

401 Second Ave S. Suite 407
Seattle, WA 98104
Tel. (206) 464-1519
Fax (206) 903-0526

NJP supports this recommendation. Ms. Kleinberg proposes to address the following points:

1. How are recipients currently using integrated intake and referral systems?
 - Programs and delivery systems are configured in many different ways and there should be latitude for activities that achieve LSC's private attorney involvement goals to count toward the PAI requirement.
 - Washington has a long history of independent pro bono programs. Local lawyers are highly motivated by and relate to their own community-based volunteer program efforts to provide services for low income persons in their communities. NJP has developed a collaborative system of support for the 17 small independent volunteer lawyer programs (VLPs) located throughout Washington and fosters efficient and effective service by local lawyers who volunteer with those programs.
 - Pursuant to Washington State Plan for the Delivery of Legal Services to Low Income Persons, NJP has been assigned responsibility to serve as the primary client entry point into the legal services delivery system, employing existing and

Legal Service Corporation PAI Rulemaking Workshop Coordinator
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receive reports of whether a referred client received legal assistance from a volunteer lawyer.

Key Points Addressed to Topic 3LSC should examine the rule, as currently interpreted, that mandates adherence to LSC grantee case handling requirements, including that matters be accepted as grantee cases in order for programs to count toward PAI requirements.

NJP supports this recommendation. Ms. Perluss proposes to address the following points:

1. How do recipients currently

ensures compliance with legal restrictions on recipients' activities and uses of LSC funds?

- For NJP, prospective clients are screened for LSC eligibility before they are referred to VLP brief service clinics. NJP is able to document referrals to such clinics for persons who are LSC eligible and could relate the percentage of referrals to a reasonable and justified percentage of costs associated only with those referrals, subject to Independent Auditor review.
- Persons referred to the NJP sponsored domestic violence clinic are LSC eligible.
- Training and support provided to the Housing Justice Projects or Debt Clinic are not specifically client-based but "support" the pro bono work of private lawyers serving persons assisted by these clinics. That0d n ablriicsesx5(o)P0 Tc 0 Tw -1(r)- ers C
Training is provided to the (i)p(r)3(c)2(e)4(wm2(i)e-5)-26(x5t3 pr)x5(5(e)-(e) ph6(x5(o)2)-

Name

Joan Kleinberg / Deborah Perluss

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