



Comment on Legal Services Corporation's (LSC)

and Department Procedures:

United Regulations in Relation

on: Enforcement: Suspension Procedures

Recompetition

by

AID

COMMITTEE ON LEGAL

MEMORANDUM DATED BY THE

Register.

The proposed changes made to the January 31, 2012 Notice of Proposed R

We wish to thank the Board for its modifications of the proposed rules as related to o

a response.

For these reasons we reiterate our original comments and attach a copy of them for your

includes an exception for a program that acts on good faith following a reasonable

to comment. We would be happy to discuss this further if

Thank you for the opportunity

The Lewis and Clark Foundation

Lewis and Clark Foundation, Inc.
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Department of Justice

OFFICE OF THE ATTORNEY GENERAL

COMMITTEE ON LEGAL AID

COURT REPORT

Committee on Legal Aid

REPORT OF THE COMMITTEE ON LEGAL AID

FOR THE YEAR 1934

Terminations under 45 C.E.R. 1606.3 including reductions of between 5% and

100% of a credit

• Withdrawals under 45 C.E.R. 1606.3 and

• Decisions not to refund a program during the competition process—45 C.E.R. 1634

could not have been addressed through LSC's current tools.

We also note that the report of LSC's own Fiscal Task Force never identified a need for

the reductions in funding embodied in this proposal
LSC funded programs and non-LSC funded programs
providers operate on very limited budgets. Reserves are either very low

We are particularly concerned that the
will harm clients and applicants of LSC

All legal services pro

for office visits, due to the nearly 15%
to years. The penalties as proposed could

reduction in our LSC funding over the last two
years, not controls of service, and the potential

York, LSC providers also face significant additional LSC reductions over the next two

These types of cuts are particularly threatening given the intense need for civil legal

