

**TESTIMONY OF**

**STEVEN NISSEN**

**ON BEHALF OF**

**LEGAL SERVICES TRUST FUND COMMISSION OF**

**THE STATE BAR OF CALIFORNIA**

**BEFORE THE**

**OFFICE OF THE COMPTROLLER OF THE CURRENCY**

**CRA INTERAGENCY PUBLIC HEARING**

**LOS ANGELES PUBLIC HEARING**

**ON AUGUST 17, 2010**

**AT THE LOS ANGELES BRANCH**

**OF THE FEDERAL RESERVE BANK OF SAN FRANCISCO**

Ladies and Gentlemen, my name is Steven Nissen. I am Co-Chair of the Legal Services Trust Fund Commission of The State Bar of California, and have been involved in providing legal services to the poor in California for over 25 years. I served for over 13 years as President of the nation's largest pro bono provider (Public Counsel Law Center), am currently a member of the American Bar Association national Standing Committee on Pro Bono and Public Service, and am a former Chief Executive Officer of The State Bar of California. I also practiced law as a partner in a national private law firm for nearly a decade and a half, and am now employed as Vice President for Legal and Government Affairs with NBC Universal. I am here today on behalf of the Legal Services Trust Fund Commission of The State Bar of California, but I am confident that my testimony today would be supported broadly by the providers of legal services to the poor in California.

The California State Bar and State Legislature established a program in 1981 through which interest earned on certain lawyers' trust accounts at depository institutions is paid by the institutions to The State Bar and distributed to fund legal services organizations that serve the poor. This program is called the "Interest on Lawyers' Trust Accounts" program, or IOLTA. In enacting this new program, the Legislature stated, "It is the purpose of this article to expand the availability and improve the quality of existing free legal services in civil matters to indigent persons, and to initiate new programs that will provide services to them."

In California, 96 non-profit legal aid organizations depend on IOLTA funds for their critical funding needs. These non-profit organizations provide civil legal aid to indigent individuals and families to preserve affordable housing, protect children from

violence and help veterans get the benefits provided to them under Federal law.

California has the largest low-income population of any state. Over 5.34 million people live below the federal poverty level in California, and almost 7.2 million qualify for legal aid. Legal aid provides vital legal services to women, veterans, immigrants, seniors, people with disabilities and people in rural communities. The legal services organizations that receive IOLTA grants all target their community services at low- and moderate-income communities. This is driven by a number of factors, including the statutory requirements of federal and state funders, guidelines of institutional funders and the fact that demand for legal assistance outstrips available resources such that legal services providers must focus their outreach and service on the neediest communities. Although the need is great, the available resources are not.

Since the amendment of the IOLTA statute in 2008, banks and other depository institutions have been required to pay a rate of interest that is no less than the rate paid by the institution on “comparable” non-IOLTA accounts. As you might imagine, the “comparable rate” has decreased dramatically in the past two years as interest rates have fallen. Because of the important public purpose of these IOLTA funds, the Legal Services Trust Fund Program encourages depository institutions to pay higher rates than “comparable” on IOLTA accounts to maximize the institutions’ investments in low income communities.

If a depository institution were to make a cash grant to any of the legal aid organizations that currently receive IOLTA funds, that bank would receive “investment credit” for that grant. Today, however, a depository institution that pays an interest rate above the statutory minimum “comparable rate” or waives service fees otherwise

applicable to such accounts in order to support legal services for the indigent, cannot be certain that its examiners will give it “investment test” credit for these efforts. We would ask the federal banking agencies to issue a Q&A in the Interagency Questions and Answers to confirm to depository institutions that they will receive “investment test” credit for payments to IOLTA programs to the extent such payments exceed any legally-required minimum.

In support of this proposal, I would like to emphasize four key points:

**I. IOLTA Programs Serve “Indigent” Persons, Who Fall Within the CRA Guidelines For “Low- and Moderate-Income” Individuals and Communities.**

By statute, the State Bar is required to distribute IOLTA revenue by grant “for the provision of civil legal services to indigent persons.” Although the California IOLTA statute uses different income tests for eligibility for free legal services than the income test codified in the CRA, the income-eligibility thresholds for legal aid are much lower than the CRA threshold. Therefore, virtually all eligible individuals under the IOLTA definition of “indigent” persons are also “low- or moderate-income” under the CRA.

The terms “low-income” and “moderate-income” are defined in the CRA regulations as less than 50% or 80%, respectively, of the area median income. Area median income of California Metropolitan Statistical Areas (MSAs), as reported by Fannie Mae for 2009, ranged from \$50,400 (Merced County) to \$102,500 (San Jose-Sunnyvale-Santa Clara). Thus, if 80 percent of area median income is considered “moderate-income,” then the range of eligible families in California would be from \$40,320 to \$82,000.

The term “indigent person” is generally defined for IOLTA purposes as someone whose income is 125% or less of the federal poverty level. For programs that deliver services primarily through volunteer attorneys, the income threshold is slightly higher at 75% or less of the maximum levels of income for lower income households as defined in the California Health and Safety Code. Both of these income thresholds are significantly lower than the CRA income thresholds: For 2009, the federal poverty guideline for the contiguous 48 states and the District of Columbia for individuals was \$10,830, and for a family of four was \$22,050, well within the CRA criteria. Using the threshold of 75% of household income for lower income households as defined in the California Health and Safety Code, and using Merced as an example, an indigent person would have an annual income of less than \$23,437, or less than \$33,487 for a family of four, again well within the CRA criteria.

The IOLTA statute also provides that clients who are eligible for Supplemental Security Income, or free services under the Older Americans Act or Developmentally Disabled Assistance Act, are eligible for IOLTA program assistance without regard to income restrictions. Persons eligible for Supplemental Security Income by definition meet IOLTA income requirements. Generally, other persons that meet statutory guidelines do not seek assistance from legal aid unless they are low income, either because the legal aid organizations prioritize services that meet the needs of low income people, or because they would seek private counsel, *e.g.*, a person of affluence would not likely seek legal aid to obtain a conservatorship for her mother. Thus, although a small fraction of individuals and families might qualify as “indigent” under the IOLTA statute who would not be “low- or moderate-income” under the CRA regulations, both the

IOLTA statute and the CRA regulations are *primarily targeting* the same groups of people, and only a tiny percentage of the clients served under the IOLTA statutes would be above CRA income eligibility guidelines.

The Interagency Questions and Answers recognize that a clearly defined program that benefits *primarily* low- or moderate-income persons qualifies even if it is provided by an entity that offers other programs that serve individuals of all income levels. Under the same reasoning, the IOLTA program qualifies as a “qualifying investment” if it “primarily benefits” “low- or moderate-income individuals” even if it also benefits some individuals who might not qualify as “low- or moderate-income.”

## **II. IOLTA Grant Recipients Use the Funds for Community Development**

A grant to a legal services organization qualifies as a “qualified investment” under the CRA regulations if its “primary purpose” is “community development,” including community services that are “targeted” at low- or moderate-income communities.

In California, over seven million people in need face serious civil legal problems. They need to break cycles of violence, to get a decent education and needed healthcare, to have clean water to drink and a sound roof over their heads. The elderly are victimized, financially and physically. Children need protection, whether through child custody or support orders, appointment of a grandparent guardian or safe foster care placements. The developmentally disabled are denied the means to live independently. For many of these people, getting the help of a skilled legal aid lawyer is literally a matter of life and death. In all of these cases, providing legal aid to stabilize their lives and

minimize their social and financial displacement, not only stabilizes their families' lives but also benefits their communities and society as a whole.

In addition to helping individuals and families, skilled legal aid lawyers work within California's 58 counties, often joining other community-based organizations, the local courts, and local government to improve the economic well-being of whole communities. For example, just in the area of revitalization of low-income neighborhoods and affordable housing, a local legal aid program might:

- work with community organizations to enforce city laws that preserve existing affordable housing and partner with developers to obtain land use approvals for new affordable housing;
- work with local government to protect tenants from slumlords;
- represent a family that has been unlawfully evicted;
- protect a senior who has lost his home to construction fraud;
- advise a community development organization that is building a childcare center;
- assist individuals in obtaining earned income tax credits;
- provide legal advice to a micro-business serving a low-income neighborhood;
- support a workforce development training; and

- develop a public transportation corridor so that low income people living in less expensive remote areas have access to work in urban centers.

IOLTA funded legal aid programs provide crucial services to those most in need, helping them to resolve their legal issues directly through self-help and community education, as well as through advice and counsel, administrative and courtroom representation, and even impact advocacy. These critical services must be interwoven into the safety net for low income people. Legal aid advocates enhance independence and stability for every person they touch, and they bring new vitality to depressed communities. By voluntarily increasing IOLTA rates, financial institutions are able to leverage their CRA investments for statewide impact and to touch communities that otherwise might be difficult to serve.

**III. Payment of Interest at a Rate Above the “Comparable Rate” Should be Considered a “Grant” and a “Qualifying Investment” for Purposes of the “Investment Test.”**

A depository institution that accepts IOLTA accounts is required by the IOLTA statute to pay a rate of interest on the account that is no less than the rate paid by the institution on “comparable” non-IOLTA accounts. The Trust Fund Program at The State Bar monitors bank compliance with this requirement. The statute does not require that an institution pay a higher rate than the “comparable rate” or require an institution to waive any service fees that would otherwise apply to the IOLTA account.

Some depository institutions have indicated a willingness to pay rates above their “comparable rate” and/or to waive service fees that would otherwise apply to the IOLTA

account but are reluctant to do so without authority that they will receive “investment test” credit for such decisions.

The CRA regulations do not define the term “grant” or provide examples of qualifying “grants.” Most institutions make grants by writing checks to qualifying organizations. In the case of IOLTA accounts, if a depository institution were to pay the comparable rate on its IOLTA accounts, then remit net IOLTA account interest of \$1 million above that amount to The State Bar together with a traditional grant of \$1 million, it has the same effect as if the depository institution paid a higher rate resulting in net interest of \$2 million. Since the legal services program and the depository institution are in the same economic position in both cases, it is appropriate to treat them the same for purposes of the CRA regulations. Any interest paid by the depository institution above the “comparable rate” is akin to a “grant” by the depository institution to the legal services program.

As an example (see Attachment A), one bank in California actually paid \$817,382 to our California IOLTA program in 2009, while if it paid the “comparable rate” of interest and applied normal service charges on the accounts, it would have paid net interest to us of only \$37,797, a difference of \$779,585. In other words, this bank paid us more than 20 times what it was legally required to pay under the IOLTA statute.

Because the IOLTA statute directs that funds be allocated throughout the State among all 58 counties (see Attachment B, Legal Aid in the Community), contributing through the IOLTA program helps depository institutions leverage their community development to impact not just the urban centers in California but the remote rural areas

that often are neglected and underserved. Through investments in the IOLTA program, depository institutions can capitalize on the existing network of legal aid organizations and their collaborative partners in local government, community based organizations, and the court system. Through investments in the IOLTA program, depository institutions can make an impact on a statewide basis.

**IV. Waiver of Service Fees on IOLTA Accounts Should Be Considered a “Grant” and a “Qualifying Investment” for Purposes of the “Investment Test” or, Alternatively, Should Qualify for Credit Under the “Service Test.”**

Using the same example as above, when a depository institution pays an interest rate above the “comparable rate” on its IOLTA accounts and also waives the comparable service fees for IOLTA accounts, then the remitted net IOLTA account interest of \$1 million (above what it would pay if it paid the “comparable rate” and charged comparable service fees), has the same economic effect as a \$1 million cash grant. In other words, if waiving service fees of \$100,000 results in net interest paid being increased by \$100,000, then the waiver of service fees should be treated the same as a cash grant of \$100,000. Since the legal services program and the depository institution are in the same economic position in both cases, they should be treated the same for purposes of the CRA regulations. Both interest paid by the depository institution above the “comparable rate” and waiver of service fees should qualify for credit as a “grant” under the “investment test.” Alternatively, depository institutions should receive “service test” credit for waiving fees on IOLTA accounts.

## CONCLUSION

The California Legislature has provided a mechanism under which interest on lawyers' trust accounts is used to fund legal services for the poor in California, but the current interest rate environment has dramatically reduced the total amount of funds made available under this program. California financial institutions that are willing to pay above the statutorily required "comparable rate" on these accounts, or that agree to waive the service fees on such accounts and thus increase the net interest paid are in effect making a grant to legal aid organizations, and should receive credit under the "investment test" for any amount paid that exceeds the statutory minimum.

Thank you. I will be happy to answer any questions that you may have.

### **Disclaimer**

**This position is only that of the Legal Services Trust Fund Commission. This position has not been adopted by the State Bar's Board of Governors or overall membership, and is not to be construed as representing the position of the State Bar of California.**

## Attachment A

### Bank A: Calculation of CRA Credit in 2009 on IOLTA Accounts

MONTH	AVERAGE BALANCE	Legally Required Comparable Rate				IOLTA Rate Paid by Bank A			
		COMPARABLE INTEREST RATE	COMPARABLE INTEREST EARNED	COMPARABLE SERVICE CHARGE	COMPARABLE NET AMOUNT	ACTUAL INTEREST RATE	ACTUAL INTEREST EARNED	ACTUAL SERVICE CHARGE	NET AMOUNT REMITTED
JANUARY	184,629,472.10	.05	7,840.43	4,649.88	3,190.55	.17	25,474.62	0	25,474.62
FEBRUARY	175,646,042.45	.05	6,737.11	4,219.73	2,517.38	.17	22,388.04	0	22,388.04
MARCH	179,375,003.00	.05	7,617.29	4,568.40	3,048.89	.18	25,897.32	0	25,897.32
APRIL	182,587,430.03	.05	7,503.59	4,503.23	3,000.37	.17	24,993.17	0	24,993.17
MAY	191,561,234.97	.05	8,134.79	4,571.44	3,563.35	.63	99,370.41	0	99,370.41
JUNE	197,519,640.03	.05	8,117.25	4,567.80	3,549.45	.71	115,110.68	0	115,110.68
JULY	184,225,095.21	.05	7,823.26	4,636.05	3,187.21	.69	104,724.36	0	104,724.36
AUGUST	179,609,417.48	.05	7,627.25	4,641.10	2,986.15	.69	101,177.56	0	101,177.56
SEPTEMBER	187,564,904.37	.05	7,706.56	4,542.50	3,164.06	.67	103,044.20	0	103,044.20
OCTOBER	185,949,518.95	.05	7,896.49	4,667.71	3,228.78	.67	102,066.46	0	102,066.46
NOVEMBER	186,366,556.21	.05	7,632.37	4,666.41	2,965.96	.30	47,761.17	0	47,761.17
DECEMBER	196,025,825.22	.05	8,324.38	4,929.27	3,395.11	.28	45,374.30	0	45,374.30
<b>GRAND TOTALS</b>	<b>2,231,060,140.02</b>		<b>92,960.78</b>	<b>55,163.52</b>	<b>37,797.26</b>		<b>817,382.29</b>	<b>0</b>	<b>817,382.29</b>

LEGAL SERVICES TRUST  
FUND PROGRAM



CALIFORNIA COMMISSION  
ON ACCESS TO JUSTICE

THE STATE BAR OF CALIFORNIA  
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Telephone: (415) 538-2249  
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## Legal Aid in the Community

When communities need legal help to create affordable housing, to preserve public transit corridors or to establish needed micro-businesses, or when individuals need access to justice to avoid homelessness, prevent domestic violence, claim earned wages, or keep children in school, California's nonprofit Legal Aid organizations are there to help as they have been for over 75 years. Legal Aid advocates make sure that otherwise vulnerable Californians are better able to keep a roof over their heads, food on the table, and keep their families together. These services minimize social and financial displacement and benefit not only the low-income clients but society as a whole.

Unfortunately, between 2008 and 2009, revenue from one of the core sources of funding for legal aid, the Interest on Lawyers' Trust Accounts (IOLTA) dropped almost 70% due to declining interest rates — from \$22 million to \$7 million. Because this loss of income has tremendous human costs for low-income people, the State Bar of California has stepped up its efforts to encourage financial institutions to voluntarily increase their IOLTA rates and otherwise to sustain and encourage other sources of funding, such as the Equal Access Fund (consisting of a state appropriation and court filing revenues) and the Justice Gap Fund, a new program to solicit contributions from attorneys. Unfortunately, these efforts have not been enough to bridge an ever-widening "Justice Gap."



The Legal Aid Community: Distribution of Legal Aid Programs

## California has one of the Most Diverse, Complex, Rich and Coordinated Legal Services Delivery Systems in the Nation

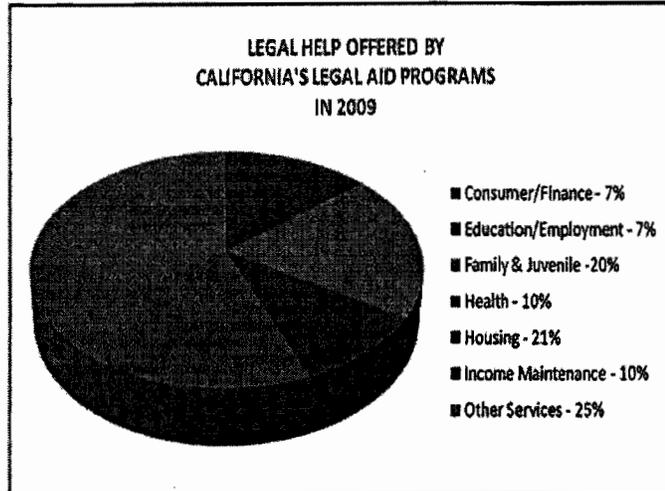
- Ninety-six separate nonprofits are funded by IOLTA in a network of Legal Aid organizations that provide or support free civil legal services to low-income Californians;
- These programs cover every county in the state, and base their legal work on locally-set priorities;
- Legal Aid nonprofits enlist volunteer attorneys, law students and social service experts to expand the resources available for the delivery of legal aid;
- These nonprofits leverage their effectiveness by forming broad and creative partnerships with each other, the courts, local, state and federal government, community-based organizations, law schools, law firms and others, to share resources and coordinate service delivery.

## Who is Served by Legal Aid?

Legal Aid organizations receive IOLTA funding to serve clients who meet statutory criteria:

- "Indigent" clients are those earning 125% or less of the federal poverty threshold (currently \$27,563 for a family of four);
- For programs that deliver services primarily through volunteer attorneys, the income threshold is slightly higher at 75% or less of the maximum levels of income for lower income households as defined in the Health and Safety Code;
- Clients who are eligible for Supplemental Security Income, or free services under the Older Americans Act or Developmentally Disabled Assistance Act, are eligible without income restrictions, although many of these clients in fact are indigent.

*The IOLTA program was established by statute to "expand the availability and improve the quality of existing free legal services in civil matters to indigent persons, and to initiate new programs that will provide services to them." [California Business & Professions Code §6210 et seq.]*



## Where do the IOLTA Dollars Go?

The distribution of IOLTA funds is regulated by Business & Professions Code Sec. 6216. After allocating 15% of the funds for statewide support organizations, 85% of the funds are divided among the 58 California counties based on the county's poverty population. For example, census figures indicate 35% of the State's indigent people live in Los Angeles County, and therefore Los Angeles County receives 35% of the distribution. Kings County has less than 1% of the State's indigent people, and therefore it receives .027% of the distribution. The funds allocated by County are then divided among qualified legal services programs based on their past year's qualified expenditures in each county that they serve.

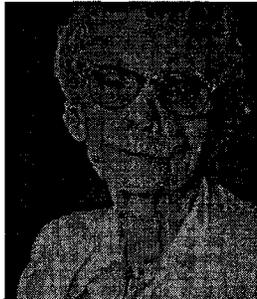
### 2009 CALENDAR YEAR GRANT ALLOCATIONS IN DOLLARS BY COUNTY

COUNTY	TOTAL	COUNTY	TOTAL	COUNTY	TOTAL
Alameda	401,139	Marin	41,367	San Mateo	111,566
Alpine	1,253	Mariposa	7,521	Santa Barbara	147,921
Amador	7,521	Mendocino	36,353	Santa Clara	325,925
Butte	100,284	Merced	120,342	Santa Cruz	78,974
Calaveras	12,535	Modoc	5,014	Shasta	66,438
Colusa	8,775	Mono	3,760	Sierra	1,253
Contra Costa	191,794	Monterey	145,412	Siskiyou	22,564
Del Norte	13,788	Napa	27,578	Solano	85,242
El Dorado	31,338	Nevada	21,310	Sonoma	101,539
Fresno	466,325	Orange	801,026	Stanislaus	190,540
Glenn	13,789	Placer	40,114	Statewide	2,212,155
Humboldt	61,424	Plumas	7,521	Sutter	32,593
Imperial	81,482	Riverside	579,147	Tehama	26,324
Inyo	6,268	Sacramento	442,507	Trinity	6,269
Kern	345,982	San Benito	15,043	Tulare	231,909
Kings	57,664	San Bernardino	703,247	Tuolumne	16,296
Lake	28,832	San Diego	913,846	Ventura	190,541
Lassen	8,776	San Francisco	230,654	Yolo	75,213
Los Angeles	4,420,058	San Joaquin	246,950	Yuba	32,593
Madera	65,185	San Luis Obispo	78,973	<b>Grand Total</b>	<b>26,747,741</b>

## Legal Aid Helps Low-income Individuals in Crises, Supports Economic Self-sufficiency and Builds Strong Communities

Legal Aid organizations have developed an array of strategies and partnerships to ensure effective services. Services range from representing clients in administrative hearings to litigating impact cases that help low income people throughout California. Legal Aid organizations provide consumer education in order that individuals can help themselves, and an attorney where individuals – because of language, legal complexity, or other barriers – need representation.

**By being there when people have nowhere else to turn, Legal Aid organizations help individuals in crises and, in doing so, help preserve community and government resources.**



- **Independent Living.** Legal Aid helps seniors obtain in-home supportive care, avoiding the much higher cost associated with nursing home care; and helps people with disabilities avoid unnecessary institutionalization.
- **Safe Housing.** Legal Aid prevents wrongful eviction and forces slumlords to repair tenant housing, reducing demand on shelters and revitalizing communities.
- **Domestic Violence.** By keeping people safe, Legal Aid saves public medical expenses, alleviates the cost of law enforcement, and contributes to healthy communities.

**Legal Aid ensures that individuals receive the support they need to become economically self-sufficient and productive members of society.**

- **Tax Credits.** Many Legal Aid organizations help low-wage earners claim earned income tax credits (EITC). One southern California Legal Aid alone brought over \$12 million in EITC to low-wage workers in 2009.
- **Employment and Economic Development.** By preventing workplace abuses, Legal Aid ensures that employees are safe, healthy and receive their earned wages. Legal Aid organizations also provide legal advice to entrepreneurs and micro-businesses in low income neighborhoods.
- **Education.** By making sure that children have access to education and receive adequate supports to succeed in school, Legal Aid organizations give the next generation of children the tools they need to break the cycle of poverty.

**Legal Aid achieves community development by partnering with local community-based organizations, developers and government.**

- **Affordable Housing.** Legal Aid programs partner with developers to obtain necessary affordable housing land use approvals, and with community organizations to enforce affordable housing laws. For example, in northern California the Legal Aid program has helped achieve tens of thousands of new affordable apartment units.
- **Transportation.** Recognizing the connection between transportation and economic well-being, Legal Aid programs preserve and develop transportation corridors. For example, a rural Legal Aid advocated for public transportation between Sacramento jobs and distant towns where poor people live. Currently, another Legal Aid is collaborating to ensure that the distinct needs for transportation and affordable housing near jobs are considered by those planning major land use and transportation reform to reduce greenhouse emissions
- **Revitalization.** Whether it is working to facilitate construction of a shopping center, to develop local childcare facilities, or to support new entrepreneurs, Legal Aid brings new jobs and provides neighborhood resources that strengthen and revitalize the community.

## The “Justice Gap” — the Chasm Between Resources and Need

There are an estimated 8,995 vulnerable Californians who qualify for legal aid for every one Legal Aid lawyer.

Number of Californians below 125% of Poverty	7,196,000
Approximate Number of Legal Aid Lawyers	800
Number of Eligible Clients per Legal Aid Lawyer	8,995

A national study in 2009 found that nine of the California programs that receive funding from the federal Legal Services Corporation serve roughly 44,000 Californians annually, but are forced to turn away almost 190,000 eligible clients.

Roughly extrapolating to the statewide system, IOLTA-funded legal services nonprofits serve 270,000 individuals directly, but are forced to turn away over 1.1 million Californians. [Documenting the Justice Gap in America, Legal Services Corporation, September 2010]

- Not only did IOLTA revenue drop almost 70% between 2008 and 2009, but other sources of funding including government grants and contracts, foundation funding and private giving, all have also been negatively affected by the economic downturn.
- Because of the recession, legal aid advocates say that five to ten times more clients are now showing up at clinics. One hotline reported that their wait time increased from 7 minutes to 45 minutes.
- Sadly, not only are organizations seeing an increase in the number of clients, but those clients are in deeper crisis. More people who previously were stable are losing their jobs, their housing or their healthcare – any one of which could result in serious social costs.
- In a recent study, nearly two-thirds of the responding organizations reported that they were forced to reduce personnel costs due to decreases in 2009 funding, including by reducing staff, eliminating vacant positions, or implementing furloughs. As a result, programs have had to reduce their caseloads by 5% to 50% – despite increased demand. [Shaping the Future of Justice: Effective Recruitment and Retention of Civil Legal Aid Attorneys in California, Legal Aid Association of California, April 2010]
- These funding shortages are even more pronounced in rural areas, where legal aid funding and

## The Outlook for Legal Services

Without additional resources, Legal Aid programs face significantly reduced capacity to provide services, just as demand is on the rise. However, the State Bar is committed to helping the IOLTA-funded Legal Aid programs serve those who otherwise have nowhere to turn, including by linking Legal Aid to expanded partnerships that leverage services, recruit new volunteers and, of course, provide crucial funding. Our growing partnerships go beyond the private bar, to policymakers, business and civic leaders and most recently, the financial institutions that hold IOLTA accounts. Together we can ensure that Legal Aid organizations can continue to deliver cost-effective services that strengthen the communities they serve.