



OPEN SESSION

AGENDA ITEM

7.5 JANUARY 2025

**LEGAL SERVICES TRUST FUND COMMISSION GRANT ELIGIBILITY AND
SUPPORT COMMITTEE**

DATE: January 27, 2025

TO: Members, Legal Services Trust Fund Commission Grant Eligibility and Support Committee

FROM: Michael Chong, Program Analyst

SUBJECT: Action on Follow Up to Legal Services Trust Fund Committee meeting with Asian Pacific Islander Legal Outreach Leadership

EXECUTIVE SUMMARY

Asian Pacific Islander Legal Outreach (APILO) has been an IOLTA-funded Qualified Legal Services Project since 1984. APILO has demonstrated challenges submitting applications, reports, and other documents by required deadlines, despite numerous reminders and follow up communication by State Bar staff. This memo summarizes recent instances of continued issues and requests action from the Legal Services Trust Fund Commission Grant Eligibility and Support Committee (GES committee) to require APILO to renew its entity registration on SAM.GOV and to submit to the State Bar a written corrective action plan that outlines the organization's obligations for timely communication and its intention to meet all grant deadlines.

RECOMMENDED ACTION

Staff recommend that GES committee) require APILO to renew its entity registration on SAM.GOV and to submit to the State Bar a written corrective action plan that outlines the organization's obligations for timely communication and its intention to meet all grant deadlines.

DISCUSSION

During the 2024 IOLTA/EAF application process, APILO submitted a late budget submission. The Legal Services Trust Fund Eligibility and Budget Review Committee (EBR), now sunsetted, accepted the late budget submission but requested that the State Bar send a letter to APILO emphasizing the importance of meeting grant deadlines. The EBR Committee noted that future late submissions would be tracked for accountability purposes.

In the subsequent 2025 IOLTA/EAF funding cycle, APILO again submitted both their application and audit late. The Committee accepted APILO's late 2025 IOLTA/EAF application and audit request extension, contingent upon a meeting between State Bar staff, APILO's Executive Director, and APILO's Board Chair on the importance of complying with deadlines.

On August 23, 2024, State Bar staff reached out to APILO to schedule this meeting for the week of September 9—September 13, 2024, and requested a response by August 30, 2024, to confirm. APILO did not respond until September 6, 2024, and requested to meet the following week of September 16—September 20, 2024. State Bar staff were unable to accommodate this request but did schedule the meeting for September 25, 2024. During this meeting, State Bar staff and LSTFC Co-Chair, Erica Connolly, reiterated the importance of complying with State Bar deadlines and discussed strategies to assist APILO to ensure compliance. APILO agreed to respond to State Bar staff's inquiries within 48 hours and adhere to State Bar deadlines. Despite State Bar staff's attempts, APILO has not demonstrated adherence to these terms.

A recent example is APILO's expired SAM.GOV registration. On November 5, 2024, during a meeting to discuss APILO's 2025 IOLTA/EAF budget submission, State Bar staff reminded APILO that its SAM.GOV registration expired on August 29, 2024. Staff also explained that having an active SAM.GOV registration was a condition of its Homelessness Prevention 3 grant. State Bar staff reached out to APILO via email on December 4, 12, and 17 reminding them that their SAM.GOV registration was expired. Although State Bar staff provided several reminders, APILO has not responded to the State Bar's emails nor renewed its SAM.GOV registration.

Another example is APILO's late 2025 EAF Grant Agreement. Grant agreements were released on December 3, 2024, via DocuSign and organizations were requested to electronically sign them by December 30, 2024, to ensure timely disbursement of grant funds. In addition to automated emails generated from DocuSign, a separate email was sent to all grantees and posted on the SmartSimple message board. On December 18, 2024, to ensure APILO met the deadline, State Bar staff emailed the organization reminding them of the missing grant agreement. Although State Bar staff did not receive a response, another attempt was made on January 6, 2025, requesting that APILO submit the missing grant agreement. APILO finally submitted the signed grant agreement on January 14, 2025, but did not respond to State Bar staff.

PREVIOUS ACTIONS

[Action on 2024 IOLTA/EAF Budget-Related Issues and Recommend Approval of 2024 IOLTA/EAF Budget Proposals to Legal Services Trust Fund Commission \(LSTFC\)](#) (LSTFC Eligibility & Budget Review Committee, November 3, 2023)

[2025 IOLTA/EAF Application Process: Late Application Submissions, Audit Extension Requests, and Eligibility Review Conferences](#) (LSTFC Eligibility & Budget Review Committee, June 12, 2024)

[2025 IOLTA/EAF Late Application Submissions and Audit Extension Requests \(Eligibility & Budget Review Committee\)](#) (LSTFC, June 21, 2024)

[Approve 2025 IOLTA and EAF Budget Submissions](#) (LSTFC Eligibility & Budget Review Committee, November 8, 2024)

RESOLUTIONS

Should the Legal Services Trust Fund Commission Grant Eligibility and Support Committee (GES committee) concur, it is:

RESOLVED, that the Legal Services Trust Fund Commission Grant Eligibility and Support Committee (GES committee) requires Asian Pacific Islander Legal Outreach (APILO) to renew its Sam.Gov entity registration by February 14, 2025.

FURTHER RESOLVED, that the GES committee requires (APILO) to provide a corrective action plan (CAP) that outlines the organization's obligations for timely communication and its intention to meet all grant deadlines, the CAP must be submitted to the State Bar by February 14, 2025.