\$28,000		
max allowed	\$28,000		

Total AmeriCorps Member Service Years: 7.0

	Slot Types Requested						
	1700	1200	900	675	450	300	Total
Slots With living allowance	4		6				10
Living allowance proposed	28000		14000				
Slots with only ed award							

Program Description (executive summary): Alpha Legal Foundation proposes to have 7 AmeriCorps members who will serve in courthouses, legal aid organizations, and community-based organizations to ensure Maine residents understand (1) their rights under U.S. law and (2) how to access the local courts to advocate for and protect their interests without lawyers (the "Program"). The AmeriCorps members will connect people to needed information and resources, ultimately increasing access to justice for all people. The Program will complement existing legal aid and court self-help resources and leverage the legal community's experience and network of legal resources to help low-income people to be served more holistically and effectively. Members will serve in courthouses in the Cumberland and Androscoggin counties. At the end of the first program year, the members will have made the civil justice system more accessible to at least 500 Maine residents who face

difficult legal issues that adversely impact their basic needs for housing, safety, and economic security. In addition, the members will leverage an additional 10 community volunteers who will provide educational seminars to Program members or partner with the Program to provide legal information and procedural guidance to Maine residents alongside members. The CNCS investment of \$196,000 will be matched with approximately \$125,000 in private funding and \$80,000 in in-kind services.

Service locations:

Not identified beyond Cumberland and Androscoggin Counties

Other than the legal applicant, please list the agencies or organizations that appear to be the major collaborators or partners in this grant.

Civil legal aid orgs., courts, universities, Maine Law, community NGOs, and private and public charities

Will the applicant place AmeriCorps members with other agencies? Yes No

Applicant proposes to deliver services:

- Within a single municipality
- Within a single County but not covering the entire County
- County-wide in a single County
- Multiple Counties but not Statewide
- Statewide

Performance measures (targets proposed for Year 1; targets for years 2 and 3 set in continuations):

SERVICE ACTIVITIES

OUTPUT: O1A: Number of individuals served

Proposed target: 500

OUTCOME: Individuals are better prepared to move forward in their legal matter and advocate for their rights

Proposed target: 7

MEMBER DEVELOPMENT

OUTPUT: Increase legal skills and knowledge, making a career in public interest/law more likely

Proposed target: 7

OUTCOME: Employed in public interest or legal profession OR attending law school 3 years post-service

Proposed target: 10

CAPACITY BUILDING

(measures listed in the RFA not entered and targets were not proposed)

Scoring Detail:

Peer Reviewer Consensus Score. *Assessment of narrative using point distribution from federal agency. Major categories (Program Design, Organizational Capability, Budget and Cost) are dictated by CFR rubric for scoring.*

	Quality Rating	Score
Program Design		
Need	Weak	3.5
Intervention	Adequate	5.25
Theory of Change, Evidence, & Logic Model	Weak	8
Funding Priority	Substandard	1
AmeriCorps Member Training	Weak	2
AmeriCorps Member Supervision	Weak	2
AmeriCorps Member Experience	Adequate	3
Commitment to AmeriCorps Identity	Incomplete/ Nonresponsive	0.2
Organizational Capability		
Organizational Background & Staffing	Adequate	10
Compliance/Accountability	Substandard	3.25
Cost Effectiveness and Budget Adequacy	Adequate	20
Evaluation Plan	n/a – no prior grant	
Total Peer Reviewer Score (100 pts possible)		58.2

Task Force Consensus Score. *The Task Force reviewers assess the additional technical criteria that states are directed to consider by the CFR.*

	Quality Rating	Score
Program Alignment		
<ul style="list-style-type: none"> Alignment with funding priorities 	Adequate	18.75
Program Model		
<ul style="list-style-type: none"> Serve communities described in 2522.450(c) 	Incomplete/ Nonresponsive	0
<ul style="list-style-type: none"> Proposal adds to goal of being programmatically, demographically, and geographically diverse 	Adequate	1.875
<ul style="list-style-type: none"> Potential for innovation and/or replication 	Strong	2.5
<ul style="list-style-type: none"> Strength of evidence program can be sustained over time. 	Weak	1.25
Preferences from RFP Announcement		
<ul style="list-style-type: none"> From a partnership or coalition whose members represent local organizations working together 	Weak	2.5
<ul style="list-style-type: none"> Proposal submitted by an organization led by or primarily supporting or recruiting participants from historically marginalized communities and/or people. 	Strong	5
<ul style="list-style-type: none"> serve, counties classified as 6, 7, or 8 on the USDA rural-urban continuum 	Incomplete/ Nonresponsive	0
Past Performance		
<ul style="list-style-type: none"> Can comply with requirements, info consistent with other grant administrator's info, consistent with externally verified past performance 	Weak	5
<ul style="list-style-type: none"> RECOMPETE ONLY: applicant used member positions 		
<ul style="list-style-type: none"> RECOMPETE ONLY: used financial resources allocated 		
<ul style="list-style-type: none"> RECOMPETE ONLY: implemented program effectively 		
Financial Plan	Weak	5

Fiscal Systems		
<ul style="list-style-type: none"> Capacity of Financial mgt system to comply with fed requirements 	Substandard	1.25
<ul style="list-style-type: none"> Strength of orgz financial mgt practices as evidenced by audits, etc. 	Substandard	1.25
<ul style="list-style-type: none"> Strength of sponsor orgs financial status/stability per audit, 990, etc. 	Substandard	1.25
Grant Readiness	Weak	7.5
Total Task Force Score		53.125
Peer Review Score		58.2
Final Score for Applicant (200 possible)		111.325

Final Assessment of Application:

- Forward or fund with no corrections/modifications
- Forward or fund with corrections/modifications
- Do Not Forward or fund

Referenced Conditions/Corrections

The following proposal issues need to be clarified or, in the case of missing required elements, added.

Peer Reviewer Notes and Appraisal Summary:

Section: Program Design (50 %)

Need

- AmeriCorps members will connect people to needed information and resources. Members will serve in courthouses in Cumberland and Androscoggin counties. I do have an issue with the Racial Demographics of the Maine State Bar Association numbers, 82.6% are white, 0.4% are Asian, 0.2% are American Indian, 0.2% are African American, 0.2% are Hispanic or Latino (should this not add up to 100% to be complete information?)
- The applicant provides a thorough and deep analysis of the need to be addressed by the Americorp members. There could be more localized data used to explain the need within the two counties targeted for service. There is little description of how the target service population was engaged to determine the need and the localized data could have come from work to gather that information.
- The applicant demonstrates knowledge of the underserved communities' needs for legal representation in the qualifying AmeriCorps priority areas. The application does not include local data to address the question of how many and what kind of legal services are needed by low-income Mainers. The frequently referenced and oft changing "3 in 4" Mainers comment is never cited and therefore is inadequate. However, the applicant does use national level data that serves as an acceptable proxy. The applicant merely mentions partnering with but does not provide any detail about the services already provided by other organizations.

Intervention

- the "boots on the ground approach"
- When discussing the program model implemented by Americorp, the applicant covers the following topics:
 - The core activities of members and describes them as being legal navigators who help low-income community members make their way through the legal system in civil cases.
 - The duration and intensity of the project is delivered in measurable timetables.
 - The demographics of the population served are described as primarily low-income Mainers. While most of these items are touched upon, there could be more detail for the population served by this program and how diversity plays a role in amplifying the service. The section lacks discussion of why this intervention is the best fit for the identified community need. The roles and specialized qualifications for Americorp members are discussed.
- The applicant demonstrates how it will use existing JusticeCorps models across the country and apply them to this pilot program in Maine. There is a clear definition of the distinction between the roles in the proposed program and partner organizations, along with a solid description of minimal qualifications of the

proposed program staff. the other organizations will undertake. However, there is no explanation for how at least one of the proposed program elements, a weekly lecture on navigating the legal system, is a fit for the target population. Further, the referral services offered in the courthouses, while intuitively appealing, when taken with the lecture program, have no documented connection to the target number of people reached, namely 500 in the first year.

Theory of Change, Evidence of Effectiveness, Logic Model

- where it talks about one or both in civil cases in 3 out of 4 having not talked to a lawyer.
- There is a general discussion of how increasing the diversity of the legal field will enhance services provided to marginalized and underrepresented communities. The Logic Model is very thorough with an impressive amount of detail. Visually the diagram was difficult to follow, but this could be due to how the program created the display.
- The applicant references other JusticeCorps models but then states that there is no reliable transferability. This section requires the applicant to select a durable model for the Maine case but the applicant denies the existence of one. The reviewer uses business judgment to determine proxy models are sufficient. This section earns an adequate score.

Evidence of Effectiveness

- The applicant does not discuss how the solutions they propose have been proven effective in addressing this need claiming the previous programs from other States cannot be used as comparison. No citations to quality sources for statements presented as evidence. There is an appendix with performance goals, but adding this to the narrative would be helpful and clearer.
- The logic model itself covers most of the required areas sufficiently however, there is no alpha-numeric reference to performance outputs, measures or quantity of changes. This section is adequately addressed.

Funding Priority

- As far as this reviewer can see, no funding priority was addressed in the application.
- The applicant does describe in sufficient detail how the need for the program fits within AmeriCorps funding priorities and programmatic requirements. This is largely accomplished through multiple references to other programs.

Member Training

- 20% of MSY, required member training and conference attendance.
- Applicant provided only vague generalities as to what training will be provided to members and by which organizations. Seems to be no method for establishing consistent training outcomes.
 - The applicant demonstrates it understands the importance of legal training component, allocating the highest percent of time in a MSY to it. However, there is no evidence of quality of training. Further, there is no discussion of how the training will be customized to the target Mainer audience and the applicant already noted that it does not have local data. Notwithstanding, the applicant articulates effectively the applicability of the proposed program to future employment

Member Supervision

- The Program Manager will engage in regular compliance training to stay informed on potential compliance issues. If issues come up, JusticeCorps staff will immediately contact Volunteer Maine with the description of the situation and the resulting solution, action plan and timeline to address the issue.
- The applicant responds to the prompt, but they currently do not have established personnel to hire the supervisor for Americorp members. No knowing the qualifications of the individual to be hired or knowing the plan for supervision is concerning.
- While the applicant does discuss the qualifications of the proposed supervisor, which focus on people and project management, it does not identify resources for the 7 FTEs (4 FT and 6 PT) to call on for legal questions which require a subject matter expert. Perhaps the trainers will be available, but the applicant does not discuss this and it is a key point to the success of this program.

Member Experience

- There is good detail on the selection process. There is a mentioned preference for hiring members. Opportunities for growth and education outside of the Americorp assignment are not thoroughly discussed. More detail on how members will be given the opportunity to reflect on any personal/professional growth could be discussed. There is no discussion on how to connect to the broader National Service network.

- The applicant describes matching AmeriCorps members with the diverse communities it intends to serve and the applicant clearly describes how the program will benefit the volunteers in ways that support the AmeriCorps program, particularly as it aspires to inspire participants to become attorneys.

Commitment to AmeriCorps Identification

- The Program will work closely with community partners and site supervisors to make sure they are trained on AmeriCorps rules and regulations, and will be asked to be particularly mindful of situations that might put members in a position to engage in prohibited activity.
- As far as this reviewer can tell, there is no discussion of commitment to AmeriCorps identification.
- The applicant does not include any descriptions of AmeriCorps identification in its program, rather leaving it to the reviewer's imagination that the set-ups in the court houses and the collateral materials will include such branding.

Organizational Capability Overall Rating 25%

Organizational Background and Staffing

- ALF provides space to convene BIOP attorneys in Maine to develop deeper relationships and community among the few BIOP attorneys currently practicing in Maine.
- The applicant does discuss how Americorp fits into their strategic goals, but it feels as though this application is putting the cart before the horse. The organization hopes to hire two full time employees including an executive director and the staff person responsible for overseeing the Americorp members. However, this means there are many questions left up in the air surrounding the quality of experience for members at an organization relying on one person who works another full time job. While there is ample discussion of how marginalized communities can benefit from this program, this organization may not be ready to head it. The Americorp members' supervisor is currently unknown.
- The applicant does discuss robustly how the program fits into the ALF mission, goals and even its current and aspirational programmatic structure.

Compliance and Accountability

- The Program Manager will engage in regular compliance training to stay informed on potential compliance issues. If issues come up, JusticeCorps staff will immediately contact Volunteer Maine with the description of the situation and the resulting solution, action plan and timeline to address the issue.
- There are no current policies or practices in place at the organization as it is theoretical based on the hiring of a Program Manager. There is no discussion of existing protocols for the organization even though it is volunteer based.
- The applicant does not discuss any of its internal policies, procedures controls or otherwise to ensure compliance and accountability. Having these measures in place is a program requirement, regardless of where the applicant is in a business lifecycle.

Cost Effectiveness and Budget Adequacy 25%

- The usage of the MSYs in employment and other economic opportunity.
- Budget is incomplete without assigning a number of Americorp members into their appropriate category and no average amount of allowance for those members is entered. Non-Americorp funding is discussed.
- The applicant does nothing more than demonstrate how it arrived at the 7 MSY positions per guidelines. There is no budget.

SUMMARY APPRAISAL

Comments:

- the legal help they would be supplying to people to navigate the court system on their own.
- The applicant has found a program that could be implemented in Maine and established a thorough understanding of that need. However, the organization seems to be ill-prepared to take on 7 full-time

AmeriCorps members. There is no Executive Director and no Program Manager to oversee operations. Members would be scattered to multiple other organizations without clear standards for training and how the AmeriCorps members would be checked-in on. Modeling a program after existing AmeriCorps projects was smart, but this organization needs to establish its own foundations first.

- The applicant relies on a tested model of JusticeCorps and understands statewide legal need, making this a sound proposal. However, the applicant will need to provide multiple missing application requirements, including an evaluation plan, a budget, compliance or accountability and AmeriCorps identification

What elements of the proposal are unclear?

- 82.6% are white, 0.4% are Asian, 0.2% are American Indian, 0.2% are African American, 0.2% are Hispanic or Latino (should this not add up to 100% to be complete information?) 2 of Maine's 12 Counties (where did the other 4 go?)
- Whether due to the complicated nature of the budget device available to the applicant or otherwise, the budget is lacking and needs more details. The application is not organized by the categories presented in the RFP and several categories could arguably be missing. There was not much emphasis on the AmeriCorps member experience.
- What subject matter legal expertise resources will AmeriCorps staff have beyond the training sessions, they will need these in real time.

What else do you have to say about this proposal?

- Where did the other 4 counties go? one should know how many there are when talking that point.
- I would be worried about placing AmeriCorps members at a site with such little foundation and support for them, relying on non-specified third party organizations to look after them.
- The applicant notes in multiple sections that local data is unavailable, which suggests the previously approved planning grant did not address the needs of the target population. There may be a very steep learning curve and a number of surprises along the way with this worthy project proposal.

Task Force Review Notes and Appraisal Summary:

Proposal Alignment and Program Model

- This proposal will arrange workforce development for diversified (racial is priority; also LGBTQ+) college graduates in Cumberland and Androscoggin Counties. It proposed to expand legal navigation services to low-income populations, using 10 AmeriCorps members. It builds on a JusticeCorps model used in 5 locations including California, but will require modification to implement in Maine. The legal focus expands the grant portfolio programmatically but not geographically. It expands diversity grantmaking by supporting an organization run by a 3-member volunteer BIPOC board.

While this is a solid concept, the interview clarified that it is basically an idea developed by the lead volunteer with little input from potential partners, the rest of the board (except to sign off on the idea), or the community to be served. There is little evidence that the court or organizations where the AmeriCorps members will be placed have agreed to those placements and to the responsibilities required.

The organization has no staff and does not have the capacity to succeed with overseeing the members. They plan to secure private funding to hire a program director but how they will accomplish that is not included in the proposal. Also, there is no upper management to supervise the program director. A periodic meeting and access through email and text to a busy, practicing professional volunteer leader is inadequate for the complexity of overseeing this grant proposal. Recruitment, onboarding, supervision and management of 10 members is beyond the scope of this young organization with no staff hired yet.

Starting with a single member as a pilot might be more feasible. Otherwise, they might consider waiting until after a full-time Executive Director is hired in 1-2 years, pending fundraising. Developing internal policies and procedures is essential before taking on a project this large. If we approved the proposal now, I

fear we would be setting them up to be unsuccessful.

- The proposal aligns with the economic opportunity federal priority and the commission's workforce development priority. Depending on the clients served, it could also address some of the other priorities such as housing.

The application makes a strong case for the need for such a program.

The proposal would add a new demographic to our service mix through its focus on BIPOC and other marginalized groups.

The Justice Corps model could become an example for expanding the program into other areas of the state. The applicant notes that the JC model in other states is not directly transferable to Maine because of some of Maine's unique characteristics; however, those are not explained. It would be interesting to have that information.

The program is well aligned with the sponsoring organization's mission and plans, although the director noted that introducing this program was not initially anticipated at this time until this opportunity came along.

Given the start-up nature of Alpha Legal, its financial stability and ability to raise the local match to support the program are unproven, so this is a weak area.

As basically a one-person operation, staff stability is not assured. While there is a plan to hire a program director, which apparently is underway, that will be a part-time position which may make it more likely to see turnover. This program will be highly dependent upon the Executive Director with no clear backup plan should she leave.

It appears that other organizations were involved in developing the program and will likely provide placements. These were not specified in the application but Pine Tree Legal, ILAP, and Legal Services for the Elderly were mentioned.

As a new organization, it has had limited experience in using volunteers and has only informal processes in place to manage and track volunteers.

Preferences from RFA

- While the application and interview indicate there will be partnerships and placement within the courts and legal aid organizations, there is no evidence they were engaged in the development of the plan.
- While not fully listed, the proposal does appear to involve a number of partners. Program is not operating in a designated rural county

Past Performance

- Since the organization had a planning grant, I would have anticipated that they would have engaged partners more extensively than was reflected in the proposal or interview. Staff indicate the applicant participated fully in the planning year and submitted reporting on time. However, there were issues with financials. The lead volunteer is seeking a new finance contractor who can better understand the federal and state requirements for financial oversight.

The project, while an excellent idea, will require greater capacity than the organization currently has.

- The applicant noted that the local match has not yet been confirmed;

A new project director will be hired on a part-time basis, which may be insufficient and/or difficult to fill or retain;

There appears to be a strong commitment on the part of the agency director to ensure the program's success and to meet the performance targets.

It should be noted that some of the performance targets may extend beyond the grant time-frame (e.g., law school enrollments).

Financial Plan

- The budget supports the cost of the members. They indicate they will have \$125,000 in private funds to hire a Program Director. However, they don't explain how they will raise the funds. Also, it appears all trainings will be pro bono.

Fiscal Systems: Only the 990 post card is used, and there is no audit. Essential best practice internal controls are not all in place.

- The local sources of funds have not been identified and the applicant notes that they are not yet confirmed.

Fiscal Systems

- Only the 990 post card is used, and there is no audit. Essential best practice internal controls are not all in place.
- Alpha Legal is a new organization with a limited budget. It has depended on an outside bookkeeper and is now seeking a new firm with greater abilities. The organization is not audited and files a simple form 990.

Grant Readiness

- They still need to develop policies and procedures and other internal operating management and support systems.
- It is clear that Alpha Legal's director is strongly committed to the organization and the proposed AC program. If her continued involvement and presence could be guaranteed for the full three years, I would be more confident of success. However, the agency currently has no paid staff, a small budget, and a limited volunteer base. The application would be stronger if Alpha Legal could partner with another organization that could provide the stability and systems to increase my confidence that the program would be successful, not only in its first year, but over the full three-year grant cycle.