

External Opinion
File # 99-29

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regulations in 45 C.F.R. Part 1610. On September 16, 1999, we provided you with an opinion on a proposed plan under which Alaska Legal Services Corporation (“ALSC”) would transfer its IOLTA funds to another organization under an agreement that the program would use the funds to administer a *pro bono* program. We found the plan to be consistent with the program integrity rules. Due to one change in the plan, you now ask whether it is still consistent with program integrity requirements. *See* OGC Opinion, EX 99-19.

Under the original plan, ALSC did not intend to share any employees, either full or part-time, with the organization. Under the revised plan, the support staff person would work part-time for the new program and part-time for ALSC. The only other staff member of the new program would be the program coordinator, who would still work exclusively for the new program.

I hope this adequately responds to your inquiry. Please let me know if you need any additional assistance in this matter.

Sincerely,

Suzanne B. Glasow
Senior Assistant General Counsel

resources for restricted activities. It is anticipated that this rule will be published within the month and will be effective 30 days after publication.