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# Discussion Paper on Multilanguage Interpretation and Translation Services for Clinics and SLASSs

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*December, 2016*

## **1. Introduction / Purpose**

The purpose of this paper is to initiate discussions with clinics on how to improve the effectiveness and accountability of interpretation and translation services through the following:

- Ensuring optimal usage of available finite funding based on client and community need
- Effective oversight of Multilingual Community Interpreter Services (MCIS) through a transparent invoicing and payment process
- Promoting more effective use of MCIS services by clinics and SLASSs
- A transparent funding allocation process for clinics and SLASSs to facilitate effective budgeting and business planning for interpretation and translation services

## **2. Key principles for discussion**

- Interpretation and translation services are important for ensuring the delivery of high quality legal aid services to clinic clients and communities. The creation of an Interpretation and Translation Fund, and the use of the MCIS services offered through that Fund have improved the practice of clinic law in Ontario.
- Development of an effective and administratively efficient process to ensure that funding is used effectively by clinics and SLASSs; and the accountability and magnitude of expenditures is appropriate in light of finite resources
- Development of a funding allocation or funding flow for interpretation and translation funding to clinics and SLASSs within which clinics can manage their use of services such that funds available are used effectively for services across the system where it is needed most
- Development of a re-allocation or funding overview process that ensures the fund is put to maximum use each year and distributed equitably based on client need
- Development of an efficient reporting framework and quality measurement tracking for interpretation and translation services

## **3. Background**

- The overall purpose of the provision of interpretation and translation services is to provide consistent access to clinic services across the province for non-English speaking communities
- Funding for interpretation and translation services to clinics and SLASSs through a dedicated budget was initiated in 2011 based on \$1 million in new funding from the

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province, set aside for improving access to interpretation and translation services to clinic clients. The new money was divided up as follows:

- \$600,000 divided amongst the Regions for interpretation and translation services to clinics through the MCIS contract. There was no allocation by region or by clinic.
  - \$300,000 as a holdback for covering over-expenditures by clinics and SLASS in any region, and various other uses related to clinic/SLASS-related language requirements.
  - \$100,000 transferred to the French Language Services budget for general FLS programming, including staff training, translation, French clinic services, etc., and for special project funding including bilingual articling and paralegal student funding for clinics, development of specialty clinic bilingual websites and French PLE, etc.
- LAO began purchasing clinic translation and interpretation services through MCIS in 2011-12. The contract included clinic and SLASS use of the services as well as services required by LAO's Client and Lawyer Support Centre (CLSC). Funding for services used by the CLSC is separate from the \$1million dedicated to clinic and SLASS interpretation and translation services and is not a part of these discussions.
  - The most recent contract for multi-language services took effect August 2013, and expired March 2015, with an option to renew for an additional year, on mutual consent of both parties. In March 2015, the contract was renewed for the additional year, and further renewed for 6 months effective April 1, 2016. A new 3-year contract is in development with a target starting date of January 2017.
  - Since there was no baseline from which to gauge the anticipated spending per clinic, this funding has been managed centrally by LAO and there was no cap placed on the total amount any clinic could spend per year on interpretation and translation services.
  - The existing process has resulted in some inconsistencies in the way the services are used but has established a general baseline from which the overall budget and an estimated cap can be calculated.
  - Under the most recent contract, LAO managed the MCIS contract and paid MCIS directly for all services provided by MCIS for clinics, SLASSs, and LAO. However, MCIS tracked usage by organization and provided a listing of services provided in the monthly invoice.
  - LAO held some preliminary discussions with the ACLCO in September 2015 about the need to develop a discussion paper to elicit clinic feedback. Efforts have been made to include components of those preliminary discussions in this paper.

#### **4. Need for fiscal management**

- LAO's spending on interpretation and translation services used by clinics in 2016-17 is on track to exceed LAO's overall budget for such services by over \$200,000. The growth in clinics' interpretation and translation usage, increasing client load as a result of the expanded financial eligibility, and financial pressures in 2016 are driving the need to better manage available funding for the required services.
- Creating a clinic allocation model and a transparent, user based billing system would make clinics more accountable for expenditures for services used and would provide them the ability and flexibility to plan and manage their interpretation and translation budgets.

- More control over and timely knowledge about interpretation and translation expenditures may require clinics to pursue more cost-effective services, as for example, the following:
  - Clinics may have to rely more on phone interpretation over face to face interpretation. In 2015/16, while phone interpretation cost \$1.49/minute compared to \$0.69/min to \$0.89/min for face to face interpretation, face to face had a minimum charge of 2 hours and may incur travel costs. Travel costs represented approximately \$36K last fiscal year.
  - In an allocation model, clinics / SLASSs who have disproportionately used a higher amount of the interpretation and translation budget could see a significant reduction in budget / allocation. The average provincial usage in 2015/16 was \$13K per clinic. Due to a number of outliers (high users), the median usage was \$5.8K.
  - Based on FY2015/16 volumes and average costs, if all interpretation services had been provided via telephone interpretation the total cost would have been approximately \$200K less. This indicates that there may be cost-effectiveness gains through shifting of service type, as long as client services are maintained.

## 5. Considerations/Issues

- Multi-language interpretation and translation services have been utilized by 68 clinics and 6 SLASSs over the past 5 years. Expenditures for the past five years were as follows: (see Appendix A for details of 2013/14 to 2015/16 expenditures by clinic):

2011-12	2012-13	2013-14	2014-15	2015-16
\$239,982	\$560,560	\$652,308	\$783,102	\$826,774

- As clinic and SLASS users do not directly pay for services used, , there is an accountability gap, there is no measure of effectiveness of the various types of services, and no apparent motive for clinics and SLASSs to manage their usage. In recent discussions with clinics, some clinics have identified that they had not scrutinized the MCIS invoices as diligently as they could have, if at all. Clinics and SLASSs receive 2 invoices monthly which identify their usage, and they are required to sign off on a log for the interpreters that are on-site. Clinics are the only party in a position to scrutinize them.
- LAO has no mechanism to confirm what services are provided at the clinics other than the invoices received. The invoices alone are not sufficient enough to determine whether any individual expenditure is accurate.
- LAO now has five years' data to form a historical baseline from which funding allocations can be developed, taking into account changing client use patterns, expanded eligibility, and demographics. At the same time, it should be noted that some clinics have only recently begun using these services and the expansion of financial eligibility is expected to create a change in usage patterns over the coming years.

## 6. Service oversight through transparent invoicing and payment process

- Under the current process, LAO manages the MCIS contract and pays MCIS directly for all services provided for clinics, SLASSs, and LAO. MCIS tracks usage by organization and provides monthly invoices to LAO.
- Until FY2016/17, clinics have had no specific allocations or spending limits on interpretation and translation services they used. LAO had not previously posted the in-year status of the Interpretation and Translation fund. Unlike legal aid certificates, services provided by clinics do not have a cap for interpretation and translation per client or category of service.
- In light of the expanding use of services and finite nature of the total funds available for interpretation and translation services, clinics need to be able to monitor their use against the available budget as they do for other services and products they purchase, and take steps to address potential service inefficiencies and unexpected usage patterns.

### Options:

#### Direct invoicing and payment:

- LAO would provide funding to clinics based on a funding application. As with other operating funding, there would be an annual allocation, provided in equal instalments.
- MCIS would invoice each clinic monthly and the clinic would make payments for the services they use.
- The option would provide clinics an independence for decision making and prioritization of how they spend their interpretation and translation budget.
- Any issues respecting billing and service issues would be addressed between the 2 parties directly involved.
- As LAO conducted an RFP for the interpretation and translation services, and the contract is between MCIS and LAO, all interpretation and translation services purchased with the respective allocations must be through MCIS, unless there are mitigating circumstances such as lack of services in the language or format required for the client or other reason why the clinic or SLASS cannot be accommodated by MCIS. The RVP must be notified prior to such service being purchased.
- There would be a loss of administrative efficiency with 77 clinics being invoiced and paying separate bills rather than one central invoice and one payment.
- This approach would be in line with clinics' and SLASSs' need to scrutinize monthly invoices, while transferring some administrative responsibility from LAO to individual clinics and SLASSs. .
- LAO expects that funds provided for interpretation and translation would be used only for that purpose. If clinics spent more for interpretation and translation than the amount funded, the over-expenditure would be offset by: under-expenditures in other non-personnel funding, the clinic would apply for more funding from a provincial holdback of interpretation and translation funding, clinic may have to cease to provide interpretation and translation services, or clinic would use FEG funding respecting the services provided to FEG clients.

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- If clinics spent less, the under-expenditure would not be used against over-expenditures in other funding categories and would comprise part of next year's clinic allocation or would be recovered by LAO as surplus or for use by other clinics/SLASSs that are in need.
  - The funding would be treated similar to legal disbursement funding in that it is kept in a separate fund. In-year increases would be submitted and reviewed based on factors driving the increase and available funds. The fund would be topped up to the pre-determined budget allocation each fiscal year.
  - This method could decrease flexibility and potentially lead to an allocation of resources that is less in line with actual need and current usage. A clinic's allocation would be based on its previous usage, but if that clinic's work changed (i.e.: clinic wanted to reach out to communities that did not have English as a first language) the clinic would not have the funds to do this work. Conversely, if a clinic ceased an outreach initiative and its translation needs decreased, it would have a surplus in interpretation and translation funds.

#### Invoicing and payment coordinated through LAO:

- As the current practice, invoicing through LAO, but with monthly report to the clinics to provide for tracking of services used. Payment to MCIS would be by LAO, with monitoring against the clinics' allocations or respective cap. LAO would provide a quarterly or monthly report to the clinic to inform them of the status of use.
- Continued administration by LAO with a need to coordinate with individual clinics and SLASSs with respect to monitoring and problem resolution.
- When a clinic reaches its cap, resolution options could include the following: clinic would be expected to pay for overage from their other operating budgets, clinic would apply for more funding from a provincial holdback of interpretation and translation funding, clinic would cease to provide interpretation and translation services, clinic would use FEG funding respecting these services provided to FEG clients, and other options to be explored.

#### Invoicing and payment through a 3<sup>rd</sup> party, such as ACLCO or other structure

- The administration of invoicing, payment and tracking could be outsourced to a 3<sup>rd</sup> party or group that would take responsibility for administering the Fund and overseeing its usage. (Option to be explored as the contract for services is directly between LAO and MCIS).
- Subcontracting through a 3<sup>rd</sup> party or additional intermediary would most likely result in additional costs for the administration,
- Not all users of MCIS, including SLASSs, are part of any one association (i.e. ACLCO)
- Interpretation and translation funding impacts the provision of client service across the province; LAO has responsibility and obligation to monitor and provide oversight for client services. Release of funds to a third party which would release to clinics and SLASSs would create a further distance between LAO and usage of the fund.

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Creation of an LAO-clinic oversight committee with authority to determine funding distribution.

- This committee would include LAO staff and clinic representatives, appointed by the ACLCO, and users of the fund who are not part of the ACLCO. Clinic reps would come from a range of clinics, including those that have the largest immigration and non-English speaking populations:
- An oversight committee would monitor usage and educate clinics through usage protocols to help guide cost-effective service purchases.
- The committee would meet quarterly to review the status of the total interpretation and translation budget and communicate with the clinic system on usage patterns, funding expended to date, and identification of funding shortages in specific areas. The committee would, if necessary based on cost projection, impose limits on access to the Fund.
- This approach would engage clinics in the effective management of these resources, while retaining LAO's role in overseeing the overall use of this provincial resource.

Other option/s:

- The above options were developed through discussions at LAO and some ACLCO suggestions in September 2015. LAO would like to invite clinics to suggest other options that seek to achieve the principles identified, and to provide feedback on the options above.

## 7. Cost-effective use of MCIS services

- Based on the new contract, all users need to be made aware of the MCIS contract, the relative costs and cost benefit of each type of service, the provider's policies and billing practices, rules, and best practices to ensure the most cost-effective services are used and to ensure the prudent use of public funds, regardless of who pays the bill.
- See tabulation of 2015-16 costs by service type, below:

### LAO Expenditures on Clinic Interpretation and Translation Services, 2015-16, by Service Type

Service Type	Number of Assignments	Pre-tax \$	% of Total Cost	Average Cost of Service	Median Cost of Service
Face-to-face	4,952	\$517,802	65.0%	\$105	\$80
Immediate Phone	3,698	\$97,721	12.3%	\$26	\$15
Planned Telephone	256	\$17,301	2.2%	\$68	\$67
On-site	126	\$22,747	2.9%	\$181	\$156
Other(Video/Captioning)	88	\$7,020	0.9%	\$80	\$22
Translation	519	\$133,791	16.8%	\$258	\$124
<b>TOTAL (pre-tax)</b>	<b>9,639</b>	<b>\$796,382</b>		<b>\$83</b>	

## 8. Approaches to funding allocations

- Options to allocate funding include consideration for such factors as historical spending, standardized (average and median) costs for the various service types, volume of annual services used by individual clinics, clinic FTE, and non-English speaking at home.
- The attached allocation models are developed based on some of the above factors.
- The total provincial funding that will be available for interpretation and translation services in future years is yet to be determined.
- Clinic concern with allocations, raised in September 2015 by ACLCO:
  - If funds just given to individual clinics, no guarantee that it will be used for improving translation/interpretation.
    - LAO agrees that this is a possibility. Clinics have a fiduciary duty to ensure that funding provided is used for the intended purposes. Managing the fund similar to legal disbursements is an option to keep the funding restricted.
  - Clinic needs can vary from year to year so a fixed amount can be problematic, e.g. hiring or losing a staff member who speaks another language can make a big difference, changes in the community demographics can have a big impact e.g. refugee resettlement.
    - LAO agrees that usage changes. There are a number of possibilities to address short term fluctuations in usage (e.g. holdback amounts similar to legal disbursements)
  - With clinic level allocations, will clinics be bound to use MCIS services, or can they use other service providers?
    - Clinics and SLASSs are bound to use MCIS services unless a particular timely service is not offered or there is another mitigating circumstance. Clinics and SLASSs are expected to notify LAO prior to undertaking for services outside MCIS.
  - We don't really have a baseline after 3 years because usage is changing, some clinics have only recently started to make use of the service and some clinics may need additional services because growth patterns will change due to needs resulting from additional Financial Eligibility funded staff.
    - If the clinics' funding for interpretation and translation is insufficient for services as a result of the increase in clients resulting from the expansion of financial eligibility, funding received specifically for addressing financial eligibility needs may be used for these services.
- In addition to the models below, clinics are invited to provide suggestions that would respond most effectively to the system-wide need.

### Allocation Models:

- 1) Historical Spending Levels (Appendix B):
  - This allocation model is based on the most recent 3 years' activity, 2013/14 to 2015/16 expenditure levels for each clinic and SLASS and provides allocations

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reflecting the 3-year baseline for interpretation and translation funding utilized by each clinic and SLASS.

- In addition, the allocation model is refined to provide a nominal \$1000 allocation per \$800K provincial allocation to all those clinics that have not used the services in the past or used these services very sparingly,.
- The strength of this model is that it is based on the best estimate of interpretation service needs as shown by the most recent usage history, however it does not take into account changing demographics, increased clinic funding, the cost-effectiveness of the services used, or the gap in use of the services by those clinics that have not accessed the service.

2) Historical usage patterns adjusted for standardized service costs (Appendix C):

- The allocation model is based on the 2015-16 usage levels by clinics and SLASSs, adjusted by the median cost of each of the key services across the clinic system.
- In the model, immediate and planned telephone services are combined, at a median cost of \$15, and face-to-face and on site interpretation services are combined at a median cost of \$80. The median cost of translation services was \$124 per assignment.
- This model attempts to standardize the cost of each service using the median, or mid-way point of all services used during 2015-16. It indicates that there may be some gains in cost-effectiveness if the duration of services used is confined or restricted to the median level. For example, per Appendix C, the cost of services in 2015-16 would be reduced from \$783,102 to \$511,635 plus tax, or approximately \$578,000 using this standard.
- Clinics and SLASSs can explore savings through the promotion of those services that are most cost effective. For example, the average cost of face-to-face interpretation in 2015/16 was \$105 per service, and immediate phone interpretation was only \$26 per service. Clinics can explore the most cost-effective and most efficient services according to their needs and funding allocation. In order to maximize the use of the available funds, LAO will solicit clinic feedback respecting best practices that can be shared with the clinic system.

3) Historical usage of services irrespective of cost per service (Appendix D):

- This allocation model is based on the 2015-16 usage levels by each clinic and SLASS, and does not differentiate between the costs of the various service types. It is based on the volume of activity (number of assignments) used by each clinic and SLASS in 2015-16.
- The allocation model is refined to provide a nominal 10 assignments to all those clinics that had not used the services in the past or used these services very sparingly.

4) Allocation based on clinic FTE numbers

- This allocation is based on the notion that there is a proportional ratio between Full-time equivalent (FTE) counts in clinics and the number of clients served. There are a number of weaknesses with using this proportion, as client to FTE ratios change with type of law, specialty clinic initiatives, etc. Analysis of the allocation based on FTE is shown in a column in Appendix E.



## 5) Summary of above models

- The results of the 4 allocation models above have been summarized in Appendix E. There are significant variations among models and discussions are required to determine which model or perhaps another model should be employed.
- Discussions with clinics may yield further options for allocations.
- For reference to a summary of the clinic and SLASS use of interpretation services by language, please refer to Appendix F.

### Other allocation options:

## 6) Allocation for disproportionately high users only

- In 2015-16, 14 users utilized 43% of the interpretation and translation budget. One option for consideration is to provide capped allocations to those high users only, and have available the remainder of funds to the minor users.

## 7) Allocation restricted to 75% of available budget

- In order to address unexpected client requirements for services, spikes in immigration patterns FEG uptake, 25% of the total budget would be put aside for in-year adjustments to clinic allocations, as required.

## 9. Re-allocation models

LAO and the clinics operate in an environment of change. Over the last decade many clinics have seen a change in their demographics, including the volume of non-English speaking clients. In the most recent years the clinics have seen new investments from LAO for Financial Eligibility which will yield new clients and new services, including immigration services which can be very reliant on interpretation and translation services. To ensure that no clinic is left behind and unable to meet the client needs of tomorrow by a decision today LAO is presenting, for discussion purposes, the models below for future re-allocations of interpretation and translation funding. The main principle in the models below is to fully optimize the use of available funds.

### 1) Alignment of Interpretation and Translation allocation to non-English speaking population of catchment area.

- Assumes that the most equitable allocation is based on the non-English speaking allocation within clinic catchment areas. (e.g. if all clinics required interpretation and translation services on a finite budget that the equitable decision would be to ensure the funding distribution matches the non-English speaking population distribution.)
- This re-allocation model does not take into consideration variances in levels of work (summary advice, full representation) and it does not take into consideration non-English speaking clients not captured within the census.

Below is an example chart of 8 clinics including their interpretation and translation funding and their non-English speaking population.

	<b>Current FY Funding</b>	<b>%</b>	<b>Non-English Pop.</b>	<b>%</b>	<b>% Difference</b>
<i>Clinic A</i>	\$58,000	23%	16,239	2%	-22%
<i>Clinic B</i>	\$3,000	1%	34,380	3%	2%
<i>Clinic C</i>	\$25,000	10%	403,430	40%	30%
<i>Clinic D</i>	\$0	0%	296,775	29%	29%
<i>Clinic E</i>	\$0	0%	88,660	9%	9%
<i>Clinic F</i>	\$148,000	59%	43,835	4%	-55%
<i>Clinic G</i>	\$12,000	5%	127,775	13%	8%
<i>Clinic H</i>	\$4,000	2%	555,280	3%	2%
	\$250,000		1,011,094		

Clinic D, which has a large non-English speaking population and has received FEG funding, creates new immigration services and incurs \$6,000 in Interpretation and Translation expenses. Clinic F has the largest difference between amount funded and non-English speaking population; \$6,000 is adjusted from clinic F's next year allocation to allow clinic D to support their new clients.

	<b>Future FY Funding</b>	<b>%</b>	<b>Non-English Pop.</b>	<b>%</b>	<b>% Difference</b>
<i>Clinic A</i>	\$58,000	23%	16,239	2%	-22%
<i>Clinic B</i>	\$3,000	1%	34,380	3%	2%
<i>Clinic C</i>	\$25,000	10%	403,430	40%	30%
<i>Clinic D</i>	\$6,000	2%	296,775	29%	27%
<i>Clinic E</i>	\$0	0%	88,660	9%	9%
<i>Clinic F</i>	\$142,000	57%	43,835	4%	-52%
<i>Clinic G</i>	\$12,000	5%	127,775	13%	8%
<i>Clinic H</i>	\$4,000	2%	555,280	3%	2%
	\$250,000		1,011,094		

Question:

A. Is there a better objective allocation benchmark than non-English speaking population that is easily accessible?

2) Alignment of Interpretation and Translation allocation based on Full Time Equivalents.

- Assumes that the volume of Interpretation and Translation is limited by the capacity of staff regardless the proportion of the non-English speaking population within a clinic catchment area.

	<b>Current FY Funding</b>	<b>%</b>	<b>FTE</b>	<b>%</b>	<b>% Difference</b>
<i>Clinic A</i>	\$58,000	23%	7	11%	-12%
<i>Clinic B</i>	\$3,000	1%	5	8%	7%
<i>Clinic C</i>	\$25,000	10%	8	13%	3%
<i>Clinic D</i>	\$0	0%	3	5%	5%
<i>Clinic E</i>	\$0	0%	10	16%	16%
<i>Clinic F</i>	\$148,000	59%	19	30%	-29%
<i>Clinic G</i>	\$12,000	5%	11	17%	13%
<i>Clinic H</i>	\$4,000	2%	7	11%	10%
	\$250,000		63		

Clinic D, E, G and H all start new immigration services which incur substantial increases in interpretation and translation costs. Clinic F has the largest gap in funding and FTE allocation. The first part of the re-allocation comes from clinic F until the difference between funding and FTE allocation matches clinic A. Funding for both Clinic A and F are reduced simultaneously to ensure no inequity.

	<b>Future FY Funding</b>	<b>%</b>	<b>FTE</b>	<b>%</b>	<b>% Difference</b>
<i>Clinic A</i>	\$50,000	20%	7	11%	-9%
<i>Clinic B</i>	\$3,000	1%	5	8%	7%
<i>Clinic C</i>	\$25,000	10%	8	13%	3%
<i>Clinic D</i>	\$10,000	4%	3	5%	1%
<i>Clinic E</i>	\$25,000	10%	10	16%	6%
<i>Clinic F</i>	\$97,000	39%	19	30%	-9%
<i>Clinic G</i>	\$30,000	12%	11	17%	5%
<i>Clinic H</i>	\$10,000	4%	7	11%	7%
	\$250,000		63		

## 10. Next Steps:

- Consultations with clinics on these and other models for allocations and effective administration of interpretation and translation expenditures are targeted to begin in December 2016 and completed by the end of February 2017.

## 11. Input sought:

**LAO welcomes comments and feedback from all clinics and SLASS's pertaining to the options presented in this paper, as well as ideas for other**

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**options around all aspects of the interpretation and translation funding allocations, accountability, and billing process.**

Some questions to consider are as follows:

1. How can the effectiveness and administrative efficiency of the interpretation and translation funding process be improved to enhance accountability for funding expended, and maximizing the use of the finite resources available for these services?
2. Are there funding allocation models or processes (those in the paper or others) that would better facilitate clinics and SLASSs ability to manage and budget for their annual use of interpretation and translation services?
3. Does the re-allocation model or funding overview process noted in the paper enhance the system's ability to ensure that the fund is put to maximum use each year, without going over budget? Is there a better model?
4. How can LAO and the clinics get the maximum use of the funding available for interpretation and translation services?
5. Other comments about the paper, options, or recommendations?

## APPENDIX A: Clinic Interpretation and Translation Fund expenditures, 2013-14 to 2015-16 and the 3-year average

		2013-14	2014-15	2015-16	3-year average	% of Total
<b>Central &amp; East</b>						
CJPR	Clinique juridique populaire de Prescott et Russell	-	-	-	-	0.00%
CLSOC	Community Legal Services (Ottawa Centre)	26,857	26,034	26,876	26,589	3.53%
CORR	Correctional Law Project	-	-	-	-	0.00%
CSCV	Centre des services communautaires de Vanier	85	81	283	150	0.02%
DUR	Durham Legal Clinic	2,019	1,395	1,741	1,718	0.23%
CALC	Community Advocacy and Legal Centre	3,583	630	504	1,572	0.21%
KING	Kingston Community Legal Clinic	1,810	1,286	214	1,103	0.15%
LAN	Lanark, Leeds & Grenville Legal Clinic	-	42	-	14	0.00%
LCCLC	Lake County Community Legal Clinic	-	-	-	-	0.00%
NCLC	Northumberland Community Legal Centre	28	367	858	418	0.06%
PETE	Peterborough Community Legal Centre	310	538	552	466	0.06%
REN	Renfrew County Legal Clinic	-	1,289	230	506	0.07%
RLS	Rural Legal Services	-	-	-	-	0.00%
SDG	Clinique juridique Stormont, Dundas And Glengarry Legal Clin	288	-	116	135	0.02%
SIMCO	Community Legal Clinic - Simcoe, Haliburton, Kawartha Lakes	1,627	2,324	1,186	1,713	0.23%
SOTT	South Ottawa Community Legal Services	31,177	43,790	25,775	33,581	4.45%
WEST	West End Legal Services	4,653	5,312	8,701	6,222	0.83%
U of Ottawa	U of Ottawa SLASS	1,500	2,857	5,812	3,390	0.45%
Queen's	Queen's University SLASS	114	600	314	342	0.05%
<b>Total - Central &amp; East</b>		<b>74,050</b>	<b>86,544</b>	<b>73,162</b>	<b>77,919</b>	<b>10.33%</b>
<b>North</b>						
ALGO	Algoma Community Legal Clinic	-	684	135	273	0.04%
CJGN	Clinique Juridique Grand Nord	-	-	-	-	0.00%
ELAK	Elliot Lake & Northshore Community Legal Clinic	-	103	4	36	0.00%
KEEW	Keewaytinok Native Legal Services	1,562	757	107	809	0.11%
KINNA	Kinna-Aweya Legal Clinic	304	1,903	1,624	1,277	0.17%
MAN	Manitoulin Legal Clinic	14	-	-	5	0.00%
NIP	Nipissing Community Legal Services	-	-	-	-	0.00%
NWCLC	Northwest Community Legal Clinic	-	-	-	-	0.00%
SUD	Sudbury Community Legal Clinic	-	4	-	1	0.00%
TTLC	Timmins-Temiskaming Community Legal Clinic	-	-	75	25	0.00%
<b>Total - North</b>		<b>1,880</b>	<b>3,451</b>	<b>1,945</b>	<b>2,425</b>	<b>0.32%</b>
<b>GTA</b>						
ALST	Aboriginal Legal Services of Toronto	-	222	-	74	0.01%
CFT	Centre francophone de Toronto	1,529	1,358	941	1,276	0.17%
CSSP	Centre For Spanish-Speaking Peoples	9,094	18,844	21,715	16,551	2.19%
DOWN	Downsview Community Legal Services	9,748	9,944	13,495	11,062	1.47%
EAST	East Toronto Community Legal Services	8,807	3,965	2,148	4,974	0.66%
FLEM	Flemingdon Community Legal Services	30,729	53,151	55,060	46,313	6.14%
CLCYR	Community Legal Clinic of York Region	12,132	16,937	12,718	13,929	1.85%
JANE	Jane Finch Community Legal Services	7,321	6,805	8,199	7,442	0.99%
KENB	Kensington-Bellwoods Community Legal Services	17,132	28,126	20,914	22,057	2.93%
MCSA	Metro Toronto Chinese & South East Asian Legal Clinic	2,143	14,120	3,952	6,738	0.89%
MISS	Mississauga Community Legal Services	6,588	5,100	11,411	7,699	1.02%
NLS	Neighbourhood Legal Services	13,348	19,352	18,648	17,116	2.27%
NPD	North Peel & Dufferin Community Legal Services	10,913	6,821	14,829	10,854	1.44%
PCLS	Parkdale Community Legal Services	131,048	140,079	174,444	148,524	19.70%
REX	Rexdale Community Legal Clinic	37,262	53,995	60,340	50,532	6.70%
SALCO	South Asian Legal Clinic of Ontario	5,982	14,568	8,490	9,680	1.28%
SCAR	Scarborough Community Legal Services	7,870	12,201	12,321	10,797	1.43%
SETOB	South Etobicoke Community Legal Services	14,950	11,724	9,899	12,191	1.62%
WILL	Willowdale Community Legal Services	12,700	16,823	22,432	17,319	2.30%
WSCAR	West Scarborough Community Legal Services	25,856	26,977	29,838	27,557	3.65%
WTOR	West Toronto Community Legal Services	19,183	15,249	11,139	15,190	2.01%
YCS	Unison Health and Community Services	19,128	23,864	31,015	24,669	3.27%
DLS	Downtown Legal Services (U of T SLASS)	16,798	17,533	14,005	16,112	2.14%
CLASP	Community Legal Assistance (Osgoode SLASS)	11,540	16,585	22,933	17,019	2.26%
<b>Total - GTA</b>		<b>431,800</b>	<b>534,342</b>	<b>580,886</b>	<b>515,676</b>	<b>68.39%</b>

		2013-14	2014-15	2015-16	3-year average	% of Total
<b>Southwest</b>						
BHN	Community Legal Clinic - Brant, Haldimand, Norfolk	649	395	-	348	0.05%
CKLC	Chatham-Kent Legal Clinic	-	-	-	-	0.00%
CLAS	Community Legal Assistance Sarnia	-	-	-	-	0.00%
CLSNS	Community Legal Services Of Niagara South	383	464	-	282	0.04%
EOLC	Elgin-Oxford Legal Clinic	484	70	163	239	0.03%
GBLC	Grey-Bruce Legal Clinic	-	794	-	265	0.04%
HAM	Hamilton Community Legal Clinic	38,064	39,528	41,891	39,828	5.28%
HCLS	Halton Community Legal Services	2,498	3,311	4,920	3,576	0.47%
HPLC	Huron/Perth Legal Clinic	-	-	-	-	0.00%
LAW	Legal Assistance of Windsor	10,211	18,968	21,724	16,968	2.25%
NLSLM	Neighbourhood Legal Services (London & Middlesex)	541	248	574	454	0.06%
NN	Niagara North Community Legal Assistance	643	815	-	486	0.06%
WATER	Waterloo Region Community Legal Services	7,752	16,398	20,581	14,910	1.98%
WINE	Windsor-Essex Bilingual Legal Clinic	2,552	480	227	1,086	0.14%
WLC	Legal Clinic of Guelph and Wellington County	9,235	6,241	4,175	6,550	0.87%
Western	Univesity of Western Ontario SLASS	6,427	5,495	3,081	5,001	0.66%
Windsor	University of Windsor SLASS	927	2,799	5,997	3,241	0.43%
<b>Total - Southwest</b>		<b>80,366</b>	<b>96,007</b>	<b>103,333</b>	<b>93,235</b>	<b>12.36%</b>
<b>Specialty</b>						
ACE	Advocacy Centre for the Elderly	2,415	3,061	1,801	2,426	0.32%
ALCL	African Canadian Legal Clinic	1,947	373	-	773	0.10%
ACTO	Advocacy Centre for Tenants - Ontario	5,244	3,508	8,190	5,648	0.75%
ARCH	ARCH Disability Law Centre	1,579	6,770	1,433	3,261	0.43%
CELA	Canadian Environmental Law Association	9,238	10,165	10,201	9,868	1.31%
CLEO	Community Legal Education Ontario	9,027	1,060	-	3,362	0.45%
HALC	HIV & AIDS Legal Clinic (Ontario)	4,304	5,375	7,605	5,761	0.76%
IAVGO	Industrial Accident Victims Group Of Ontario	14,443	14,020	14,563	14,342	1.90%
ISAC	Income Security Advocacy Centre	525	1,694	1,714	1,311	0.17%
IWC	Injured Workers' Consultants	5,585	7,294	9,631	7,503	1.00%
JUST	Justice For Children And Youth	2,360	1,546	3,412	2,439	0.32%
LSHC	Landlord's Self Help Centre	4,163	5,313	4,938	4,805	0.64%
TDC	Tenant Duty Counsel Program	1,363	1,240	1,246	1,283	0.17%
WORK	Toronto Workers' Health & Safety Legal Clinic	2,018	1,338	2,714	2,023	0.27%
<b>Total - Specialty</b>		<b>64,210</b>	<b>62,759</b>	<b>67,448</b>	<b>64,806</b>	<b>8.59%</b>
<b>Total - all clinics</b>		<b>652,308</b>	<b>783,102</b>	<b>826,774</b>	<b>754,061</b>	<b>100.00%</b>

## APPENDIX B: Allocation Model Using 3-Year Average Expenditure Levels from 2013/14 to 2015/16, with a Nominal Allocation of \$1000 per \$800K to Clinics with Minimal Historical Use of Services

	Clinic/SLASS	Average Costs 2013/14 to 2015/16	% of total	Calculated Percentage for Model
	<b>Central &amp; East</b>			
CJPR	Clinique juridique populaire de Prescott et Russell	\$ -	0.00%	0.13%
CLSOC	Community Legal Services (Ottawa Centre)	\$ 26,589	3.53%	3.42%
CORR	Correctional Law Project	\$ -	0.00%	0.13%
CSCV	Centre des services communautaires de Vanier	\$ 150	0.02%	0.13%
DUR	Durham Legal Clinic	\$ 1,718	0.23%	0.22%
CALC	Community Advocacy and Legal Centre	\$ 1,572	0.21%	0.20%
KING	Kingston Community Legal Clinic	\$ 1,103	0.15%	0.14%
LAN	Lanark, Leeds & Grenville Legal Clinic	\$ 14	0.00%	0.13%
LCCLC	Lake County Community Legal Clinic	\$ -	0.00%	0.13%
NCLC	Northumberland Community Legal Centre	\$ 418	0.06%	0.13%
PETE	Peterborough Community Legal Centre	\$ 466	0.06%	0.13%
REN	Renfrew County Legal Clinic	\$ 506	0.07%	0.13%
RLS	Rural Legal Services	\$ -	0.00%	0.13%
SDG	Clinique juridique Stormont, Dundas & Glengarry L C	\$ 135	0.02%	0.13%
SIMCO	Comm'ity Legal Clinic-Simcoe, Halib'n, Kawartha Lakes	\$ 1,713	0.23%	0.22%
SOTT	South Ottawa Community Legal Services	\$ 33,581	4.45%	4.32%
WEST	West End Legal Services	\$ 6,222	0.83%	0.80%
U of Ottawa	U of Ottawa SLASS	\$ 3,390	0.45%	0.44%
Queen's	Queen's University SLASS	\$ 342	0.05%	0.13%
	<b>Total - Central &amp; East</b>	<b>\$ 77,919</b>	<b>10.33%</b>	<b>11.13%</b>
	<b>North</b>			
ALGO	Algoma Community Legal Clinic	\$ 273	0.04%	0.13%
CJGN	Clinique Juridique Grand Nord	\$ -	0.00%	0.13%
ELAK	Elliot Lake & Northshore Community Legal Clinic	\$ 36	0.00%	0.13%
KEEW	Keewaytinok Native Legal Services	\$ 809	0.11%	0.13%
KINNA	Kinna-Aweya Legal Clinic	\$ 1,277	0.17%	0.16%
MAN	Manitoulin Legal Clinic	\$ 5	0.00%	0.13%
NIP	Nipissing Community Legal Services	\$ -	0.00%	0.13%
NWCLC	Northwest Community Legal Clinic	\$ -	0.00%	0.13%
SUD	Sudbury Community Legal Clinic	\$ 1	0.00%	0.13%
TTLC	Timmins-Temiskaming Community Legal Clinic	\$ 25	0.00%	0.13%
	<b>Total - North</b>	<b>\$ 2,425</b>	<b>0.32%</b>	<b>1.29%</b>
	<b>GTA</b>			
ALST	Aboriginal Legal Services of Toronto	\$ 74	0.01%	0.13%
CFT	Centre francophone de Toronto	\$ 1,276	0.17%	0.16%
CSSP	Centre For Spanish-Speaking Peoples	\$ 16,551	2.19%	2.13%
DOWN	Downsview Community Legal Services	\$ 11,062	1.47%	1.42%
EAST	East Toronto Community Legal Services	\$ 4,974	0.66%	0.64%
FLEM	Flemingdon Community Legal Services	\$ 46,313	6.14%	5.95%
CLCYR	Community Legal Clinic of York Region	\$ 13,929	1.85%	1.79%
JANE	Jane Finch Community Legal Services	\$ 7,442	0.99%	0.96%
KENB	Kensington-Bellwoods Community Legal Services	\$ 22,057	2.93%	2.83%
MCSA	Metro Toronto Chinese & South East Asian Legal Clinic	\$ 6,738	0.89%	0.87%
MISS	Mississauga Community Legal Services	\$ 7,699	1.02%	0.99%
NLS	Neighbourhood Legal Services	\$ 17,116	2.27%	2.20%
NPD	North Peel & Dufferin Community Legal Services	\$ 10,854	1.44%	1.39%
PCLS	Parkdale Community Legal Services	\$ 148,524	19.70%	19.09%
REX	Rexdale Community Legal Clinic	\$ 50,532	6.70%	6.49%
SALCO	South Asian Legal Clinic of Ontario	\$ 9,680	1.28%	1.24%
SCAR	Scarborough Community Legal Services	\$ 10,797	1.43%	1.39%
SETOB	South Etobicoke Community Legal Services	\$ 12,191	1.62%	1.57%
WILL	Willowdale Community Legal Services	\$ 17,319	2.30%	2.23%
WSCAR	West Scarborough Community Legal Services	\$ 27,557	3.65%	3.54%
WTOR	West Toronto Community Legal Services	\$ 15,190	2.01%	1.95%
YCS	Unison Health and Community Services	\$ 24,669	3.27%	3.17%
DLS	Downtown Legal Services (U of T SLASS)	\$ 16,112	2.14%	2.07%
CLASP	Community Legal Assistance (Osgoode SLASS)	\$ 17,019	2.26%	2.19%
	<b>Total - GTA</b>	<b>\$ 515,676</b>	<b>68.39%</b>	<b>66.38%</b>

	Clinic/SLASS	Average Costs 2011/12 to 2014/15	% of total	Calculated Percentage for Model
	<b>Southwest</b>			
BHN	Community Legal Clinic - Brant, Haldimand, Norfolk	\$ 348	0.05%	0.13%
CKLC	Chatham-Kent Legal Clinic	\$ -	0.00%	0.13%
CLAS	Community Legal Assistance Sarnia	\$ -	0.00%	0.13%
CLSNS	Community Legal Services Of Niagara South	\$ 282	0.04%	0.13%
EOLC	Elgin-Oxford Legal Clinic	\$ 239	0.03%	0.13%
GBLC	Grey-Bruce Legal Clinic	\$ 265	0.04%	0.13%
HAM	Hamilton Community Legal Clinic	\$ 39,828	5.28%	5.12%
HCLS	Halton Community Legal Services	\$ 3,576	0.47%	0.46%
HPLC	Huron/Perth Legal Clinic	\$ -	0.00%	0.13%
LAW	Legal Assistance of Windsor	\$ 16,968	2.25%	2.18%
NLSLM	Neighbourhood Legal Services (London & Middlesex)	\$ 454	0.06%	0.13%
NN	Niagara North Community Legal Assistance	\$ 486	0.06%	0.13%
WATER	Waterloo Region Community Legal Services	\$ 14,910	1.98%	1.92%
WINE	Windsor-Essex Bilingual Legal Clinic	\$ 1,086	0.14%	0.14%
WLC	Legal Clinic of Guelph and Wellington County	\$ 6,550	0.87%	0.84%
Western	Univesity of Western Ontario SLASS	\$ 5,001	0.66%	0.64%
Windsor	University of Windsor SLASS	\$ 3,241	0.43%	0.42%
	<b>Total - Southwest</b>	<b>\$ 93,235</b>	<b>12.36%</b>	<b>12.84%</b>
	<b>Specialty</b>			
ACE	Advocacy Centre for the Elderly	\$ 2,426	0.32%	0.31%
ACLC	African Canadian Legal Clinic	\$ 773	0.10%	0.13%
ACTO	Advocacy Centre for Tenants - Ontario	\$ 5,648	0.75%	0.73%
ARCH	ARCH Disability Law Centre	\$ 3,261	0.43%	0.42%
CELA	Canadian Environmental Law Association	\$ 9,868	1.31%	1.27%
CLEO	Community Legal Education Ontario	\$ 3,362	0.45%	0.43%
HALC	HIV & AIDS Legal Clinic (Ontario)	\$ 5,761	0.76%	0.74%
IAVGO	Industrial Accident Victims Group Of Ontario	\$ 14,342	1.90%	1.84%
ISAC	Income Security Advocacy Centre	\$ 1,311	0.17%	0.17%
IWC	Injured Workers' Consultants	\$ 7,503	1.00%	0.96%
JUST	Justice For Children And Youth	\$ 2,439	0.32%	0.31%
LSHC	Landlord's Self Help Centre	\$ 4,805	0.64%	0.62%
TDC	Tenant Duty Counsel Program	\$ 1,283	0.17%	0.16%
WORK	Toronto Workers' Health & Safety Legal Clinic	\$ 2,023	0.27%	0.26%
	<b>Total - Specialty</b>	<b>\$ 64,806</b>	<b>8.59%</b>	<b>8.35%</b>
	<b>Total - all clinics</b>	<b>\$ 754,061</b>	<b>100.0%</b>	<b>100.0%</b>



## APPENDIX C: Allocation Model Using 2015-16 Usage levels, with Standardized (Median) Costs per Assignment

Clinic/SLASS	Immediate & planned telephone assignments	Cost using median of \$15 per assignment	Face-to-face & on-site	Cost using median of \$80 per assignment	Translation assignments	Cost using median of \$124 per assignment	Total Cost Using Median rate	Calculated Percentage for Model
<b>Central &amp; East</b>								
Clinique juridique populaire de Prescott et Rus	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Community Legal Services (Ottawa Centre)	8	\$ 120	143	\$ 11,440	42	\$ 5,208	\$ 16,768	3.15%
Correctional Law Project	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Centre des services communautaires de Vanier	0	\$ -	1	\$ 80	1	\$ 124	\$ 204	0.04%
Durham Legal Clinic	3	\$ 45	11	\$ 880	1	\$ 124	\$ 1,049	0.20%
Community Advocacy and Legal Centre	6	\$ 90	1	\$ 80	0	\$ -	\$ 170	0.03%
Kingston Community Legal Clinic	2	\$ 30	2	\$ 160	0	\$ -	\$ 190	0.04%
Lanark, Leeds & Grenville Legal Clinic	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Lake County Community Legal Clinic	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Northumberland Community Legal Centre	8	\$ 120	0	\$ -	4	\$ 496	\$ 616	0.12%
Peterborough Community Legal Centre	1	\$ 15	2	\$ 160	0	\$ -	\$ 175	0.03%
Renfrew County Legal Clinic	1	\$ 15	0	\$ -	1	\$ 124	\$ 139	0.03%
Rural Legal Services	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Clinique juridique Stormont, Dundas And Glen	6	\$ 90	0	\$ -	0	\$ -	\$ 90	0.02%
Community Legal Clinic - Simcoe, Haliburton, K	19	\$ 285	0	\$ -	0	\$ -	\$ 285	0.05%
South Ottawa Community Legal Services	119	\$ 1,785	155	\$ 12,400	36	\$ 4,464	\$ 18,649	3.50%
West End Legal Services	11	\$ 165	52	\$ 4,160	7	\$ 868	\$ 5,193	0.97%
U of Ottawa SLASS	65	\$ 975	25	\$ 2,000	6	\$ 744	\$ 3,719	0.70%
Queen's University SLASS	3	\$ 45	3	\$ 240	1	\$ 124	\$ 409	0.08%
<b>Total - Central &amp; East</b>	<b>252</b>	<b>\$ 3,780</b>	<b>395</b>	<b>\$ 31,600</b>	<b>99</b>	<b>\$ 12,276</b>	<b>\$ 47,656</b>	<b>8.95%</b>
<b>North</b>								
Algoma Community Legal Clinic	0	\$ -	0	\$ -	1	\$ 124	\$ 124	0.02%
Clinique Juridique Grand Nord	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Elliot Lake & Northshore Community Legal Clin	3	\$ 45	0	\$ -	0	\$ -	\$ 45	0.01%
Keewaytinok Native Legal Services	1	\$ 15	1	\$ 80	0	\$ -	\$ 95	0.02%
Kinna-Aweya Legal Clinic	8	\$ 120	0	\$ -	6	\$ 744	\$ 864	0.16%
Manitoulin Legal Clinic	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Nipissing Community Legal Services	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Northwest Community Legal Clinic	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Sudbury Community Legal Clinic	2	\$ 30	0	\$ -	0	\$ -	\$ 30	0.01%
Timmins-Temiskaming Community Legal Clinic	3	\$ 45	0	\$ -	0	\$ -	\$ 45	0.01%
<b>Total - North</b>	<b>17</b>	<b>\$ 255</b>	<b>1</b>	<b>\$ 80</b>	<b>7</b>	<b>\$ 868</b>	<b>\$ 1,203</b>	<b>0.23%</b>
<b>GTA</b>								
Aboriginal Legal Services of Toronto	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Centre francophone de Toronto	7	\$ 105	3	\$ 240	3	\$ 372	\$ 717	0.13%
Centre For Spanish-Speaking Peoples	0	\$ -	0	\$ -	78	\$ 9,672	\$ 9,672	1.82%
Downsview Community Legal Services	13	\$ 195	143	\$ 11,440	0	\$ -	\$ 11,635	2.18%
East Toronto Community Legal Services	4	\$ 60	15	\$ 1,200	3	\$ 372	\$ 1,632	0.31%
Flemingdon Community Legal Services	215	\$ 3,225	414	\$ 33,120	35	\$ 4,340	\$ 40,685	7.64%
Community Legal Clinic of York Region	86	\$ 1,290	122	\$ 9,760	1	\$ 124	\$ 11,174	2.10%
Jane Finch Community Legal Services	81	\$ 1,215	69	\$ 5,520	0	\$ -	\$ 6,735	1.26%
Kensington-Bellwoods Community Legal Service	30	\$ 450	134	\$ 10,720	3	\$ 372	\$ 11,542	2.17%
Metro Toronto Chinese & South East Asian Leg	4	\$ 60	15	\$ 1,200	2	\$ 248	\$ 1,508	0.28%
Mississauga Community Legal Services	84	\$ 1,260	80	\$ 6,400	1	\$ 124	\$ 7,784	1.46%
Neighbourhood Legal Services	90	\$ 1,350	134	\$ 10,720	16	\$ 1,984	\$ 14,054	2.64%
North Peel & Dufferin Community Legal Service	40	\$ 600	73	\$ 5,840	7	\$ 868	\$ 7,308	1.37%
Parkdale Community Legal Services	766	\$ 11,490	911	\$ 72,880	66	\$ 8,184	\$ 92,554	17.37%
Rexdale Community Legal Clinic	65	\$ 975	515	\$ 41,200	27	\$ 3,348	\$ 45,523	8.54%
South Asian Legal Clinic of Ontario	27	\$ 405	59	\$ 4,720	4	\$ 496	\$ 5,621	1.06%
Scarborough Community Legal Services	43	\$ 645	122	\$ 9,760	0	\$ -	\$ 10,405	1.95%
South Etobicoke Community Legal Services	65	\$ 975	82	\$ 6,560	1	\$ 124	\$ 7,659	1.44%
Willowdale Community Legal Services	195	\$ 2,925	181	\$ 14,480	9	\$ 1,116	\$ 18,521	3.48%
West Scarborough Community Legal Services	182	\$ 2,730	248	\$ 19,840	3	\$ 372	\$ 22,942	4.31%
West Toronto Community Legal Services	22	\$ 330	114	\$ 9,120	1	\$ 124	\$ 9,574	1.80%
Unison Health and Community Services	116	\$ 1,740	256	\$ 20,480	19	\$ 2,356	\$ 24,576	4.61%
Downtown Legal Services (U of T SLASS)	79	\$ 1,185	96	\$ 7,680	14	\$ 1,736	\$ 10,601	1.99%
Community Legal Assistance (Osgoode SLASS)	212	\$ 3,180	168	\$ 13,440	3	\$ 372	\$ 16,992	3.19%
<b>Total - GTA</b>	<b>2426</b>	<b>\$ 36,390</b>	<b>3954</b>	<b>\$ 316,320</b>	<b>296</b>	<b>\$ 36,704</b>	<b>\$ 389,414</b>	<b>73.09%</b>

Clinic/SLASS	Immediate & planned telephone assignments	Cost using median of \$15 per assignment	Face-to-face & on-site	Cost using median of \$80 per assignment	Translation assignments	Cost using median of \$124 per assignment	Total Cost Using Median rate	Calculated Percentage for Model
<b>Southwest</b>								
Community Legal Clinic - Brant, Haldimand, No	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Chatham-Kent Legal Clinic	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Community Legal Assistance Sarnia	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Community Legal Services Of Niagara South	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Elgin-Oxford Legal Clinic	1	\$ 15	1	\$ 80	0	\$ -	\$ 95	0.02%
Grey-Bruce Legal Clinic	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Hamilton Community Legal Clinic	326	\$ 4,890	290	\$ 23,200	5	\$ 620	\$ 28,710	5.39%
Halton Community Legal Services	67	\$ 1,005	20	\$ 1,600	4	\$ 496	\$ 3,101	0.58%
Huron/Perth Legal Clinic	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Legal Assistance of Windsor	365	\$ 5,475	1	\$ 80	0	\$ -	\$ 5,555	1.04%
Neighbourhood Legal Services (London & Mid	13	\$ 195	0	\$ -	0	\$ -	\$ 195	0.04%
Niagara North Community Legal Assistance	3	\$ 45	0	\$ -	0	\$ -	\$ 45	0.01%
Waterloo Region Community Legal Services	17	\$ 255	149	\$ 11,920	1	\$ 124	\$ 12,299	2.31%
Windsor-Essex Bilingual Legal Clinic	2	\$ 30	1	\$ 80	0	\$ -	\$ 110	0.02%
Legal Clinic of Guelph and Wellington County	26	\$ 390	24	\$ 1,920	0	\$ -	\$ 2,310	0.43%
University of Western Ontario SLASS	1	\$ 15	25	\$ 2,000	0	\$ -	\$ 2,015	0.38%
University of Windsor SLASS	55	\$ 825	23	\$ 1,840	0	\$ -	\$ 2,665	0.50%
<b>Total - Southwest</b>	<b>876</b>	<b>\$ 13,140</b>	<b>534</b>	<b>\$ 42,720</b>	<b>10</b>	<b>\$ 1,240</b>	<b>\$ 57,100</b>	<b>10.72%</b>
<b>Specialty</b>								
Advocacy Centre for the Elderly	11	\$ 165	14	\$ 1,120	1	\$ 124	\$ 1,409	0.26%
African Canadian Legal Clinic	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
Advocacy Centre for Tenants - Ontario	1	\$ 15	0	\$ -	17	\$ 2,108	\$ 2,123	0.40%
ARCH Disability Law Centre	7	\$ 105	33	\$ 2,640	0	\$ -	\$ 2,745	0.52%
Canadian Environmental Law Association	1	\$ 15	0	\$ -	21	\$ 2,604	\$ 2,619	0.49%
Community Legal Education Ontario	0	\$ -	0	\$ -	0	\$ -	\$ -	0.00%
HIV & AIDS Legal Clinic (Ontario)	91	\$ 1,365	25	\$ 2,000	2	\$ 248	\$ 3,613	0.68%
Industrial Accident Victims Group Of Ontario	112	\$ 1,680	91	\$ 7,280	23	\$ 2,852	\$ 11,812	2.22%
Income Security Advocacy Centre	2	\$ 30	0	\$ -	1	\$ 124	\$ 154	0.03%
Injured Workers' Consultants	23	\$ 345	53	\$ 4,240	33	\$ 4,092	\$ 8,677	1.63%
Justice For Children And Youth	22	\$ 330	4	\$ 320	5	\$ 620	\$ 1,270	0.24%
Landlord's Self Help Centre	27	\$ 405	0	\$ -	4	\$ 496	\$ 901	0.17%
Tenant Duty Counsel Program	46	\$ 690	0	\$ -	0	\$ -	\$ 690	0.13%
Toronto Workers' Health & Safety Legal Clinic	49	\$ 735	8	\$ 640	0	\$ -	\$ 1,375	0.26%
<b>Total - Specialty</b>	<b>392</b>	<b>\$ 5,880</b>	<b>228</b>	<b>\$ 18,240</b>	<b>107</b>	<b>\$ 13,268</b>	<b>\$ 37,388</b>	<b>7.02%</b>
<b>Total - all clinics</b>	<b>3,963</b>	<b>\$ 59,445</b>	<b>5,112</b>	<b>\$ 408,960</b>	<b>519</b>	<b>\$ 64,356</b>	<b>\$ 532,761</b>	<b>100.00%</b>

## APPENDIX D: Allocation Model Using 2015-16 Usage levels, with a Nominal Allocation of 10 Assignments to Clinics with Minimal Usage

Clinic/SLASS	Based on 2015-16 assignments			Total assignments	Minimum 10 assignments allocated to all clinics	Calculated Percentage for Model
	Immediate & planned telephone assignments	Face-to-face & on-site assignments	Translation assignments			
<b>Central &amp; East</b>						
Clinique juridique populaire de Prescott et Russell	0	0	0	0	10	0.10%
Community Legal Services (Ottawa Centre)	8	143	50	201	201	2.04%
Correctional Law Project	0	0	0	0	10	0.10%
Centre des services communautaires de Vanier	0	1	0	1	10	0.10%
Durham Legal Clinic	3	11	2	16	16	0.16%
Community Advocacy and Legal Centre	6	1	0	7	10	0.10%
Kingston Community Legal Clinic	2	2	0	4	10	0.10%
Lanark, Leeds & Grenville Legal Clinic	0	0	0	0	10	0.10%
Lake County Community Legal Clinic	0	0	1	1	10	0.10%
Northumberland Community Legal Centre	8	0	0	8	10	0.10%
Peterborough Community Legal Centre	1	2	1	4	10	0.10%
Renfrew County Legal Clinic	1	0	0	1	10	0.10%
Rural Legal Services	0	0	0	0	10	0.10%
Clinique juridique Stormont, Dundas And Glengarry Le	6	0	1	7	10	0.10%
Community Legal Clinic - Simcoe, Haliburton, Kawartha	19	0	82	101	101	1.02%
South Ottawa Community Legal Services	119	155	6	280	280	2.84%
West End Legal Services	11	52	1	64	64	0.65%
U of Ottawa SLASS	65	25	1	91	91	0.92%
Queen's University SLASS	3	3	0	6	10	0.10%
<b>Total - Central &amp; East</b>	<b>252</b>	<b>395</b>	<b>145</b>	<b>792</b>	<b>883</b>	<b>8.94%</b>
<b>North</b>						
Algoma Community Legal Clinic	0	0	1	1	10	0.10%
Clinique Juridique Grand Nord	0	0	0	0	10	0.10%
Elliot Lake & Northshore Community Legal Clinic	3	0	1	4	10	0.10%
Keewaytinok Native Legal Services	1	1	0	2	10	0.10%
Kinna-Aweya Legal Clinic	8	0	2	10	10	0.10%
Manitoulin Legal Clinic	0	0	0	0	10	0.10%
Nipissing Community Legal Services	0	0	0	0	10	0.10%
Northwest Community Legal Clinic	0	0	0	0	10	0.10%
Sudbury Community Legal Clinic	2	0	0	2	10	0.10%
Timmins-Temiskaming Community Legal Clinic	3	0	0	3	10	0.10%
<b>Total - North</b>	<b>17</b>	<b>1</b>	<b>4</b>	<b>22</b>	<b>100</b>	<b>1.01%</b>
<b>GTA</b>						
Aboriginal Legal Services of Toronto	0	0	0	0	10	0.10%
Centre francophone de Toronto	7	3	1	11	11	0.11%
Centre For Spanish-Speaking Peoples	0	0	47	47	47	0.48%
Downsview Community Legal Services	13	143	0	156	156	1.58%
East Toronto Community Legal Services	4	15	3	22	22	0.22%
Flemingdon Community Legal Services	215	414	69	698	698	7.07%
Community Legal Clinic of York Region	86	122	0	208	208	2.11%
Jane Finch Community Legal Services	81	69	0	150	150	1.52%
Kensington-Bellwoods Community Legal Services	30	134	7	171	171	1.73%
Metro Toronto Chinese & South East Asian Legal Clinic	4	15	6	25	25	0.25%
Mississauga Community Legal Services	84	80	0	164	164	1.66%
Neighbourhood Legal Services	90	134	16	240	240	2.43%
North Peel & Dufferin Community Legal Services	40	73	2	115	115	1.16%
Parkdale Community Legal Services	766	911	57	1734	1734	17.56%
Rexdale Community Legal Clinic	65	515	33	613	613	6.21%
South Asian Legal Clinic of Ontario	27	59	7	93	93	0.94%
Scarborough Community Legal Services	43	122	1	166	166	1.68%
South Etobicoke Community Legal Services	65	82	2	149	149	1.51%
Willowdale Community Legal Services	195	181	1	377	377	3.82%
West Scarborough Community Legal Services	182	248	5	435	435	4.40%
West Toronto Community Legal Services	22	114	0	136	136	1.38%
Unison Health and Community Services	116	256	13	385	385	3.90%
Downtown Legal Services (U of T SLASS)	79	96	11	186	186	1.88%
Community Legal Assistance (Osgoode SLASS)	212	168	1	381	381	3.86%
<b>Total - GTA</b>	<b>2426</b>	<b>3954</b>	<b>282</b>	<b>6662</b>	<b>6672</b>	<b>67.56%</b>

Clinic/SLASS	Immediate & planned telephone assignments	Face-to-face & on-site assignments	Translation assignments	Total assignments	Nominal 10 assignments allocated to all clinics	Calculated Percentage for Model
<b>Southwest</b>						
Community Legal Clinic - Brant, Haldimand, Norfolk	0	0	0	0	10	0.10%
Chatham-Kent Legal Clinic	0	0	0	0	10	0.10%
Community Legal Assistance Sarnia	0	0	0	0	10	0.10%
Community Legal Services Of Niagara South	0	0	0	0	10	0.10%
Elgin-Oxford Legal Clinic	1	1	0	2	10	0.10%
Grey-Bruce Legal Clinic	0	0	1	1	10	0.10%
Hamilton Community Legal Clinic	326	290	4	620	620	6.28%
Halton Community Legal Services	67	20	2	89	89	0.90%
Huron/Perth Legal Clinic	0	0	0	0	10	0.10%
Legal Assistance of Windsor	365	1	1	367	367	3.72%
Neighbourhood Legal Services (London & Middlesex)	13	0	0	13	13	0.13%
Niagara North Community Legal Assistance	3	0	1	4	10	0.10%
Waterloo Region Community Legal Services	17	149	0	166	166	1.68%
Windsor-Essex Bilingual Legal Clinic	2	1	0	3	10	0.10%
Legal Clinic of Guelph and Wellington County	26	24	0	50	50	0.51%
University of Western Ontario SLASS	1	25	0	26	26	0.26%
University of Windsor SLASS	55	23	0	78	78	0.79%
<b>Total - Southwest</b>	<b>876</b>	<b>534</b>	<b>9</b>	<b>1419</b>	<b>1499</b>	<b>15.18%</b>
<b>Specialty</b>						
Advocacy Centre for the Elderly	11	14	1	26	26	0.26%
African Canadian Legal Clinic	0	0	1	1	10	0.10%
Advocacy Centre for Tenants - Ontario	1	0	20	21	21	0.21%
ARCH Disability Law Centre	7	33	1	41	41	0.42%
Canadian Environmental Law Association	1	0	13	14	14	0.14%
Community Legal Education Ontario	0	0	2	2	10	0.10%
HIV & AIDS Legal Clinic (Ontario)	91	25	1	117	117	1.18%
Industrial Accident Victims Group Of Ontario	112	91	20	223	223	2.26%
Income Security Advocacy Centre	2	0	2	4	10	0.10%
Injured Workers' Consultants	23	53	12	88	88	0.89%
Justice For Children And Youth	22	4	2	28	28	0.28%
Landlord's Self Help Centre	27	0	4	31	31	0.31%
Tenant Duty Counsel Program	46	0	0	46	46	0.47%
Toronto Workers' Health & Safety Legal Clinic	49	8	0	57	57	0.58%
<b>Total - Specialty</b>	<b>392</b>	<b>228</b>	<b>79</b>	<b>699</b>	<b>722</b>	<b>7.31%</b>
<b>Total - all clinics</b>	<b>3,963</b>	<b>5,112</b>	<b>519</b>	<b>9,594</b>	<b>9,876</b>	<b>100%</b>

## APPENDIX E: Comparison of Various Allocation Models

	2013/14 to 2015/16 Ave. Expenditures	3-yr Historical Expenditures including base	2015-16 Usage with Standard Median Price	2015-16 Usage including Minimum Base	Based on FTE Distribution
<b>Central &amp; East</b>					
Clinique juridique populaire de Prescott et Russell	0.00%	0.13%	0.00%	0.10%	1.11%
Community Legal Services (Ottawa Centre)	3.53%	3.42%	3.15%	2.04%	1.30%
Correctional Law Project	0.00%	0.13%	0.00%	0.10%	0.74%
Centre des services communautaires de Vanier	0.02%	0.13%	0.04%	0.10%	0.74%
Durham Legal Clinic	0.23%	0.22%	0.20%	0.16%	1.11%
Community Advocacy and Legal Centre	0.21%	0.20%	0.03%	0.10%	1.86%
Kingston Community Legal Clinic	0.15%	0.14%	0.04%	0.10%	0.74%
Lanark, Leeds & Grenville Legal Clinic	0.00%	0.13%	0.00%	0.10%	1.67%
Lake County Community Legal Clinic	0.00%	0.13%	0.00%	0.10%	1.11%
Northumberland Community Legal Centre	0.06%	0.13%	0.12%	0.10%	0.74%
Peterborough Community Legal Centre	0.06%	0.13%	0.03%	0.10%	0.74%
Renfrew County Legal Clinic	0.07%	0.13%	0.03%	0.10%	0.93%
Rural Legal Services	0.00%	0.13%	0.00%	0.10%	
Clinique juridique Stormont, Dundas And Glengarry Legal Clinic	0.02%	0.13%	0.02%	0.10%	1.11%
Community Legal Clinic - Simcoe, Haliburton, Kawartha Lakes	0.23%	0.22%	0.05%	1.02%	2.04%
South Ottawa Community Legal Services	4.45%	4.32%	3.50%	2.84%	0.93%
West End Legal Services	0.83%	0.80%	0.97%	0.65%	1.11%
U of Ottawa SLASS	0.45%	0.44%	0.70%	0.92%	0.00%
Queen's University SLASS	0.05%	0.13%	0.08%	0.10%	0.00%
<b>Total - Central &amp; East</b>	<b>10.33%</b>	<b>11.13%</b>	<b>8.95%</b>	<b>8.94%</b>	<b>18.01%</b>
<b>North</b>					
Algoma Community Legal Clinic	0.04%	0.13%	0.02%	0.10%	1.11%
Clinique Juridique Grand Nord	0.00%	0.13%	0.00%	0.10%	0.74%
Elliot Lake & Northshore Community Legal Clinic	0.00%	0.13%	0.01%	0.10%	0.56%
Keewaytinok Native Legal Services	0.11%	0.13%	0.02%	0.10%	0.74%
Kinna-Aweya Legal Clinic	0.17%	0.16%	0.16%	0.10%	2.51%
Manitoulin Legal Clinic	0.00%	0.13%	0.00%	0.10%	0.56%
Nipissing Community Legal Services	0.00%	0.13%	0.00%	0.10%	0.93%
Northwest Community Legal Clinic	0.00%	0.13%	0.00%	0.10%	2.04%
Sudbury Community Legal Clinic	0.00%	0.13%	0.01%	0.10%	1.86%
Timmins-Temiskaming Community Legal Clinic	0.00%	0.13%	0.01%	0.10%	0.93%
<b>Total - North</b>	<b>0.32%</b>	<b>1.29%</b>	<b>0.23%</b>	<b>1.01%</b>	<b>11.98%</b>
<b>GTA</b>					
Aboriginal Legal Services of Toronto	0.01%	0.13%	0.00%	0.10%	0.93%
Centre francophone de Toronto	0.17%	0.16%	0.13%	0.11%	0.74%
Centre For Spanish-Speaking Peoples	2.19%	2.13%	1.82%	0.48%	0.74%
Downsview Community Legal Services	1.47%	1.42%	2.18%	1.58%	1.11%
East Toronto Community Legal Services	0.66%	0.64%	0.31%	0.22%	1.11%
Flemingdon Community Legal Services	6.14%	5.95%	7.64%	7.07%	1.49%
Community Legal Clinic of York Region	1.85%	1.79%	2.10%	2.11%	1.86%
Jane Finch Community Legal Services	0.99%	0.96%	1.26%	1.52%	1.49%
Kensington-Bellwoods Community Legal Services	2.93%	2.83%	2.17%	1.73%	1.30%
Metro Toronto Chinese & South East Asian Legal Clinic	0.89%	0.87%	0.28%	0.25%	0.93%
Mississauga Community Legal Services	1.02%	0.99%	1.46%	1.66%	1.86%
Neighbourhood Legal Services	2.27%	2.20%	2.64%	2.43%	1.30%
North Peel & Dufferin Community Legal Services	1.44%	1.39%	1.37%	1.16%	1.11%
Parkdale Community Legal Services	19.70%	19.09%	17.37%	17.56%	3.53%
Rexdale Community Legal Clinic	6.70%	6.49%	8.54%	6.21%	1.49%
South Asian Legal Clinic of Ontario	1.28%	1.24%	1.06%	0.94%	1.11%
Scarborough Community Legal Services	1.43%	1.39%	1.95%	1.68%	1.86%
South Etobicoke Community Legal Services	1.62%	1.57%	1.44%	1.51%	0.93%
Willowdale Community Legal Services	2.30%	2.23%	3.48%	3.82%	0.93%
West Scarborough Community Legal Services	3.65%	3.54%	4.31%	4.40%	1.30%
West Toronto Community Legal Services	2.01%	1.95%	1.80%	1.38%	1.11%
Unison Health and Community Services	3.27%	3.17%	4.61%	3.90%	1.30%
Downtown Legal Services (U of T SLASS)	2.14%	2.07%	1.99%	1.88%	
Community Legal Assistance (Osgoode SLASS)	2.26%	2.19%	3.19%	3.86%	
<b>Total - GTA</b>	<b>68.39%</b>	<b>66.38%</b>	<b>73.09%</b>	<b>67.56%</b>	<b>29.53%</b>

	2013/14 to 2015/16 Ave. Expenditures	4-yr Historical Expenditures including \$1000 base	2014-15 Usage with Standard Median Price Structure	2014-15 Usage including 10 Assignment Base	Based on FTE Distribution
<b>Southwest</b>					
Community Legal Clinic - Brant, Haldimand, Norfolk	0.05%	0.13%	0.00%	0.10%	1.30%
Chatham-Kent Legal Clinic	0.00%	0.13%	0.00%	0.10%	0.74%
Community Legal Assistance Sarnia	0.00%	0.13%	0.00%	0.10%	0.93%
Community Legal Services Of Niagara South	0.04%	0.13%	0.00%	0.10%	1.67%
Elgin-Oxford Legal Clinic	0.03%	0.13%	0.02%	0.10%	0.93%
Grey-Bruce Legal Clinic	0.04%	0.13%	0.00%	0.10%	1.02%
Hamilton Community Legal Clinic	5.28%	5.12%	5.39%	6.28%	4.27%
Halton Community Legal Services	0.47%	0.46%	0.58%	0.90%	0.93%
Huron/Perth Legal Clinic	0.00%	0.13%	0.00%	0.10%	0.93%
Legal Assistance of Windsor	2.25%	2.18%	1.04%	3.72%	1.49%
Neighbourhood Legal Services (London & Middlesex)	0.06%	0.13%	0.04%	0.13%	1.67%
Niagara North Community Legal Assistance	0.06%	0.13%	0.01%	0.10%	1.30%
Waterloo Region Community Legal Services	1.98%	1.92%	2.31%	1.68%	1.49%
Windsor-Essex Bilingual Legal Clinic	0.14%	0.14%	0.02%	0.10%	0.93%
Legal Clinic of Guelph and Wellington County	0.87%	0.84%	0.43%	0.51%	0.74%
University of Western Ontario SLASS	0.66%	0.64%	0.38%	0.26%	0.00%
University of Windsor SLASS	0.43%	0.42%	0.50%	0.79%	0.00%
<b>Total - Southwest</b>	<b>12.36%</b>	<b>12.84%</b>	<b>10.72%</b>	<b>15.18%</b>	<b>20.33%</b>
<b>Specialty</b>					
Advocacy Centre for the Elderly	0.32%	0.31%	0.26%	0.26%	1.49%
African Canadian Legal Clinic	0.10%	0.13%	0.00%	0.10%	1.11%
Advocacy Centre for Tenants - Ontario	0.75%	0.73%	0.40%	0.21%	1.30%
ARCH Disability Law Centre	0.43%	0.42%	0.52%	0.42%	1.76%
Canadian Environmental Law Association	1.31%	1.27%	0.49%	0.14%	1.86%
Community Legal Education Ontario	0.45%	0.43%	0.00%	0.10%	1.86%
HIV & AIDS Legal Clinic (Ontario)	0.76%	0.74%	0.68%	1.18%	0.74%
Industrial Accident Victims Group Of Ontario	1.90%	1.84%	2.22%	2.26%	1.49%
Income Security Advocacy Centre	0.17%	0.17%	0.03%	0.10%	1.49%
Injured Workers' Consultants	1.00%	0.96%	1.63%	0.89%	1.67%
Justice For Children And Youth	0.32%	0.31%	0.24%	0.28%	1.11%
Landlord's Self Help Centre	0.64%	0.62%	0.17%	0.31%	0.74%
Tenant Duty Counsel Program	0.17%	0.16%	0.13%	0.47%	2.79%
Toronto Workers' Health & Safety Legal Clinic	0.27%	0.26%	0.26%	0.58%	0.74%
<b>Total - Specialty</b>	<b>8.59%</b>	<b>8.35%</b>	<b>7.02%</b>	<b>7.31%</b>	<b>20.15%</b>
<b>Total - all clinics</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>

## APPENDIX F: Clinic and SLASS usage of interpretation services by language

### Number of Interpretation and Translation Services Provided for top 16 Languages, 2015-16

Language	Scheduled Phone, face-to- face, and translation	Immediate Telephone	TOTAL	% of Total
Arabic	676	622	1298	13.5%
Spanish	554	380	934	9.7%
Hungarian	449	414	863	9.0%
Mandarin	356	216	572	5.9%
Farsi	314	249	563	5.8%
Somali	392	149	541	5.6%
Vietnamese	253	209	462	4.8%
Tamil	282	174	456	4.7%
Tibetan	351	100	451	4.7%
Dari	223	64	287	3.0%
Portuguese	125	148	273	2.8%
Cantonese	122	139	261	2.7%
Russian	165	67	232	2.4%
Assyrian	205	9	214	2.2%
Polish	153	52	205	2.1%
Bengali	69	27	96	1.0%
Other	1252	679	1931	20.0%
<b>TOTAL</b>	<b>5941</b>	<b>3698</b>	<b>9639</b>	

Note: Data not available for immediate phone interpretation by language.