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# FAQS ABOUT LEGAL AID & VOCA

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AKA Victims of Crime Act  
Victim Assistance Formula Grant Program

THE JUSTICE  
IN GOVERNMENT  
PROJECT

GETTING RESULTS WITH LEGAL AID  
National Legal Aid & Defender Association



# TOOLKIT

For more information about state-administered federal funds that can be used for legal aid, see NLADA's Legal Aid Resources page: <https://legalaidresources.org/>

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## 1. Q: What is the Victims of Crime Act (VOCA)?

**A:** The Victims of Crime Act (VOCA) of 1984 established the Crime Victims Fund (CVF), the nation's primary funding source to help victims of all types of crimes.<sup>1</sup> CVF is a repository of federal criminal fines, forfeitures and special assessments. It does not include tax dollars.

Among the VOCA-authorized grant programs is the state administered victim assistance formula grants. It provides funding to groups and direct services for victims, such as domestic violence shelters, legal support, faith-based organizations, and child abuse organizations.

The DOJ Office for Victims of Crime (OVC) – the federal CVF administrator for all the VOCA-authorized grant programs – awards the VOCA Victim Assistance Formula Grant Program in accordance with VOCA and the Victim Assistance Rule and related guidance. The states, in turn, provide sub-grants to local public agencies and non-profit community service providers (referred to as the “subgrantee” or “subrecipient”) that help individuals, families and communities recover from both the initial trauma and the long-term effects of victimization.

## 2. Q: What does VOCA have to do with legal aid?

**A:** A lot. At least for those legal aid programs that provide legal assistance to victims of domestic violence, human trafficking, elder abuse, financial fraud, identity theft, and other crimes that raise civil legal needs and/or that help victims in exercising their rights to participate in criminal justice proceedings.

For three reasons, the VOCA Victim Assistance Formula Grant Program administered by states provides an excellent opportunity to expand crime victim legal services:

1. DOJ OVC documented the need for legal aid. In 2013, DOJ OVC released its *Vision 21: Transforming Victim Services Final Report*,<sup>2</sup> to provide a roadmap for comprehensive and systemic improvements for meeting crime victims' needs. Chapter 2, “Meeting the Holistic Legal Needs of Crime Victims,” details the unmet civil legal needs of crime victims.
2. DOJ OVC new VOCA Assistance rule expanded legal services.<sup>3</sup> The new rule, effective August 8, 2016, included clarification that state VOCA administrators have the freedom and flexibility to use their funds for a broader array of legal needs. Victims may now receive VOCA-funded legal services that extend beyond the immediate aftermath of the crime. (See question 3).
3. Increase in state VOCA Victim Assistance funds. Beginning in 2015, Congress significantly increased the amount available from the CVF for all VOCA-authorized grant programs (as well as some that are not authorized in the VOCA statute) including the VOCA Victim Assistance program. (See question 4).

Now, more than 40 states use VOCA funds to expand legal assistance for various types of crime victims.

## 3. Q: What does the new rule say about the range of allowable legal services?

**A:** The DOJ OVC compared the 1997 guidance to the new rule and identified a non-exhaustive list of legal services arising directly from a criminal victimization that state VOCA victim assistance administrators could fund:<sup>4</sup>

- Proceedings for protective/restraining orders or campus administrative protection/stay-away orders;

- Family, custody, housing, and dependency matters, particularly for victims of intimate partner violence, child abuse, sexual assault, elder abuse, and human trafficking;
- Divorce and child support proceedings;
- Immigration assistance for victims of human trafficking, sexual assault, and domestic violence;
- Intervention with creditors, law enforcement (e.g., to obtain police reports), and other entities on behalf of victims of identity theft and financial fraud;
- Intervention with administrative agencies, schools/colleges, tribal entities, and other circumstances where legal advice or intervention would assist in addressing the consequences of a person’s victimization; and
- VOCA funds may also be used to allow victims to file a motion to vacate and/or expunge certain convictions based on their status of being a victim.

The rule makes clear that states may fund direct services regardless of a victim's participation in the criminal justice process and that victim eligibility under this program for direct services is not dependent on the victim's immigration status. The rule also reaffirmed the prohibition against using VOCA funds for criminal defense and tort lawsuits.

#### 4. Q: What other allowable costs were changed in the new rule especially relevant to legal aid programs and the courts?

**A:** Section 94.121, Allowable sub-recipient administrative costs, details the non-inclusive list of allowable costs.<sup>5</sup> Notable because of the key changes in the new rule includes relocation costs, organizational expenses necessary and essential to providing direct services and other allowable victim services, indirect costs at the sub-recipient level, and the costs of evaluations of specific project effectiveness. Section 94.119 now allows services for incarcerated victims, including filing motions to vacate and/or expunge certain convictions based on their status of being a victim.

#### 5. Q: How much VOCA Victim Assistance funding is available to states?

**A:** Because of fluctuations in annual CVF deposits of federal criminal fines and penalties, in 2000, Congress began “capping” annual CVF obligations “to ensure that a stable level of funding will remain available for these [VOCA] programs in future years.”<sup>6</sup> Unspent amounts remained in the CVF for future victim services. By 2015, CVF’s balance had grown by 900 percent, but the annual cap increased by only 49 percent – from \$500 million in 2000 to \$745 million in 2014.

As the National Association of Victim Assistance Administrators (NAVAA) explained, “[S]tate VOCA victim assistance grants did not even keep pace with the rate of inflation let alone the growing needs of crime victims. The mounting [CVF] balance was used by congressional appropriators to offset spending for other federal programs. However, the 2015 Congressional Budget Resolution limited the amount the [CVF] could be used as an offset and the cap was increased to \$2.361 billion!”<sup>7</sup> The large cap increase resulted in state VOCA victim assistance grants quadrupling. Although the amount has fluctuated from year-to-year, Congress has so far continued at elevated levels since the 2015 increase with the 2018 increase significantly surpassing all previous years.

OVC maintains an archive of annual CVF Victim Compensation and Victim Assistance allocations dating back to 2005.<sup>8</sup> The chart below was previously published by NAVAA and illustrates increases in VOCA Victim Assistance Grants from 2010-2018.

<i>VOCA Victim Assistance Grants (in thousands)</i>									
	2010	2011	2012	2013	2014	2015	2016	2017	2018
<b>TOTAL</b>	<b>412,134</b>	<b>428,081</b>	<b>379,670</b>	<b>425,207</b>	<b>455,790</b>	<b>1,958,83</b>	<b>2,219,900</b>	<b>1,846,507</b>	<b>3,328,058</b>
Alabama	6,323	6,626	5,864	6,537	6,973	29,522	33,245	27,566	49,343
Alaska	1,364	1,410	1,307	1,416	1,484	4,909	5,476	4,629	7,912
Arizona	8,656	8,692	7,739	8,705	9,373	40,786	46,514	39,074	70,800
Arkansas	4,073	4,237	3,781	4,192	4,463	18,253	20,570	17,131	30,602
California	46,205	48,244	42,593	48,127	51,829	232,723	264,297	218,943	396,642

## 6. Q: Do any states already provide VOCA-funded legal services to crime victims?

**A:** According to the American Bar Association, more than 40 states now use VOCA funds for legal aid for crime victims. A number of states have also launched statewide VOCA-funded legal aid programs. The statewide models show great promise to eliminate legal aid “deserts” that can occur through fragmented grantmaking, as well as raise the overall quality of services through joint provider trainings, consistent data-collecting to better identify statewide patterns and trends as well as identify hotspots that need greater attention, improved collaboration among the state’s legal aid providers, and importantly, to get legal aid to rural areas. The Justice in Government Project profiled three statewide VOCA-funded legal aid programs. These narratives can be accessed in [Module 3 of the JGP toolkit](#).<sup>9</sup> Some examples of statewide programs include:

**Massachusetts:** In 2017, the Massachusetts Legal Assistance Corporation received a VOCA grant to increase access to legal services for victims of violent and economic crimes in the state. The [Civil Legal Aid for Victims of Crime \(CLAVC\)](#) initiative helps victims of crime throughout Massachusetts with their related civil legal problems — including family law, housing, immigration, disability rights, child welfare, education, consumer, identity theft, employment rights and public benefits.<sup>10</sup> There are six regional CLAVC-funded legal aid programs and three statewide CLAVC-funded legal aid programs.

**Michigan:** In 2016 and 2017, [Michigan Advocacy Program \(MAP\)](#) received VOCA funding for 14 attorneys serving survivors of domestic violence and another 12 dedicated to helping elder abuse survivors.<sup>11</sup> These attorneys work out of 18 legal aid offices across Michigan. Michigan’s legal aid programs recognized that where someone lived should not determine their access to justice and this notion inspired a statewide collaboration.

**Washington:** In 2016, thanks to a Department of Commerce VOCA grant, the Washington State Office of Civil Legal Aid (OCLA) established the [Integrated Civil Legal Aid to Crime Victims Program](#).<sup>12</sup> The effort was informed by findings in the [2015 Civil Legal Needs Study](#) which found that victims of crime experience civil legal problems at substantially higher rates than the general public and focus groups that the state’s VOCA administering agency held throughout the state.<sup>13</sup> OCLA recognized the need for a coordinated statewide effort and agreed to subcontract, support, and oversee the delivery of civil legal aid services.

Other innovative uses of VOCA since the new rule include:

- Online automated court-approved Petition for Order of Protection Forms in South Carolina
- [Victims of Crime Portal](#) at Illinois Legal Aid Online<sup>14</sup>
- New York created [The New York Crime Victims Legal Network \(CVLN\)](#), an online web tool to connect victims of crime with attorneys in the state.<sup>15</sup>

- [Human Trafficking Prevention Project](#) at the University of Baltimore School of Law<sup>16</sup>
- Economic Exploitation and Fraud Prevention Project at Washington DC's Tzedek DC
- [Kinship Care Project](#) at Atlanta Legal Aid for caregivers of abused or neglected children, including those who are affected by the opioid crisis<sup>17</sup>
- Helping post-disaster financial exploitation crime victims, including victims of identity theft, wage theft, price gouging, exotic home and auto financing schemes, and contractor scams, at [Legal Aid of North Carolina](#)<sup>18</sup>
- Helping employment-related crime victims, such as those who experienced wage theft, at California Rural Legal Assistance and Justice at Work in Pennsylvania

## 7. Q: How does DOJ OVC allocate VOCA funds for Victim Assistance Grants?

**A:** All states, the District of Columbia, the U.S. Virgin Islands, and Puerto Rico each receive an annual VOCA victim assistance grant with a base amount of \$500,000; the Northern Mariana Islands, Guam, and American Samoa each receive a base amount of \$200,000. Additional funds are distributed to states and territories based on population, following the grant formula.

In each state and territory, VOCA assistance funds are awarded to subrecipients—local community-based organizations and public agencies that provide services directly to victims of crime. The final rule outlines some criteria for state spending; for example, a minimum of 10 percent of each year's VOCA grants will go to each of the three priority categories of victims – sexual assault, spousal abuse, or child abuse – and another minimum 10 percent to underserved victims of violent crimes. But the rule makes clear that VOCA administrators have sole discretion to determine what organizations will receive funds, and in what amounts, subject to the minimum requirements of the final rule and VOCA statute.

## 8. Q: Do states submit a plan to DOJ OVC for their VOCA Victim Assistance funds?

**A:** The final rule did not require states to have a strategic state plan to allocate funding. However, the final rule encourages states to develop a funding strategy, and requires states to have a documented method of making funding decisions.<sup>19</sup> DOJ OVC also included things states should consider in strategic planning, including: “The range of direct services throughout the State and within communities; the sustainability of such services; the unmet needs of crime victims; the demographic profile of crime victims; the coordinated, cooperative response of community organizations in organizing direct services; the availability of direct services throughout the criminal justice process, as well as to victims who are not participating in criminal justice proceedings; and the extent to which other sources of funding are available for direct services.”<sup>20</sup> As part of the state application for VOCA assistance grants, in some years OVC has asked states to submit a statement explaining the process by which they will make subgrants, including efforts to identify additional victims' needs. The VOCA statute does not require that state administrators submit performance reports to OVC on a quarterly basis.

## 9. Q: Is there a match requirement for VOCA Victim Assistance subgrantees?

**A:** State VOCA subrecipients must contribute 20 percent of the total project cost of each VOCA-funded project, with some exceptions, e.g., federally recognized American Indian or Alaska Native tribes and projects that operate on tribal lands. Match contributions may be cash and/or in-kind.<sup>21</sup> However, in a June 2019 OVC policy memo, states were given the discretion to waive or partially waive the match requirement on behalf of subrecipients provided that the state has adopted an OVC-approved waiver policy. As of March 31, 2020, the match waiver process became somewhat more accessible when

updated guidance said that "there is now a 'unique circumstance' exception to the requirement that states must submit a revised policy to the grant manager and receive approval prior to making any waiver determinations." State administrators are encouraged to consult with their grant manager about when "unique circumstances" would apply.<sup>22</sup> When determining whether a full or partial waiver is "well-justified," the administrator must consider: "practical and/or logistical obstacles to providing match (e.g., public agencies that do not engage in private fundraising and may have limitations on soliciting contributing funds); local resource constraints (e.g., rural community with limited local funding availability or volunteer capacity); increases to VOCA funding where local funding availability has not increased to the same degree; past ability to provide match - OVC generally expects subrecipients to provide at least the same dollar amount of match it provided during the grant year immediately preceding the year of the waiver request unless a change in circumstances justifies a lower amount."

Relatedly, VOCA-funded programs must use volunteers in order to be eligible to receive VOCA funds. The mandated use of volunteers provision is an eligibility requirement for subgrantees, not as a requirement for individual VOCA-funded projects. This eligibility requirement can be waived by the chief executive of the state (who may act through the administrator), however, when certain circumstances are met.<sup>23</sup>

#### **10. Q: Who selects the state's VOCA administrator?**

**A:** Generally, the Governor decides which office or department administers VOCA. Consequently, where VOCA sits in the state executive branch varies state-to-state. Go to the DOJ OVC webpage, titled, "Providers and Community Leaders" and click on your state: <http://ojp.gov/ovc/map.html> NAVAA also has a directory of state administrators, here: <http://navaa.org/statedirectory.html>

#### **11. Q: Are there other victim-related federal funds administered by my state?**

**A:** Yes, many state VOCA administering agencies also administer at least one other victim-related funding program, and often several. These are typically other federal formula or discretionary grants and/or state-supported victim funding or service programs. For example, agencies administering VOCA may also have responsibility for STOP Violence Against Women Act formula grant program and the Family Violence Prevention and Services Formula grants to states and territories, both of which allow funding for legal services. JGP published a [Grants Matrix](#), which includes information about how these two grants, among others, can support legal aid and examples of how states have used these funds to advance their goals with legal aid.<sup>24</sup> All states also operate crime victim compensation programs supported mostly with state funds that are supplemented with VOCA compensation formula grants.

#### **12. Q: Do states invite public input on crime victim needs and priorities?**

**A:** It depends on the state. In some states, like Massachusetts and California, there are opportunities for public comment where citizens can submit information to make the case to invest in certain organizations or communities.<sup>25</sup> For example, in California, the VOCA Steering Committee holds a public hearing, where key organizations (one of which is the Legal Aid Association of California) and the public can present and discuss VOCA priorities and directions.<sup>26</sup> If your state holds a public hearing, attending can help raise awareness about the civil legal needs of crime victims.



### 13. Q: What next steps can the legal aid community and its crime victim provider partners take to tap into VOCA funds to help meet crime victims' legal needs in my state?

**A:** Start by getting more background about your state and its grant-making history. The US Department of Justice, Office for Victims of Crime [US Resource Map of Crime Victim Services & Information](#) makes it easy to click on your state to find your state's administering agency, information on events, statistics, compensation and assistance, and VOCA performance reports.<sup>27</sup> The state's "assistance report" AKA "annual state performance report" can be found at the "VOCA Reports" tab. This performance report provides a snapshot of financial information for the last four fiscal years, and information about subawards, the number of individuals VOCA-funded services served including legal services.

A number of states have had their VOCA programs audited by the DOJ Office of Inspector General. To see if your state has been audited, [scroll down](#) to your state and see if there's a "Victim Assistance Formula Grants" audit report.<sup>28</sup> These reports are similarly filled with helpful information about your state.

In some states, like California, the VOCA administrator submits reports the state legislature. If your state prepares this kind of report, you may find additional information about how VOCA victim assistance grants work in your state.

In November 2019 OVC released [VOCApedia](#), a VOCA Victim Assistance allowability resource tool for VOCA Victim Assistance SSAs.<sup>29</sup> VOCApedia is a living resource updated on a monthly basis as OVC provides answers to question from the field. Whenever you have questions about what VOCA and its corresponding rule allows subgrantees (like legal aid programs and the courts) to do or need guidance about implementation and oversight your VOCA administrator must follow, it is the best place to look first.

Finally, the [NAVAA website](#) has helpful updates about Congress, funding, and other useful information.<sup>30</sup>

In light of the fiscal year 2018 increase, the legal aid community can expand its collaborations – among legal aid programs, with other service providers, and with the courts – and consider ambitious proposals for meeting the civil legal needs of your state's crime victims. [Karen Lash](#) at The Justice in Government Project, [klash@american.edu](mailto:klash@american.edu), is happy to help brainstorm about this. For more information about JGP at American University Justice Programs Office, click [here](#).<sup>31</sup>

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### Legal aid helps mom and children achieve safety

"Mary" lived in a remote rural community in Washington State with her abusive husband and two young children. For years, her husband had sexually assaulted her and kept her without telephone access or transportation. After fleeing to a domestic violence shelter, Mary's VOCA-funded attorney with the Washington state Northwest Justice Project helped her secure a life-long protection order and protection orders for Mary's children until they turn 18. She now lives with her children and peace of mind.<sup>32</sup>

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## Endnotes

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- <sup>1</sup> Office for Victims of Crime, U.S. Department of Justice, *OVC Fact Sheet*, available at <https://www.ovc.gov/pubs/crimevictimsfundfs/intro.html>
- <sup>2</sup> Office for Victims of Crime, U.S. Department of Justice, *Vision 21: Transforming Victims Services* (May 2013), available at [https://ovc.ncjrs.gov/vision21/pdfs/Vision21\\_Report.pdf](https://ovc.ncjrs.gov/vision21/pdfs/Vision21_Report.pdf)
- <sup>3</sup> Office for Victims of Crime, U.S. Department of Justice, *Side-by-Side Comparison of VOCA Victim Assistance Guidelines and Rule*, available at <https://www.ovc.gov/pubs/comparison-VOCA-victim-assistance-guidelines-and-final-rule.pdf>; Joye Frost & Bea Hanson, *New VOCA Assistance Rule Means More Services, More Funds for Victims*, US Department of Justice Archives (December 31, 2016), available at <https://www.justice.gov/archives/opa/blog/new-voca-assistance-rule-means-more-services-more-funds-victims>
- <sup>4</sup> VOCA Allowable Direct Service Costs- Legal Assistance- 28 CFR Part 94.119(f); See *Supra* note 2 at 35.
- <sup>5</sup> See <https://www.law.cornell.edu/cfr/text/28/94.121>
- <sup>6</sup> Congressional Report 106-479. Making Appropriations for the Government of the District of Columbia and Other Activities Chargeable in Whole or in Part Against Revenues of Said District for the Fiscal Year Ending September 30, 2000, and for Other Purposes, available at <https://www.govinfo.gov/app/details/CRPT-106hrpt479/CRPT-106hrpt479/context>
- <sup>7</sup> National Association of VOCA Assistance Administrators (NAVAA), *Briefing Background* (2017), available at [http://www.navaa.org/budget/17/VOCA\\_Backgrounder%202017.pdf](http://www.navaa.org/budget/17/VOCA_Backgrounder%202017.pdf)
- <sup>8</sup> Office for Victims of Crime, Formula Grant Allocations Archive, available at [https://www.ovc.gov/grants/formula\\_archive.html](https://www.ovc.gov/grants/formula_archive.html)
- <sup>9</sup> Justice in Government Project, Module 3, available at <https://www.american.edu/spa/jpo/toolkit/module-3.cfm>
- <sup>10</sup> Civil Legal Aid for Victims of Crime (CLAVC), available at <https://massclavc.org/>
- <sup>11</sup> Crime Victims Legal Assistance Project (CVLAP), available at <https://cvlap.org/>
- <sup>12</sup> Washington State Office of Civil Legal Aid, *Civil Legal Aid to Crime Victims Program, Delivering Effective Civil Legal Aid Services to Victims of Crime*, available at <https://www.american.edu/spa/jpo/upload/Washington-state-report.pdf>
- <sup>13</sup> Social & Economic Sciences Research Center, Washington State University, *2015 Washington State Civil Legal Needs Study Update* (October 2015), available at [https://ocla.wa.gov/wp-content/uploads/2015/10/CivilLegalNeedsStudy\\_October2015\\_V21\\_Final10\\_14\\_15.pdf](https://ocla.wa.gov/wp-content/uploads/2015/10/CivilLegalNeedsStudy_October2015_V21_Final10_14_15.pdf)
- <sup>14</sup> <https://www.illinoislegalaid.org/voc/victims-crime-portal>
- <sup>15</sup> <https://crimevictimshelpny.org/>
- <sup>16</sup> <http://law.ubalt.edu/clinics/humantrafficking.cfm>
- <sup>17</sup> <https://atlantalegalaid.org/about-us/our-work/>
- <sup>18</sup> <http://www.legalaidnc.org/>
- <sup>19</sup> Victims of Crime Act Victim Assistance Program, 28 C.F.R. 94., available at <https://www.federalregister.gov/documents/2016/07/08/2016-16085/victims-of-crime-act-victim-assistance-program>
- <sup>20</sup> *Ibid.*, § 94.103 (d)
- <sup>21</sup> *Ibid.*, 28 CFR 94.118
- <sup>22</sup> See OVC March 2020 Updates to Match Waiver Approval Process, and more, April 2020: <https://www.ovc.gov/VOCA-Administrators/041320.html>
- <sup>23</sup> *Ibid.*, 28 CFR 94.113
- <sup>24</sup> The Justice in Government Project, *Grants Matrix: State-Administered Federal Funds that can Support Legal Aid*, available at <https://www.american.edu/spa/jpo/toolkit/module-2.cfm#Grants>
- <sup>25</sup> Californians for Safety and Justice, *Victims of Crime Act and the Need for Advocacy* (March 2017), available at <https://safeandjust.org/wp-content/uploads/CSJ-VOCA-toolkit-Mar2017-R2.pdf>
- <sup>26</sup> See <https://www.caloes.ca.gov/cal-oes-divisions/grants-management/victim-services/task-forces-committee-councils>
- <sup>27</sup> Office for Victims of Crime, *U.S. Resource Map of Crime Victim Services & Information*, available at <http://ojp.gov/ovc/map.html>

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<sup>28</sup> Office of Inspector General, U.S. Department of Justice, *Office of Justice Programs Grant Audits*, available at <https://oig.justice.gov/reports/ojp-ext.htm>

<sup>29</sup> See <https://www.ovc.gov/VOCA-Administrators/110119.html>

<sup>30</sup> National Association of VOCA Assistance Administrators, available at <http://navaa.org/>

<sup>31</sup> <https://www.american.edu/spa/jpo/JGP.cfm>

<sup>32</sup> Washington State Office of Civil Legal Aid, *Delivering Effective Civil Legal Aid Services to Victims of Crime* (2018), available at <http://ocla.wa.gov/wp-content/uploads/2018/07/Civil-Legal-Aid-to-Crime-Victims-Report-Final.pdf>