

UNIVERSAL REPRESENTATION PROGRAM

Performance Audit Report

For the Two-Year Period Ended June 30, 2024

Clark Nuber PS

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Executive Summary

The Universal Representation Fund (URep) is an innovative approach to addressing the immigration legal gap in Oregon. During the first two years, URep established its internal structure and technological infrastructure to support immigrants seeking legal assistance. Clark Nuber, P.S. (Clark Nuber) was engaged by Universal Representation Fund's fiscal agent, Oregon Worker Relief, to conduct this performance audit of the Universal Representation Fund to meet the performance audit requirement outlined by Senate Bill 1543 (SB 1543). Clark Nuber's audit objectives were to:

- Confirm that policies and procedures as well as the organizational structure are in alignment with SB 1543.
- Verify that governance and program staff are knowledgeable about Universal Representation and its related eligibility requirements.
- Confirm that efforts to provide universal representation are not duplicative, unnecessarily burdensome, or are not provided to those prioritized by SB 1543.
- Confirm that those individuals deemed eligible are provided universal representation in accordance with SB1543 and are distributed equitably between navigators and legal providers to maximize the number of people served.
- Verify that billing and statements of work are done timely and in accordance with SB 1543.

This report includes the audit background, objective, scope, approach and results of the performance audit. Within the audit results section of this report Clark Nuber summarizes the recommendations which resulted from the audit procedures.

Clark Nuber noted four recommendations resulting from the audit. While the recommendations for improvement are explained below, the overall setup and self-monitoring are meeting expectations.

The robust technological tools provided by Innovation Law Lab and the steadfast oversight from the Community-Based Organizations involved in the Oregon Worker Relief administration have created a conducive environment for the URep program to flourish. However, the primary challenge is the lack of current legal capacity due to the current legal pipeline to meet the demand for services.

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Background

Immigration has always been a contentious and urgent issue in the United States. The politicalization of immigration has increased public demand for governmental intervention. The State of Oregon passed Senate Bill 1543 (SB 1543) to ensure that individuals facing immigration issues have access to legal representation and support, regardless of their financial situation. SB 1543 established the Universal Representation Fund, which provides funding to the Equity Corps of Oregon (ECO), a program of Oregon Worker Relief, to coordinate program services by awarding grants to organizations providing services and increasing legal capacity through legal fellowships and training programs. ECO providers assist enrollees with a broad spectrum of immigration-related services including deportation defense, asylum applications, work permits applications, DACA renewals, visas applications for crime survivors, family unification cases, citizenship applications, etc. It also provides interpretation services and filing fee support.

SB 1543 further established the program's structure, including Navigation, Clearinghouse, Workshops, Helpdesk, and Clinics. The bill also mandated a program and financial audit after two years beginning with the two-year period ending June 30, 2024.

With stricter Federal immigration enforcement and policies, the demand for these services is expected to increase significantly. This heightened demand underscores the importance of the Universal Representation Fund in ensuring that all individuals facing immigration challenges have access to legal support on immigration matters.

The Need for Universal Representation

Immigration significantly impacts Oregon's economy, contributing to sectors facing labor shortages, such as agriculture, technology, and healthcare. In 2019, immigrants in Oregon paid an estimated \$1.1 billion in state and local taxes ([Source](#)). When immigrants face legal challenges due to their immigration status, their potential contributions to the community and economy diminish. The U.S. immigration system is complex, and without legal representation, immigrants may struggle to navigate it, leading to errors that negatively impact their cases.

Providing publicly funded universal representation for those in immigration proceedings who cannot afford a lawyer protects the values of due process and fairness. It has proven effective against extended detention and deportation, ensuring immigrants can access their rights under U.S. law. Universal representation is crucial for keeping families and communities together and reducing the stress and uncertainty immigrants face when dealing with legal issues ([Source](#)).

Equity Corps of Oregon (Oregon's Universal Representation Program)

ECO launched in the fall of 2018, with support from the City of Portland and Multnomah County. At the time it was launched, it was administered by Innovation Law Lab and now, after the passage of SB 1543, it is jointly administered by Oregon Worker Relief and the Oregon State Bar. Oregon Worker Relief now serves as fiscal agent for the Universal Representation Fund.

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Innovation Law Lab

Innovation Law Lab is a not-for-profit created by a team of lawyers, activists, software coders and graphic designers to create a case management system (LawLab). The Oregon Worker Relief Portal (the Portal), COE (Case Management software), and the ECO Provider Portal (EPP) was designed and is implemented by Innovation Law Lab.

Governance

Oregon Worker Relief (OWR) is organized to provide disaster relief for Oregonians that face economic and system hardship and do not qualify for traditional forms of relief or benefits.

OWR's governance is structured with a board president, treasurer, and secretary and is made up of members from other local community-based organizations (CBO). OWR also has an executive committee, a URep advisory committee, and a URep grant committee. The advisory committee oversees the spending within the program and meets bi-weekly for recommendations. Additionally, the granting is overseen by Seeding Justice, a local foundation.

Community Navigators

CBOs provide navigation to immigrants seeking help through the URep program. URep utilizes not-for-profits already entrenched in the immigrant community and provides them with grant funding to expand their legal navigation programs.

Eligibility and Priority

To be eligible for services under the Universal Representation Program, individuals must be Oregon residents, have a household income below 200% of the Federal Poverty Guideline, and be facing removal or experiencing civic exclusion due to their immigration status. SB 1543 prioritizes those facing imminent deportation or detention.

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Audit Results

Overall

SB 1543 requires the that the fiscal agent develop the following: Attorneys working at community-based organizations to provide culturally responsive services to members of the immigrant and refugee community; Navigators working at community-based organizations to guide persons who are at-risk of deportation or need assistance with immigration matters into URep; Development of capacity and training to support navigation efforts through community-based organizations into the Program and culturally responsive services carried out by community-based organizations; A client service fund to assist with fees associated with filings; interpretation and related costs in immigration matters; A statewide universal navigation and support system, including a call center, to provide direct contacts and streamlined access for those seeking assistance with immigration matters; and A clearinghouse to provide logistical support, income and Program eligibility screening, navigation review, case placement and technical assistance, and referral coordination, mentoring and supervision of attorneys working for community-based organizations. It also requires certain data to be reported annually with the first report filed in August 2024, for the two-year period ending June 2024.

During the two-year period ending June 30, 2024, URep built program infrastructure and ramped up operations. With the help of the OWR portal, the COE portal, and the EPP portal, individuals that are eligible for services are tracked, served, and capacity is managed. These systems are robust and currently serving the needs of the SB 1543.

While SB 1543 requires extensive data to be included in its regular reporting, the bill does not prescribe specific performance outcomes; it is apparent that the spirit of the bill is to serve as many eligible individuals as possible. **The main limiter of serving this population is the capacity of the existing legal professionals that are qualified to provide representation and other legal services to these individuals.** Even without considering the legal capacity, this bill still serves as an efficient and effective way to serve the immigrant community.

On average, it takes seven years for an individual to complete their education and become licensed as a lawyer. There is additional time needed for lawyers that do want to specialize in immigration to become experts in this area. These time factors are bottle necks to serving the immigrant community. There are some cases where nonlawyers may provide certain services to the immigrant community and requires additional, in-depth training and support to do so.

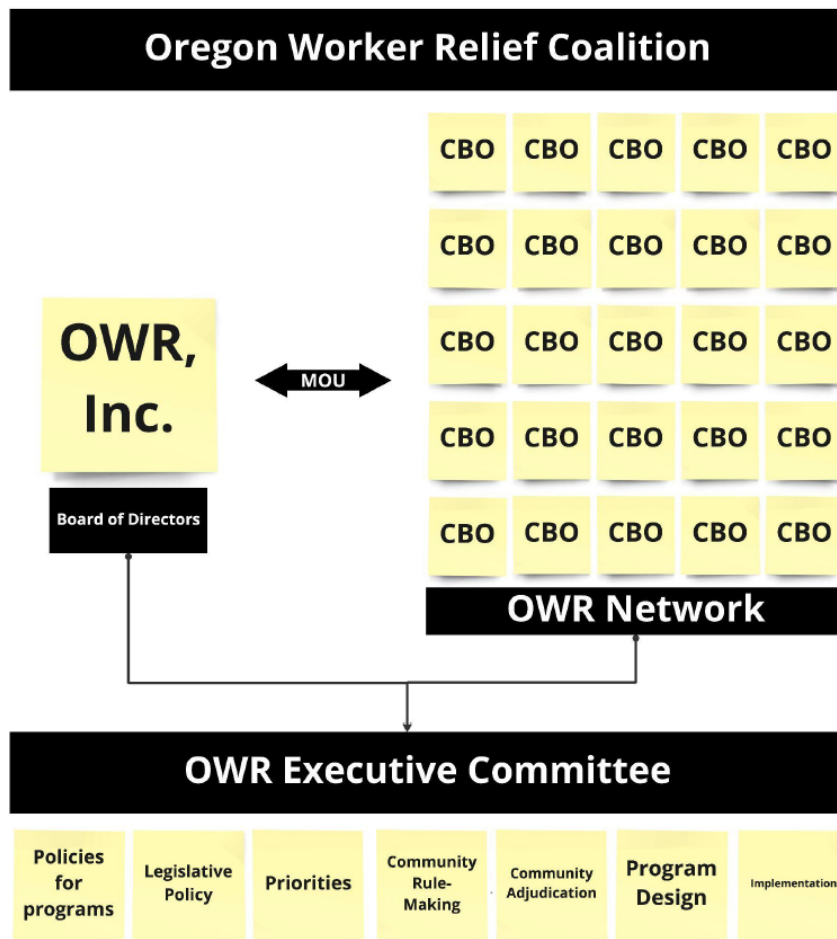
In addition to legal capacity, there are certain aspects to this program that thrive in a small team setting that could be overwhelmed by a greater need or an increase in people served.

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Collaboration is the Heart

OWR is a not-for-profit organization that leverages community partnerships to fulfill its mission because it intentionally does not have employees to foster collaboration. OWR houses several programs that are targeted at providing services to immigrant workers in Oregon. This includes ECO, which is overseen by and collaborated on by a board that is staffed by several CBOs in Oregon. These CBOs saw a rise in immigration legal needs during the COVID-19 pandemic.



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Interviews of Governance and Policy Review

The executive committee, advisory committee, and the grant committee meet regularly to review specific parts of URep. The executive committee meets bi-weekly to review and approve expenditures for URep. Individuals serving the community present their reasons for additional spending and there are deliberations on the spending and these deliberations may be postponed if more information is needed prior to committing additional funds. The governance of URep is further guided by extensive policies and procedures that were collaborated on with the help of the CBOs involved. These policies and procedures are in close alignment with SB 1543. The language in the procedure documents mirrors that of the bill when it comes to the structure of the organization and the eligibility and prioritization of individuals.

With URep in its first two years and the goal of SB 1543 being “serve as many people as possible”, it is reasonable that specific key performance indicators (KPIs) were not developed and have not been set and the only metric of success is decreasing wait times, decreasing the backlog, and serve as many people as possible. **With many individuals serving on the board are deeply involved in the URep process and with many of those members also belonging to other parts of the URep structure, the program can rely on their expertise and knowledge to develop additional specific metrics that will guide future success, in addition to the performance data benchmarks mentioned below.** There is further discussion of the measurable metrics of success below.

The collaboration brings multiple perspectives on the best way to serve the immigrant community through these legal services and specialties in a culturally responsive way. Because the program uses culturally responsive approaches, it has succeeded in meeting the community where they are at, yet this has created capacity challenges because of the ongoing shortage of legal service providers.

Responsiveness to the Community

The CBOs involved in the URep system and the board often have URep navigators. Navigators help individuals seeking legal help fill out the eligibility application and serve as touchpoints for the process as the individuals are served through URep.

As part of the URep program, the capacity to assist in navigations was expanded by grants to these CBOs. The CBOs have used the grant funding to hire more people dedicated to URep navigation, additional space (if needed), and other supplies. URep has doubled the capacity of their navigation providers through their ramp up during the two years ended June 30, 2024.

Interviews With Community Based Organizations

The organizations that provide navigators often provide other services and consider URep to be another tool in aiding immigrants. For example, if a person comes in looking for help seeking asylum, they may also bring their children into the CBO. The navigator may ask if they need help finding affordable childcare. These wrap-around services and the access of this program in already established CBOs makes URep see the demand for their services increase.

Additionally, the CBOs were granted additional funds to create workshops on the immigration process. The CBOs developed them with ECO. They are often provided at clinics where legal services are received and are provided on demand. These workshops, like the rest of the program are slowly ramping up and some of the CBOs did not meet the budgeted number of workshops due to the ramp-up process.

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Interviews With Community Based Organizations (Continued)

Generally, the navigators and the CBOs feel well supported by the URep program through the legal support they receive and trainings. **The biggest areas that were noted for improvement were the call center and the lack of automations in the OWR portal. The call center was mentioned several times as having long wait times. Some of the CBOs mentioned that adding a help desk ticketing system could help reduce the call time and relieve some of the stress on the call center. The automations that were requested in the OWR portal were related to notifications around the request for more information.** While navigators do monitor the portal for changes in the status of their assigned individuals, it would assist the navigators if they were notified when the status of their assigned individuals changed to request more information.

The Portals

The URep program is supported by two systems created by Innovation Law Lab. The process from entry to referral is covered by the Oregon Worker Relief Portal (OWR Portal). After the individual has been deemed eligible, they are then input into the Case Management Portal (COE). When referrals are made to providers, the referrals are generated and managed in a connected portal call Equity Corp Provider Portal (EPP).

Technology Walkthrough

The OWR Portal receives information from either the call center or a navigator as a first step to getting an individual enrolled into URep. The call center individual or navigator inputs the key personal data into a new record. During this process, the individual seeking services answers questions about themselves and can provide documents supporting their claims through a unique token sent to the individual's smartphone requesting pictures of the documents. If they are unable to upload documents at that time, the navigator/call center individual can mark the area for the assigned navigator to complete. After the record is preliminarily completed, it is submitted to Oregon Worker Relief (OWR) where a processing team at Innovation Law Lab (ILL) processes for allocation. ILL reviews this queue once weekly unless they receive an email or instant message regarding someone who is currently detained or in immediate danger of deportation (prioritized by SB 1543, "priority"). Additional information that could be included in the record could be the association with other individuals in the system or additions of dependents. When records are completed, there is an area on the same screen that notes duplicates related to the full name, date of birth, phone number, and address. These duplicates are investigated for potential other household members seeking services (in which case they are grouped) or perhaps they are already receiving services and are re-routed.

Those that are priority are immediately, after the email or message to ILL by the call center or navigator, allocated to a navigator to finalize their application. For those that are in the queue at the time of review, the ILL team reviews new records for priority (this can be tagged in the record). The records in the queue then can be downloaded as an excel file. The entirety of the record is included in this download to allow the ILL team to review for any immediate eligibility red flags (not an Oregon resident, etc.) and then group records for allocation to navigators. Allocation of nonpriority records occurs when there is legal capacity and by the date the individual tied to the record entered the United States. Allocation occurs based on if they entered through a particular navigator, language spoken, and area they are located. ILL monitors capacity of the navigation organization through inquiries to the team leads at the CBOs. When asked about the need for additional capacity at the CBO level, ILL noted that capacity could be easily expanded and has been expanded as part of the URep program. Nonpriority allocations are sent out on a bi-weekly basis.

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Technology Walkthrough (Continued)

The record is then sent to the navigator's queue to complete. The navigator contacts the individual to complete the record and collect the necessary documents. If the application is getting in the way of services, the navigator can work with the ILL team to get the person enrolled using alternative documents approved by the ILL legal team. The navigator's queue contains a dashboard displaying statistics related to the time from "enqueued to submitted" and "enqueued to allocated" as well as "oldest unallocated navigation". This helps prevent individuals from being enrolled but not receiving services. Due diligence on individuals is generally expected to take less than two weeks. After documentation is completed, it is tagged as submitted within the record and it is sent back to ILL to complete review for eligibility.

The ILL team reviews the record of the individual along with the documentation submitted for eligibility. If the person is noted as priority through emails and messages, they are reviewed the same day when possible. If they are not priority, they are reviewed weekly. The review process first makes sure that any priority records are dealt with immediately. Otherwise, the review takes place weekly. During the review, the address, household information, income/explanation for no income, A number, and entry date are all reviewed against supporting documentation. ILL review team may also ask one of the legal experts if they are uncertain about documentation received. If the documentation is inadequate or if there is a question about the individual's eligibility, the ILL team then submits the record back to the navigator and tags it "Feedback Needed". The explanation for the request is noted in the notes to the record. If the person is ultimately determined to be ineligible after checking with their allocated navigator, a reason for their denial is sent via automated text message to the individual. If the person is determined to be eligible, they are then noted as "found eligible." The OWR fiscal agent team, separate from the ILL team, then reviews a limited view of those to be "found eligible" and approves the listing for referral.

Throughout the OWR Portal there is the dashboard showing the waiting time for individuals during the clearinghouse process. The dashboard is on every queue screen, putting in the place of priority and constant review.

Once the individual is approved, a new record for the individual is created in COE which uses the information from the OWR Portal to fill in a good amount of the information. Once they are entered into the COE, a legal review takes place to refer the individual to either a clinic or a full-service lawyer. If it is unclear what services the individual needs, the review is escalated to a legal team, if it is still unclear an assessment appointment with the individual is made. Referrals to clinics are done based on the availability of seats in a clinic which is monitored in the COE. Referrals to full-service lawyers are reviewed by the referred lawyer who can deny the referral if they are at capacity. This will generate another referral to another lawyer and so on.

Once the individual's legal needs are satisfied, no more referrals are generated, and an automated text message notifies the individual that their case is closed. If more information needs to be given to the individual regarding the closure of their case, a physical letter will be sent by the lawyer closing the case.

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Technology Walkthrough (Continued)

Billings for all these services are done monthly. Navigations are done on a per navigation basis and bills sent by the navigators are reviewed against the OWR Portal. Billings for legal services are capped at the mode hours (as determined by the history of the URep, modes are reviewed for modification). If additional scope (complications to the case like a criminal record) are identified, those can be requested with justification. If a separate legal matter is identified, a lawyer can request a new statement of work. Additionally, lawyers may charge travel expenses, postage, and other fees as needed. The bills are submitted through COE (or PDF if the provider has been grandfathered in) and the billing codes are reviewed against the explanations submitted by the lawyers. In both cases, the amount billed is reviewed against the cap and supporting documentation. Additionally, lawyers have an ethical obligation to bill correctly.

This is Just the Beginning

UREp's funding is provided in prepayments from the State of Oregon and OWR provides accounting for the program as its fiscal agent. As ILL holds the clearinghouse, many of the expenditures are paid for by ILL and passed through to OWR.

Financial Understanding

During the two years that ended June 30, 2024, there were \$17,200,000 in draw downs and \$7,592,353 in expenditures. There is an estimated additional \$2,730,837 established as a panel reserve for cases that were started during the period under audit but have not been completed.

In the Prosper Report provided by ECO in 2024, the largest expenditures were to ILL totaling \$3,890,357 related to clearinghouse services, software and technology, as well as legal services. Review of the ECO statements of work for ILL and the other integral parts of SB 1543 detail exact performance obligations (see walkthrough above).

The highest expense natural classification was to panel attorneys. ECO Panel Attorneys are required to sign agreements that are in alignment with the billing procedures noted above in the technology walkthrough.

The remaining statements of work related to the other parts of SB 1543 all align with the language used in the Senate bill.

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Summary of Recommendations

In addition to the data already collected, there is need for additional KPI goals and as described in “Collaboration is the Heart” we recommend:

1. Performing a lookback analysis over the waitlist for “enqueued to allocated” and “enqueued to submitted” and come up with a reasonable target for the next two years.

To address the call center capacity issue as described in “Responsiveness to the Community” we recommend:

2. Adding a help desk ticketing system to ensure the call center wait times are minimized.

To address the OWR Portal requests for more information notification as described in “Responsiveness to the Community” as well as notifications related to priority individuals as described in “The Portals” we recommend:

3. Adding in automated alerts for both requests for more information from navigators is needed (tagged as “feedback needed”) and when an individual record is noted as “detained” or “danger of deportation.”

To address the overall concern regarding legal capacity, we recommend:

4. Expanding the scope of the fund to push the pipeline of immigration lawyers through scholarships, incentives to nonimmigration lawyers to train as immigration lawyers or seeking other approaches to getting legal help.



March 31, 2025

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RE: Oregon Worker Relief Response to Performance Audit Findings

The Oregon Worker Relief Executive Committee appreciates the thorough and independent performance audit of the Universal Representation Fund program for the two-year period ending June 30, 2024. The audit was undertaken as part of SB 1543's rigorous reporting and accountability provisions.

Audit Findings

The audit found that

- the "Oregon Worker Relief administration [has] created a conducive environment for the URep program to flourish";
- "the overall setup and self-monitoring are meeting expectations"; and,
- the underlying systems "are robust and currently serving the needs" of the community.

The audit's findings reinforce the fact that 93% of people who have received support through the program believe that the services were both satisfactory and well-coordinated. The audit made four recommendations for improvement.

We concur with the audit's findings and accept and adopt the recommendations. We have begun implementing the recommendations as described below.

The people of Equity Corps of Oregon (ECO)—immigrants and refugees—are Oregonians from many walks of life. They have lived and worked in Oregon for decades and are deeply rooted in their communities. Some are newcomers who have fled violence, religious persecution, or war. For generations, Oregon has welcomed people who seek to build a better life for themselves and their families. As neighbors, business owners, taxpayers, and workers, immigrants and refugees are an integral part of Oregon's diverse and thriving communities and make extensive contributions that benefit all. However, our broken federal immigration system has left many of our immigrant neighbors in legal limbo, the impacts of which are felt by families, communities, employers, and workers statewide. Currently, attacks on immigrant communities have increased, sowing even additional fear and instability.

As the audit finds, Oregon has made tremendous progress building a new model of statewide universal representation since its passage in 2022. Immigrants and refugees, community groups, and legal professionals worked together to build the successful Equity Corps of Oregon program. Together, we have created a system that supports Oregonians who are excluded from full participation in their communities due to their immigration status. Universal Representation doesn't just serve people—it helps them succeed.

The program is widely popular and needed, but as the audit correctly identifies there are not enough attorneys available to meet the demand. The audit demonstrates that the primary challenge facing the program comes from a shortage of legal service providers in the state and nationwide.

Implementing Recommendations

We accept all of the audit's recommendations and are already taking steps to implement them. We have also established rigorous key performance indicators (KPIs) that this program is successfully meeting. For example, ECO's systems now automatically monitor more than 21 metrics each day to keep wait times within targets and achieve faster resolutions of referrals.

- **Waitlist Analysis & Targets** - The audit recommends a lookback analysis over the waitlist to come up with a reasonable target for the next two years. We concur. During a preliminary analysis, we reviewed each step of the waitlist process. Assuming sufficient resources are appropriated, the OWR EC has set a target of no more than 45 days of waiting for non-detained individuals seeking services. We believe this to be a feasible goal; as of the writing of this letter, the wait times are currently under 25 days.
- **Call Center Improvements** - The audit recommends adding a help desk ticketing system to minimize call center wait times. We concur and have begun implementing a ticketing system which will fully come online soon. Call center wait times are being monitored regularly and, as of the writing of this letter, the average hold time for ECO's statewide call center is just above 3 minutes. At peak hours, there is a 2% missed call rate. Callers are able to leave messages and center agents, in addition to answering calls, return calls each day. Improving call wait times is a key focus for ECO. We are monitoring various KPIs at the Call Center including total calls per day, average calls per day, outbound follow-up calls, average wait times, average handle times, and missed calls in order to make adjustments to staffing and call center agent training. ECO has plans to create additional online options for accessing case information, including the creation of a secure online portal should funds be appropriated for the next biennium. Such changes would help increase and streamline access to this critical program.
- **Automated System Alerts** - The audit recommends additional technology automations and alerts to support efficient navigations and

referrals. We concur and have begun designing additional automations, alerts, and trainings to move more navigations even faster than before. These systems are in the early design phase, with the objective of launching next quarter.

- **Legal Capacity Expansion** – The audit recommends initiatives to expand the scope of available providers. We concur and have begun implementation. We are committed to growing the legal capacity in Oregon to meet the needs of our communities and we have advanced several initiatives to build Oregon’s workforce of culturally competent, community-oriented legal professionals.

Clinics and workshops in Portland, Medford, Hermiston, Woodburn, Forest Grove, and Bend help immigrant and refugee Oregonians today, while the program trains a new generation of lawyers, paralegals, and accredited representatives to build capacity for tomorrow.

We have made and are making additional improvements to the popular [panel attorney program](#) to increase participation of lawyers who can provide immigration legal services. We are working on multiple approaches to recruit and train the next generation of immigration attorneys, paralegals, and accredited representatives including the [Immigrant Justice fellowship program](#) and the [Colibrí Fellowship for DOJ Accreditation](#).

Importantly, we are working to leverage the support of Oregon’s law schools and community colleges to expand service capacity and train the next generation of legal service providers by expanding existing programs such as ECO’s Friend of Court program and supporting law school clinics at [Willamette University College of Law](#) as well as designing new initiatives.

We anticipate the program’s continued growth and improvement. Oregon’s Universal Representation program, ECO, has been a beacon of hope to immigrant and refugee Oregonians statewide. It has served over 12,000 immigrants and refugees with both affirmative legal services and deportation defense. People in the detained representation program win the right to remain



at 8x the national average. And we are regularly and significantly achieving positive outcomes for people in non-detained removal proceedings.

We extend our sincere thanks to the audit team for their collaborative approach and valuable insights that will help us further strengthen this vital program.

Oregon Worker Relief Executive Committee

Martha Sonato, President

Isa Peña, Treasurer

Ricardo Lujan Valerio, Secretary

Adriana Miranda, Executive Committee Member

Ira Cuello Martinez, Executive Committee Member

Leland Baxter-Neal, Executive Committee Member

Maria Elena Guerra, Executive Committee Member

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Objective, Scope and Methodology

Objective

The objective of the audit was to evaluate OWR's administration of the Universal Representation Fund (the Program) for the two-year period ended June 30, 2024.

Scope

The audit focused on OWR's efforts to scale immigration legal services to immigrant Oregonians, assist individuals in the eligibility process and make appropriate conclusions on eligibility and connect and engage community providers in the delivery of universal representation.

Methodology

To address our objective and gain an understanding of OWR, we:

- Interviewed a majority of OWR leadership and other key stakeholders, including the OWR Executive Committee, grant recipients, contractors;
 - Determined how performance goals of the Program were defined and measured for each of the following program objectives:
 - Attorneys working at community-based organizations to provide culturally responsive services to members of the immigrant and refugee community;
 - Navigators working at community-based organizations to guide persons who are at-risk of deportation or need assistance with immigration matters into the Program;
 - Development of capacity and training to support navigation efforts through community-based organizations into the Program and culturally responsive services carried out by community-based organizations;
 - A client service fund to assist with fees associated with filings, interpretation and related costs in immigration matters;
 - A statewide universal navigation and support system, including a call center, to provide direct contacts and streamlined access for those seeking assistance with immigration matters; and
 - A clearinghouse to provide logistical support, income and Program eligibility screening, navigation review, case placement and technical assistance, and referral coordination, mentoring and supervision of attorneys working for community-based organizations.
 - Evaluated how capacity for providing legal services are managed and measured.
- Interviewed community navigators to understand how navigation works to match universal representation services to eligible immigrants needing services.
- Interviewed community navigator and legal providers to determine how the representation needs of eligible immigrants are matched and ultimately engaged with qualified legal representation.



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- Reviewed systems and documentation used for the eligibility process.
 - How individuals are entered by navigator for the eligibility determination process.
 - How open eligibility determinations are evaluated for timing - i.e. period of time between when referred by navigator to when the eligibility determination is made.
 - Timing between eligibility determination and individual assessment.
 - Referrals/placements - how time period is tracked between when an individual assessment is completed and when they are placed with a community provider.
 - From when individual is placed, how is level of engagement/effectiveness of representation tracked and measured by OWR.
- Reviewed systems and documentation utilized to track and monitor universal representation services being provided to eligible immigrants.
 - expectations placed on community providers for timeliness, effectiveness, etc. of providing representation services.
- Reviewed contracts with community-based organizations tasked with navigation, as well as, attorneys providing legal services, and capacity grants.
- Reviewed the billing and invoicing of services to OWR by organizations and firms providing universal representation services to OWR.
- Evaluated fraud procedures in place, especially as it relates to participant support, including existence of a whistleblower policy.
- Evaluated and measured performance data benchmarks regarding:
 - Individual engagement
 - Number of individuals referred to the program for eligibility determinations.
 - Number of individuals determined to be eligible and referred to community providers for engagement.
 - Number of universal representation hours provided (total).
 - Universal representation hours provided per individual.
 - Community providers:
 - Number of community providers engaged and trained for universal representation.

Internal Control Review

We determined that the following internal controls were relevant to our audit objective.

Control Environment

- We reviewed oversight body management of internal controls.
- We reviewed management's establishment of an organizational structure, responsibilities, and delegation of authority to achieve OWR's mission.
- We reviewed management's commitment to recruit, develop, train, and retain competent organizations, contractors, and stakeholders.

Risk Assessment

- We interviewed staff and other interested parties, statutes, and policy guidance.
- We considered whether management identifies, analyzes, and responds to risks related to achieving the defined objectives.

Internal Control Review (Continued)

- We considered whether management identified, analyzed, and responded to significant changes that could impact the internal control system.

Information and Communication

- We evaluated whether management used quality information and whether internally and externally management communicated the necessary quality information.

Monitoring Activities

- We evaluated OWR's role in monitoring compliance, performance, funding, and spending.
- We considered whether management has established and operated monitoring activities to monitor the internal control system and evaluate the results.
- We considered whether management remediates identified internal control deficiencies on a timely basis.

No deficiencies were identified in this report.

We conducted this performance audit in accordance with generally accepted *Government Auditing Standards*. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We sincerely appreciate the courtesies and cooperation extended by officials and participants in the Universal Representation Program during the course of this audit.

Clark Nuber P.S.

Certified Public Accountants
April 2, 2025

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