

WEST TENNESSEE LEGAL SERVICES

Board Manual

Updated September 24, 2021

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I. Introduction and Welcome

Thank you for agreeing to serve on the board for West Tennessee Legal Services (WTLS). WTLS is a private, nonprofit organization that provides high-quality civil legal assistance and equal access to justice free of charge, to low-income individuals and families in 17 counties in West Tennessee. The WTLS Board of Directors (BOD) is a working board that meets as a full board for regularly scheduled meetings four times each year. The Executive/Finance Committee meets on months when there is not a full board meeting. Additional meetings may be scheduled as needed. Subcommittees meet as needed/scheduled, and board retreat(s)/training are scheduled as needed. Board members are expected to have commitment to and ownership of the mission, vision and plans of WTLS and to perform their responsibilities in a professional manner. In general, BOD members are expected to:

- prepare for, attend, and participate in board meetings to provide good governance;
- remain knowledgeable about the legal issues that affect WTLS' clients and knowledgeable about other issues faced by persons living in poverty;
- remain knowledgeable about the delivery of legal services to the low-income community;
- understand the programs offered by WTLS, and through the designated committee, evaluate the effectiveness of services delivered by WTLS;
- attend training seminars and board retreats as provided;
- be willing to serve on at least one committee during each two (2) year term;
- make a financial and/or in-kind contribution to WTLS, commensurate with each member's ability to do so;
- review the budget and other financial statements as needed, and, through designated committee, assure compliance with all basic standards of accountability and ethics;
- act as good will ambassadors for WTLS in the community;
- periodically and comprehensively self-evaluate their performance on the board;
- review and adhere to the WTLS Code of Conduct;
- review, sign and adhere to the WTLS BOD Conflict of Interest Policy;
- actively participate in fund development efforts, including attendance at fundraising events, when possible.

WTLS' Board of Directors are expected to adhere to these expectations; but we do realize that there may be exceptions for individual board members. We take these expectations seriously, and believe they are consistent with what constitutes an effective WTLS board.

You were asked to serve on WTLS' Board of Directors in recognition of your proven strong commitment to access to justice for our low-income neighbors. Together, we work towards making the pledge of "justice for all" a reality in WTLS' 17 county service area.

A. Board Member Responsibilities

WTLS Board of Directors are provided the Tennessee Guidebook for Nonprofits (2019), which outlines general Board Governance Responsibilities. Specific to WTLS, the Board of Directors' Governance consists of the following:

1. MISSION: "Providing equal access to justice in 17 counties in West Tennessee"
 - a. Ensure that the mission of WTLS is carried out, and that it meets the needs of the community that it serves, including setting annual priorities and income guidelines.
2. POLICY/ADMINISTRATION:
 - a. Assist in the establishment of policies that determine the purpose, governing principals, and course of action of WTLS, through which its mission can be accomplished;
 - b. Participate in the development and implementation of the WTLS Strategic Plan;
 - c. Approve WTLS annual objectives and long-range goals;
 - d. Empower the Executive Director to manage WTLS according to the policies adopted by the Board;
 - e. Monitor WTLS goals and achievements;
 - f. Ensure that WTLS conducts its business in compliance with legal and funding requirements; and
 - g. Be familiar with, review and approve major WTLS plans and programs.
3. PERSONNEL
 - a. Select and employ the Executive Director, and annually evaluate that person's performance;
 - b. Participate in the ongoing development of succession planning for the Board and WTLS management.
4. EVALUATION
 - a. Set standards of performance for the Board and WTLS, and monitor and assess progress, based on the WTLS' mission;
 - b. Oversee evaluation of WTLS' services and programs;
 - c. Review annually WTLS' accomplishments for the previous year; and
 - d. Counsel and provide good judgment on plans of the Board, its Committees and the Executive Director
5. PROFESSIONAL and ETHICAL STANDARDS
 - a. Maintain the confidentiality of Board meetings and WTLS;
 - b. Support the outcome of decisions, even when not in agreement;
 - c. Identify "conflicts of interest" and abstain from voting when appropriate; and
 - d. Maintain open lines of communication with the Executive Director.

I understand that as a member of the Board, I will be accountable on an annual basis to the Expectations and Responsibilities stated above.

SIGNATURE OF BOARD MEMBER

DATE

Printed Name of Board Member

SIGNATURE OF BOARD CHAIR

DATE

B. Board Member Responsibilities Specific to OCJP

The board responsibilities of greatest concern to OCJP and its contractual relationship with a nonprofit include, but are not limited to the following:

- Ensuring that all necessary requirements of OCJP relative to the grant are met
- Ensuring that the Board President or Chair serve as the Authorizing Official for OCJP Contracts and thereby sign or appoint a designee to sign OCJP/agency contracts
- Establishing policies, regulations, and by-laws consistent with the purpose of the agency
- Establishing accounting systems and fiscal controls consistent with generally accepted accounting principles and good business practice
- Establishing policies prohibiting nepotism whether between the board and the agency or within the agency itself
- Governing in a manner that would avoid even the appearance of any conflict of interest
- Being actively involved in directing the agency's operations through the process of conducting regular board meetings held in accordance with the agency's by-laws
- Ensuring board minutes are maintained and kept on file for review by OCJP Monitoring staff
- Accepting liability for and resolving any costs questioned resulting from OCJP monitoring
- Providing adequate resources for the activities of the organization through direct financial contributions and a commitment to fund raising
- Developing and maintaining communication with the community and promoting the mission and activities of the organization

BOARD MEMBER TRAINING

All new board members are required to complete the **Resource Sharing Project E-Learning Course for Board of Directors** training within three months of joining the agency's board, as a part of their orientation.

A certification of completion should be signed by each Board member and kept in WTLS' VOCA grant file.


To access the online training, complete the following steps:

1. Paste this link in your browser and navigate to the page:
<http://www.resourcesharingproject.org/e-learning-course-boards-directors>
2. Click on the link in the first paragraph that says online board orientation course.
3. Complete the short survey and continue to the training. The training consists of modules and can be broken down over the course of time available. It takes approximately 3 hours to complete in its entirety.
 - a. Only the Tennessee Coalition to End Domestic and Sexual Violence board members must complete Module 1: Section 3, as it is tailored to statewide coalitions. All other non-profit board members are not required to complete Module 1: Section 3.
 - b. Only board members who are with non-profit agencies that receive OVW funding are required to complete Module 2: Section 3: 8.2.
4. After completing the training, board members are required to sign the Certificate of Completion and save the certification in the Agency's grant file.

C. Certificate of Completion of E-Learning Course for Boards of Directors



MEMO

To: OCJP Subrecipients
From: William J. Scollon, Director 
Office of Criminal Justice Programs
Date: August 9, 2017
Subject: Non-Profit Board Member Training

Non-Profit Agencies 2017-01

In an effort to improve the connection between non-profit agencies and those serving on their boards, all non-profit board members of agencies funded by the Tennessee Office of Criminal Justice Programs (OCJP) are required to complete the Resource Sharing Project E-Learning Course for Board of Directors found at the [second link](#) below **no later than December 31, 2017**.

Board members generally do not manage the day-to-day activities of the non-profit agency, however, they do act as stewards of the agency and have certain fiduciary responsibilities under Tennessee law. Specifically, Tennessee law imposes the duties of good faith, loyalty and care. OCJP is instituting this requirement to insure that board members are aware of their responsibilities. To find more on the requirements specific to Tennessee non-profit boards, each board member should be given the [What Every Board Member Should Know Guidebook](#) written by the Tennessee Attorney General and Reporter Office and found at this link: <https://www.tn.gov/assets/entities/attorneygeneral/attachments/nonprofitguidebook.pdf>

From this point forward [all new board members](#) are required to complete this training **within three months of joining the agency's board**, as a part of their orientation.

The attached certification of completion should be signed by each board member and kept in the agency's grant files.

To access the online training, follow the steps listed below:

1. Paste this link in your browser and navigate to the page. <http://www.resource-sharingproject.org/e-learning-course-boards-directors>
2. Click on the link in the first paragraph that says [online board orientation course](#).
3. Complete the short survey and continue to the training. The training consists of modules, and can be broken down over the course of time available. It takes approximately 3 hours to complete in its entirety.
 - a. Only the Tennessee Coalition to End Domestic and Sexual Violence board members must complete Module 1: Section 3, as it is tailored to statewide coalitions. All other non-profit board members are not required to complete Module 1: Section 3.
 - b. Only board members who are with non-profit agencies that receive OVW funding are required to complete Module 2: Section 3: 8.2.
4. After completing the training, board members are required to sign the Certificate of Completion that is attached to this memo and save the certification in the Agency's grant file.

If your agency has a standard board member training that includes the topics in the training above, OCJP will review your policy and training plan. Contact your program manager for more information on this process. Thank you in advance for your cooperation.

Office of Criminal Justice Programs • William R. Snodgrass Tennessee Tower •
312 Rosa L. Parks Ave., 18th Floor • Nashville, TN 37243 • tn.gov/finance/section/fa-ocjp



Resource Sharing Project E-Learning Course for Board of Directors
Board Member Certification of Training

Agency: _____

Board Member Name: _____

Date Board Member Joined Board: _____

Date online Board Member E-Learning Series completed: _____

Agency receives OVW funding and Board Member completed Module 2: Section 3: 8.2. YES NO

Agency is Tennessee Coalition to End Domestic and Sexual Violence and Board Member completed Module 1: Section 3 YES NO

I, the undersigned, certify that I have completed the online Board Member E-Learning Series located at <http://www.resourcesharingproject.org/e-learning-course-boards-directors> and all requirements as set forth in the above information provided.

Signature: _____ **Date:** _____

Office of Criminal Justice Programs • William R. Snodgrass Tennessee Tower – 18th Floor •
312 Rosa L. Parks Avenue • Nashville, TN 37243-1102 •
<http://www.tn.gov/finance/section/fa-ocjp>

D. Conflict of Interest Form

WTLS WHISTLEBLOWER POLICY

An employee, officer, or director who observes, learns of, or in good faith believes it is likely that another employee, officer, or director, or a director or an employee of a WTLS contractor or of a recipient of LSC funding, has engaged in unlawful or unethical activity, must immediately report the actual or suspected activity to the Executive Director. Suspected unlawful/unethical behavior involving the Executive Director shall be reported to the Board Chair. The whistleblower shall cooperate fully in the investigation of the reported unlawful or unethical behavior conducted by the Executive Director or the Board Chair. Reported activities will be reviewed and addressed promptly, including reporting to funders and law enforcement as may be appropriate. WTLS will protect the identity of the whistleblower to the extent possible and except as may be otherwise required by law and not retaliate against any employee, officer, or director for reporting or participating in good faith in the investigation of such activity.

WTLS CODE OF CONDUCT/CONFLICT OF INTEREST POLICY

Employees, officers, and/or directors conducting business on behalf of WTLS have a responsibility to do so in a manner that is objective and ethical. The goal of all such business dealings must be to benefit WTLS and be in accordance with funder requirements.

The following policies apply:

- a. WTLS employees, officers, and/or directors will conduct WTLS' business ethically and objectively, in compliance with all applicable laws, regulations, and WTLS policies.
- b. WTS employees, officers, and/or directors must not accept gifts, entertainment, meals, or travel that might directly or indirectly influence their business judgement or decision-making as agents of WTLS, or that might give the appearance of impropriety.
- c. WTLS intends to avoid any unnecessary costs that are the result of gifts from suppliers given to employees.
- d. WTLS provides equal opportunity to firms wishing to pursue business relationships.
- e. The purchase of goods or services by WTLS from a business in which an employee, officer, and/or director or their family has a financial interest, or may directly benefit from such a purchase, is a potential conflict of interest. Such situations should be disclosed to the Executive Director for review prior to the purchase. WTLS will strictly follow its procurement policies and will not provide special favor to businesses in which any employee or employee's family member has a financial interest or may directly benefit from such a purpose. No WTLS employee, officer, and/or director who has or whose family has a financial interest in a business seeking to do business with WTLS shall have any involvement in the procurement process for which the employee or their family has a business interest.
- f. Any promotional benefit that results from a business transaction on behalf of WTLS will be provided to WTLS and not to an individual employee, officer, or director.
- g. Employees, officers, and/or directors may not accept any sum from any supplier attempting to "reward" the employees, officers, and/or directors for WTLS' decision to do business with the supplier. Any acceptance of such sums, or kickbacks, will result in termination of the employees' employment (and possible legal action); and the termination of the business relationship with the supplier.
- h. Gifts – in conducting WTLS' business, employees, officers, and/or directors may encounter offers of gifts from suppliers. The following guidelines apply:
 - i. Offers of gifts should never be accepted in return for a business favor.

- ii. Gifts of cash or monetary gifts of any kind or amount may never be accepted by employees.
- iii. The cumulative value of gifts received from all suppliers in total should not exceed \$75 in any calendar year.
- iv. Employees should review with their supervisor any offers of gifts.
- i. Business Entertainment – in conducting WTLS’ business, employees, officers, and/or directors may from time to time be invited by a supplier to attend a sporting event, cultural activity, or other entertainment event. It may be appropriate for employees, officers, and/or directors to accept such offers according to the following guidelines:
 - i. The value of the entertainment is reasonable and not excessive.
 - ii. Employees’ business judgements and decisions will not be influenced by the entertainment or by the expense involved in the entertainment.
 - iii. The entertainment offer is from a supplier from whom WTLS has an existing relationship or contact.
 - iv. The entertainment offer is not made during a time period where proposals or bids are being sought to establish a new contract.
 - v. Entertainment offers should not be accepted with routine frequency.
 - vi. Employees should review with their supervisors any offers of business entertainment.
- j. Business Meals – in conducting WTLS’ business, employees, officers, and/or directors may from time to time find it appropriate to do so in conjunction with mealtimes. While employees should not routinely plan business meetings around mealtimes in order to be the recipient of a “free” meal, it may not be inappropriate for employees to accept such a meal from suppliers. The following guidelines should be observed:
 - i. Business will be conducted at the meal.
 - ii. Employees’ business judgements and decisions will not be influenced by the meal or by the expense involved in the meal.
 - iii. Employees should review with their supervisors any offers of business meals.
- k. Employees who are uncertain about whether to accept any offer from a supplier are advised to not accept the offer if there are any doubts at all. Supervisors should be made aware of all offers made to employees. In turn, supervisors should contact the Executive Director to discuss any questionable offers and any known violations of this policy. The Executive Director or any Board Member will make the Board Chair aware of any offers from suppliers that would benefit the Executive Director or any member of the Board of Directors. The Executive Director will make the Board Chair aware of any offers from suppliers that would benefit the Executive Director. Any questionable offers and/or known violations of this policy by the Executive Director shall be reported to and investigated by the Board Chair. Any questionable offers and/or known violations of this policy by the Board Chair shall be reported to and investigated by the other members of the Board Executive Committee.

By my signature below, I certify that I have reviewed WTLS’ Whistleblower and Conflict of Interest Policies.

Click or tap here to enter text.

Name (printed)

Click or tap here to enter text.

Date

Click or tap here to enter text.

Signature

E. WTLS Code of Ethics

Code of Ethics: WTLS Board of Directors

Mission

The mission of West Tennessee Legal Services (WTLS) is to provide equal access to justice in 17 counties in West Tennessee¹.

Code of Ethics

Given its mission, WTLS has adopted a code of ethics to guide its Board members in their conduct when acting on behalf of WTLS.

The Code contains broad principles reflecting the types of behavior the organization expects towards constituents, donors, employees, peers, and the public.

This policy is not intended as a stand-alone policy. It does not embody the totality of the organization's ethical standards, nor does it answer every ethical question or issue that might arise. Rather, it is one element of a broader effort to create and maintain a quality organization that sees ethical conduct as the highest priority. This Code will be reviewed periodically.

The Board of Directors should:

1. Listen to our stakeholders and make all reasonable efforts to satisfy their needs and concerns within the scope of our mission, strive for excellence and innovation, and demonstrate professional respect and responsiveness to constituents, donors, and others.
2. Make an effort to understand, respect, and support our constituent from other cultures, exemplified by the contributions of our staff and executive leadership, and to contribute to an organizational culture that respects the diverse, individual contributions of staff and leadership.
3. Respect the confidentiality of sensitive information about WTLS, its staff, constituents, donors, and Board members.
4. Comply with applicable federal, state, and local laws, regulations, and fiduciary responsibilities in an effort to create transparency in all of our operations.
5. Provide credible and effective oversight to the organization's work without personal bias.
6. Not accept commissions, gifts, payments, loans, promises of future benefits, or other items of value from anyone who has or may seek some benefit from WTLS in return, other than the occasional gifts of nominal value that are in keeping with good business ethics.
7. Abide by the governing documents and policies of WTLS.
8. Remain accountable for adhering to this Code of Ethics.
9. Implement and follow a Conflict of Interest policy.
10. Act at all times in accordance with the highest ethical standards and in the best interest of WTLS, its staff, constituents, donors, Board members, and reputation.

¹ Updated on June 8, 2020, based on the mission listed on WTLS' website.

11. Appropriately acknowledge contributions from other individuals and organizations that help facilitate our goals.

Compliance, Monitoring, and Reporting

WTLS' management is responsible for communicating this Code of Ethics to all members of the Board of Directors, and for ensuring its adherence to this Code at all times.

Code of Ethics – Disclosure Form

This form must be completed by all members of the Board of Directors. The undersigned, by their affixed signature, accept and agree to abide by the Code of Ethics policy.

Name of Officer or Board Member

Date

Signature of Officer or Board Member

Date

F. Board Assessment

	GOOD	AVERAGE	POOR	?
2. Select the Executive Director				
▪ ED's job description has been reviewed within the last three years				
▪ Plan and policy is in place around hiring and selecting the ED				
▪ Board actions comply with current labor laws				
▪ Agency has an affirmative action plan				
▪ Board has a plan for supervision of the ED				
How are you going to address or have you addressed this responsibility?				
What challenges do you see in the future?				
How are you going to address these challenges?				
How will you know you have adequately addressed these challenges?				

	GOOD	AVERAGE	POOR	?
3. Support the ED and assess his or her performance				
▪ Compliments and constructive feedback are given in a timely manner				
▪ Review job description and discuss job expectations with the ED				
▪ Evaluation criteria is frequently and clearly communicated to the ED				
▪ When difficult situations arise the ED is supported by the board				
▪ Sharing information with the ED (community)				
▪ Encourage ED to maintain self-care				
▪ Serve as liaison between the ED and the community (introduce them)				
▪ Ensures professional development of the ED				
How are you going to address or have you addressed this responsibility?				
What challenges do you see in the future?				
How are you going to address these challenges?				
How will you know you have adequately addressed these challenges?				

	GOOD	AVERAGE	POOR	?
4. Plan for the organization's development				
▪ Agency has clear long and short term goals				
▪ Agency has a strategic plan in place				
▪ Agency monitors and evaluates progress towards goals and strategic plan				
▪ Board has approved comprehensive personnel policies which have been reviewed by a qualified professional				
How are you going to address or have you addressed this responsibility?				
What challenges do you see in the future?				
How are you going to address these challenges?				
How will you know you have adequately addressed these challenges?				

	GOOD	AVERAGE	POOR	?
5. Ensure adequate resources				
▪ Board does not rely on staff to do fundraising				
▪ All board members participate in some manner of fundraising				
▪ There is an understanding of the responsibility of board members to ensure adequate resources for the agency				
▪ Every board member makes a personal contribution to the agency				
▪ Board helps to set fundraising goals and is actively involved in fundraising				
How are you going to address or have you addressed this responsibility?				
What challenges do you see in the future?				
How are you going to address these challenges?				
How will you know you have adequately addressed these challenges?				

	GOOD	AVERAGE	POOR	?
6. Manage resources effectively				
▪ There is an operating plan with a budget				
▪ Board approves the annual budget				
▪ Board receives regular financial reports from the ED and carefully reviews those reports				
▪ Board ensures that the agency stays within the parameters of the budget				
▪ Board ensures an annual audit				
How are you going to address or have you addressed this responsibility?				
What challenges do you see in the future?				
How are you going to address these challenges?				
How will you know you have adequately addressed these challenges?				

	GOOD	AVERAGE	POOR	?
7. Determine and monitor the organization's programs and services				
▪ Board assesses trends in the service area and uses this info in planning				
▪ Board has a system in place to evaluate the effectiveness of programs and services				
▪ Do programs and projects fit within the mission statement?				
▪ Board members have a complete understanding of the organization's programs				
How are you going to address or have you addressed this responsibility?				
What challenges do you see in the future?				
How are you going to address these challenges?				
How will you know you have adequately addressed these challenges?				

	GOOD	AVERAGE	POOR	?
8. Enhance the organization's public standing				
▪ Board members are able to articulate the mission, goals and programs of the agency				
▪ Board members take opportunities to do presentations about the agency				
▪ All board members exhibit the duty of loyalty to the organization				
▪ Board effectively represents the agency to the community				
How are you going to address or have you addressed this responsibility?				
What challenges do you see in the future?				
How are you going to address these challenges?				
How will you know you have adequately addressed these challenges?				

	GOOD	AVERAGE	POOR	?
9. Ensure legal and ethical integrity and maintain accountability				
<ul style="list-style-type: none"> Board members exhibit the duty of obedience to bylaws, articles of incorporation, state and federal laws, obligations to funders and stakeholders 				
<ul style="list-style-type: none"> Board members are aware of potential conflicts of interest 				
<ul style="list-style-type: none"> The board ensures that all policies meet the minimum legal requirements 				
<ul style="list-style-type: none"> The board ensures that the agency adheres to its contracts, occupational, safety, health and related regulations 				
How are you going to address or have you addressed this responsibility?				
What challenges do you see in the future?				
How are you going to address these challenges?				
How will you know you have adequately addressed these challenges?				

	GOOD	AVERAGE	POOR	?
10. Board development				
▪ Each board member possess an up-to-date board manual				
▪ The board provides an orientation to new board members				
▪ The board continuously educates itself on the agency, board work or other related topics that enable them to do a better job of governance				
▪ They annually assess board performance and make plans for improvement				
▪ Each board member has a complete understanding of the roles and responsibilities of a board				
▪ Identify and recruit new members				
▪ Develop new committees as appropriate				
▪ Board meetings facilitate focus and progress on important organizational matters				
▪ Each board member feels involved and interested in the board's work				
▪ Members of the board possess necessary skills, are stakeholders, and are representative of the diversity in the community				
How are you going to address or have you addressed this responsibility?				
What challenges do you see in the future?				
How are you going to address these challenges?				
How will you know you have adequately addressed these challenges?				

Resources used in compiling this tool:

Hurt, C. (2004). Your board of directors: The basics. *The Washington Coalition of Sexual Assault Programs*, 10-13.

McNamara, C. (2006). Evaluation activities in organizations. *Free Management Library*. Retrieved August 22, 2006 from <http://www.managementhelp.org/evaluatn/evaluatn.htm>.

G. Executive Director Annual Review

EXECUTIVE DIRECTOR EVALUATION

PLEASE CHECK ALL APPLICABLE BOXES:

I am _____ a Board Member

_____ a Board Member/Attorney

Please use the attached form for guidance in evaluating the executive director's performance (to the extent of your personal knowledge of it). Use the comment portion to emphasize any particular strengths or weaknesses you may perceive within each general area, and please feel free to amplify beyond the space provided for comments.

If you are willing to be interviewed by a member of the Personnel Committee, please provide your name below. You need not sign this form or identify yourself if you do not wish to be interviewed.

WE WOULD ALSO LIKE YOUR ASSISTANCE IN IMPROVING THE PROGRAM.
IN YOUR OPINION, WHAT TWO THINGS COULD THE EXECUTIVE DIRECTOR DO TO
IMPROVE OUR OPERATIONS AND EFFECTIVENESS?

Name (Please Print): _____

Telephone: _____

Please circle the score you think best reflects the executive director's performance in each of the areas below. The scale is 1 through 5, with 5 the highest or best score.

1. LEADERSHIP

- | | |
|--|-----------|
| A. Thinks ahead and anticipates problems | 1 2 3 4 5 |
| B. Acts decisively | 1 2 3 4 5 |
| C. Motivates staff & colleagues | 1 2 3 4 5 |
| D. Maintains program leadership in community affairs | 1 2 3 4 5 |
| E. Serves as a desirable role model | 1 2 3 4 5 |

Comments: _____

2. SUPERVISORY SKILLS

- | | |
|--|-----------|
| A. Defines goals & expectations clearly | 1 2 3 4 5 |
| B. Gives timely, clear & positive feedback | 1 2 3 4 5 |
| C. Provides needed information | 1 2 3 4 5 |
| D. Fosters professional growth in staff | 1 2 3 4 5 |

Comments: _____

3. PERSONNEL MANAGEMENT

- | | |
|---|-----------|
| A. Recruits and retains highly qualified personnel | 1 2 3 4 5 |
| B. Recognizes and deals effectively with staff's strengths & weaknesses | 1 2 3 4 5 |
| C. Resolves personnel concerns in a timely, decisive & sensitive manner | 1 2 3 4 5 |
| D. Committed to EEO & affirmative action | 1 2 3 4 5 |

Comments: _____

4. STAFF RELATIONS

- | | |
|---|-----------|
| A. Ensures that staff is well-informed about the program, their own job descriptions & regulations affecting their work | 1 2 3 4 5 |
| B. Able to balance decisiveness with decision-making | |

- | | |
|--|-----------|
| by consensus with appropriate staff input & involvement | 1 2 3 4 5 |
| C. Encourages creativity by staff in problem-solving | 1 2 3 4 5 |
| D. Conducts effective staff meetings & follows up on issues raised there | 1 2 3 4 5 |

Comments: _____

5. BOARD RELATIONS

- | | |
|---|-----------|
| A. Involves Board members appropriately in the program, informing Board adequately to facilitate policy decisions | 1 2 3 4 5 |
| B. Strikes suitable balance between management & Board decisions | 1 2 3 4 5 |

Comments: _____

6. COMMUNITY RELATIONS

- Relates effectively to communities outside West Tennessee Legal Services to make West Tennessee Legal Services an effective & positive force in the community:
- | | |
|----------------------|-----------|
| A. client community | 1 2 3 4 5 |
| B. funding community | 1 2 3 4 5 |
| C. private bar | 1 2 3 4 5 |

Comments: _____

7. PERSONAL ATTRIBUTES

- | | |
|--|-----------|
| A. Sets personal goals that are realistic | 1 2 3 4 5 |
| B. Works productively & positively without burnout | 1 2 3 4 5 |
| C. Keeps appointments & meets deadlines | 1 2 3 4 5 |
| D. Thinks creatively about problem solving | 1 2 3 4 5 |
| E. Admits to & corrects personal errors & misjudgments | 1 2 3 4 5 |
| F. Receives & deals positively with suggestions and/or criticism | 1 2 3 4 5 |

Comments: _____

8. KNOWLEDGE OF LAW

- A. Appreciation of the substantive law affecting the program
so as to be effective in decision-making regarding
case management where appropriate 1 2 3 4 5

Comments: _____

9. USE OF RESOURCES

- A. Appreciates community resources available & is
creative in approaches to tapping those resources 1 2 3 4 5
- B. Effectively deploys program's resources to meet
client needs 1 2 3 4 5
- C. Encourages cooperation both within the program
& with other legal services programs to achieve
maximum efficiency in delivery of services 1 2 3 4 5

Comments: _____

10. FISCAL MANAGEMENT

- A. Understands fiscal affairs of the program sufficiently to
supervise and evaluate fiscal officers & employees 1 2 3 4 5

Comments: _____

GENERAL/ADDITIONAL COMMENTS:

II. Who We Are

A. Board Members

WEST TENNESSEE LEGAL SERVICES, INC. (WTLS) BOARD OF DIRECTORS (updated September 24, 2021)

Charles H. Barnett, Attorney at Law
P. O. Box 2004
Jackson, TN 38302
731-424-0461; Cell: 731-394-4455
cbarnett@spraginslaw.com
Appointed by J-M Co. Bar Association
Term Ends 12/16*, 20+ years on board

Cecil M. Giles
2363 Fredonia Road
Stanton, TN 38069
Work: 731-772-1472
Cecilmgiles1951@att.net
Appointed by NAACP-Haywood
Term Ends 12/19*, member since 2018

John Hamilton, Attorney at Law
245 West Sycamore Street Jackson, TN 38301
Work: 731-423-7907; Cell: 731-431-0992
John.Hamilton@tn.gov Office direct line: 731-423-7907; Cell: 431-0992 (call or text)
Appointed by J-M Co. Bar Association
Term Ends 12/17*, member since 2014

Barbara R. Hudson
2695 Stanton Koko Rd.
Stanton, TN 38069
731-780-2881
barbhud1@hotmail.com
Appointed by W. Haywood Community Center
Treasurer, Finance/Executive and Audit Committees
Term Ends 12/17*, member since 2000

Laura A. Keeton, Attorney at Law
346 E. Main Street P. O. Box 647
Huntingdon, TN 38344-0647
731-986-4444 Cell: 731-616-0911
Email: keetonlawoffices@keetonlaw.net
Appointed by Carroll Co. Bar Association*
Secretary, Executive/Finance Committee
Term Ends 12/16, 20+ years on board

Mary Jo Middlebrooks Attorney at Law
P.O. Box 1985 Jackson, TN 38302
731-423-2234
mmiddl9469@aol.com
Appointed by Law Association for Women*
Audit Committee
Term Ends 12/16*, member since 1978

Kortney Simmons, Attorney at Law
449 E. Baltimore St. Jackson, TN 38301
731-660-5252 (work)
kortneysimmons@live.com
Appointed by J-M Co. Bar Assoc.
Term Ends 12/17*, member since 2014

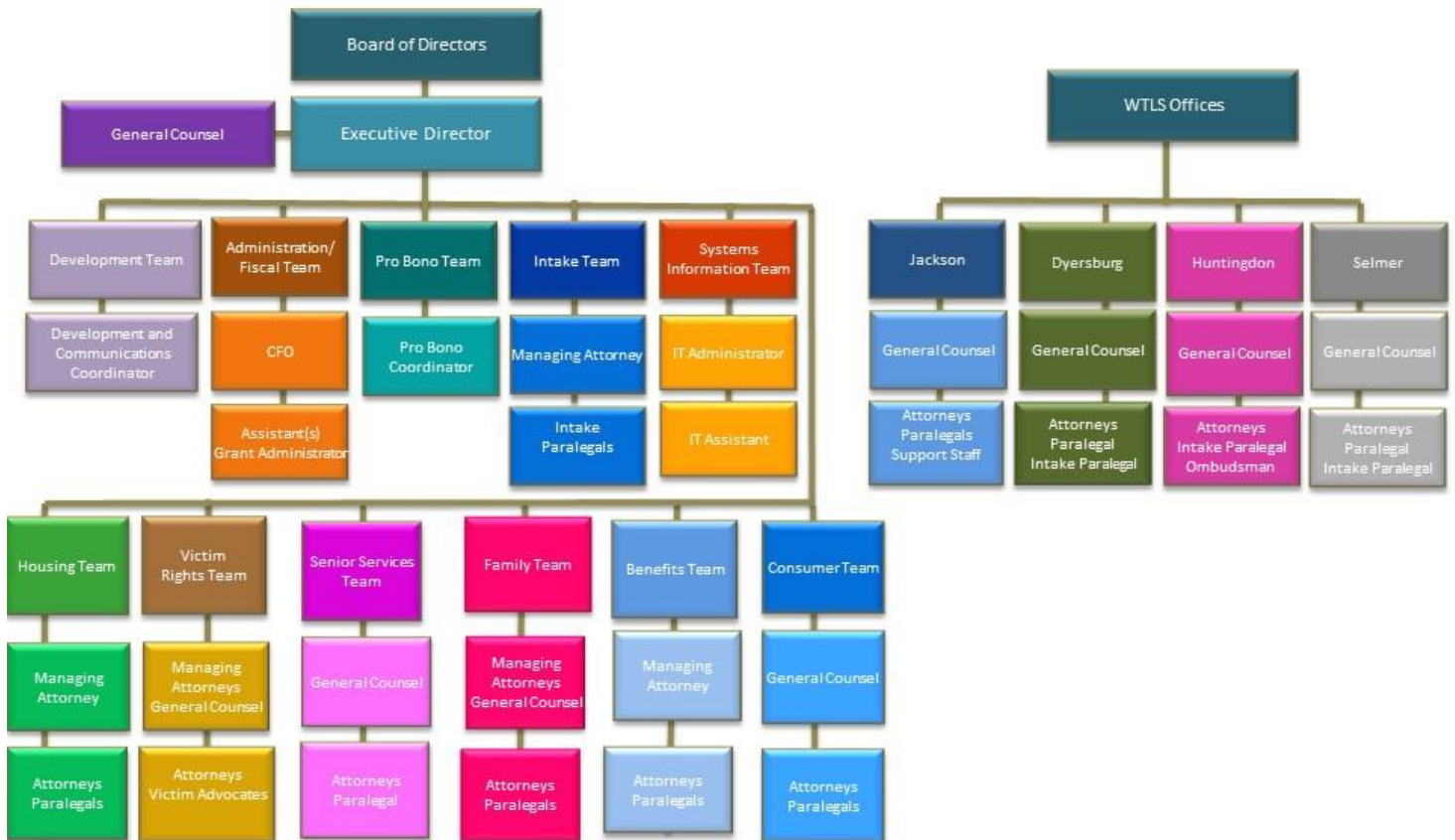
Michael Tate
1020 Rosser Circle
Huntingdon, TN 38344
731-697-3880
Mmtate2@yahoo.com
Appointed by NAACP-Carroll
Executive/Finance Committee
Term Ends 12/19*, member since 2018

Vanedda Webb
121 W. Market Street P.O. Box 1843
Dyersburg, TN 38024
731-285-6677
vaneddawebb@aol.com
Appointed by Dyer County Bar Association
President, Executive/Finance Committee
Term Ends 12/17*, member since 2016

* Pursuant to the By-Laws of WTLS, board members continue to serve beyond the end of a term until such time as the appointing agency or bar association selects a succeeding appointee.

B. Management and Staff

WEST TENNESSEE LEGAL SERVICES



Organizational Chart 2021

III. Charter and Bylaws

These can be viewed in their entirety here: <https://wtls.org/wp-content/uploads/2021/07/Charter-and-Bylaws.pdf>

IV. WTLS Manual

WTLS' Manual includes the following

1. Employee Manual
2. Advocacy Manual
3. Supervisory Manual
4. Accounting Manual
5. Tech Manual

The WTLS Manual can be accessed online [here](#); physical copies of the Board Manual will include the WTLS Manual in its entirety in this section.

V. Strategic Plan

The strategic plan can be viewed in its entirety here: <https://wtls.org/wp-content/uploads/2021/07/Strategic-Plan-2021-2024.pdf>

VI. Income and Asset Guidelines

For reasons set forth in the preamble, the Legal Services Corporation amends 45 CFR part 1611 as follows:

PART 1611—ELIGIBILITY

■ 1. The authority citation for part 1611 continues to read as follows:

Authority: 42 U.S.C. 2996g(e).

■ 2. Revise appendix A to part 1611 to read as follows:

Appendix A to Part 1611—Income Level for Individuals Eligible for Assistance

LEGAL SERVICES CORPORATION 2021 INCOME GUIDELINES *

Size of household	48 Contiguous states and the District of Columbia	Alaska	Hawaii
1	\$16,100	\$20,113	\$18,525
2	21,775	27,213	25,050
3	27,450	34,313	31,575
4	33,125	41,413	38,100
5	38,800	48,513	44,625
6	44,475	54,938	51,150
7	50,150	62,713	57,675
8	55,825	69,813	64,200
For each additional member of the household in excess of 8, add:	5,675	7,100	6,525

* The figures in this table represent 125% of the Federal Poverty Guidelines by household size as determined by HHS.

REFERENCE CHART—200% OF FEDERAL POVERTY GUIDELINES *

Size of household	48 Contiguous states and the District of Columbia	Alaska	Hawaii
1	\$25,760	\$32,180	\$29,640
2	34,840	43,540	40,080
3	43,920	54,900	50,520
4	53,000	66,260	60,960
5	62,080	77,620	71,400
6	71,160	88,980	81,840
7	80,240	100,340	92,280
8	89,320	111,700	102,720
For each additional member of the household in excess of 8, add:	9,080	11,360	10,440

* The figures in this table represent 200% of the Federal Poverty Guidelines by household size as determined by HHS.

VII. Priorities

REPORT on 2021 PRIORITIES AND NEEDS ASSESSMENT WEST TENNESSEE LEGAL SERVICES, INC.

WTLS annually conducts a needs assessment in establishing priorities, which included review of the most recent statewide legal needs assessment (2014); review of the Senior Legal Needs Assessment conducted by the Tennessee Commission on Aging and Disability as part of a Model Approaches Grant (2017); and review of on-going survey available to all stakeholders (clients, WTLS staff, WTLS board members, legal professionals, and community partners).¹ Additionally, WTLS managing and supervising attorneys have, since March 2020, met weekly with the Executive Director and General Counsel to discuss trends and types of legal issues the teams they supervise are seeing. WTLS considers this information, along with information gleaned from our case management system, to track the types of issues most critical to our client population. Based on this review, WTLS recommends that the Board adopt the following priorities², which are broad-based and cover the current client needs, for 2021.

The priorities established by WTLS will be implemented and developed through the following principles:

- I. The issue presented must be one for which there is no appropriate referral.
- II. The issue presented must be one in which the probability of success is reasonable given the projected amount of resources necessary to achieve the desired outcome.

¹ In 2019, WTLS developed a new priorities survey tool, which can be accessed via hyperlink on our website at <https://www.wtls.org/about/priorities>. Additionally, WTLS intake paralegals, beginning in Summer 2020, have sent a link to WTLS' Legal Needs Assessment, along with the application to individuals to contact WTLS for legal help. If a potential client does not give WTLS permission to email or text the link to the Legal Needs Assessment, the Legal Needs Assessment is mailed to the potential client, along with a return, pre-stamped envelope. As of November 24, the survey has been completed by 62 clients or former clients, 36 private bar members, 12 community partners, 14 client-eligible individuals and 39 WTLS employees, Board members, or volunteer attorneys in 2020. The attached charts show survey results to date.

² The priorities recommended for 2021 retain WTLS' long-standing principles that allow us to be nimble in meeting the most-pressing needs of our client population. While the priorities have not changed since 2020, WTLS recognizes that the COVID-19 pandemic has resulted in increased income and housing insecurity in our service area and anticipates that the need for legal help in unemployment, consumer debt, mortgage modification, and eviction will increase over the next year. As those anticipated needs, as well as unanticipated needs rise, WTLS may dedicate more available resources to areas of greatest need.

- III. The issue presented lends itself to a legal solution as well as a solution which may be legally pursued pursuant to relevant laws, rules, regulations and operating standards.
- IV. In determining substantive areas, client populations and delivery methodology, consideration will be given to project resources, service demand and funder priorities.
- V. The following substantive areas constitute the most serious needs of WTLS clients and will form the core of the WTLS work:
 - 1. Access to health care;
 - 2. Securing or retaining income;
 - 3. Securing or retaining shelter;
 - 4. Personal freedom and security of
 - a. abused persons;
 - b. institutionalized/vulnerable persons, including the area's growing elderly population; and
 - 5. Other issues that affect family safety, cohesiveness and stability - including but not limited to children's safety and health, and assistance to families facing civil legal issues arising out of opioid/other addictions.

Substantive areas are to be broadly interpreted so the effect of WTLS representation is more important than the means. The substantive areas listed above are not in the relative order of importance.

- VI. The delivery of services will be broad-based and comprehensive including legal representation, information and referral, community education, partnerships - local, statewide, regional and other, pro bono, resource development and other appropriate methodology.
- VII. Community education/outreach is important in implementing the priorities.
- VIII. All projects will consider available resources - current and potential, client service demand, funding source criteria in conjunction with priorities.

VIII. LSC Specifications

A. LSC Board Composition

“(c) In making grants or entering into contracts for legal assistance, the Corporation shall insure that any recipient organized solely for the purpose of providing legal assistance to eligible clients is governed by a body at least 60 percent of which consists of attorneys who are members of the bar of a State in which the legal assistance is to be provided (except that the Corporation (1) shall, upon application, grant waivers to permit a legal services program, supported under Section 222(a)(3) of the Economic Opportunity Act of 1964, which on the date of enactment of this title has a majority of persons who are not attorneys on its policy-making board to continue such a non-attorney majority under the provisions of this title, and (2) may grant, pursuant to regulations issued by the Corporation, such a waiver for recipients which, because of the nature of the population they serve, are unable to comply with such requirement) and at least one-third of which consists of persons who are, when selected, eligible clients who may also be representatives of associations or organizations of eligible clients. Any such attorney, while serving on such board, shall not receive compensation from a recipient.”¹

B. LSC Performance Criteria – Performance Area 4, Criterion 1. Board Governance

This information can be found in [LSC’s Performance Criteria](#), published 2018

C. 45 CFR 1607: Governing Bodies

This can be read in its entirety on the page [LSC Regulations](#), updated 2021

D. Program Letters and Advisory Opinions

A comprehensive and up-to-date list of LSC’s Program Letters and Advisory Opinions can be found on LSC’s website.

[LSC Program Letters](#)

[LSC Advisory Opinions](#)

¹ Retrieved from <https://www.lsc.gov/about-lsc/laws-regulations-guidance/lsc-act>

IX. Current Funders and Programs

Access to Justice

Bail Bonds

Community Development Block Grant

Cycles of Success

Department of Justice

ESG: Emergency Solutions Grants Program

Fair Housing Initiatives Project

Fair Housing Initiatives Project, Education + Outreach

Filing Fees

Housing Counseling

Housing Opportunities for Persons with AIDS (HOPWA)

Interest on Lawyer Trust Accounts (IOLTA)

Legal Services Corporation

Legal Services Corporation, Pro Bono Initiative

Long-Term Care Ombudsman

Minority AIDS Initiative

Northwest Senior Citizens Law Project

Ryan White CARES

Southwest Senior Citizens Law Project

Supplemental Nutrition Assistance Program (SNAP)

Supplemental Security Income (SSI) Program

Supportive Services for Veteran Families (SSVF)

Tennessee Housing Development Agency (THDA)

Tennessee Senior Law Alliance (TSLA)

Victims of Crime Act

X. Acronyms

Administrative Office of the Courts	AOC
Bank of America Settlement Funds	BOA
Community Development Block Grant	CDBG
Cost of Living Adjustment	COLA
Department of Children's Services	DCS
Department of Justice	DOJ
Emergency Solutions Grant	ESG
Equal Justice Works	EJW
Fair Housing Initiative Program	FHIP
Housing and Urban Development	HUD
Housing Opportunities for Persons with AIDS	HOPWA
Interest on Lawyer's Trust Accounts	IOLTA
Legal Services Corporation	LSC
Long Term Care Ombudsman	LTCO
Minority Aids Initiatives	MAI
National Foreclosure Mitigation Counseling	NFMC
Northwest Development District	NWDD
Office of Inspector General	OIG
Office of Justice Programs	OJP
Private Attorney Involvement	PAI

Pro Bono Innovation Fund	PBIF
Ryan White AIDS Grant	CARE
Salary Adjustment Funding Equalization	SAFE
Senior Citizen's Law Project	SCLP
Services Training Officers Prosecutors	STOP
Social Security Disability Income	SSD or SSDI
Supplemental Security Income	SSI
Supportive Services for Veterans' Families	SSVF
Supplemental Nutrition Assistance Program (formerly Food Stamps)	SNAP
Southwest Development District	SWDD
Tennessee Alliance for Legal Services	TALS
Tennessee Bar Association	TBA
Tennessee Housing Development Agency	THDA
Technology Initiatives Grant	TIG
Victims of Crime Act	VOCA
Violence Against Women's Act	VAWA
United Way of Metropolitan Nashville	UWMN
United Way of West Tennessee	UWWT

XI. Tennessee Guide for Nonprofits – What Every Board Member Should Know (2019)

This booklet in its entirety can be found at <https://sos.tn.gov/products/charitable-solicitations-and-gaming/2019-nonprofit-guidebook>



XII. Calendar of Regularly Scheduled Meetings and Minutes

KEY:

Board Meeting

Audit Committee Meeting

Executive/Finance Committee Meeting

2021



JANUARY

27	28	29	30	31	1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31	1	2	3	4	5	6

FEBRUARY

31	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	1	2	3	4	5	6
7	8	9	10	11	12	13

MARCH

28	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31	1	2	3
4	5	6	7	8	9	10

APRIL

28	29	30	31	1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	1
2	3	4	5	6	7	8

MAY

25	26	27	28	29	30	1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31	1	2	3	4	5

JUNE

30	31	1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	1	2	3
4	5	6	7	8	9	10

JULY

27	28	29	30	1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31
1	2	3	4	5	6	7

AUGUST

1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31	1	2	3	4
5	6	7	8	9	10	11

SEPTEMBER

29	30	31	1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	1	2
3	4	5	6	7	8	9

OCTOBER

26	27	28	29	30	1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31	1	2	3	4	5	6

NOVEMBER

31	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	1	2	3	4
5	6	7	8	9	10	11

DECEMBER

28	29	30	1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	1
2	3	4	5	6	7	8

XIII. Important Documents

A. Form 990

WTLS' full 2020 990 can be found here: <https://wtls.org/wp-content/uploads/2021/07/2020-IRS-Form-990.pdf>

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Form 8879-EO	IRS e-file Signature Authorization for an Exempt Organization	OMB No. 1545-0047
For calendar year 2020, or fiscal year beginning _____, 2020, and ending _____, 20____		2020
▶ Do not send to the IRS. Keep for your records. ▶ Go to www.irs.gov/Form8879EO for the latest information.		
Department of the Treasury Internal Revenue Service		Taxpayer identification number
Name of exempt organization or person subject to tax West Tennessee Legal Services, INC.		58-1326791
Name and title of officer or person subject to tax Catherine Clayton Executive Director		

Part I Type of Return and Return Information (Whole Dollars Only)		
Check the box for the return for which you are using this Form 8879-EO and enter the applicable amount, if any, from the return. If you check the box on line 1a, 2a, 3a, 4a, 5a, 6a, or 7a below, and the amount on that line for the return being filed with this form was blank, then leave line 1b, 2b, 3b, 4b, 5b, 6b, or 7b, whichever is applicable, blank (do not enter -0-). But, if you entered -0- on the return, then enter -0- on the applicable line below. Do not complete more than one line in Part I.		
1a Form 990 check here ▶ <input checked="" type="checkbox"/>	b Total revenue, if any (Form 990, Part VIII, column (A), line 12)	1b 4,637,507
2a Form 990-EZ check here ▶ <input type="checkbox"/>	b Total revenue, if any (Form 990-EZ, line 9)	2b
3a Form 1120-POL check here ▶ <input type="checkbox"/>	b Total tax (Form 1120-POL, line 22)	3b
4a Form 990-PF check here ▶ <input type="checkbox"/>	b Tax based on investment income (Form 990-PF, Part VI, line 5)	4b
5a Form 8868 check here ▶ <input type="checkbox"/>	b Balance due (Form 8868, line 3c)	5b
6a Form 990-T check here ▶ <input type="checkbox"/>	b Total tax (Form 990-T, Part III, line 4)	6b
7a Form 4720 check here ▶ <input type="checkbox"/>	b Total tax (Form 4720, Part III, line 1)	7b

Part II Declaration and Signature Authorization of Officer or Person Subject to Tax		
Under penalties of perjury, I declare that <input checked="" type="checkbox"/> I am an officer of the above organization or <input type="checkbox"/> I am a person subject to tax with respect to (name of organization) _____, (EIN) _____ and that I have examined a copy of the 2020 electronic return and accompanying schedules and statements, and, to the best of my knowledge and belief, they are true, correct, and complete. I further declare that the amount in Part I above is the amount shown on the copy of the electronic return. I consent to allow my intermediate service provider, transmitter, or electronic return originator (ERO) to send the return to the IRS and to receive from the IRS (a) an acknowledgement of receipt or reason for rejection of the transmission, (b) the reason for any delay in processing the return or refund, and (c) the date of any refund. If applicable, I authorize the U.S. Treasury and its designated Financial Agent to initiate an electronic funds withdrawal (direct debit) entry to the financial institution account indicated in the tax preparation software for payment of the federal taxes owed on this return, and the financial institution to debit the entry to this account. To revoke a payment, I must contact the U.S. Treasury Financial Agent at 1-888-353-4537 no later than 2 business days prior to the payment (settlement) date. I also authorize the financial institutions involved in the processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries and resolve issues related to the payment. I have selected a personal identification number (PIN) as my signature for the electronic return and, if applicable, the consent to electronic funds withdrawal.		
PIN: check one box only		
<input type="checkbox"/> I authorize _____ to enter my PIN _____ as my signature		
ERO firm name		
Enter five numbers, but do not enter all zeros		
on the tax year 2020 electronically filed return. If I have indicated within this return that a copy of the return is being filed with a state agency(ies) regulating charities as part of the IRS Fed/State program, I also authorize the aforementioned ERO to enter my PIN on the return's disclosure consent screen.		
<input checked="" type="checkbox"/> As an officer or person subject to tax with respect to the organization, I will enter my PIN as my signature on the tax year 2020 electronically filed return. If I have indicated within this return that a copy of the return is being filed with a state agency(ies) regulating charities as part of the IRS Fed/State program, I will enter my PIN on the return's disclosure consent screen.		
Signature of officer or person subject to tax ▶ <u>Catherine B. Clayton executive director</u> Date ▶ <u>06/17/21</u>		

Part III Certification and Authentication	
ERO's EFIN/PIN. Enter your six-digit electronic filing identification number (EFIN) followed by your five-digit self-selected PIN.	
62508610050	
Do not enter all zeros	
I certify that the above numeric entry is my PIN, which is my signature on the 2020 electronically filed return indicated above. I confirm that I am submitting this return in accordance with the requirements of Pub. 4163, Modernized e-File (MeF) Information for Authorized IRS e-file Providers for Business Returns.	
ERO's signature ▶ <u>John D. Whybrew</u>	Date ▶ <u>06/17/21</u>

ERO Must Retain This Form — See Instructions
Do Not Submit This Form to the IRS Unless Requested To Do So
For Paperwork Reduction Act Notice, see back of form.

Form 8879-EO (2020)

DAA

B. Charitable Solicitations Registration

Tennessee Secretary of State Tre Hargett



Division of Business Services
Division of Charitable Solicitations and Gaming
312 Rosa L. Parks Avenue, 6th Floor
Nashville, Tennessee 37243-1102

615-741-2555
Tom.Riley@tn.gov

Thomas H. Riley, III
Director
August 18, 2021

Sarah Johnston-Barnett
West Tennessee Legal Services
210 West Main Street
Jackson, TN 38301

RE: **APPROVAL** - Registration to Solicit Funds for Charitable Purposes
West Tennessee Legal Services - CO4739
Registration Expiration Date: **June 30, 2022**

Dear Sarah Johnston-Barnett:

Pursuant to Tenn. Code Ann. § 48-101-501, *et seq.*, the Division of Charitable Solicitations and Gaming has reviewed your submitted application and is pleased to announce your organization's registration to solicit contributions has been **approved**.

With this approval, your organization has new responsibilities for maintaining statutory compliance, including submission of the proper documents and required fees on an annual basis. The required filings include:

- Completed *Application to Renew Registration* form
- Completed *Summary of Financial Activities* form
- IRS determination letter granting tax-exempt status, if not previously filed
- IRS *Form 990*, *Form 990EZ*, or *990N* for the most recently completed accounting year, if the organization qualifies as tax-exempt
- An audited financial statement if the organization grossed more than \$500,000 in revenue
- Any amendments to the organization's governing documents

The *Application to Renew Registration* and *Summary of Financial Activities* forms are available on our website at <http://sos.tn.gov/charitable>. Additionally, the "CO" number listed above will serve as your organization's identification number specific to this division and should be included on all correspondence.

Please also be advised that if the organization's application or other provided information includes false, misleading or deceptive statements, appropriate action will be taken. Pursuant to the Tennessee Charitable Solicitations Act, a civil penalty of up to five thousand dollars (\$5,000) may be assessed for any violation.

Thank you for registering your organization and please do not hesitate to contact us with any questions.

Sincerely,

Tre Hargett
Secretary of State

AB:CO4739

sos.tn.gov

C. Nonprofit Registration with TN Secretary of State

00457 2 of 2



**STATE OF TENNESSEE
DEPARTMENT OF REVENUE**

WEST TENNESSEE LEGAL SERVICES, INC.
PO BOX 2066
JACKSON TN 38302-2066

Effective Date: July 1, 2019
Expiration Date: June 30, 2023
Account No: 1000066091-SLC
Exemption No: 975862784
Facility Address:
210 W MAIN ST
JACKSON TN 38301-6114

**Exempt Organizations or Institutions
Sales and Use Tax Certificate of Exemption**

This organization or institution qualifies for the authority to make sales and use tax exempt purchases of goods and services that it will use, consume or give away.

This authorization for exemption is limited to sales made directly to the referenced organization. This exemption certificate may not be used for sales made to individuals paying with personal checks or personal debit or credit cards, even if the individual is a representative or employee of the organization, and he or she will be reimbursed for the purchase. Sellers must refuse to accept the certificate when the sale is made to someone other than the organization.

This exemption certificate may not be used to make purchases without the payment of sales and use tax for other locations and may not be transferred to or used by any other person.

Seller's Name

Seller's Address (City & State)

I, KAREN S. LAIRD, as an authorized representative of the taxpayer named above, affirm that the purchases qualify for the exemption and will be used at the location of the facility address referenced above. Under penalty of perjury, I affirm this to be a true and correct statement.

KAREN S. LAIRD
Print Name of Authorized Representative

Karen S. Laird
Signature of Authorized Representative

6/12/2019
Date

The supplier must maintain a copy of this document as evidence of the sales tax exemption.