Legal Aid Society
OF THE DISTRICT OF COLUMBIA
MAKING JUSTICE REAL

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Before the Committee on the Judiciary and Public Safety
Council of the District of Columbia

Performance Oversight Hearing Regarding the Office of the Attorney General

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The Legal Aid Society of the District of Columbia[1] submits this testimony regarding the performance of two branches of the Office of the Attorney General (OAG): the Child Support Services Division (CSSD), which is tasked with initiating child support cases, establishing and enforcing support orders, and collecting child support; and the Domestic Violence Section, which helps survivors of intimate partner and family violence, sexual assault, and stalking obtain civil protection orders (CPOs), and which serves as the primary enforcer of these orders through its prosecution of CPO violations.

We are encouraged by the fact that, following our oversight testimony last year, OAG leadership and CSSD met with us to discuss some of the concerns we raised. Further, CSSD has also begun to include us in discussions regarding child support policy, which we hope will result in productive policy changes. We appreciate CSSD's responsiveness, and hope to continue to work collaboratively with the agency. However, we continue to observe aspects of CSSD's day-to-day practices that are concerning, and detail two such practices – the improper imputation of income in child support cases and the need for better communication with parents receiving TANF – in our testimony today. We also commend OAG's Domestic Violence Section, which

[1] The Legal Aid Society of the District of Columbia was formed in 1932 to "provide legal aid and counsel to indigent persons in civil law matters and to encourage measures by which the law may better protect and serve their needs." Legal Aid is the oldest and largest general civil legal services program in the District of Columbia. Over the last 88 years, Legal Aid staff and volunteers have been making justice real – in individual and systemic ways – for tens of thousands of persons living in poverty in the District. The largest part of our work is comprised of individual representation in housing, domestic violence/family, public benefits, and consumer law. We also work on immigration law matters and help individuals with the collateral consequences of their involvement with the criminal justice system. From the experiences of our clients, we identify opportunities for court and law reform, public policy advocacy, and systemic litigation. More information about Legal Aid can be obtained from our website, www.LegalAidDC.org, and our blog, www.MakingJusticeReal.org.

has played a crucial role in protecting survivors, and continues to do so with thoroughness and sensitivity.

Legal Aid domestic violence/family law attorneys have significant experience litigating both with and against attorneys from OAG/CSSD, via the Child Support Resource Center, where we and Bread for the City provide court-based legal services at the Parentage and Child Support (P&S) Branch of the D.C. Superior Court. We also work closely with attorneys and staff from the Domestic Violence Section, as we maintain a permanent presence at both the Northwest and Southeast Domestic Violence Intake Centers (DVICs), providing advice and full representation to survivors seeking Civil Protection Orders (CPOs) against their abusers. The Domestic Violence Section's enforcement of Civil Protection Order violations is crucial to protecting our clients who are survivors. In light of our work with both of these branches of OAG, we offer the following perspective on their performance.

Child Support Services Division

Although we frequently oppose OAG/CSSD in the courtroom, we unreservedly share OAG/CSSD's goal of reducing poverty among District children. Since 2012,[2] we have testified before the Council regarding OAG/CSSD's performance, areas of concern, and ways in which we hope to collaborate with the agency in support of our goal of a better-functioning child support system in the District. Addressing the challenges we raise in our testimony will lead to a child support system that is more fair and navigable to families, and will better serve the interests of both parents and children.

OAG/CSSD Should Address Practices that Lead to the Entry of Unlawful and Unrealistic Child Support Orders

Through our daily presence at the Child Support Resource Center, our attorneys have the opportunity to observe and work closely alongside OAG/CSSD attorneys and legal support staff. The Superior Court relies on Assistant Attorneys General to be specialists in the area of child support law. These prosecutors, along with their paralegals, are expected to be well-versed in the provisions of the D.C. Child Support Guidelines, as well as other statutes governing the litigation of child support and parentage cases, and to seek relief that falls within the confines of the law.

Legal Aid testified last year about several cases in which OAG attorneys either sought or permitted child support orders to be entered in violation of the Child Support Guidelines, as well as instances wherein OAG attorneys were unfamiliar with important aspects of child support law. In a meeting that took place after we testified at this hearing last year, OAG/CSSD leadership assured Legal Aid that it would provide its staff with receive regular, comprehensive, and ongoing training on substantive legal issues.

[2] We respectfully refer the Committee to our 2012, 2013, 2014, 2015, 2016, 2017, 2018 and 2019 Testimony before the Committee on the Judiciary and Public Safety and the Committee on the Judiciary. We are happy to provide copies upon request.

We are encouraged by OAG's willingness to address these concerns. However, we have also continued to witness OAG/CSSD staff draft and enforce child support orders that clearly violate the provisions of the Child Support Guidelines. In particular, we are concerned that OAG/CSSD staff are continuing to propose and seek enforcement of child support orders which improperly impute income to non-custodial parents, in violation of the Child Support Guidelines.

Improper Imputation of Income Continues to be a Problem in Child Support Cases

Under the Child Support Guidelines, when a non-custodial parent fails to appear for a child support hearing and no other information about their income is known, the Court may enter a child support order in the amount of $75 per month.[3] This provision deters the non-custodial parent's failure to appear, but also, by limiting such initial orders to $75 per month, it prevents the order of child support payments that are beyond a non-custodial parent's ability to pay. Orders that parents cannot possibly pay do not benefit children and can carry significant consequences for non-custodial parents if arrearages accumulate. The current Guidelines balance these two concerns in setting the $75 per month limit.

Despite the law's very clear statement on the amount of child support an absent non-custodial parent can be charged at an initial hearing, Legal Aid continues to encounter cases where OAG has sought to impute minimum wage-income to non-custodial parents who are not present in court, and about whom no factual income information has been presented. Imputing minimum wage income to non-custodial parents has the effect of setting child support obligations that are far in excess of the $75 contemplated in the Guidelines.

In one case we handled after presenting our testimony last year, Legal Aid discovered that OAG had obtained a permanent support order of $404 per month by imputing minimum-wage income to a non-custodial parent who did not appear at his initial support hearing in April 2017 because he was incarcerated at that time. Not only was it contrary to the law for OAG to seek a child support order charging our client more than $75 per month in child support in his absence, but OAG later admitted that its office had actually received notice of our client's incarceration one month before the initial hearing, meaning that it should not have sought any child support from our client at all until after his release.

In another case we are currently handling, our client, a non-custodial parent, was ordered to pay $400 per month in child support at a February 2017 hearing at which he did not appear. The Court calculated our client's child support order by imputing income to him at OAG's request, despite the fact that the only income information known about our client at the time was that he was unemployed and collecting unemployment insurance. The amount of unemployment benefits our client was receiving was so meager that it fell below the Child Support Guidelines' self-support reserve, which is the amount of annual income a non-custodial parent is legally

[3] D.C. CODE § 16-916.01(f-1)(1)

permitted to set aside to meet their personal subsistence needs.[4] The Guidelines presume that non-custodial parents whose incomes fall below the annual self-support reserve should not be charged more than $75 per month in child support.[5] Yet, despite this presumption, as well as the separate Guideline provision limiting the Court's ability to charge more than $75 per month to an absent non-custodial parent, OAG still succeeded in obtaining a default permanent support order that imputed a minimum wage income to our client without his knowledge. OAG is now refusing to admit that this order was in error and should be corrected.

We are concerned that improper imputation of income continues to be part of CSSD's practice, and believe strongly that seeking relief that is beyond the bounds of the Child Support Guidelines benefits neither custodial nor non-custodial parents, both of whom deserve child support orders that are fair, legal, and realistic We urge the Committee to ask the agency what its internal policies and practices are when they are seeking as order against a non-custodial parent who is not present at the hearing and for whom they do not have reliable information about income. Additionally, we make the following recommendations:

Recommendations:

- OAG/CSSD staff should cease its practice of proposing and enforcing default permanent child support orders that rely on the unlawful imputation of income to absent non-custodial parents.

- OAG/CSSD should ensure that this practice does not continue or re-appear through regular training an internal monitoring of its practices.

OAG/CSSD Must Increase Communication with DHS Regarding Parents Receiving TANF and the Child Support Cooperation Requirement

As Legal Aid testified last month at the oversight hearing for the Department of Human Services (DHS),[6] parents in households receiving TANF do not receive clear communication from DHS when they apply or recertify for TANF about how to comply with child support-related requirements that could impact their TANF award. As a result, these parents are at risk of significant TANF sanctions that could be avoided if DHS and OAG did a better job of communicating, both with the parents and each other. We urge the Committee, in coordination with the Committee on Human Services, to work with OAG/CSSD and DHS to address this problem.

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[4] D.C. CODE § 16-916.01(g)(1)(A).

[5] D.C. CODE § 16-916.01(g)(3)(A).

[6] *See Legal Aid Testimony Regarding Agency Performance Oversight for the Department of Human Services* (January 29, 2020), https://www.legalaiddc.org/wp-content/uploads/2020/02/Legal-Aid-DHS-Oversight-Testimony-FY19-FY20YTD-ESA-FINAL.pdf

Parents in households receiving TANF assign their right to receive child support to the District government while they are receiving TANF.[7] This means that TANF recipients must cooperate with the District in identifying, locating, and establishing child support orders against the non-custodial parents of their children.[8] If a TANF recipient does not cooperate with the government's efforts to pursue child support from the non-custodial parent, the TANF recipient parent is subject to a TANF sanction equaling a 25% reduction in the family's TANF grant.[9] There is a "good cause" exception to cooperating with the child support enforcement if cooperating with the government, or seeking child support, may result in harm to the TANF recipient or the recipient's family. [10]

Currently, parents must complete a Combined Application[11] when they apply or recertify for TANF at a Service Center. The Combined Application requires parents to provide information about the non-custodial parents, where relevant, including their last known address, whether paternity has been established, and the parent's last place of employment, for each child in the household. Many parents believe that by providing this information to DHS, they have provided the necessary information to the District government for the child support cooperation requirement. However, this is only the first step in the process – something that DHS does not make sufficiently clear to recipients and potential recipients.

When DHS receives this information, it then sends it to CSSD/OAG for follow up. If CSSD requests information or participation from a TANF recipient and does not receive a response, CSSD notifies DHS that the family should be sanctioned. At that point, DHS is supposed to send a notice about the impending child support sanction before implementing the sanction, which reduces the family's benefits by 25%.

If DHS sanctions a TANF recipient, the recipient must take multiple steps to get the sanction lifted – basically acting as a go-between between the two government agencies. First, the recipient must go to CSSD and comply with the request for cooperation, whether that means providing information about the non-custodial parent or attending a child support hearing. Then, the recipient must obtain a letter from CSSD that they are in compliance with the child support cooperation requirement. Third, the recipient must physically take the letter from CSSD to DHS to have the TANF sanction lifted and demonstrate that they are in compliance.

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[7] D.C. CODE § 4-205.19(b).

[8] D.C. CODE § 4-217.08(a).

[9] 29 DCMR §§ 1715.2-.3.

[10] 29 DCMR § 1709.1(a).

[11] *Available at* https://dhs.dc.gov/sites/default/files/dc/sites/dhs/publication/attachments/Combined_Application_December-2015_%28English_%202_0.pdf

The failure of DHS and CSSD to adequately communicate, with either the TANF family or each other, places an enormous burden on TANF recipients, particularly those who are experiencing domestic violence and fear for their safety. Given that CSSD has the capability to communicate to DHS that a family should be sanctioned, it is unclear why CSSD cannot communicate that the family is in compliance and that the sanction should be lifted. Forcing a parent to act as a liaison is unnecessary and burdensome when appropriate lines of communication already exist.

Recommendation:

- OAG/CSSD should develop and implement a clear plan of communication with DHS when a parent receiving TANF has come into compliance with the cooperation requirements.

The Council Should Prioritize Updating the District's Outdated Parentage Laws and CSSD Should Do More to Facilitate the Fair Resolution of Paternity and Parentage Matters

We have testified over the years about CSSD's hardline positions in cases involving paternity challenges. We have worked on cases where CSSD opposed granting parents genetic testing or fought against the disestablishment of paternity where there was an existing Acknowledgement of Paternity. This included situations where (1) parents were not provided with required statutory notices and protections mandated by District and federal law before signing, (2) putative fathers were lied to about the probability of their paternity, (3) both the mother and putative father wanted genetic testing, and/or (4) DNA testing conclusively proved that the putative father was not actually the biological father.

Inappropriate use of an Acknowledgement of Paternity by a non-biological parent – whether intentional or inadvertent – denies the biological parent his parental rights, while allowing someone without a genetic relationship to claim custody of a child. Acknowledging paternity at the hospital does not, on its own, increase a father's involvement or a child's well-being. Due to the widespread availability of low-cost DNA testing, parents and children alike often know who is and is not the child's biological father. Many people have learned the truth and adjusted their family structures long before coming to court.

Inaccurate Acknowledgements of Paternity only serve to circumvent biology. It is better for children for their acknowledged and biological father to be the same person: it promotes their sense of identity and emotional wellbeing, guarantees they have access to essential medical history information, allows them to connect with their biological extended family, and ensures they are not forced into a relationship or custody with a biological stranger. A paternity judgment may also affect a child's inheritance, citizenship, entitlement to public and private benefits, and the right to bring a wrongful death claim. Aligning legal determinations of parentage with the biological truth of DNA is more likely to result in stronger, longer-lasting bonds between father and child, which is also to the benefit of the children and society as a whole.

We urge CSSD to take important steps to ensure that it is taking a more efficient and fair approach to cases regarding the disestablishment of parentage. However, the problems we have seen highlight the urgent need for the Council to update the District's paternity law, which is unnecessarily complicated, does not reflect the widespread availability and use of DNA testing to answer questions about paternity, and creates unnecessary barriers for parties who simply want to ensure the records documenting parentage are accurate.

The District's Parentage Law and Acknowledgements of Paternity

By way of background, generally, in order to establish a child support order, parentage must first be determined for a child's father. In the District, unmarried parents can establish the father's paternity of a child by going to court to request DNA testing or by signing a legal form called an Acknowledgment of Paternity at the hospital or Vital Records. The Acknowledgement of Paternity was created by federal and D.C. law to provide unmarried biological parents with an efficient means of legally recognizing the relationship between a father and child. To safeguard the Acknowledgment of Paternity process and ensure that the system is not abused, federal and D.C. law include procedural requirements that must be followed for parents to validly execute an Acknowledgment of Paternity. For instance, both parents must be placed under oath. They must also be given written and oral notice of the alternatives to, legal consequences of, and rights and responsibilities that arise from the Acknowledgment.[12] When these requirements are not followed, Legal Aid takes the position that the Acknowledgment should not be used to establish parentage or require a putative father to pay child support if a party wants genetic testing or has obtained private genetic testing conclusively showing the man is not the biological father.

Unfortunately, our years of experience tell us that these procedural safeguards are not always followed – often with significant consequences. As we have noted in previous testimony, litigants report that too often, hospital or Vital Records staff fail to provide statutorily mandated notices. Parties often are not told that they could obtain DNA testing prior to signing an Acknowledgement of Paternity at a hospital or at Vital Records. Parties even sign Acknowledgements of Paternity when they lack capacity. We have heard from clients who signed these documents when they were under the influence of drugs or alcohol, suffering from untreated schizophrenia, or heavily medicated in the wake of an emergency Cesarean Section.

Problems arise when parties sign an Acknowledgement of Paternity without understanding the significance of the document or their right to not sign it. The breakdown of these safeguards makes it important that there be a clear, navigable process for addressing cases in which a party did not make an **informed** decision to sign an Acknowledgement of Paternity. Unfortunately, over the years CSSD has consistently argued to uphold invalid Acknowledgements of Paternity.

Private Genetic Testing

As genetic testing becomes increasingly available to the public, parties regularly come to court seeking disestablishment of paternity after taking a private DNA test. Parties are easily able to

[12] *See* D.C. CODE § 16-909.01 (a)(1) (2018).

obtain tests at drug stores, and they come to court armed with the truth. In the face of these tests, CSSD has still refused to support disestablishment. The following are several examples of cases where this has occurred:

- In one recent case, a putative father signed an Acknowledgement of Paternity after having a one-night stand with the child's mother, but began to doubt his paternity after spending time with the child. He obtained a private DNA test which showed a 0% probability of paternity, and he filed a Motion to Disestablish Paternity immediately after receiving the results. Although this information was easily accessible to CSSD, it proceeded with filing a separate child support case against him, despite there being a clear paternity issue already underway. The two cases were eventually consolidated and CSSD was stern in its position not to disestablish paternity. To add insult to injury, CSSD asked the court to order the client to pay for the court-ordered genetic test, placing an unnecessary financial burden on the unemployed individual.

- In another recent case, our client was diagnosed with paranoid schizophrenia and manic depression. Despite these mental health issues, this client signed an Acknowledgement of Paternity for a child he believed to be his. A private DNA test later showed that he was not the child's biological father. The case resulted in a permanent child support order of $0 per month after the client was hospitalized indefinitely due to his mental health. Paternity was not disestablished.

- A client in a similar situation informed us that he had bipolar schizophrenia, but that he had signed an Acknowledgement of Paternity. He did not understand the legal effect of the Acknowledgement of Paternity, specifically that he was waiving his right to future court-ordered DNA testing. When this client was brought to court for child support, he raised concerns about paternity. He testified that he took a private DNA test years earlier, and that test showed that he was not the child's biological father. Nonetheless, CSSD opposed his request.

In many cases, fathers express understandable concerns about paternity. They come to court with the results of genetic testing, or after the mother has revealed that another man could be the child's father. Yet, in each of these cases, they are told that they are bound by the Acknowledgement of Paternity they signed, and that they must pay child support for a child they know is not theirs. CSSD should be more flexible in these cases, especially when presented with scientific proof that a birth certificate is factually incorrect.

CSSD Has Impeded the Resolution of Some Parentage Matters

Over the years, Legal Aid and Bread for the City have represented putative fathers, biological fathers, and mothers, in their requests to disestablish paternity. We have seen that these requests can come from all sides of the case, and that, often, parties agree on how to proceed. Parties may agree that the circumstances around signing the Acknowledgement of Paternity warrant genetic testing to confirm what they believe to be true. They may agree that it is appropriate to remove a non-biological parent from a birth certificate so the child's legal documents are accurate. They may even agree on what rule putative and biological fathers will play in the life of the child

going forward. Even in these cases, CSSD adheres to its rigid internal policy of honoring Acknowledgements of Paternity.

We have seen other instances where CSSD is unwilling to consent to disestablishment of parentage unless the biological father is present and on hand to have his own paternity established simultaneous with the disestablishment. We think that it is unreasonable and illogical for CSSD to routinely take this position. In doing so, it is conflating two separate issues that ought to be dealt with in succession, not simultaneously. By combining these two steps, the agency is effectively requiring a person that CSSD may know with certainty not to be the father to remain the legal father of a child unless and until the biological father can be located and brought to court to have his own paternity established.

CSSD's refusal to consider requests for genetic testing and disestablishment of paternity prevents people from resolving cases, and worse, from choosing how to raise their children.

It is Time to Modernize the District's Parentage Laws

Though we believe CSSD could be more reasonable in paternity cases, District laws remain complicated and out-of-date. The Council should take this opportunity to update the District's parentage laws to better account for the availability and accuracy of genetic testing. A number of other jurisdictions, including neighboring ones, do this. These laws could be models for any modernization effort here in the District. For example, Maryland law provides that a declaration of paternity in an order can be modified or set aside if a genetic test establishes that the individual named in the order is not the biological father.[13] Additionally, under Maryland law, the court shall order paternity testing if requested by either party or the government.[14] Virginia, as well as California, Alabama, Alaska, Colorado, Florida, Iowa, Georgia, Minnesota, Missouri, South Dakota, and Louisiana, all specifically allow a "father" who signed an Acknowledgment to subsequently disestablish paternity based on genetic testing,[15] and numerous other states at least provide some means for a "father" to challenge paternity after the rescission period.[16]

[13] MD. CODE ANN., FAM. LAW § 5-1038 (2).

[14] MD. CODE ANN., FAM. LAW § 5-1029.

[15] *See* VA. CODE ANN. § 20-49.10; CAL. FAM. CODE § 7581(d); ALA. CODE § 26-17A-1; ALASKA STAT. § 25.27.166; COLO. REV. STAT. § 19-4-107.3(1)(a); FLA. STAT. ANN. § 742.18(2); IOWA CODE § 600B.41A; GA. CODE ANN. § 19-7-54; MINN. STAT. § 257.75; MO. REV. STAT. § 210.854; S.D. CODIFIED LAWS § 25-8-64; LA. STAT. ANN. § 9:406.

[16] *See, e.g.*, 750 ILL. COMP. STAT. ANN. § 46/309; ARK. CODE ANN. § 9-10-115; CONN. GEN. STAT. ANN. § 46b-172; HAW. REV. STAT. ANN. § 584-3.5; IDAHO CODE ANN. § 7-1106; KAN. STAT. ANN. § 23-2209; MONT. CODE ANN. § 40-6-105.

Recommendations:

- OAG/CSSD should revise its internal policies and practices regarding the circumstances under which it will oppose requests to disestablish paternity. The agency should not create barriers to addressing acknowledgments of the paternity that did not comply with District law or prevent efforts to correct erroneous paternity determinations.

- The Council should amend the District's paternity statute to recognize the role of DNA testing in addressing erroneous paternity documents and align the District with other jurisdictions' more progressive paternity laws.

Domestic Violence Section

Legal Aid would also like take this opportunity to highlight the performance of the Assistant Attorneys General who comprise its Domestic Violence Section, which has played an important role in serving and protecting our clients who are survivors of domestic violence.

The Domestic Violence Section of OAG serves survivors of abuse by both representing them directly in CPO proceedings, as well as criminally prosecuting violations of CPOs. As a significant portion of Legal Aid's Family Law/Domestic Violence practice is devoted to representing survivors of domestic violence in CPO cases, our attorneys and clients often work closely with attorneys in the Domestic Violence Section.

Obtaining a CPO is often one of the first and most crucial steps a survivor takes towards escaping the cycle of violence, holding their abusers accountable, and building a safe and independent life free from abuse. On behalf of our survivor clients, Legal Aid attorneys are in Domestic Violence Court on a daily basis, negotiating with and litigating against abusers and their lawyers in order to secure CPOs that require them to stay away from, not contact, and not harass, assault, stalk, or threaten our clients.

Although these CPOs can be powerful tools in keeping our clients safe, they do not always succeed in deterring abuse. Even after securing CPOs for our clients, we may receive frightened and fearful reports that their abusers are still calling, texting, and showing up outside our clients' homes, workplaces, and schools, in violation of the 'stay away' and 'no contact' provisions of their protection orders. In some instances, abusers continue to threaten or inflict violence on our clients during the pendency of a CPO. An abuser's refusal to abide by the terms of a CPO is often compounded by the justice system's refusal to believe and take a survivor's story seriously. Our clients have told us countless stories about police officers who shrug their shoulders when they report violations of CPOs, and Assistant U.S. Attorneys who do not return their calls, fail to keep them informed on the status of criminal domestic violence cases, and decline to prosecute domestic violence cases or violations of their CPOs or criminal stay away orders.

The Domestic Violence Section of OAG operates in stark contrast to these other government agencies. As the primary prosecutor of CPO violations, we rely on OAG to take our clients' stories of abuse seriously, and to hold abusers accountable when they violate the terms of our

clients' CPOs. We have observed that its attorneys and support staff are highly knowledgeable of and sensitive to the dynamics of domestic violence. They are understanding when a survivor has second thoughts about going forward with a criminal case against her abuser, who also happens to be her child's father. They are patient when a low-income survivor says she is interested in pursuing criminal charges, but is unable to meet with them because of her work or childcare schedule. They are reassuring when a survivor admits her fears about having to face her abuser in court and testify about his conduct. When our clients inform us that their abusers are violating the terms of their CPOs, we never hesitate to refer them to file complaint for criminal contempt with OAG's Domestic Violence Section because we know that its staff will treat them with dignity and respect.

As an organization that specifically serves low-income individuals, Legal Aid is particularly impressed by how sensitively the staff of the Domestic Violence Sections treats survivors who are not well-off or do not have access to many resources. We have witnessed its attorneys being consistently diligent about providing our clients with witness vouchers, considerately working around their hectic schedules and transportation limitations, and sparing their presence from court hearings at which their presence or participation is not necessary.

Domestic Violence Section attorneys are also very accessible, responsive, and approachable. Legal Aid attorneys are frequently in communication with the Assistant Attorneys General who are assigned to prosecute our clients' contempt cases, and we regard them as our allies and fellow advocates for the interests of our clients. Our close collaboration with them on contempt cases has led to many of our survivor clients feeling safe, protected, and empowered.

We offer this testimony because the important work and contributions of the Domestic Violence Section of OAG should not be overlooked or undervalued. We are thankful that its skilled attorneys have chosen to devote their careers to helping survivors of domestic violence, and we look forward to maintaining a close and effective working relationship with them.

Conclusion

Legal Aid appreciates the opportunity to share our perspective on the performance of these two key parts of OAG. We hope to continue to work with the agency and this Committee to address the concerns that we raise in this testimony.