

**Administration for Community Living – Administration on Aging**  
Model Approaches to Statewide Legal Assistance Systems—Phase II  
Conference Call for Potential Applicants

Moderator: Omar Valverde  
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1:00 pm CT

Coordinator: Thank you all for standing by. At this time today's call is being recorded. If you have any objections you may disconnect at this time.

All lines will be open. Please utilize your mute. If you don't have one you can use star 6 to toggle back and forth.

And I'd now like to turn the call over to Omar Valverde. Thank you sir. You may begin.

Omar Valverde: Thank you. Hello everyone. I'm so glad that everyone can join us this afternoon for the Model Approaches Phase II conversation we're going to have.

I'm joined here as well by Valerie Soroka who is a project officer for Model Approaches Phase I. Val and I have worked together on Model Approaches projects for a number of years. And we're always just very excited to start a new series of initiatives.

And we are also joined by LaDeva Harris from our Office of Grants Management that can answer questions for you about the often mysterious grant process itself.

Thank you all for calling in today. I know that most of you out there are proud veterans of the previous iterations of the Model Approaches grant and really have made significant progress in improving legal service delivery systems in your states.

Now you all have a chance at a Model Approaches Phase II cooperative agreement that will allow your state to evolve towards even higher levels of capacity and service delivery impact.

And that will continue to move your states towards those more integrated and cost-effective service delivery systems that address priority legal issues that are important to and impact older Americans and especially responsive to the whole range of various legal issues that we know emerge from cases of elder abuse, neglect and financial exploitation.

And I know that many of you are aware that this has been a key priority for Kathy Greenlee for going on the last 3-1/2 years now. And there is definitely a tremendous national movement on the elder abuse prevention front and that activity will only intensify once recommendations from the elder justice coordinating council are presented to the secretary of HHS and Congress for review and possible action.

And let me just say the members of the Elder Justice Coordinating Council are very much aware and conscious of the importance of legal services in preventing and responding to all forms of elder mistreatment.

The first thing that you'll notice about the program announcement and what we're calling no longer program announcement -- we're calling them FOAs now, funding opportunity announcements -- is that you notice it's really quite lengthy and it has lots and lots of details.

And it has a wide range of mandatory and discretionary components all of which will go into making your high-impact and well-integrated legal services delivery tapestry in your state.

Now we recognize that may seem a little bit daunting at first. But if you break this application down -- if you break it down to its basic components as you no doubt probably already have, it should make a great deal of sense to you based on your previous experience and involvement with the Model Approaches construct itself.

And you may realize that many of the required partnerships in this grant you already have a pretty good start at and may even have them already in place. And I think you'll find that the greater detail in this (FOA) in terms of what's expected from you in your applications is meant to help you write a better application.

So, first, I think you should look at the FOA as a kind of blueprint that identifies and describes a full range of raw materials from which you can build your ideal legal service delivery system in your state.

In other words it's a kind of blueprint for what we think is a very special kind of delivery system, the Model Approaches Phase II legal service delivery system.

And if you -- I hope you all have your FOAs in front of you -- if you look at Page 10, Page 10 of your FOA, that is the stated Goal of this cooperative agreement, to create a Phase II legal service delivery system. You're thinking, "Well what's that?"

And those types of systems have -- you'll see -- have some very distinct (features and components all of which are advanced by the seven objectives of the grant, the lucky seven objectives of your grant. And you see those listed on Page 11 of the FOA.

Now if your state is a grantee, is lucky enough to be a grantee, and you implement each one of those objectives with a high level of excellence, your state would then have achieved a status of a Model Approaches Phase II legal service delivery system.

Now at this time I am going to go over those objectives one by one with you and pause between each objective to see if you have any questions. I think that's the way I want to proceed.

The first objective -- and once again we're working off of Page 11 everybody - - the first objective deals with assessing the capacity of your current legal service delivery system to meet the priority legal challenges impacting older adults in your states that are most in need.

And I know many of you are thinking out there, "Hey wait a minute Omar. We already did a capacity assessment last time. Now you're going to make us do this all again?"

But you need to reflect carefully on that. The question really is, "Did you really do a capacity assessment as described in this current FOA?" You need

to determine whether you really did do a true capacity assessment the last time around.

Remember legal capacity assessment is not the same as a needs assessment. It is the flipside of a needs assessment. In other words capacity assessments examine the existing service delivery structure, infrastructure, to see to what degree it is actually capable of meeting the legal needs you have previously identified in your states.

By comparing those two sets of data you identify where the legal service delivery gaps are. And from there you can make, you know, concrete recommendations and take your proactive steps to address those gaps.

Now Pages, 15 and 16 now those pages go on at length on what a capacity assessment is, and what all its components are.

So I'm not going to go over that in great detail with you unless you have a question about a specific component within the capacity assessment.

But read that portion very carefully because the important caveat here is that if you can demonstrate to us, ACL, that during the post-award negotiation phase that your state has already done a capacity assessment in the last five years that meets the requirements and descriptions of this grant -- and I should note -- that capacity assessment has been woven into a broader needs and capacity report that makes concrete recommendations that address the systemic weaknesses that you found, then and only then, will the ACL waive that objective for purposes of Model Approaches Phase II.

Now I hope that makes some good sense. At this point I'm going to pause to see if anybody has any questions about the capacity assessment portion of the FOA.

Okay hearing no questions I want you to also pay attention to the fact that you're looking for a capacity assessment that may have looked into legal issues emerging from elder abuse, neglect and financial implication.

Look at your previous capacity assessment if you did one and see if it adequately addresses those types of legal issues that spring from that category. That's the only additional caveat that I would put on that.

But once again the FOA goes on in detail in terms of what the components are that you need to have in your capacity assessment. And remember this capacity and needs report lays the foundation for a lot of stuff in this.

It lays the foundation for your strategic outreach and targeting plan. It lays the foundation for your strategic, your statewide legal training agenda and also sets forth the foundation for your data collection and reporting system. So it's a pretty important document to have hammered in.

Now the next objective is to integrate and (calibrate) low-cost service delivery components so they are ideally responsive to the priority legal issues in the...

((Crosstalk))

Omar Valverde: ...Older Americans Act including legal issues related to elder mistreatment. Now this is no different than what you had to do on the Model Approaches Phase I in terms of integrating low-cost mechanisms into your broader

tapestry except this time there is a special emphasis on the numerous issues that spring and emerge from elder abuse.

And we know those issues well. I know you guys do -- everything from preventing further losses of property and assets to creditor harassment issues to rescinding or revoking surrogate decision making arrangements that are abusive, removing abusive guardians and misused powers of attorney, that kind of stuff.

Now these things can be as you know fairly complex areas of elder law. So it's not always easy to orient entities like your helplines and your volunteer attorneys to take on those more difficult issues. And to help in those cases the way that we think there is potential for them to help.

Now Model Approaches Phase II is designed to provide the proper inducement to make this happen, to sharpen those components in that direction.

That means that you can use your funds in this grant to integrate any of the low-cost components that I have listed here on Pages 16 through 20 -- mark those pages, Pages 16 through 20 -- integrate those components into your delivery system.

And now in terms of how much money you can allocate to support each one of those particular components you may notice that only the senior legal help lines have set funding parameters. And you will notice you can - you may allocate no less than \$75,000 and no more than \$85,000 to support your help line and to calibrate it to be more responsive to legal issues emerging from elder abuse and all forms of elder mistreatment.

As part of the overall grant -- and this is important -- the grantee has to make a good-faith effort to incorporate all of those low-cost components I have listed on Pages 16 through 21. And that includes pro bono volunteer services, reduced fee panels, law school clinics and self-help resources.

But that doesn't mean necessarily, once again, that you have to allocate grant funding directly to those efforts. As with all the potential partnerships you'll find in this FOA with the exception of help lines, the low-cost mechanisms do not necessarily have to have funds allocated for the formation, support and integration.

The necessary partnerships can be formed perfectly well with no money allocated at all by creating memorandums of agreement, protocols of referral and cooperation and even just something as simple as commitments to train together on priority legal issues. Those activities usually mostly only require human capital.

So are there any questions at this time about integrating low-cost mechanisms into your broader service delivery tapestry?

((Crosstalk))

Woman: I'm sorry.

Omar Valverde: No go ahead. Yes.

Woman: Thank you.

Omar Valverde: Hello?

(Mafine): Hi. This is (Mafine) in Nebraska. Did you say that we had to address all these low-cost in our plan?

Omar Valverde: You have to make a good-faith effort to reach out to those entities and to integrate them as part of your overall delivery system.

(Mafine): Okay.

Omar Valverde: That - however you don't necessarily have to allocate grant funds to do so.

(Mafine): Thank you.

Omar Valverde: You're welcome. Okay.

Cheryl Driscoll: I have - oh I have one question. Sorry.

Man: (Unintelligible).

Cheryl Driscoll: Can you hear me?

Omar Valverde: Go ahead.

Cheryl Driscoll: This is Cheryl Driscoll. I'm with New Hampshire Legal Assistance and unfortunately a couple years ago our program lost \$1 million in state funding. And we had to discontinue our advice line. And so - and we haven't been able to get it back up again.

(And would) we basically be disqualified because we don't have a current, you know, what you consider a help line right now? I mean, we still have a toll

free number and we still help people. But it doesn't have the same kind of advice focus that it did before.

Omar Valverde: Yes your question has two components. The first part is whether you can be a primary applicant in this grant. I'm not sure...

Cheryl Driscoll: I know I can't do that. No no. That wasn't my...

Omar Valverde: Let me go to the second part. And is it - I think definitely if you look at the FOA it does refer to civil legal providers as discretionary partners in this grant. So you can be...

Cheryl Driscoll: Okay.

Omar Valverde: ...in cooperation with the state unit on aging and there's no reason why you cannot partner with the state unit and contract with the state unit to start your help line again.

Cheryl Driscoll: Okay okay. Well that'd be - yes, I mean, I just wanted to know whether that would kind of - I'm thinking it probably isn't the best (facts) over here because we don't have one currently in operation. But...

Omar Valverde: Not at all, I mean...

Cheryl Driscoll: ...you're saying it doesn't - okay great. Okay thank you.

Omar Valverde: I mean, you can propose to start a fully robust helpline...

Cheryl Driscoll: Yes. Okay.

Omar Valverde: ...to your current sytem. And also you've got the fallback where you can be a civil legal provider which you are...

Cheryl Driscoll: Yes.

Omar Valverde: ...and be a part...

Cheryl Driscoll: Yes.

Omar Valverde: ...although not as a mandatory partner. That's a discretionary partner. I'll get to that later.

Cheryl Driscoll: Okay great. Thank you.

Omar Valverde: Thank you Cheryl.

Cheryl Feuerman: This is Cheryl Feuerman, Consumer Law Project for Elders in Connecticut.

Omar Valverde: Yes hi Cheryl.

Cheryl Feuerman: I just need - hi Omar. I just need to clarify on the \$75,000 to \$85,000 that's allocated to the senior legal hotline. Would that be per year? Or is that over the three-year period of the grant?

Omar Valverde: That's per year.

Cheryl Feuerman: Okay thank you very much.

Omar Valverde: And the reason we put those parameters, we didn't want a grantee to select not to fund the helpline at all or - we wouldn't want the grantees to allocate all the

fundings to helpline since there are so many other worthy objectives in this grant.

Cheryl Feuerman: Okay.

Omar Valverde: So that's why you kind of see this range. Does that make sense?

Cheryl Feuerman: Yes understood. Thank you.

Omar Valverde: All right the third objective...

(Michael Davinado): Omar?

Omar Valverde: Oh I'm sorry.

(Michael Davinado): This is - hi this is (Michael Davinado) from Vermont.

Omar Valverde: Hi (Michael).

(Michael Davinado): My question on that hotline funding -- the \$75,000 to \$85,000 is the federal funding. I assume we can also allocate some of our state match to supporting hotline activities.

Omar Valverde: Absolutely. Absolutely. And once again if the folks are having trouble with meeting their match requirements on this grant you can get a hardship waiver through this.

We just wove that in recently into the FOA. So that's a consideration as well.

Now the third objective is to develop outreach and targeting strategies designed to identify and serve older adults' multiple needs. These requirements everybody you'll find on Pages 37 and 38.

And again, you know, what's required here in this objective is really no different from what you've done in the past with your great outreach efforts under Phase I.

But this time we really want you to test yourselves on this. We want you to be as innovative as possible, creative as possible in your statewide outreach and targeting plan. And that's a required document that you need to complete in your first year of the project.

For example your plan could include things like incorporating the use of GIS mapping techniques. And I think (Michael) from Vermont who just spoke. I think Vermont and New Hampshire as I recall - actually no. Scrap that. Connecticut and Michigan were two states that I noticed last time around that used that.

They're really using this technique to make more of a science I guess of where those limited outreach resources are deployed in a state. And some of the more impressive projects we saw last time around include outreach activities that involved direct client intake and actual provision of legal services onsite.

In other words many grantees were reaching out to the right clients at the right places, but not just handing out information or business cards. They were active providing directive legal advice onsite.

We were also impressed with the direct provision of service to homebound seniors in some of those previous grants.

So this is all really high-impact stuff in our estimation. And we want to promote those kind of activities in Phase II to the greatest degree possible. And we really want to see you reach new levels in your outreach efforts in close coordination and collaboration with aging and disability networks.

Now are there any questions? We go into a lot of details in terms of what's going on with your outreach plan and what needs to go into that. So I don't know if I need to cover all the pieces. But if you have any questions with regards to that let me pause for a second.

Woman: (Unintelligible).

Omar Valverde: Anything on outreach and targeting the plan that's required in the first year, its components, its intent, the things you can do?

I - yes. With these types of objectives I'd try to be in interface as much as possible and coordinate them with the pre-existing efforts going on with the aging and disability networks through your AAAs. That would be my best advice, to start from there.

Also make sure to target your secondary sources. If you can't reach, you know, the high-impact priority targets out there directly, you can always go through secondary sources with providers and professionals that reach them directly such as APS, Protection Advocacy agencies and your Ombudsman. These are just some ideas.

The fourth objective is to fully implement statewide legal services, the standards. And let me refer you to Pages 38 and 39 of your FOAs.

As we know these legal standards are really essential documents that can help you ensure high quality and consistent legal services across your state.

Now standards serve, you know, to really clearly define the roles of all the vital components or players that we're talking about here in your service delivery system -- the roles of the state units, the roles of the LADs, the AAAs, your III-B providers, the helplines and so forth as well as setting forth clearly the prior legal issues and the target audiences to be served on those issues.

These documents the way I visualize it really serve as systems templates or systems blueprints that really, you know, define, describe and formalize the ideal legal service delivery systems that we are trying to build out there.

Under this objective you need to describe a plan bring together a group of key stakeholders from aging and disability, legal, and elder abuse prevention networks to help develop and implement your legal standards.

Now once again, if you previously implemented your standards in Phase I your application should describe the intent to review your current standards, review - take out the dusty copy of your current standards to see if there's sufficient emphasis placed on the most current and emerging legal issues in your state including and especially, once again, legal problems emerging from elder mistreatment, all the categories of elder mistreatment.

And then determine - from there if you need to modify and enhance or update your standards accordingly. Remember more than anything else, the standards are your systems blueprint actualized at the state level. And they need to be current and up to date and reflect the current realities of your current legal service delivery system.

I should note that many uses of the standards are listed on Page 38, you know, what you can use your standards for -- everything from providing the framework for provider contracts to forming the foundation for statewide reporting systems. It's all there listed out for you.

And the requirement is that a new – or a revised set of standards needs to be in place by year two of the grant period.... year two of the grant period. And that should be more than enough time for you to do this considering you all have had at least three years to lay the foundation for those standards in your last go of Model Approaches.

Now are there any questions about developing and implementing legal standards or guidelines for your state?

Once again I would pay particular close attention when you're reviewing your standards as to whether they're paying attention to the elder abuse prevention components, whether the systems are aligned or in place to be more responsive to those types of issues.

Take a close look at your standards. You might need to bring in, if you haven't done so before, APS workers, the ombudsman to refine and build upon these standards. So keep that in mind.

The fifth objective is to establish a framework for the implementation of statewide legal data collection and reporting systems. Now that takes you to Pages 39 and 38 of the FOA.

This is very important to listen here. If that “established a framework language sounds a little bit softer than say the requirements to implement standards for instance, that's because in some ways it is a little softer.

We are fully aware that creating a statewide reporting system that measures outcomes and the impact of your legal services can be a very important but potentially very costly achievement for your states. And that really goes beyond what this grant would be able to support given that you have so many other numerous objectives to achieve.

And that being said - you know, in this current service delivery environment, I know you all agree with me, we all need to have the ability to collect data that quantifies a tangible beneficial impact our services have on the independence, health, and financial security of seniors.

This is hugely important. You know, for the sake of program sustainability. We need to be able to develop credible impact data to show the value of Older Americans Act funded legal programs.

But, we know...We're fully aware that creating systems like this is not an easy thing to do. But you're certainly never going to make progress in that direction if you don't have a concrete plan of action.

And that's why Model Approaches Phase II requires you to complete a data collection plan that sets forth the resources necessary and the steps that need to take to achieve a uniform statewide reporting system that collects outcomes data.

Now the creation of the plan and the movement towards this implementation are the essential requirements of this objective although we are fully aware

and recognize that states will have varying abilities to proceed to full implementation on this objective.

Yes it does sound a little softer and squishier. So does anybody have questions in terms of what I just said?

(Elisa Shly): I have a question.

Omar Valverde: Sure.

(Elisa Shly): Can you hear me?

Omar Valverde: Sure.

(Elisa Shly): This is (Elisa Shly) from Minnesota. We weren't a Phase I recipient. And listening to this conversation is the funding opportunity only for the Phase I states? Or are other states able to apply for this?

Omar Valverde: No the primary applicant will be the state unit housing the legal service developers in the 31 previous Model Approaches states, so the previous Model Approaches Phase I states.

And there is a separate program announcement now for the Phase I grants as well. So yes this is only for states that have been previously involved. And it's only for states that currently house -- not "proposes to house", or "may house", but currently house -- the Legal Assistance Developer. And that could - most times, more often than not, it will be in a state unit on aging.

(Elisa Shly): But you said there is a Phase I opportunity available now?

Omar Valverde: Yes. And actually we're going to have a conference call on that tomorrow.

(Elisa Shly): Perfect. Thank you so much.

Omar Valverde: Yes it's 2:00.

(Bruce Bauer): Omar this is (Bruce Bauer). May I ask a question?

Omar Valverde: Go ahead (Bruce). How are you doing?

(Bruce Bauer): Good. Thank you very much and I hope you're doing well as well.

Omar Valverde: Great. Yes.

(Bruce Bauer): My question concerns the scope of the statewide legal data collection and reporting system...

Omar Valverde: Right.

(Bruce Bauer): ...measures program outcomes. Is that meant to capture data from entities that are not under the Older Americans Act? I'm thinking of - is that meant to capture data from legal services grantees and law school clinics that may not have the same kind of relationship with the Older Americans Act as say Title III-B programs have?

Omar Valverde: That is such a good question (Bruce). Actually we want these reporting systems targeted to the III-B services under the Older Americans Act. Actually that's a point that should have been more clear in the FOA. So thank you for bringing that up.

However collecting data on some of those other components that you mentioned (Bruce) could be part of - go towards establishing your outcomes...

((Crosstalk))

Omar Valverde: ...in terms of direct service delivery in terms of what kind of cases are being addressed, the kind of target audience being reached and even if you have any impact data from components like volunteer services, your reduced fee panel- if you established one- or a law school clinic.

So your question is good on two levels. I've got to be clear again. The statewide data collection system refers to Title III-B funded legal entities in your state. Thank you.

(Lynn Barry): Omar this is (Lynn Barry) in North Carolina.

Omar Valverde: Hey (Lynn).

(Lynn Barry): Hi.

Omar Valverde: Hey.

(Lynn Barry): I guess the other side of that question is does that also apply with the capacity assessment is just the Title III-B providers.

Omar Valverde: Actually the converse is true on that. If you look - let's flip back to the essential components of that if you give me a second. We are referring to the core components of a legal service delivery system which are defined as the Title III-B providers, senior legal helplines, the pro bono volunteer attorneys, law school clinics, etc....

So yes it includes all of those basic components. So it actually - that scope is broader than what the parameters that we are setting for the statewide legal reporting system.

That's an excellent question. We wanted you to encompass the whole range of vital service delivery components within your systems.

(Lynn Barry): Cool. Thanks Omar.

Omar Valverde: Yes. Okay are there any more questions on -- we're going right through this -- any more questions on the data collection part?

Now remember eventually the gold standard to this will be, you know, in terms of outcomes that you can possibly get from these reports is, you know, the monetary value of your legal intervention in terms of your ability to recover public benefits, what dollar value that holds and also what I call a second tier, double whammy in terms of what is the impact on your state budgets in terms of legal interventions and what kind of savings can you quantify.

That stuff is powerful stuff for funders and policymakers to see.

So but, you know, once again this is like pie-in-the-sky stuff. Very few states have achieved this level of sophistication. But we hope, you know, that these goals will be taken seriously and we can look and see serious movement towards implementation, towards data collection systems that can do that.

So that's kind of my last comment on reporting. Now let's move to objective six.

(Lynn Caswell): Omar?

Omar Valverde: Yes.

(Lynn Caswell): This is (Lynn Caswell) from Maine. I have a question about the reporting. Is there any reason why we couldn't - if there was something in our APS statewide to collect data for our APS if we somehow combined those and if our proposal involved let's say APS or (unintelligible) or guardianship or - does it have to be discreet and separate?

Omar Valverde: No. I mean, hypothetically if you can separate your Title III-B data from the APS data that would be great. However what you mentioned would be really good if you can correlate your APS case categories with the responses that your Title III-B (networks) took to remediate or help in those elder abuse cases.... that would be like a beautiful hybrid if you're able to correlate the APS cases with the legal case results.

Does that - I don't know if that's what you were - maybe you were mentioning like the APS data in lieu of a statewide data collection system that's of course III-B...

(Lynn Caswell): Oh no I was wondering if in addition or if there...

Omar Valverde: Yes that would - yes actually that would be totally consistent with the spirit and intent of this grant. You notice that elder abuse prevention permeates everything that this grant is about. And what you just mentioned, if you could do it, would be fantastic.

(Lynn Caswell): Okay good to know.

Omar Valverde: Okay. All right objective number six, establish partnerships or collaborations... Now distinguish the words partnership from collaboration... I'll get into more of that later... collaborations and partnerships with aging and disability and elder abuse prevention networks interested in improving legal responses to elder mistreatment.

Your options under this objective seem.... really there are a lot of options. And they run through Pages 21 through 36. And you can really select and choose to weave your service delivery tapestry with all these components.

You'll notice that if you look at the language describing the different partnerships, you'll see that, you know, the classic lawyer's use of mandatory language like, you know, the applicant "shall", the applicant "must" or the applicant "will.

And when you see that language you need to pay particular attention to proposing to form of partnership with the component that's in question.

You'll also see discretionary language as well in the application. You know, you "may" do something or the applicant "may" form partnerships with X, Y and Z.

So just to be clear, make sure everybody's clear, under the language of this FOA the state unit must partner or collaborate with the following five categories of entities... the following five categories of entities.... at least one aging and disability resource center, at least one entity involved in administering programs that assist people with Alzheimer's and their caregivers.

You need a partnership or collaboration with Adult protection services. You need a partnership or collaboration with a long-term care ombudsman. And you need a partnership or a collaboration with a state court or other entity that have oversight responsibility for persons in a guardianship or conservatorship. Those are the five mandatory partnerships and collaboration.

Now when you're forming partnerships or engaging in collaboration with these entities you may choose once again to allocate a portion of your grant funding to advance the activities under those partnerships just as you can with the low-cost components that I talked about.

You may - of course as I mentioned you may choose not to allocate any money to forming these partnerships or collaborations. But either way you go on the funding issue, you must seek out the partnerships with these entities. They are considered critical and essential components of your Phase II legal service delivery tapestry.

Now the balance of the other partnering entities that you see there -- these are discretionary -- that includes your legal medical partnerships; financial institutions; P&As, protection and advocacy entities; tribal organizations; and of course individual civil legal services entities.

Now partnerships may or may not be established with those entities and funding may or may not be allocated to developing those relationships.

Now...

(Michelle): Omar?

Omar Valverde: ...I know that there's a lot of components here. So I would expect some questions about particular partnerships that are referenced there ... both the mandatory and the discretionary ones.

So let's open up the conversation here.

(Michelle): Omar?

Man: Omar?

Omar Valverde: Oh I knew it. Yes. Okay who was first?

(Keith): This is (Keith) -- just a quick question. In terms of establishing the partnerships do we have to have former memorandums of understanding for the grant or letters of support? Or what's required for purposes of applying to show that these partnerships will be established?

Omar Valverde: Yes you'll notice the partnerships that I listed as mandatory (Keith) do require a letter of support in your application. Showing they're going to go along with the common goals and objectives of this grant. So by all means you need a letter of support.

Now in terms of what constitutes a partnership of collaboration, you have a lot of options. If you fund money to it, it sounds more like a partnership. And you're going to need a contract and your contract needs to be very detailed in terms of what you expect from them.

And we would hope that you have within those contracts the requests for data in terms of what they're producing. So that's one level.

Now the second level is collaborations. And you can call these partnerships or collaborations. That means reciprocal protocols of referral, agreements between entities to refer certain cases to certain folks. That's one level.

And of course the higher level that borders on partnership is memorandums of agreement that typically have - describe your parameters of information exchange for instance. They have training components and they have outreach objectives in those as well, at least the ones I've seen.

So that's - so it depends on how you define partnerships of collaborations. I think both of them are acceptable.

And once again you may or may not choose to assign funding to those. Indeed the only thing you have to.. in this grant.. assign funding to is a helpline component.

All right does that answer your question (Keith)?

(Keith): Yes thank you.

Omar Valverde: All right cool.

(Michelle): Omar this is (Michelle) from North Dakota.

Omar Valverde: Hi (Michelle).

(Michelle): Hi. Could you just go through the five one more time for me?

Omar Valverde: Sure.

(Michelle): Thanks.

Omar Valverde: Aging and disability resource center -- and this may be analogous with your AAA in your state. I'm not sure. Aging and disability resource center, at least one entity involved in administering programs that assists Alzheimer's...

(Michelle): Okay.

Omar Valverde: ...caregivers. And this is important you asked this because in some states the ADRCs that have the money from -- what was it called -- the - from the Prevention and Public Health Fund that went out. This was part of the Affordable Care Act money and some ADRCs have that.

So you could actually kill two birds with one stone in theory if you partner with an ADRC, okay? The other one was partnerships with an adult protection services and partnership with your long-term care w ombudsman and a state court or other entity that has oversight responsibilities regarding people under guardianship.

And this could include if your state has a public guardianship program - that's the other - that's one example of another entity that you would need to reach out to and form a collaboration with.

(Michelle): Thank you.

Omar Valverde: All right. All right let's see. Okay guys there's one more thing I want to draw your attention to. I don't remember what page this is one. It's kind of embarrassing.

But there's reference and actually I think it comes right in the Guardianship Partnership section. And that's the section dealing with partnerships involving guardianship entities has a section that refers to WINGS. And WINGS stand for Working Interdisciplinary Networks of Guardianship Stakeholders.

Now I'm aware of seven states. I don't have them off the top of my head and I promise to put this in a frequently asked questions document that we'll issue after this conversation... that this is an entity that's been funded to start up a nucleus of stakeholders that are involved in guardianship issues.

And it seems to me if your state is one of those recipients that's been asked to form a WINGS this would be a logical entity for the state unit to reach out to. Now of course if they have not received that - this doesn't apply to states that have not received that money to start this nucleus of stakeholders.

But that's just an idea to think about. Think about the WINGS. Once again I wish I had the page number for you. But it is in the section regarding guardianship partnership and collaborations.

Okay and with regards to APS I'll just briefly reiterate that we hope that those entities agree to cooperate in referring clients in certain types of cases to your legal provider network.

If they're not doing so already then that would be a good idea to - a good opportunity to get with your APS entity to review what the referral protocols are right now in terms of how do they get in touch with your legal providers to remedy harms caused to their clients in the different mistreatment categories.

And also you should bring in - this is an opportunity now to bring APS into the multidisciplinary construct. And indeed this is an objective that's been

advanced by our Elder Abuse Prevention grants. There's perfect overlap with Elder Abuse Prevention grants that are out there.

And I think in the FOA I list all the states where that's happening right now on Page - that's on Page 33. So yes this is a good opportunity to bring in APS into the fold.

And in terms of multidisciplinary construct or MDT it's not going to do just to have APS there with your law enforcement and other entities. You have to have legal providers there at the table as well to show that they are instrumental in intervening and remedying the harm caused by elder abuse.

So think about a partnership that can actually put together a team concept, an MDT, multidisciplinary team concept, that we've seen in other states. And hopefully maybe one of your states has an Elder Abuse Prevention grant where you can have synergies form between those two grant initiatives.

Okay moving on to objective seven (was) to establish and implement a statewide legal training agenda. And you can find the statewide legal agenda information on Page 41.

As you can see you have a wide range of options on who you can train and what legal issues they will be trained on. But we hope to see a sharp focus once again on the legal issues coming out of elder mistreatment.

And the FOA makes it pretty clear whenever training is mentioned, in any of those partnerships, for instance, that a cross-training format is a preferred format. And this is especially true in the context of elder abuse-related issues which involves APS, ombudsman, and III-B providers training together and training each other, because it's quite clear to us that each one of these

disciplines has, you know, plenty to learn from the others in these complicated areas of elder law.

And you should also note that the training agenda needs to be completed in the first year of the project along with your target and outreach plans. These activities should go hand-in-hand in the first year with the training agenda and your target and outreach plan.

Are there any question related to the statewide training agenda?

Man: (Unintelligible).

Omar Valverde: Okay is the operator still there? Operator?

Coordinator: Yes.

Omar Valverde: Can you put the lines on mute?

Coordinator: Yes just a second.

Omar Valverde: Okay seven lucky objectives as you can see them ...and you can clearly see the theme of elder abuse prevention runs through each one of those objectives in some way.

And there is another theme that, you know, runs through the entire FOA as well. And you'll notice that the legal assistance developer's role is everywhere in this grant. They are the assigned leaders in achieving each one of those objectives.

And we are looking for strong and fully empowered LADs at the state level to lead these grants. They are the absolutely critical players because as you all know under Title VII they are the ones tied directly into the statewide legal service delivery planning process.

And it is through elder rights provisions of state plans and area plans that the vital components of these efficient and effective legal service delivery systems can be formalized and sustained beyond your project period.

The role in the state planning for LADs is an empowering element that is just too often overlooked. And you will notice references in the state plan -- I'm sorry -- reference in the FOA to the state planning process a couple of times.

Now ideally we would like to see the systems blueprint that your states implement in Phase II be reflected at some level through your state plans. Otherwise the Phase II grants ... I fear they're destined to become just stand alone grants that really have, you know, no logical interface or connection with a broader vision of aging service delivery in your states, including legal service delivery and elder abuse prevention activities in your states.

Now just kind of in closing here... you will notice that the objectives whether you take them separately or in combination are sufficiently challenging. So it's clear to us that only the most motivated entities and LADs should be involved in applying for these grants because it really is going to be the social services equivalent of a Navy SEALs course, a three-year-long Navy SEALs course.

And it's designed to be that way. It's designed to be hard and to challenge folks to a higher level of achievement because let's face it. Nobody ever said, nobody ever said, that the process of systemic evolution and transformation is an easy thing.

So the prevailing states will definitely have to work hard within limited resources. And your proposals need to reflect the necessary drive and commitment to this.

And that's why, if you'll notice, I want you to bring your attention to that 50% of the points available in your grant will be allocated to details described in your project narratives, in your approach.

And you'll notice that if you look at those requirements, the review criteria, they are a mirror image of the requirements from Pages 10 to 47. Think about what an advantage that is for you.

I know that many of you out there are lawyers of course. And you can harken back to your law school days where you wish you had the professor's scoring sheet in front of you before an exam because the professor told you that if you missed certain issues you won't get points.

That's the same thing here in terms of your requirements. So in essence your detailed scoring criteria is more detailed than it's ever been. It's kind of your cheat sheet - to prevail in your application because you know exactly - you'll know exactly what those reviewers are looking for and what we intend to train them on to look for.

So take a look at that scoring criteria very carefully as you go through - you can't lose if you follow that template.

Okay now at this time Operator can you unmute the lines? Operator?

Coordinator: Yes just a second.

Omar Valverde: Okay.

Coordinator: All lines are open now.

Omar Valverde: I have some more time for questions and answers.

(Shoshana): Omar this is (Shoshana). I have kind of a more general question.

Omar Valverde: Sure.

(Shoshana): I know you can't predict the future, but I see that there are six awards to be made in Phase I and seven in Phase II and - the other way around. And is that - do you anticipate that next year there will be another FOA for Phase I or Phase II? Or is this going to be it for three years and then there'll be another cycle?

Omar Valverde: That's a great...

(Shoshana): (Did) I make myself clear what the question was?

Omar Valverde: (Shoshana) yes. And I'm sorry the answer is no there will not be a new iteration in Model Approaches Phase II for the second year. It is a three-year grant.

We had to make some funding allocation decisions. You'll notice the grants for the Phase II are much more hefty than the previous iteration. So we had to have fewer grants.

But we were dealing with a finite number of, you know, resources that we've been dealing with for a number of years with regards to this initiative. So unfortunately the answer to your question is no.

This is going to be a Phase II for the next three years. And of course we can't make any guarantees what comes after that in terms of a new round of Model Approaches Phase II.

(Shoshana): Thank you.

Omar Valverde: All right (Shoshana). Thank you.

(Lynn Barry): Omar this is (Lynn Barry) in North Carolina.

Omar Valverde: Yes.

(Lynn Barry): Could you go into the details about what would be required for the waiver?

Omar Valverde: Yes, but the language is pretty - it should be in your FOA. I don't have that in front of me, but it does talk about your state establishing a hardship in terms of being able to meet the waiver requirements.

And it does say state in detail why you can't. So it's not just - you can't just make a statement that says, "Well we're suffering fiscal difficulties in our state and we can't meet the match." I think they want some more levels of detail in terms of what the actual fiscal situation is in your state and why you cannot meet the match requirement.

So but the language is pretty much clear in the FOAs (Lynn)...

(Lynn Barry): Okay.

Omar Valverde: ...if you take a look at that. And of course if it's not sufficient in terms of what your waiver request requires we'll let you know if there are certain elements that need to be included for us to further consider whether you're going to be granted the waiver.

(Lynn Barry): Okay.

Omar Valverde: But there was some conversation here in ACL whether we're going to allow that option. And it was unanimous that we include that back in to give those states that are still suffering a hardship to have that opportunity to waive that requirement.

(Lynn Barry): Okay. Were you thinking more along the lines of, you know, because they're suffering a natural disaster or there was some kind of calamity in the state or?

Omar Valverde: Well that could be part of it. But traditionally since 2007 when we offered this option it was more in terms of the fiscal constraints of your system.

(Lynn Barry): Okay.

Omar Valverde: So your statewide appropriations for senior-based services is one consideration. Of course your federal funding situation is also a consideration. If times are tight you need to explain why those times are tight and why you don't have the ability to meet the match requirements.

(Lynn Barry): Okay thanks Omar. I have one more question.

Omar Valverde: Sure.

(Lynn Barry): The timeline on this is very brief. And because of the fiscal situations in my state and I believe in several other states, maybe most states, the clearance that we need to get from our department heads is a mandatory requirement.

And for some of us we have to give them 30 days to review our proposal or review our request to make a proposal. And the deadlines just don't match up. Time - there's just not enough time.

And I'm wondering if there's any possibility that you could give us more time to prepare this application so we can get it through our departments.

Omar Valverde: Right. Now your understanding is that the situation's typical for other states in terms of approval process?

(Lynn Barry): Yes yes.

Omar Valverde: It's certainly an issue we'll take under advisement. The requirement for the fed is to provide, you know, no less than 30 days. That's our absolute requirement. But all right, that's something we'll take under advisement.

(Lynn Barry): Thank you.

(Sarah Hashoh): Omar this is (Sarah) in Florida. Hi. I have a couple of questions.

I'll echo what (Lynn) just said about the requirements in Florida to get our draft application. I have to have something done by next week under the current timeframe. So I think they're (unmanageable). So I just wanted to echo what (Lynn) said on that.

Another concern I have for applying for this grant is that the same level of funding is being offered to states regardless of the size of the state. So of course coming from Florida we have such a large state and such a large demographic that the funding really is not enough to support some of the project objectives in terms of implementation statewide.

In terms of the objectives to integrate some of the low-cost mechanisms and develop targeting mechanisms, that kind of thing, would it be appropriate to propose testing implementation in - as like a pilot in a part of the state and then have a sustainability plan and a full implementation plan if it's successful after the grant?

Or is it intended that this grant be used to support statewide initiatives only?

Omar Valverde: Now if your question is whether you can use a portion of the grant to establish a new low-cost mechanism in your state certainly it's always been the intent that we show examples of how those can work. And it's always been fair game to allocate portions of this funding to those activities including pro bono volunteer activities and helplines.

So no. And certainly you want those components to achieve sustainability at the end of the road.

But I guess the answer to your question is yes you can use the funds to promote those types of activities, but it's not expected that you're going to fund them into perpetuity with the initial grant funds you get from the feds.

(Sarah Hashoh): Well just to be clear I - one of my question was - is that would it be appropriate to pilot it in a local community?

Omar Valverde: Oh yes, you're referring to whether it needs to be statewide in scope?

(Sarah Hashoh): Right.

Omar Valverde: It's absolutely appropriate to pilot this at the local level. I'm sorry (Sarah). I didn't understand your question the first time around. But yes.

(Sarah Hashoh): Okay.

Omar Valverde: You can have a localized pilot project in your state in all these partnerships that we've discussed. Both the low-cost components, even the partnership potential with your state courts can be regionalized.

Woman: You could (unintelligible)...

(Sarah Hashoh): Okay. And just lastly my final concern is the limitation on the project narrative to be 20 pages, double-spaced. This is quite a debt to respond to.

I mean, 50 pages of single-spaced description of project objectives and to be fully responsive including description of strengths and weaknesses of Phase I that are, you know, being required, all of the things that are laid out, I have a hard time seeing how I'm going to fit it into 20 pages.

Is there any way to request a revision to that requirement so that it can - that can be...

Omar Valverde: The page number requirement?

(Sarah Hashoh): Yes.

Omar Valverde: I don't recall whether any such a request has ever been granted. I don't even know if it's possible within the confines of our grant rules. Now do we have our - LaDeva are you on the line?

LaDeva Harris: Yes I'm on, still here.

Omar Valverde: Yes LaDeva has there ever been an instance where there's exceptions made to the page limits on this? It seems to me that it's always been pretty much cut in stone.

LaDeva Harris: No there's - we haven't had any exceptions.

Omar Valverde: Right right. Yes. (Sarah) I guess my only advice would be you would have to economize and look where the point distributions are in the scoring criteria here in terms of what you provide the most detail on. Then you can be parsimonious in terms of how you allocate your space.

But it is a challenge and I recognize and there's a lot of objectives to be achieved. But certainly if you're parsimonious, if you're clear in terms of what you want to say I think - I'm confident you can achieve your 20-page objective.

And you're not the only one working with these constraints. Everybody else has to do the same thing. So now that's how I'll respond to that.

(Sarah Hashoh): Okay thank you.

Omar Valverde: You're welcome.

(Mafine): Omar this is (Mafine) in Nebraska.

Omar Valverde: Hi (Mafine).

(Mafine): Hi. I have a couple of questions.

Omar Valverde: Sure.

(Mafine): As far as budgeting time and funds of the developer can we use entirely other funds as cash match and not use any from this grant?

Omar Valverde: Yes. Well yes certainly you can use other sources than that.

(Mafine): Okay.

Omar Valverde: Now even an LAD's, your services developer's time dedicated to this grant can be viewed as in kind as well.

(Mafine): Right.

Omar Valverde: You can use that.

(Mafine): Okay. And my other question was do you need a letter of intent to apply?

Omar Valverde: No.

(Mafine): You don't. Okay. Thank you.

Omar Valverde: You're welcome.

(Bruce Bauer): Omar this is (Bruce Bauer). I have a follow-up question to (Sarah Hashoh)'s question.

Omar Valverde: Sure.

(Bruce Bauer): And what I captured from your answer is that it is expected that the response will propose a statewide response, but that one component or some components can be done on a less-than-statewide basis. Is that correct?

Omar Valverde: That is correct.

(Bruce Bauer): Thank you.

Omar Valverde: You're welcome.

(Keith): (Keith) -- given the partnerships that we're creating with the ADRCs and the disability community are we going to be allowed to provide services? Or do we need targeting to folks that are under the age of 60 given the restrictions under the Older Americans Act?

Woman: Good question.

Omar Valverde: Right. Well if any direct service is going to be provided with this grant money it has to be for persons over the age of 60. And the III-B requirements are pretty clear on that.

So no. I mean, in terms of funds actually being used for the direct services part of this grant it has to be for a person over 60.

(Rob): Omar?

Omar Valverde: Yes.

(Rob): This is (Rob) from Idaho. Does it - when you say over 60 does that mean 61 and above? Or do you mean 60 and above?

Omar Valverde: Sixty and above (Rob).

(Rob): Okay.

Omar Valverde: Yes sorry.

(Michael Davinado): In the budgeting for the legal services developer does that actually need to be a required component of how the money from the grant is allocated? Or can a legal services developer do their activities and not be part of the actual budget justifications?

Omar Valverde: Yes there - no direct grant dollars need to be allocated to the LAD to perform their duties. But if you are going to allocate dollars they need to be in addition to what their duties already are.

So the intent is not to supplant what the LAD is doing, but to supplement it with dollars. But no. There's no requirement to allocate any money to the LAD if they perform the functions of this grant in terms of an administrative standpoint. There - no funds need to be allocated to them to do that.

Was that your question?

(Michael Davinado): Yes thank you.

Omar Valverde: All right good.

(Sunrise Ayers): Hello this is (Sunrise Ayers) from Idaho.

Omar Valverde: Hey.

(Sunrise Ayers): Hello.

Omar Valverde: Hi.

(Sunrise Ayers): I had a quick question. I haven't had a chance to read the (developing form).  
Maybe it's in here.

But for the services component and for the hotline component will it be - is it a requirement of the grant that it be open regardless of income? Or is it up to us to when we're making the proposals as far as whether we want to have income requirements on that or not?

Omar Valverde: You mean income in terms of who receives the service?

(Sunrise Ayers): Right -- for the recipients, yes...

((Crosstalk))

Omar Valverde: ...in general a III-B services provider under the Older Americans Act deal with persons in the most social or economic need as defined in the statute. So there's no specific requirements that...

(Sunrise Ayers): Okay because that - because I'm just look from our last hotline grant we had -- I think it was because of the way we wrote the grant -- had to serve all regardless of income.

Omar Valverde: Well yes. The Older Americans Act is non-means tested federal...

(Sunrise Ayers): Okay that...

Omar Valverde: ...legislation. So you really can't really put limitations. So use your broad definitions of social or economic need in terms of defining the parameters of service. Does that make sense?

(Sunrise Ayers): Oh yes it does.

Omar Valverde: Okay.

(Jane Martin): Omar this is (Jane Martin) from the state of Maine.

Omar Valverde: Hey (Jane).

(Jane Martin): How are you?

Omar Valverde: Doing good.

(Jane Martin): Say I have a couple questions for you. One of them hasn't been asked. I think it's because the answer is really obvious and I'm going to ask it anyway.

In terms of the applying agency being the state unit on aging I know in the past under like the elder prevention grant and I think maybe one other grant

there wasn't an ability to recognize a deeming or kind of agency relationship for the purpose of accomplishing the task of applying.

Omar Valverde: Right.

(Jane Martin): Is there any flexibility around this as far as that goes? Again resources are just extremely tight both private and public. And just the task of getting something like this done is going to be difficult. And so I'm just wondering what your thoughts are about that.

Omar Valverde: Right. I - we should be clear. The primary applicant doesn't necessarily have to be a state unit. It has to be an entity that (proposes) to house a legal - or actually houses a legal assistance developer.

(Jane Martin): But if we already have one and they are house in the state unit on aging then you're saying there's no way for that unit for the purpose of applying for this grant to enter into a relationship with another entity again to deem - to grant them the authority or deem them to be the agent for the purposes of applying...

Omar Valverde: (Yes).

(Jane Martin): ...because again I just saw that principle applied one other time with another grant.

Omar Valverde: No you can't delegate the authority to apply to a third-party entity although they can become a critical player in terms of your broader implementation plan if the state unit with the LAD is the primary applicant.

I'm sorry. The answer is no.

(Jane Martin): No. And then in terms of matching funds (unintelligible). I'm sorry. Is it okay to go ahead Omar?

Omar Valverde: Oh go ahead, yes.

(Jane Martin): I just want to be sure I - so then in terms of the matching funds I just wanted to also confirm on that though that if a state is not going to seek full or partial waiver of the match -- they're going to provide the match -- that those funds could in fact come through or be made available by a partner agency. They do not have to be cash or in kind provided by the applicant state agency on aging in our case anyway.

Omar Valverde: Yes I think that's perfectly fine as long as that source is not handing over federal dollars. It's got to be a state-level...

(Jane Martin): Right.

Omar Valverde: ...match requirement. And remember this can be 100% in kind match.

(Jane Martin): Right.

Omar Valverde: But if those entities are, you know, have volunteers that are going to forward the objectives of this grant and you can quantify that, yes, that is match.

(Jane Martin): All right very good. And then I don't know if this last question is - if you can answer or not. I'm just going to throw it out there.

I just wanted - I was curious about the other grants we've been seeing come out which have not been from the Administration for Community Living, but that have been elder abuse and prevention-focused see to place quite a

significant emphasis on connections with the domestic violence community and providers.

And they seem completely absent in this. And I'm just curious about your thoughts on that or reaction to that and that if they're just in a bucket of other possible partners, kind of what your thoughts are on that.

Omar Valverde: Okay can you give me - identify specifically what the grants that you're referring to are called?

(Jane Martin): All the ones that are coming with Violence Against Women Act funding Omar is where I see it.

Omar Valverde: Right.

(Jane Martin): But the grants that are coming from that realm seem, to be honest, to a certain extent -- and this is just my opinion -- almost emphasize the domestic violence, sexual assault service community rather than the aging network.

And I'm just trying to - you know, I'm trying to look down the road and get a vision for where all this is going and just get your thoughts on that.

Omar Valverde: That's certainly - if a legal entity is receiving those funds to do things under those grants it's certainly something we can consider partnering with (if that's) out there. I can't comment on the merits of the scope of those grants or what have you.

I do know our Elder Abuse Prevention grant that were under Affordable Care Act funding have a broader scope than just the domestic abuse...

(Jane Martin): Sure.

Omar Valverde: ...they have very much forwarded this multidisciplinary paradigm that's also part of the core of what we're trying to do with this grant.

(Jane Martin): Yes.

Omar Valverde: So I definitely encourage partnerships with - in those states where that money's at- to look for the synergies and interface with those grants...

(Jane Martin): Yes.

Omar Valverde: ...definitely. And that applies to other ACL funding opportunities as well.

(Jane Martin): Thank you very much Omar.

Omar Valverde: You're welcome (Jane).

Woman: Omar?

Omar Valverde: Yes.

Woman: I'm in Connecticut.

Omar Valverde: Hi.

Woman: Can the agency that provides the helpline, like if we gave them \$85,000 for that, can they receive other funds under this grant for other work like training or something else besides the work on the helpline?

Omar Valverde: Absolutely.

Woman: Okay great. Thank you.

(Mafine): Omar this is (Mafine) in Nebraska again.

Omar Valverde: Yes.

(Mafine): I don't know if I missed it, but I didn't see a start date on the grant. Is it September 1 again or?

Omar Valverde: No this is August -- LaDeva you're - you'll verify this -- I'm seeing an August 1 start date.

(Mafine): August 1.

LaDeva Harris: Give me just one second. I thought it was - yes it is August. I thought it was July. Actually I thought it was July 31. Give me just one second to double check.

Omar Valverde: This was from the latest matrix I received was...

LaDeva Harris: It's August 1 I believe.

Omar Valverde: Yes.

(Mafine): Okay. And when would we hear on this award?

Omar Valverde: Let's see.

LaDeva Harris: I think...

Omar Valverde: Two weeks before the start date I would imagine. LaDeva what's the rule on that? Is that the – would it be like July 15?

LaDeva Harris: I didn't catch her question.

Omar Valverde: Oh it's when would they be notified whether they receive the grant or not.

LaDeva Harris: Well the day in theory we would like to have the notices of awards go out around the (top) or the 15th of July. So yes probably about two weeks prior.

Omar Valverde: Okay.

(Mafine): Okay thank you.

(Keith): Omar this is (Keith). In regards to the guardianship requirements it says we have to have a partner with the group that has oversight over the guardianship program.

Would - I mean, are we talking like the oversight of the court system or oversight of the judges in there? Because we in Michigan have this probate court judges association.

Omar Valverde: Yes.

(Keith): Is that - I mean, is that something sufficient? Or does it have to be the government entity that like the state court administrator's office which is the more administrative side of it?

Omar Valverde: It depends on who has the oversight responsibility to look over those reports supposedly submitted by guardians (unintelligible) in terms of how they're doing with their wards.

I don't know. Does that probate judges association cover that type of, you know, oversight?

(Keith): Yes I don't know for sure. But at least now that I know what you're wanting oversight of specifically we can figure that out.

Omar Valverde: Yes. And it can be - once it - it doesn't have to be on a statewide basis. You can pick a county with a state court that wants to do work with you.

(Keith): Okay.

Omar Valverde: (Unintelligible) -- all those areas are fair game. It certainly would be quite a tax to coordinate with every state court in your state on these very important objectives.

(Keith): Pretty much.

Omar Valverde: All right thanks (Keith). All right we are seven minutes over the time. And I of course welcome all of you to call me one on one to ask other questions that you didn't have answered here.

And we promise to issue a frequently-asked-questions document to provide more details to some of the answers that I gave you and get back with each of you individually on specific issues that you might have.

We look forward to working with all of you on this. And I certainly thank you for your time and attention today.

Man: Thank you.

Omar Valverde: Thank you.

((Crosstalk))

Woman: Thank you.

Woman: Thank you Omar.

END