

COMMENTS ON LSC'S REGULATORY AGENDA FOR 2007

**SUBMITTED BY
THE CENTER FOR LAW & SOCIAL POLICY
ON BEHALF OF
THE NATIONAL LEGAL AID AND DEFENDER ASSOCIATION**

MARCH 16, 2007

These brief comments are submitted to the Legal Services Corporation (LSC) by the Center for Law & Social Policy (CLASP) on behalf of the National Legal Aid and Defender Association (NLADA). NLADA is a membership organization that represents civil legal aid programs, including those funded by LSC. CLASP serves as counsel to NLADA and its civil members.

On Thursday, February 22, 2006, LSC President Helaine Barnett sent a message to all LSC Executive Directors seeking comments on the adoption of a 2007 regulatory agenda for LSC. The message asked that comments be submitted to Victor Fortuno by March

the OIG's agenda for years, and the CRLA investigation has just provided a convenient excuse for recommending action that LSC has not seen fit to adopt in the past. Some of the recommendations are directly contrary to longstanding LSC regulatory and legislative interpretations, which are clearly understood by recipients and LSC compliance staff and there is no reason to change.

In the event that the Operations and Regulations committee does decide to consider the OIG's recommendations, NLADA requests an opportunity to comment in more detail, both orally and in writing, on the specific proposals. Please contact our counsel, Linda Perle, at lperle@clasp.org or 202-906-8002 to make any necessary arrangements for such comments prior to the Operations and Regulations Committee meeting.