

**NC DEPARTMENT OF HEALTH AND HUMAN SERVICES**  
Division of Aging and Adult Services

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# **Legal Services**

## **PROGRAM MANUAL**

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**Effective Date: March 1, 1997**

Updated: 12/1/2021

# NC DEPARTMENT OF HEALTH AND HUMAN SERVICES

## Division of Aging and Adult Services

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## I. Purpose and Goals

This document provides guidance to Title IIIB legal assistance providers and, to a lesser extent, regional NC Area Agencies on Aging (“AAA”) in meeting the requirements for providing legal assistance to North Carolina residents 60 years of age or older under the Older Americans Act (“OAA”). The legal assistance program, also referred to as the legal services program, is intended to protect and secure the rights, benefits, and dignity of older persons.

## II. Legal Base

The Older Americans Act of 1965, as amended, designates legal assistance as a priority service under Title IIIB (42 U.S.C. § 3026(a)(2)(c)). As such, the funding of legal assistance by each AAA is mandatory and legal services shall be accessible and available throughout each of the planning and services areas in North Carolina. In Titles III (42 U.S.C. § 3027(a)(13)) and VII (42 U.S.C. § 3058j) of the Older Americans Act, the OAA calls on each state to assign personnel to provide leadership on legal assistance throughout their state. In North Carolina, the Division of Aging & Adult Services has requested the legal services developer to fulfill this mandate.

At the state level, N.C.G.S § 143B-181.1(c) designates the North Carolina Department of Health & Human Services through the North Carolina Division of Aging & Adult Services to adopt rules to implement OAA programs including legal assistance. Legal assistance is defined, in part, as legal advice or representation provided to older individuals with economic or social needs (42 U.S.C. § 3002(33)).

The statewide legal standards will be amended periodically to reflect changes made through future reauthorizations of the OAA and other governing federal and state laws and regulations as well as to reflect changes in the legal needs of older North Carolinians with social or economic needs.

## III. Definitions

**Administration for Community Living (ACL)** – The Administration for Community Living is the federal agency which supports the needs of the aging.

**Area Agency on Aging (AAA)** – A regional agency established through the Older Americans Act that supports programs which provide services to older individuals. AAAs are located within North Carolina’s 16 Regional Councils on Government.

**Aging Resource Management System (ARMS)** – A client tracking system capturing demographic data and reimbursement amounts which ties reimbursement to performance.

**Client** – An individual who is eligible to receive services. The legal services program uses the term “client”. Periodically, a client may be referred to as a consumer or participant of legal services.

**Division of Aging & Adult Services (DAAS)** – The NC Division of Aging and Adult Services is North Carolina’s state unit on aging.

**Home and Community Care Block Grant (HCCBG)** – The Home and Community Care Block Grant combines federal and state funding streams using OAA funds, state funds, local funds and other funding to provide services for older individuals. The legal services program is not funded by HCCBG but is funded through the OAA.

**Low Income** – An individual who has a self-declared household income that is at or below the Federal poverty guidelines. This person would be defined as “economically needy”.

**May/Should** – The words “may” and “should” means something is suggested but not required.

**Must/Shall/Will** – The words “must”, “shall” and “will” means something is required.

**Older Americans Act (OAA)** – Originally enacted in 1965, is an act which refers to a range of services provided to individuals 60 or older. Any reference to the OAA includes the original language and any subsequent amendments.

**Older Individual** – Anyone who has obtained 60 years of age or greater.

**Planning and Service Areas** – An area designated by the North Carolina Division of Aging & Adult Services through which an Area Agency on Aging administers Title IIIB funds to legal services providers in order to render legal assistance.

**Poverty Line** – The official minimum limit of income deemed necessary in a particular area for household goods as determined by the Office of Management and Budget and adjusted by the Federal Secretary of Health & Human Services in accordance with 42 U.S.C. § 9902(2).

**Provider** – Any agency or law firm who receives funding for the provision of legal services. A provider may be a law firm, a non-profit agency, a regional Area Agency on Aging or local

government agency. If the provider is a non-profit agency, regional Area Agency on Aging or local government agency, then a law firm shall be used to provide legal services. As used in this manual, service provider, legal services provider and community service provider are synonymous for provider.

**Site/Route/Worker (SRWs)** – Site/Route/Worker Code is to gather information concerning the points of service delivery for all service providers. The information provides for the sorting and grouping of clients for a similar service.

**State Agency (also known as State Unit on Aging)** – The Division of Aging & Adult Services serves as the state agency or state unit on aging responsible for administering the Older Americans Act.

**Target Population** – A specific population identified to receive specific services.

**Unit of Service** – The means in which a legal services provider accounts for their time in order to be reimbursed under Title IIIB funding for services rendered. For the purpose of the legal services program, a unit of service equals one (1) hour.

**Voluntary Contribution(s)** – A monetary amount voluntarily given to the legal services provider by the client or their designated representative toward the cost of legal services. Voluntary contributions are not required. Contribution and donation are synonymous for 'voluntary contribution(s)'.

**ZGA 150** – A Provider Agency form used in the Aging Resource Management System to maintain provider contact information.

## IV. Definition of Service

Legal assistance provides individuals who are 60 years of age or older with either: 1) legal advice and/or legal representation, 2) appropriate referrals to human services agencies including pro-bono legal services or 3) utilizing preventative measures such as community education and outreach to prevent legal issues from arising.

## V. Eligibility of Service

Clients eligible for legal services must be 60 years of age or older, need legal assistance and not be excluded from receiving legal services under federal law, state law or prohibited as outlined

in this manual. Excluded legal services include but are not limited to legal assistance regarding lobbying, political activities, etc. (45 CFR §1321.71(h),(i)).

Under the Older Americans Act, means testing is prohibited. Consequently, a legal services provider may ask a potential client about their financial circumstances in order to assign them to the most appropriate funding source for their situation or to determine if the potential client is requesting legal services which exceed the scope of legal representation provided under the OAA by the legal services provider (e.g., trusts or estate administration). However, the legal services provider is prohibited from asking a potential client about their financial circumstances in order to deny that individual legal services under the OAA solely because of the potential client's income status. Once a client has been accepted for legal services, validation of income to provide effective legal advice, counseling or legal representation is permissible under the OAA (45 CFR §1321.71(d),(e)). An older individual is determined to move from the status of potential client to client once the older individual has been notified by the legal services provider, regardless if notification is made verbally or in writing, that he/she/they is eligible for legal services.

## **A. TARGET POPULATION**

Consistent with 42 USC §3026(a)(4)(B), the North Carolina legal services developer, the North Carolina AAAs and legal services providers serving North Carolina residents under the OAA, will use outreach efforts to focus on the following groups:

- older individuals residing in rural areas;
- older individuals with greatest economic needs, with particular attention to low income minority individuals;
- older individuals with greatest social need, with particular attention to low income minority individuals;
- older individuals with severe disabilities;
- older individuals with limited English proficiency;
- older individuals with Alzheimer's disease and related disorders with neurological and organic brain dysfunction (and the caretakers of such individuals); and
- older individuals at risk for institutional placement.

Older individuals who are frail, homebound by reason of illness or capacity, or isolated shall also be given priority in the delivery of services (45 CFR §1321.69(1)). Additionally, individuals who are residents of nursing homes, adult care homes and family care homes shall be given priority so that the legal services program and State long-term care program promote collaboration efforts and diminish duplicative efforts (45 CFR §1324.15(g)). For the purpose of this section only, the term "given priority" means that if two (2) potential clients come before the legal services provider seeking legal services at the same time, then a potential client who falls under 45 CFR

§1321.69(1) or 45 CFR §1324.15(g) shall receive legal services prior to the potential client who does not meet the requirements of 45 CFR §1321.69(1) or 45 CFR §1324.15(g).

42 USC §3002 defines legal assistance as, “legal advice and representation by an attorney to older individuals with economic or social need”. The same United States Code further defines “greatest social need [as] the need caused by noneconomic factors [including] physical and mental disabilities; language barriers and cultural, social, or geographic isolation, including isolation by racial or ethnic status, that restricts the ability of an individual to perform normal daily tasks; or threatens the capacity of the individual to live independently”. Consequently, individuals who identify themselves as veterans, homeless or domestic violence victims are additional populations that legal services providers shall attempt to serve.

Lastly, legal services providers shall use efforts to outreach and focus on rendering legal services to Native Americans consistent with title VI of the OAA.

Please note the target populations listed above and found in 42 USC §3026(a)(4)(B) pertains to the 2% of funds used for legal services under the OAA. If additional funding sources are being used for legal services, then there may be other target populations or priority groups that should be served based upon the requirements of that funding source.

Consistent with the joint letter issued by the United States Department of Justice, United States Department of Health & Human Services and United States Department of Housing & Urban Development dated August 5, 2016, legal services providers may render legal services regardless of immigration status of the older individual. Additionally, the US Department of Health & Human Services (HHS) published a list of its programs that fall under the definition of federal public benefits in 63 Fed. Reg. 41,658, dated August 4, 1998. Programs administered under the OAA were not listed. Lastly, a letter issued on August 4, 1998, by the Secretary Administration on Aging reads, in part, “OAA programs are not on the list published by HHS and they do not provide federal public benefits as defined in Title IV of PRWORA. Hence, new verification requirements promulgated by DOJ are not applicable.” Consequently, legal services providers may render legal services to those regardless of their legal status under the OAA but must be aware of other public aid programs which restrict access to services based upon immigration status.

## **B. SERVICE PRIORITY**

Pursuant to 42 USC §3027(a)(11)(E), OAA specifies that AAAs and legal services providers shall give priority to legal cases related to:

- Income
  - Social Security Income and Social Security

- Pension Disputes
- Unemployment Insurance
  - Eligibility, Termination, Reduction, Overpayments
- Any State Specific Income Programs
- Other General Income Issues
- Health Care
  - Medicaid/Medicare
    - Eligibility, Termination or Reduction
  - Medicare Savings Program
  - Veteran’s Benefits Disputes
  - Retiree Benefit, including Pensions
  - Private Insurance Disputes
  - Other General Health Issues
- Long Term Care
  - Nursing Home/Adult Care Home Transfer or Discharge Cases
  - Transition from Long Term Care to a Community Setting
  - Home & Community Based Services
    - Eligibility, Termination, Reduction, Overpayments
  - Other General Long-Term Care Issues
- Nutrition
  - Supplemental Nutrition and Assistance Program
    - Eligibility, Termination, Reduction, Overpayments
  - Other General Nutrition Issues
- Housing
  - Landlord/Tenant
    - Eviction
    - Warrant of Habitability
    - Mobile Tenant Home Issues
  - Real Property
    - Foreclosure
    - Predatory Lending Claims
    - Mortgage Issues
  - Other General Housing Issues
- Utilities
  - Shutoff of Utilities
  - Utilities Billing Disputes
  - Utilities Deposit Disputes
  - Utilities Diversion Disputes



- Other General Utilities Issues
- Defense of Guardianship or Protective Services (i.e. defending an older person against the imposition of guardianship or protective services)
  - Representation to Oppose Guardianship
  - Removal or Limiting Guardianship
  - Restoration of Rights
  - Documents to Preserve Self-Autonomy\*
    - Powers of Attorney, Living Wills, etc.
- Abuse, Neglect and Exploitation
  - Protection Orders and Ancillary Documents
  - Recovery of Money due to Financial Exploitation
  - Actions to Assert Rights and Remedies of Elders against Abuse, Financial Exploitation or Neglect
  - Other General Abuse, Neglect or Exploitation Issues
- Age Discrimination
  - Employment Discrimination related to Age
  - Housing Discrimination related to Age
  - Other General Claims Related to Age Discrimination
- Other
  - This category should be used sparingly when the legal service rendered does not fall within any of the above categories. For this category, a legal services provider must provide a brief description of the type of service rendered and notate it in the client's file and also in the providers' ACL data submission to the AAA and to DAAS.

Subcategories listed under each of the nine (9) service priorities above are those selected by the ACL Office of Elder Justice and Adult Protective Services as issues of legal interest.

\*Consistent with the information provided in an October 31, 2019 presentation conducted by the Administration for Community Living (ACL), if a legal services provider executes a power of attorney, regardless of type, or a living will in addition to a last will and testament, then the legal services provider should mark the case as a 'defense of guardianship or protective services' unless the majority of the legal work would cause the case to fit more accordingly in a different category.

A legal services provider using OAA funds for a legal case which meets the requirements of 45 CFR §1321.71(g) and 45 CFR §1321.71(g)(1), shall provide written documentation in the case file as to why the case was deemed an emergency and what actions were taken to seek other

adequate representation. The legal services provider at the time of monitoring shall alert the AAA monitor of any cases which apply to 45 CFR §1321.71(g) or 45 CFR §1321.71(g)(1).

A legal services provider, or an employee of a legal services provider, is prohibited from using OAA resources to participate in public demonstrations, picketing, boycotting, strikes, or to encourage others to engage in such activities or “at any time, engage in or encourage others to engage in illegal activity.” (45 CFR §1321.71(j)(3)). Consequently, legal services providers shall not provide services for criminal law matters.

## VI. STAFFING

Legal assistance to older individuals with economic or social needs must be provided by a licensed attorney. When feasible, a non-attorney, including but not limited to a law student or paralegal, may assist in providing counseling or other appropriate assistance, providing that non-attorney individual is under the direct supervision of an attorney. Where permitted by law, counseling or representation by a non-attorney is permissible as expressed in 42 USC §3002 (federal) and NCGS §84-4 (state).

Consistent with 45 CFR §1321.71(c), North Carolina shall award funds to legal assistance provider(s) that:

- Have staff with expertise in area of laws affecting older individuals;
- Demonstrate the capacity to provide effective administrative and judicial representation in areas of laws affect[ing] older individuals;
- Demonstrate the capacity to provide support for other advocacy efforts, including the long-term care ombudsman program;
- Demonstrate the capacity to provide legal services to older individuals whom are institutionalized, isolated, and homebound; and
- Demonstrate the capacity to provide legal assistance in the principal language spoken by the older individual in areas of North Carolina where a significant number of clients do not speak English as their principal language.

Pursuant to 42 USC 3027 §(a)(11)(B), if a legal services provider is not a Legal Services Corporation, then the legal services provider shall coordinate its services with Legal Services Corporation projects in an effort to efficiently serve those with the greatest social and economic need.

## VII. Documentation, Reporting and Reimbursement

In 1992, the North Carolina General Assembly created the Home and Community Care Block Grant (“HCCBG”). HCCBG combined funding from the Older Americans Act, Social Services Block Grant and other funding streams into one block grant to provide community support for older adults. The legal assistance program was not included in HCCBG due to its regional infrastructure versus county infrastructure. However, periodically the legal services program has been incorporated into DAAS’ policies which deal with the OAA as legal services is a service mandated by the OAA similar to other HCCBG services. Consequently, a legal services provider may wish to consult with DAAS’ program manuals on consumer contributions (Consumer Contributions Policy and Procedures manual) and monitoring (Service Operations Toolkit for New Monitors). Some legal services providers may wish to consult the monitoring of community [legal] service providers manual (Section 308 manual). All manuals can be located on DAAS’ website.

### **A. CONFIDENTIALITY**

Neither DAAS nor any AAA, or an employee of either group, shall require a provider of legal services to reveal any information that is protected by attorney-client privilege. (42 USC §3026(e), 45 CFR §1321.51(c)). However, when a legal services provider is monitored, the AAA monitor or legal services developer shall be permitted to view ‘basic demographic information’ about the recipient of legal services providing the information presented would not reveal the identity of the client. ‘Basic demographic information’ is defined as those categories listed in V,B (Service Priority) and VII, C (Reporting) of this manual. A legal services provider shall permit any DAAS employee or AAA employee to look at a client’s case file at any time during a monitoring visit as long as all personal identifiable information or any information that would reveal the client’s identity is redacted.

An attorney shall adhere to Rule 1.6, Confidentiality of Information, and, Rule 1.7, Conflict of Interest: Current Clients, of the North Carolina Rules of Professional Conduct while providing legal services using Title IIIB funds.

In the event that a legal services provider represents a client in an administrative hearing regarding reduction or termination of services for a public aid program that a regional AAA or DAAS administers, the legal services provider shall notify a representative from the AAA and the legal services developer about the perceived conflict. To minimize conflicts or potential conflicts for the attorney, including concurrent conflicts of interest under NC Rules of Professional Conduct 1.7(a)(1), the attorney shall provide solutions to the regional AAA and legal services developer on how best to minimize or resolve the conflict. At no time shall the legal services provider be required to divulge the name or identity of the individual. Any conflict or perceived conflict shall be noted in the client’s file in addition to what actions were taken to diminish or resolve the actual conflict or perceived conflict.

## **B. DOCUMENTATION**

### **MONITORING**

An AAA shall use the legal services program manual in conjunction with other DAAS manuals as a basis for their monitoring visits, but each AAA shall retain discretion to ask clarifying questions while monitoring. The legal services developer also has discretion in asking clarifying questions while monitoring (45 CFR §1321.7(a)).

#### FISCAL AUDIT REVIEW:

If a legal services provider: 1) serves as the legal services provider for more than one (1) regional NC AAA and 2) consolidates their financials in one central location, then only one (1) regional NC AAA is required to conduct a fiscal audit review on the legal services provider for financial services. If regional AAAs share in fiscal audit review duties, then a written contract outlining the understanding between the regional AAAs regarding shared fiscal audit reviews must be kept on file and forwarded to DAAS each year in which the written contract is in effect. Any finding of non-compliance will result in a corrective action letter being issued to each participating regional AAA and remediation of the finding of non-compliance shall be the responsibility of all participating AAAs.

#### PROGRAMMATIC MONITORING:

If a legal services provider: 1) serves as the legal services provider in more than one (1) region in NC and 2) the legal services provider has a centralized regional office which serves more than one (1) region in NC, then only one (1) regional NC AAA is required to programmatically monitor the legal services provider; however, the programmatic monitoring must be done on-site at least once every three (3) years or as warranted by their risk status. If regional AAAs share in programmatic monitoring duties, then a written document outlining the understanding between the regional AAAs regarding shared programmatic monitoring must be executed, a copy retained by each participating regional AAA and a copy forwarded to DAAS annually. Any amendments to the written document shall be forwarded to DAAS. Additionally, a regional AAA shall conduct programmatic monitoring for all regions involved in the shared programmatic monitoring arrangement and not programmatic monitoring solely for their region. To accomplish this, each participating regional AAA shall provide any and all necessary information from their AAA to the AAA conducting the programmatic monitoring to ensure monitoring standards for each region are being met. Any finding of non-compliance will result in a corrective action letter being issued to each participating regional NC AAA and remediation of the finding of non-compliance shall be the responsibility of all participating NC AAAs.

#### UNIT VERIFICATION:

Unit verification must be done every other year on each legal services provider in the planning and service area served by each regional NC AAA. Unit verification can be done in conjunction

with programmatic monitoring but is not a requirement. Each regional AAA must conduct unit verification for legal services for their respective region.

## CONSUMER CONTRIBUTIONS

As required by the Consumer Contributions Policy and Procedures type III services, each legal services provider shall provide a client of legal services the opportunity to contribute to the cost of legal services received. To accomplish this, a legal services provider shall provide a consumer contributions form to each client unless the only legal service rendered is a referral to another resource and no legal advice is rendered during the referral. The consumer contributions letter shall include the following:

- Inform each client, or representative, that the contribution is voluntary;
- Inform each client, or representative, that there is no obligation to contribute;
- Inform each client, or representative, that services will not be terminated or reduced due to electing not to donate;
- Inform each client, or representative, that donations will be used to expand legal service;
- Inform each client, or representative, that any donation is confidential; and
- Inform each client, or representative, of the contact person, including their telephone number, should there be questions regarding consumer contributions.

Consistent with DAAS Administrative Letter 13-08, a legal services provider may discuss or solicit consumer contributions at any time during the course of rendering services and is not required to request or discuss consumer contributions at the start of services. Consequently, legal services providers may elect to provide the consumer contributions form to the client at the end of the attorney-client relationship in collaboration with a closing file letter. A copy of the consumer contributions form sent to the client or evidence that it has been sent (e.g. indicating in the carbon copy “cc” line or enclosure line of a closing letter that the client received a consumer contributions form) can be placed in the client’s record to satisfy the requirement of maintaining written documentation. In the event the client is served for greater than one (1) calendar year, then the client shall receive a consumer contributions form annually, within 365 calendar days from the date of issue of the last consumer contributions form, as mandated by the Consumer Contributions Policy and Procedures manual. However, it is not a requirement for a legal services provider to present a client with a consumer contributions form annually if the client’s case extends for greater than one (1) calendar year. Whereas there is no mandated template to use for consumer contributions, the two (2) examples listed as exhibit A or exhibit B at the bottom of this manual, may be used by a legal services provider to ensure they are meeting the requirements of the consumer contributions manual.

## C. REPORTING

Legal services shall be reported in accordance with the number of units of service provided. A unit of service equals one (1) case hour. Effective October 1, 2021, or prior, all legal services providers shall be required to collect the following information for each accepted legal case as required by the Administration for Community Living:

- 1) Client Demographics
  - a. Age and Date of Birth
  - b. Gender
  - c. Geographic Distribution (Urban v. Rural)
  - d. Household Status
  - e. Poverty Status
  - f. Race
  - g. Ethnicity
  - h. Minority Status
- 2) Case Specifics
  - a. Opening Date
  - b. Closed Date
  - c. Case Type
  - d. Case Intensity

This data shall be recorded in conjunction with the federal government fiscal year so that the first of the year begins on October 1<sup>st</sup> and the fiscal year closes on September 30<sup>th</sup>. This data shall be reported biannually on March 30<sup>th</sup> and September 30<sup>th</sup> of each year to the legal services developer through the corresponding regional NC AAA. As this is a federal requirement by ACL, the process for collecting this data and the specific data collected may be amended from time to time to meet the requirements imposed by ACL.

## D. REIMBURSEMENT

Reported service data shall be the basis for requesting reimbursement for legal services. All legal services data shall be reported in ARMS using a three (3) digit service code (130 or 131). All service data shall be reported on a monthly basis to the legal services provider's respective AAA. If a new legal services provider is selected by a regional AAA to serve in their planning and service area, then a representative from the regional AAA shall email or fax to DAAS the Provider Agency Form (DAAS-150 form) within 30 calendar days from the date of selecting a new legal services provider. Any update in a legal services provider's contact information shall be updated in ARMS within 30 calendar days.

A legal services provider, including a private attorney under a purchase of service agreement, may bill travel time for traveling to the client's place of residence including but not excluding to the client's home or to a medical or long-term care facility, so long as the legal services provider has not previously included travel time in their hourly contract rate for legal services. No more

than ten (10) percent of a county's budget allocated to legal services for the State fiscal year may be used to compensate for travel time. All travel time for legal services shall be reported in ARMS using a three (3) digit service code (131). A legal services provider or a private law firm under a purchase of service agreement shall not bill using Title IIIB funds for any time used to educate clients through presentations (e.g., educational outreach) or to advocate for a particular legal cause affecting older individuals.

A list of presentations conducted by legal services providers discussing legal issues affecting older individuals shall be supplied to the regional AAAs at the end of each state fiscal year (June 30<sup>th</sup>). The legal services providers shall submit to the regional AAAs the following information: the topic presented, location of presentation, approximate date and, if feasible, the approximate number of attendees. By July 15<sup>th</sup> of each year, the legal services developer shall remind all regional AAAs of the requirement to report presentations via electronic mail. The regional AAAs shall at such time also submit any presentations conducted on legal issues by the regional AAAs to the legal services developer. By August 1<sup>st</sup> of each year, this information shall be forwarded from the regional AAA to the legal services developer.

Exhibit A  
**LOGO**

Mr./Mrs. «Client»  
«Street\_Address» , «Street\_Address\_2», «AptSuite»  
«City», «State» «Zip\_Code»

Dear <<Client>>

One or more of our attorneys recently provided assistance to you on a legal matter. We hope this was helpful to you.

Name of legal services provider is a private non-profit corporation/law firm/legal services corporation, funded in part by tax dollars, which provides legal services to persons who qualify. Name of legal services provider does not normally charge for the legal services it provides to those receiving legal services but relies on funding from a number of sources.

**Monies to pay for the legal services comes under Title III of the Older Americans Act through federal funding.** This law requires Name of Legal services provider to match a portion of the federal funds with local funds.

**Name of Legal services provider accepts voluntary contributions from persons like yourself, who have used our services, in order to expand needed services to others. There is no obligation to contribute.**

**If you would like to contribute in any amount to Name of Legal services provider** to help meet its expenses, you may do so by mailing your check or money order to:

<b><i>LEGAL SERVICES PROVIDER NAME, ADDRESS OF LEGAL SERVICES PROVIDER</i></b>
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You may also contribute by visiting our office. All contributions will be confidential; Name of legal services provider attorneys will not know who gives or does not give. Whether you give or not will have no effect on whether you can receive help from Name of legal services provider and will not reduce services for failing to contribute. If you should have any questions about contributions, you can contact \_\_\_\_\_ in our office at Telephone Number.

Thank you for your consideration. Your contribution will help provide legal services to others in need.

Name of legal services provider  
Relevant Contact Information



## Exhibit B

### VOLUNTARY CONTRIBUTIONS FOR LEGAL SERVICES

Name of legal services provider provides legal assistance to individuals who have obtained 60 years of age at no cost to them.

Name of legal services provider is able to provide these services because it receives federal, state and county funds. Some of Name of legal services provider clients have made voluntary donations for the legal services they received.

- ❖ You may make a voluntary contribution in any amount but there is no obligation to contribute.
- ❖ The services we provide to you do not depend on whether you make a voluntary contribution.
- ❖ Services will not be reduced if you do not make a voluntary contribution.
- ❖ We will keep confidential any information about whether you make or don't make a voluntary contribution.
- ❖ Any voluntary contribution you make will be used to expand the services we provide but is NOT tax deductible because you are receiving services.
- ❖ Name of legal services provider will keep an accurate accounting of all contributions.

If you would like to make a voluntary contribution,

Please mail a check or money order made payable to name of legal services provider to:

Name of legal services provider, ADDRESS

**Don't forget to include this form.** If you have questions, please feel free to contact, \_\_\_\_\_, at Telephone Number. Thank you for considering whether to make a voluntary contribution.

**PLEASE COMPLETE AND INCLUDE WITH YOUR DONATION.**

Client Name \_\_\_\_\_ County \_\_\_\_\_ Amount \_\_\_\_\_