

Greater Wisconsin Agency on Aging Resources, Inc. (GWAAR)  
Request for Proposals (RFP)/ Legal Benefit Services for Older Adults

**Request for Proposal Application – Older Americans Act (OAA) Title III-B  
Legal Services Contract**

Title: OAA Title III-B Legal Services for Older Adults

Issued by: Greater Wisconsin Agency on Aging Resources, Inc. (GWAAR)

Release Date: July 28, 2025

Proposal Due: September 12, 2025 (by 4:00 p.m.)

Award Announcement: Week of October 13, 2025

Contract Begins: January 1, 2026- December 31, 2026

Contract Amount: \$255,613.00 / One-year contract with the option for four, one-year extensions

**(\*This is a preliminary figure, and a final contract amendment will be distributed to reflect any changes to this amount)**

**RFP Application Checklist**

- ☐ **Read** the Request for Proposal (RFP) Below
- ☐ **Complete application template**  
<https://forms.office.com/r/RYNuEGeVWk>
- ☐ **Complete Goal and Key Performance Indicators document**  
[Performance Measurements.docx](#)
- ☐ **Complete budget excel spreadsheet**  
[Legal Services RFP Budget Template.xlsx](#)
- ☐ **Email Appendix A** (Job descriptions for all positions receiving full or partial GWAAR OAA funds).
- ☐ After the Goal and Key Performance Indicator and budget worksheets are completed **email documents to [angela.sullivan@gwaar.org](mailto:angela.sullivan@gwaar.org)**

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**A. Service Delivery Guidelines**

Applicants for the Greater Wisconsin Agency on Aging Resources, Inc. (GWAAR) funding to provide legal services to 71 counties (excluding Milwaukee County) and 11 tribes, and residents aged 60 or older under the legal services guidelines under the Older Americans Act. Services must comply with and incorporate the following program/service guidelines.

Where indicated, applicants must include a description of how they will meet specific requirements in the appropriate sections of the application.

**1. Program Activities and Requirements – Older Americans Act (Title III-B)  
Legal Services**

- a. Applicants must clearly demonstrate how their proposed program will provide legal services to adults 60 years or older in greatest economic or social need in 71 counties (excluding Milwaukee County) and 11 tribes – a specific plan for outreach to tribal aging units must be outlined.
- b. Applicant must demonstrate how they will offer direct representation in all Older Americans Act legal assistance priority areas [42 USC 3027: State plans](#): Income, Health care, Long-term care, Nutrition, Housing, Utilities, Protective services or defense of guardianship, abuse and neglect and age discrimination. In addition, the applicant must communicate with the elder benefit specialist program to ensure effective referrals.
- c. Applicant must describe how participants are prioritized for these services in the event funding is not adequate to represent all who request the service.

Applicants must demonstrate that their staff have expertise to provide legal counsel and representation in areas of the law affecting older people in greatest social or economic need, including those areas of the law specified in A(1)(b) above. Applicants must demonstrate a plan for continuing legal education in these areas of elder law, provide a plan for how a qualifying client may obtain representation in such matters, and how existing staff will receive the necessary legal education to develop such expertise.

- d. Applicants must provide assurance that any legal services provided by staff will be provided under the supervision of an attorney actively

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licensed and in good standing to practice law in the state of Wisconsin.

- e.** Applicants must demonstrate that they have a system in place to maintain compliance with Wisconsin's Rules of Professional Conduct for Attorney's, specifically including a method to identify and resolve any conflicts of interest, maintain the confidentiality of client records, protect the attorney-client privilege, and provide diligent and competent representation, including persons with diminished capacity.
- f.** Applicants must demonstrate how they will deliver services to older adults who are institutionalized, isolated, or homebound.
- g.** Applicants must demonstrate how they will maintain accurate monthly records of their proposed program activities. Monthly fiscal reports must be submitted to GWAAR's fiscal department, indicating expenditures under each funding source. Applicants must clearly demonstrate that they will track their time and activity in 15-minute increments by funding source and activity as required by OAA legal services guidelines.
- h.** Applicants must demonstrate how they will carry out the activities necessary to administer and maintain their proposed program including a system for maintaining client files, obtaining representation, consent, and client grievance documentation and conducting regularly scheduled file and case reviews.
- i.** Applicants must indicate how they intent to provide legal services to older adults who have limited English proficiency and/or sensory impairment and specifically demonstrate the capacity to provide legal assistance to older adults whose primary language is Spanish.
- j.** Applicants must clearly demonstrate how they plan to coordinate legal services to older adults with other legal resources in the community, including the private bar.
- k.** Applicants must demonstrate a willingness to perform other activities that may be mutually agreed upon in the GWAAR contract. Applicants must demonstrate the ability to provide:
  - 1. Effective administrative and court representation in both state and federal venues.
  - 2. Support other advocacy efforts, including yearly updates to the GWAAR Board of Directors.

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3. Coordination of legal advocacy efforts with the GWAAR Board and the Wisconsin Aging Advocacy Network.
  - l.** Applicant must demonstrate that they will comply with the restrictions and regulations of the Legal Services Corporation Act (other than restrictions and regulations governing eligibility for legal assistance under such Act and governing membership of local governing boards) for the provision of legal services under the Older Americans Act.
  - m.** The plan contains assurances, to the extent practicable, that legal assistance furnished under the plan will be in addition to any legal assistance for older adults furnished with funds from sources other than this Act and that reasonable efforts will be made to maintain existing levels of legal assistance for older adults.
  - n.** Applicant must provide assurance that legal assistance services provided through the Older Americans Act do not supplant existing legal services effort.
  - o.** Applicant must provide assurance that as a provider it will not engage in other legal activities which interfere with the provider's responsibilities under the Older Americans Act.
  - p.** The applicant will, where feasible and appropriate, make arrangements for maintaining the availability of services in weather related, public health, and disaster emergencies and describe their plan for doing so.
  - q.** The applicant, with the express consent of the older person or their guardian, will bring attention to appropriate official conditions that place the older person in danger.
  - r.** The applicant will meet all existing state and local licensing, health, and safety requirements for services provided under this program.
  - s.** The applicant will provide the Greater Wisconsin Agency on Aging Services, Inc. with enough electronic marketing materials to serve 71 counties (excluding Milwaukee County) and 11 tribes.

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**2. Unacceptable Program Activities**

- a.** Activities that are unrelated to carrying out the GWAAR's legal services program contract.
- b.** A legal assistance provider may not require an older person to disclose information about income or resources as a condition for providing legal assistance under this contract. Applicants may request income information for the purposes of reporting requirements and to provide appropriate legal advice or assistance.
- c.** Applicant must provide assurance that it will not discriminate in the delivery of any services based on race, color, national origin, disability, age, sex or income.
- d.** Applicant must provide assurance that as a provider they will not engage in prohibited political activities, lobbying, or illegal activities.
- e.** A legal services provider may not charge for legal services or condition services on a promise to make a voluntary contribution to the older adult legal services program. The provider must be given the opportunity to give a voluntary contribution from the client in accordance with OAA guidance after the client's case has been resolved and any appeal period has been exhausted.
- f.** The applicant must provide assurance that as a provider it will not provide legal assistance in any fee generating case unless other adequate representation is unavailable or there is an emergency. Other adequate representation is deemed to be unavailable when:
  - i. Recovery of damages is not the principal object of the client; or
  - ii. A court appoints a provider or an employee of a provider to a statute or a court rule or practice of equal applicability to all attorneys in the jurisdiction; or
  - iii. An eligible client is seeking benefits under Title III of the Social Security Act, 42 U.S.C. 401, et seq., Federal Old Age, Survivors, and Disability Insurance Benefits; or Title XVI of the Social Security Act, 42 U.S.C. 1381, et seq., Supplemental Security Income for Aged, Blind, and Disabled. However, for purposes of EBS program all such cases should be reviewed by a supervising attorney and referral to a private attorney is generally expected in this category of cases.

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- g.** No provider or its employees shall contribute or make available Older Americans Act funds, personnel or equipment to any political party or association or to the campaign of any candidate for public or party office; or for use in advocating or opposing any ballot measure, initiative, or referendum.
- h.** No providers or its employees shall intentionally identify the Older Americans Act Title III program or provider with any partisan or nonpartisan political activity, or with the campaign of any candidate for public or party office.
- i.** While engaged in legal assistance activities under the Older Americans Act, no attorney shall engage in any political activity during their work.
- j.** No funds made available under the Older Americans Act shall be used for lobbying activities, including but not limited to any activities intended to influence any decision or activity by any nonjudicial Federal, State or local individual or body. Nothing in this section is intended to prohibit an employee from:
  - 1.** Communicating with a governmental agency for the purpose of obtaining information, clarification, or interpretation of the agency's rules, regulations, practices, or policies.
  - 2.** Informing a client about a new or proposed statute, executive order, or administrative regulation.
  - 3.** Responding to an individual client's request for advice only with respect to the client's own communications to officials unless otherwise prohibited by the Older Americans Act, Title III regulations or other applicable law. This provision does not authorize publication of lobbying materials or training clients on lobbying techniques or the composition of communication for the client's use.
  - 4.** Providing a client with administrative representation in adjudicatory or rulemaking proceedings or negotiations, directly affecting that client's legal rights in a particular case, claim or application;

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5. Communicating with an elected official for the sole purpose of bringing a client's legal problem to the attention of that official; or
  6. Responding to the request of a public official or body for testimony, legal advice or other statements on legislation or other issues related to aging, provided that no such action will be taken without first obtaining the written approval of the agency responsible.
- k. While carrying out legal assistance activities and while using resources provided under the Older Americans Act, no provider or its employees shall:
1. Participate in any public demonstration, picketing, boycott, or strike, except as permitted by law in connection with the employee's own employment situation.
  2. Encourage, direct, or coerce others to engage in such activities; or
  3. At any time, engage in or encourage others to engage in:
    - a. Any illegal activity; or
    - b. Any intentional identification of programs funded under the Act or recipient of any political activity.
- l. None of the funds made available under the Older Americans Act may be used to pay dues exceeding \$100 per recipient per annum to any organization (other than a bar association) a purpose or function of which is to engage in activities prohibited under these regulations unless such dues are not used to engage in activities for which Older Americans Act funds cannot be used directly.

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**3. Initiation and Termination of Service**

- a. Legal Services will be initiated upon receiving the request from 71 counties (excluding Milwaukee County) older adults.
- b. Legal Services will terminate when the request has been resolved by the program, referred to an appropriate agency, or when it is determined by the program that the request cannot be met. A client will be clearly informed when his or her case has been closed as well as the reason for the case closure.
- c. Case representation, including consent, scope or representation, and case closure shall be clearly documented in writing or in a secure case management system.

**4. Limitation on the Provision of Services**

- a. There are no limits on the number of contacts per client or duration of legal services to clients, consistent with appropriate representation under the Wisconsin Rules of Professional Conduct of Attorneys.
- b. To the extent that a client requests an appeal to a court of law, the applicant may review the merits of such an appeal and enter into a separate retainer agreement for the purpose of appealing a matter to a court of law.
- c. Types of benefits/legal issues to be covered by the program are described in the application within the scope of areas listed in Section 1. Within the outlined areas for each program, applicants may prioritize areas and methods for legal services delivery.

**5. Eligible Clients**

- a. All clients must be 60 years or older and live in one of the 71 Counties or 11 Tribes in Wisconsin. (excluding Milwaukee County)
- b. All clients must need legal services as determined by program staff assigned to the program.
- c. Priority for legal services provided with funding under the Older Americans Act must be given to older adults who have the greatest economic and social need as defined by the Older Americans Act of 1965, as amended.



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“The term ‘greatest economic need’ means the need resulting from an income level at or below the poverty threshold established by the Bureau of Census”.

“The term ‘greatest social need’ means the need caused by non-economic factors which include physical and mental disabilities, language barriers, cultural or social isolation including that caused by social and ethnic status which restricts an individual’s ability to perform normal daily tasks, or which threaten his or her capacity to live independently.”

**6. Program Promotion and Client Referrals**

Applicants must clearly demonstrate how they will promote this program and recruit eligible clients to seek legal assistance from the applicant.

**7. Service Delivery Follow-Up**

Applicants must clearly demonstrate how they will provide timely follow-up to client requests. All follow-up procedures must be clearly defined.

**8. Program Personnel, Training, and Equipment**

- a. Applicants are expected to submit a job description for all positions receiving full or partial GWAAR Older Americans Act funds.

**(Required appendices A, Job Descriptions)**

- b. Personnel in programs receiving funds from sources in addition to the OAA Funds are expected to devote their staff time to GWAAR OAA Legal services program activities as specified in the GWAAR contract. Staff position and percentage of staff time dedicated to the program will be recorded.
- c. Attorneys must have an active license to practice law in Wisconsin, be in good standing, and have experience providing legal services to older adults.
- d. Paralegals must have at least one year's experience or equivalent in providing advocacy or benefit specialist services.
- e. Program volunteers must be directly supervised by legal staff and must consult with the supervising attorney as needed.
- f. Applicants must clearly indicate how people providing legal services will receive initial training upon employment as well as further specialized training in the following areas:

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- i. Awareness of legal and financial needs of older adults.
- ii. Up to date information on benefit programs, including Medicare, and other legal and financial issues affecting older adults as listed in Section I of these guidelines.
- iii. Maintenance of accurate case records.
- iv. Confidentiality, Attorney-client privilege, and diligence in representation.

**9. Program Organization**

Applicants must clearly identify the individual within the program and/or agency who will be:

- a. Solely responsible for the program.
- b. Responsible for compliance with all federal, state, and county and contractual requirements under this contract.
- c. Authorized to sign authorizations for the agency and the program.
- d. Authorized to receive checks for the program.
- e. Responsible for fiscal and budgetary matters.
- f. Responsible for data reporting and monthly reporting forms.
- g. Responsible for internal monitoring of the program.
- h. Responsible for handling customer and client complaints with respect to program activities.

**10. Program Service Coordination**

- a. Applicants must clearly demonstrate their ability to coordinate legal services program activities with other services provided to older adults by the parent agency (if any). Applicants must include a list of other services provided by the parent agency and describe how coordination will take place.
- b. Applicants must clearly demonstrate their ability to coordinate the program activities of other agencies providing services to older adults in GWAAR's service area. Applicants must list all agencies that the organization will coordinate with and describe how coordination will take place. Referral agreements are encouraged.

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**11. Contributions**

Applicant agrees to provide all clients with the opportunity to make a voluntary contribution toward the cost of legal services provided in accordance with provisions of the Older Americans Act. All such contributions must be accounted for in the monthly financial reports to GWAAR's fiscal department and be solely used to enhance services provided by the OAA Legal Services Program.

**12. Program Goals and Objectives**

- a. Applicants must specify the program objectives, methods, and time frame to achieve objectives. The objectives should relate to the proposed programs and services. The methods should specify operational and quantitative steps to accomplish the objectives. The time frame should indicate when the objectives will be completed.
- b. Proposals for the Legal Service Program must address the following program objectives:
  - i. Provision of individual legal representation to older adults in 71 Wisconsin Counties (excluding Milwaukee County) and 11 tribes listed in Section One of these guidelines, and outreach activities. The applicant shall document the number of individuals assisted in legal matters.
  - ii. Provision of group education about legal and benefit issues to older adults in the community.
  - iii. Provision of training and technical assistance to other community organizations to enhance their efforts in offering education and advocacy services.
  - iv. Facilitation of the involvement of the private bar in the provision of legal services for older adults in the community.
  - v. Targeting particular legal/benefit problems which have intensified, or which pose new challenges for older adults residing in GWAAR's service area. In so doing, the applicant should make use of available survey data regarding legal needs and the current GWAAR Aging Plan.
  - vi. Provision of direct legal representation to a specified number of older adults in 71 Wisconsin Counties (excluding Milwaukee) and 11 tribes, including goals for the number of cases that require representation in hearings, appeals, or other legal proceedings and those that constitute brief advice.

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**c. Measurable program objectives will include:**

- i. Gaining or maintaining income support for older adults on an annualized basis equates to or achieves **\$255,613 .00 . This is a preliminary figure, and a final contract amendment will be distributed to reflect any changes to this amount.**
- ii. At least 75% of all clients served will agree that the legal issue they presented was resolved to their satisfaction.
- iii. At least 90% of recipients of legal education and community presentations will demonstrate increased understanding of the topic.
- iv. Client will prevail with the assistance of legal counsel in at least 70% of appeals of public benefit decisions.

Submit an action plan for the following five objectives, include what benefits or changes are desired for individuals or populations when participating in your program, how do you plan to accomplish this outcome, how will your agency evaluate if the outcome was successful? The format should include your goal, action items to reach that outcome, and a timeline. Goal will be measured monthly with identified key performance indicators as outlined in the application template.

Goal #1 – Provide robust legal services to adults 60 and older in 71 counties (excluding Milwaukee) and 11 tribes in Wisconsin.

Goal #2 – Legal services produced desired outcomes for clients.

Goal #3 – Promote greater awareness of benefits in the community.

Goal #4 – Maximize pro bono legal services to older adults in 71 counties and 11 tribes.

Goal #5 – Provide direct representation to older adults in 71 counties and 11 tribes.

**13. Civil Rights Compliance and Client Grievance Procedure**

- a. Provider must demonstrate an internal client grievance procedure and inform all clients of the availability of the client grievance process to resolve disputes regarding the provision of legal services. Provider shall keep a record of all such client grievances and provide GWAAR with a quarterly report of any grievances.

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- b.** Provider shall post a notice detailing clients' rights under Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act and how to contact federal, state, and local government agencies to enforce their rights. Clients shall generally be informed that all legal services must be provided without discrimination based upon race, color, disability, or national origin.
- c.** Provider shall ensure the availability of translation and interpretation services for limited English language participants, specifically including Spanish language resources and American Sign Language (ASL) interpreters.

**14. Reporting and Billing Requirements**

Providers must submit GWAAR monthly expenditure reports for each funding source under this contract. In addition, providers will be required to enter demographic data – no names or other identifying information, into a database software tool used by the Wisconsin State Unit on Aging called OAAPS. This data must be entered by the tenth of every month. Additionally, key performance indicators will be measured monthly with an activities and outcomes report.

\*Resource: Administration for Community Living, Legal Services for Older Americans Program, *Authorizing Legislation: Title III-B, Section 321, of the Older Americans Act, as amended* [Legal Services for Older Americans Program | ACL Administration for Community Living](#)