

The Right Partners at the Right Time: New Opportunities for Federal Agency and Legal Aid Collaboration

By Karen A. Lash*

An elderly couple we'll call the Smiths thought they were buying a new roof from a "nice young man," only to find themselves in foreclosure due to fine print that had also signed over the deed to their home. Fortunately, the Legal Aid Foundation of Los Angeles helped restore title and keep them in their home.

Middle-schooler Emonie had multiple suspensions and been paddled repeatedly, largely due to the school's failure to follow the special education plan from her prior school. Only when the Mississippi Center for Justice advocated for Emonie did the school start providing the disability accommodations she needed to be a successful student. The family reports that Emonie is now doing well in school.

Civil legal aid advocates know what legal aid can do to prevent homelessness or keep children in school. But too often those who need legal assistance and the social service providers and government policymakers who help them do not.

To remedy that informational gap, US Department of Justice Associate Attorney General Tony West and Tonya Robinson, Special Assistant to the President for Justice and Regulatory Policy at the White House Domestic Policy Council, are co-leading an effort to raise awareness about how civil legal aid can promote access to health and housing, education and employment, family stability and community well-being. Staffed by the US Department of Justice Access to Justice Initiative (ATJ) – an office Attorney General Eric Holder launched three years ago to help spearhead national efforts to expand access to civil legal aid and criminal indigent defense – the effort involves 17 collaborating federal agencies. Everyone wins, it turns out, when lawyers help victims of predatory lenders repair their bad credit reports to get jobs, secure protective orders so victims escape domestic violence, and assist families in school disciplinary hearings to lessen the time children are away from school.

The big idea is simple: Together we can create more opportunities for Americans to grab the next rung on the ladder out of poverty by applying the power of legal services to meet federal objectives.

The highest levels of government recognize the need for legal aid. President Obama has said that the availability of civil legal assistance to low-income Americans is "central to our notion of equal justice under the law," and pledged to be a "fierce defender and advocate" for legal services. Attorney General Holder emphasized the imperative at a recent [White House Forum on Increasing Access to Justice co-hosted by the Legal Services Corporation \(LSC\)](#):¹ "Estimates suggest that more than 80 percent of civil legal needs faced by low-income individuals currently go unmet. More than 61 million Americans are eligible for civil legal aid – yet only a fraction of them can access it. And the human impact – and moral cost – of these systemic failures is compounded by every individual need that cannot be addressed – from matters involving the care and custody of minor children and dependent adults, to questions of personal finance, housing, employment, and even public safety. Let me be clear: this is both unacceptable and unsustainable." The Attorney General's clarion call for improving access to civil justice provides the inspiration for this work.

This article seeks to spread the word about opportunities for federal/legal aid collaboration that maximize both program effectiveness and access to legal aid.

Spreading the Word

ATJ has made more than a dozen presentations to federal agency staff and federal grantees to increase understanding about how civil legal services can effectively address the types of problems frequently encountered by vulnerable, underserved populations and in turn advance federal objectives. Often with the help of the Legal Services Corporation's Program Counsel Cheryl Nolan and Mytrang Nguyen, we tailor presentations to the audience. The Department of Labor's Employment and Training Administration, for example, heard how legal services can help people get and keep jobs; Health & Human Services Indian Health Services learned about the effectiveness of medical-legal partnerships for improving health outcomes; and Department of Homeland Security heard how legal assistance can help eligible immigrants become citizens.

Each presentation starts with the basics,² explaining that legal aid programs and many federal agencies often pursue overlapping goals as they serve the same populations, all working to provide:

- Basic necessities: government benefits (SNAP, School Lunch Program, SCHIP, TANF, SSI, disability); housing (loans to repair, foreclosure, eviction, unsafe housing, subsidized housing benefits); and healthcare (Medicaid and Medicare).
- Safety and stability: individual safety (domestic violence, stalking or other harassment, elder abuse, and child abuse and neglect); keeping children and youth in school (student discipline hearings, accommodations); and addressing family law concerns (probate, support, adoption, guardianship, and divorce).
- Self-empowerment and economic security: employment (unemployment benefits, proper payment for work performed, working conditions, help securing drivers/professional licenses, accommodations for people with disabilities); taxes (filing, getting low-income tax credits, refund check); and consumer protection (predatory lending, fraud and scams, discrimination, unfair debt collection practices and credit problems).

Well aware that lawyers' toolboxes include tools beyond litigation, we explain that most legal aid programs rely on a broad array of non-litigation legal assistance such as brief advice and counsel, self-help strategies, Know-Your-Rights trainings, and policy fixes for systemic issues. We also emphasize that these tasks are often leveraged with technology innovations like online software that enables self-represented litigants to complete court forms and documents³, as well as armies of pro bono lawyer and law student volunteers, and that legal aid nonprofits receive both public and private funding.

Also on the topic of Legal Aid 101, we make two important points:

1. Most people don't know what legal aid is or how it helps. A low level of understanding about when legal help is needed frustrates efforts to match people with appropriate services. According to Professor Rebecca Sandefur, Americans are more likely to think their civil justice problem is just a part of life and do not realize that there could be a legal solution. She estimates that more than 100 million people annually live with civil justice problems, many involving basic human needs, and that as a result of these problems, people can lose their homes, their jobs, custody of their children, or access to insurance, benefits or pensions.⁴ Federal policymakers can play a valuable role in raising awareness because they can get information out to the people who need help and also to the nonprofit and government grantees and partners that help carry out federal programs and initiatives.
2. Civil legal aid provides economic benefits to communities and families. Providing legal assistance to

people who cannot afford it can also have substantial economic benefits by preventing harm and financial waste.⁵ For example, studies⁶ show that civil legal aid “significantly” reduces incidents of domestic violence by helping victims obtain child custody arrangements and child support payments that enable them to leave abusive relationships, and also increases tenants’ chances of keeping their homes when facing eviction. Each prevented injury or loss of a home, in turn, reduces government expenditures in responding to crime, injuries, homelessness, as well as more obvious family and community losses that are social and emotional as well as financial.

Given this Administration’s directive to develop “evidence-based practices” that draw on data and innovation to drive policy, with the goal of driving resources toward programs and policies that work efficiently and effectively and away from programs that do not,⁷ these presentations incorporate available studies or data that demonstrate the effectiveness of legal aid in advancing federal program outcomes. After connecting the dots between our audience’s concrete goals and specific ways that legal aid can further those goals, we cite LSC’s Justice Gap Reports⁸ so the agency understands that current funding allows most legal aid programs to meet only 20% of the civil legal needs of low-income Americans and that for every client served by a grantee, at least one eligible person was turned down because of limited funding. We explain that these statistics describe only those below the poverty line and do not reflect the tens of millions of moderate income Americans who also can’t afford a lawyer.

Our goal is that agency staff leave each presentation with an increased appreciation of the contributions legal aid can make to the goals of their federal grants, training and information-exchange opportunities.

Accomplishments to Date

Collaborating agencies have made progress on many fronts. Examples of grants clarifying or raising awareness about the allowability of funds for legal aid include:

- *Preventing homelessness among veterans.* The VA’s annual survey of homeless veterans and social services providers confirms that [three of the top ten unmet needs of homeless veterans and their families include legal assistance](#).⁹ Working with ATJ, VA’s [Supportive Services for Veterans Families program](#)¹⁰ staff conducted outreach to grantees and legal aid programs through a webinar (that included Nan Heald, Executive Director of Pine Tree Legal Assistance), conference calls, and new language about legal aid in workshops for prospective grantees. More recently, the Department of Labor added language about linkages with legal assistance in their [Homeless Female Veterans and Veterans with Families Program](#).¹¹
- *Ensuring access to healthcare.* ATJ worked with the National Legal Aid & Defender Association on a teleconference to deepen outreach to the legal aid community about the HHS Center for Medicare and Medicaid Services [Connecting Kids to Coverage grant](#).¹² The effort to encourage programs to consider applying for the grant reflects the recognition that Legal Aid programs have extensive experience explaining government programs and helping eligible people successfully secure benefits.
- *Citizenship assistance.* ATJ worked with U.S. Citizenship and Immigration Services staff to expand outreach about a Department of Homeland Security (DHS) [grant opportunity](#)¹³ designed to promote immigrant civic integration and prepare permanent residents for citizenship, including a NLADA-hosted conference call.¹⁴ Recognizing the role legal services can play in meeting the grant’s objectives, DHS for the first time allowed nonprofit legal aid organizations to apply directly for funding.
- *Helping people with criminal records reenter communities successfully.*¹⁵ To maximize the effectiveness of job training programs, many of the Department of Labor’s reentry focused

solicitations now include language allowing grant funds for legal services that help remove barriers to employment such as expungement and correcting mistakes on criminal records, securing an occupational or driver's license, creating and/or modifying child support orders, advising youth about laws governing disclosure requirements to a prospective employer or college, and other services that help youth and adults who have paid their debt to society become more competitive candidates for employment.¹⁶ Similarly, the Justice Department's Second Chance Act grant programs designed to help communities develop and implement comprehensive and collaborative strategies that address offender reentry and recidivism reduction, inform potential grantees that funds for reentry services can include "referral to and payment of legal services related to the purpose of the grant such as: 1) securing a driver's license; 2) expunging criminal records; 3) litigating inappropriate denials of housing or employment and violations of the Fair Credit Reporting Act; 4) creating and/or modifying child support orders and other family law services that help stabilize individuals and families."

- *Providing housing opportunities.* Contrasting with competitive or discretionary grants, are formula or block grants, awarded by the federal government to state and local governments with more flexible provisions about how the money should be spent. Many block grants serving low-income or vulnerable populations are broad enough to allow legal services but clarifying language can help raise awareness among the state and local government grant administrators. The new HUD *Community Development Block Grant Program - State Guide to National Objectives and Eligible Activities for Non-entitlement Communities* will include housing-related legal services examples in the examples of allowable "public services."

In addition, federal agencies have reached out to the legal aid community in a number of areas:

- *Consumer protection.* Consumer Financial Protection Bureau (CFPB) Director Rich Cordray introduced a [webinar](#)¹⁷ developed to make sure legal aid lawyers -- often the front lines of defense for victims of consumer scammers -- know what federal tools are available to better protect people from abusive practices. CFPB is also developing *Your Money, Your Goals: A Financial Empowerment Toolkit for Social Services Programs*, a ten-module toolkit containing information and hands-on tools for front-line staff to help clients identify financial challenges and goals, and access consumer protections -- one version of the toolkit will be customized specifically for legal aid staff. The Federal Trade Commission (FTC) organized a nationwide team of its lawyers into a Legal Services Collaboration to identify consumer protection issues affecting low-income communities and develop partnerships on law enforcement and consumer education strategies. They meet regularly with legal aid lawyers around the country to share information, including at Common Ground conferences, informal brownbags and teleconferences, and webinars hosted by the Legal Services Corporation. Information from legal services partners has concretely benefitted the agency's law enforcement and policy activities, as well as spurring creation of [consumer.gov](#), a consumer education resource for clients of legal services organizations.
- *At-risk youth.* The HHS Interagency Working Group on Youth Programs invited ATJ and the [Legal Services Corporation](#)¹⁸ to produce a series of [webinars](#)¹⁹ highlighting the role legal aid can play in helping youth who are homeless, aging out of foster care, or victims of identity theft. DOL incorporated information about how to find legal aid in their *First Step: A Youth Practitioner's Resource Guide to Supportive Services*.²⁰
- *Free legal clinics at VA medical facilities.* Signaling the U.S. Department of Veterans Affairs' support for ensuring legal services to Veterans, the VA issued a [2012 Policy Memo](#) to VA hospitals encouraging VHA "staff to refer homeless Veterans to legal service providers or referral services for assistance with matters such as child support or outstanding warrants or

finances, and to provide office space to legal service providers, when possible.” By the end of FY13, there were 41 free legal clinics operating in 39 VA medical facilities nationwide, a more than 100% growth rate over FY12. VA now tracks the growth of these clinics and provides legal and other technical guidance to the local VA staff coordinating these clinics.

- *Elderly services.* Administration for Community Living's National Legal Resource Center (NLRC), in collaboration with ATJ, presented a [webinar](#)²¹ for legal and aging service providers, offering an overview of the NLRC and its partner organizations, focusing on how professionals and advocates in law and aging can access its wide range of resource support, expert consultation, training, and technical assistance. A new collaborative effort by the Department's Elder Justice Initiative, Office for Victims of Crime, and ATJ is developing online training materials for legal services providers to detect and address incidents of elder abuse.²² Aided by long-time legal aid lawyer and elder abuse expert, [Alison Hirschel](#),²³ the series of six modules will be available by spring 2014.
- *Health insurance.* As millions of Americans become eligible for new, affordable health insurance options in 2014, HHS CMS recognized that legal aid programs can play a vital role in making sure people learn how to get coverage and get help applying. Legal aid takes its place alongside other outreach and enrollment partners, with a fact sheet outlining [Ten Ways Legal Aid can Promote New Health Insurance Opportunities](#).²⁴

Next Steps: What Legal Aid Can Do

ATJ will continue to announce federal informational resources, training, and grant opportunities through our [website](#),²⁵ and listservs, such as those administered by MIE, NLADA, LSC and the ABA. Positioning a legal aid program for the partnerships frequently necessary to access many of the grant opportunities, however, requires more than just getting the information.

Executive Directors who have received some of these “under known” federal funding streams offer valuable tips. Dave Pantos at Legal Aid of Nebraska, who has seen his program's share of non-LSC federal funds grow from 9% to 11% in one year, says “Initiate, maintain and grow key partnerships in the non-legal community.” With non-LSC federal funds at 20% of her overall revenue, Silvia Argueta at Legal Aid Foundation of Los Angeles adds “Stay connected in the city and county” and “participate in local government work.” Relatedly, Ken Perri of Legal Assistance of Western New York – whose non-LSC federal funding is at 19% -- emphasizes the importance of “community partnering.” Ken and Silvia both described receiving small subgrants in the first year of a partnership with veterans services providers, which grew into more substantial arrangements in subsequent years. They advise, “small projects can lead to big payoffs” and “don't dismiss opportunities as too small.” Approaches to staffing federal grant management varies. Mary Asbury of the Legal Aid Society of Greater Cincinnati describes how her organization absorbs the additional and sometimes burdensome requirements into existing operations, while Silvia of the Legal Aid Foundation of Los Angeles says, “hire a great grants manager.”

1. Where to find out about federal grants:

Finding and applying for federal grants can seem daunting. Federal grants differ by eligibility requirements, award amount, application process, and timing, and many of the under known grants are available only if the main applicant opts to include you as a sub-grantee. Many online resources help determine what types of funding are available and how to apply for that funding. Federal government resources to assist potential applicants in searching for grants include:

- [Grants.gov](#) includes a unified application process allowing grant seekers to search and apply for over 1,000 different federal grant programs across 26 federal grant-making agencies. Users can

also subscribe to receive email alerts of new grant postings that meet specific criteria. Searching for closed or archived grants enables you to review old solicitations you want to learn more about in order to devise an outreach strategy for possible future partners. To apply for a grant, users must complete the Grants.gov registration process, which typically takes between three to five business days and requires organizations to obtain a data Universal Number System number and to register with the Central Contractor Registry. Grants.gov offers a step-by-step [user guide](#)²⁶ and [help section](#)²⁷ to help applicants navigate the website, register, and apply.

- [Catalog of Federal Domestic Assistance](#) contains program descriptions for over 2,000 federal assistance programs, assisting users in obtaining general information about federal assistance programs and in identifying programs that meet their organization's specific objectives.
- The [Federal Register](#) is the U.S. government's official daily journal consisting of four different types of entries, including notices of funds available. A [brochure](#)²⁸ is available to help guide you through the online version. To find notices of available funds, searches for "notice of funding," "funds availability" or "funding opportunity" along with a topic or grant name should help you find what you are looking for. Grant announcement pages provide a grant summary, contact for further information, application deadlines, and information about how to apply.
- Some agencies have a "grants forecast" page, offering advance notice and additional time to plan for prospective applications: 1) [HHS Grants Forecast](#)²⁹ is the Department of Health and Human Services' database of planned grant opportunities proposed by its agencies, and contains actual or estimated dates and funding levels for the grants that HHS intends to award during the fiscal year; and 2) Department of Education [grants forecast](#)³⁰ lists all programs and competitions under which the Department has invited or expects to invite applications for new awards, and provides estimated or actual deadline dates for the transmittal of applications.

2. How to write federal grant applications:

Federal resources also provide help preparing federal grant applications. Examples include:

- [CFDA's Guide to Writing Grants](#)³¹, the Catalog of Federal Domestic Assistance's how-to for the grant application process, gives pointers to both developing and writing the grant proposal.
- DOJ's Office of Justice Programs' [website](#)³² offers an overview of grants and funding, what to do before applying for a grant, how to write a grant proposal, application submission, and the application review process. Their [toolkit](#)³³ includes sample materials, sample application checklists, and sample program narratives. The Bureau of Justice Assistance has a [guide](#)³⁴ to grants that includes how to find, how to write, and how to submit grant applications.

Too often legal aid and government agency initiatives operate in separate siloes. But this Administration's commitment to expand opportunity for every American and every community willing to do the work, and to ensure the overall efficiency and effectiveness of federal programs, has created new opportunities for agencies and legal aid cooperation toward the common end of helping poor and vulnerable Americans.

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¹ Dep't of Justice, White House Forum on Increasing Access to Justice (April 16, 2013),

<http://www.justice.gov/iso/opa/ag/speeches/2013/ag-speech-1304161.html>

² Legal Serv. Corp., White House and LSC Co-Host Forum on the State of civil Legal Assistance,

<http://www.lsc.gov/media/in-the-spotlight/white-house-and-lsc-co-host-forum>

³ For example, A2J Author[®] is a software tool that delivers access to justice for self-represented litigants by enabling non-technical authors from the courts, clerk's offices, legal services programs, and website editors to rapidly build and implement customer friendly web-based interfaces for document assembly. See e.g.,

<http://lri.lsc.gov/legal-representation/pro-se/web-projects/a2j-author-software> and

<http://www.probono.net/dasupport/gettingstarted/>

⁴ Rebecca Sandefur, Civil Legal Needs and Public Legal Understanding Handout, Am. Bar Found.,

http://www.americanbarfoundation.org/uploads/cms/documents/sandefur_-_civil_legal_needs_and_public_legal_understanding_handout.pdf

⁵ <http://ncforaj.org/2012/09/05/economic-other-benefits-of-civil-legal-aid-are-summarized-in-new-fact-sheet/>

⁶ Laura Abel, Economic & Other Benefits of Civil Legal Aid Fact Sheet, Nat'l Ctr. for Access to Justice (September 5, 2012), <http://ncforaj.org/2012/09/05/economic-other-benefits-of-civil-legal-aid-are-summarized-in-new-fact-sheet/>

⁷ See e.g., July 26, 2013 Memorandum to the Heads of Departments and Agencies from Sylvia M. Burwell, Director, Office of Management and Budget, et al, "Next Steps in the Evidence and Innovation Agenda,"

<http://www.whitehouse.gov/sites/default/files/omb/memoranda/2013/m-13-17.pdf>

⁸ Legal Serv. Corp., Documenting the Justice Gap in America (September, 2009)

http://lsc.gov/sites/default/files/LSC/pdfs/documenting_the_justice_gap_in_america_2009.pdf ; see also, the September, 2005 report <http://lsc.gov/sites/default/files/LSC/images/justicegap.pdf>

⁹ Project CHALENG for Veterans, a VA program designed to raise awareness of homeless Veterans' needs and to help communities plan to meet those needs, conducts an annual survey of social service providers and veterans. Three of the top ten unmet needs involved legal assistance: eviction/foreclosure prevention, child support issues and outstanding warrants/fines. <http://www.va.gov/homeless/challeng.asp>

¹⁰ U.S. Dep't of Veteran Affairs, Supportive Services for Veteran Families Program,

<http://www.va.gov/homeless/ssvf.asp>

¹¹ Dep't of Labor, Homeless Women Veterans and Veterans with Families Grant Program,

<http://www.dol.gov/opa/media/press/vets/VETS20131575.htm>

¹² InsureKidsNow.gov, Connecting Kids to Coverage Outreach and Enrollment Grants,

<http://www.insurekidsnow.gov/professionals/outreach/grantees/>

¹³ U.S. Citizenship and Immigration Servs., Citizenship and Integration Grant Program,

<http://www.uscis.gov/portal/site/uscis/menuitem.eb1d4c2a3e5b9ac89243c6a7543f6d1a/?vgnnextoid=ea0e0b89284a3210VgnVCM100000b92ca60aRCRD&vgnnextchannel=ea0e0b89284a3210VgnVCM100000b92ca60aRCRD>

¹⁴ Nat'l Legal Aid & Defender Ass'n, Citizenship and Immigration Grant Program (Recording),

<http://www.nlada100years.org/audio/podcast-citizenship-and-immigration-grant-program-recording>

¹⁵ Dep't of Justice, Legal Aid Helps Successful Reentry, <http://www.justice.gov/atj/reentry-legal-aid.pdf>

¹⁶ Beginning in 2012, the following Department of Employment and Training Administration grant solicitations include explicit language allowing grantees to utilize DOL grant funds for payment of legal services related to the

purpose of the grant, such as securing a driver's license, expunging criminal records, and creating and/or modifying child support orders: Reintegration of Ex- Offenders (RExO) Adult Generation 5, http://www.doleta.gov/grants/pdf/sga_dfa_py_11_02_final_1_11_2012.pdf; Serving Young Adult Ex-Offenders through Training and Service-Learning, http://www.doleta.gov/grants/pdf/training_and_service_learning_sga.pdf; Serving Adult and Youth Ex-Offenders through Strategies Targeted to Characteristics Common to Female Ex-Offenders, http://www.doleta.gov/grants/pdf/female_ex_offender_sga_dfa_py_11_12.pdf; Serving Juvenile Offenders in High-Poverty, High-Crime Communities, http://www.doleta.gov/grants/pdf/hphc_sga_dfa_py_11_09.pdf. DOL's new 2013 Face Forward Serving Juvenile Offenders Grants, program requires collaborations with non-profit legal services providers that further its purpose to improve the long-term labor market prospects of both court involved youth prior to adjudication and juvenile offenders, <http://www.grants.gov/web/grants/view-opportunity.html?oppld=228734>.

¹⁷ Consumer Fin. Prot. Bureau, CFPB March5 Webinar (March 5, 2013), <http://www.youtube.com/watch?v=zHB7aJFD4CY&feature=youtu.be>.

¹⁸ www.lsc.gov

¹⁹ Solutions Desk, Community of Practice, <http://www.solutionsdesk.ou.edu/community-of-practice.html>

²⁰ Dep't of Labor, First Step: A Youth Practitioner's Guide to Supportive Services (Dec. 2012), http://wdr.doleta.gov/directives/attach/TEN/TEN_31_12_Att.pdf

²¹ Nat'l Consumer Law Ctr., Resources, Training, and Technical Assistance to Help Older Clients (July 10, 2013), <https://www.nclc.org/the-national-legal-resource-center-resources-training-and-technical-assistance-to-help-older-clients/event-details.html>

²² ²² Dep't of Justice, DAG Speaks at the White House World Elder Abuse Awareness Day (June 14, 2012), <http://www.justice.gov/iso/opa/dag/speeches/2012/dag-speech-120614.html>

²³ Alison Hirschel Faculty Bio, <http://www.law.umich.edu/FacultyBio/Pages/FacultyBio.aspx?FacID=hirschel>

²⁴ Ctrs. for Medicare and Medicaid Servs., Ten Ways Your Legal Aid Program can Connect Clients to New Health Insurance Opportunities, <http://marketplace.cms.gov/getofficialresources/other-partner-resources/legal-aid.pdf>

²⁵ Access to Justice, Grant Information, <http://www.justice.gov/atj/grant-info.html>

²⁶ Grants.gov, Applicant User Guide (July 29, 2013), available at <http://www.grants.gov/documents/19/18243/GrantsGovApplicantUserGuide.pdf>.

²⁷ Grants.gov, Support, <http://www.grants.gov/web/grants/support.html>.

²⁸ Introducing "Federal Register 2.0" ... the daily journal of the United States government transformed for 21st-century democracy, http://ofr.gov/documents/FR20_Brochure_forweb.pdf.

²⁹ Dep't of Health & Human Servs., HHS Grants Forecast, <http://www.acf.hhs.gov/hhsgrantsforecast/>.

³⁰ Dep't of Educ., Forecast of Funding Opportunities under the Department of Education Discretionary Grant Programs for Fiscal Year (FY) 2013. (Aug. 1, 2013), <http://www2.ed.gov/fund/grant/find/edlite-forecast.html>.

³¹ Catalog of Fed. Assistance, Gen. Info: Writing Grants, <https://www.cfda.gov/?s=generalinfo&mode=list&tab=list&tabmode=list&static=grants>

³² Off. of Just. Programs, Grants 101, <http://www.ojp.gov/grants101/>.

³³ Off. of Just. Programs, Grants 101: Toolkit, <http://www.ojp.gov/grants101/toolkit.htm>.

³⁴ Bureau of Just. Assistance, Guide to Grants: FY10 edition (Dec. 2009), <https://www.bja.gov/Publications/GrantWritingManual.pdf>.