



November 15, 2006

Mr. David Maddox  
Assistant Inspector General for Resource Management  
Office of Inspector General  
Legal Services Corporation  
3333 K St NW  
Washington, DC 20007-3558

Dear Mr. Maddox:

After reviewing the Office of Inspector General's (OIG) updated Strategic Plan of the Legal Services Corporation (LSC), I am convinced that the OIG suffers from a misunderstanding of its role as overseer and watchdog of the Legal Services Corporation. Given the checkered history of the Legal Services Corporation's efficiency, it is disappointing to review the 5 year plan and see so much room for greater enforcement and accountability. In addition to neglecting the historically poor administration of the LSC, the Strategic Plan of the OIG, in effect, hands the oversight responsibility directly to those exhibiting poor administration. Such neglect fails to fulfill the real mission of the OIG: protecting taxpayers - not the LSC agenda.

The Strategic Plan fails to question the strategic goals of the LSC. Among the vaguely stated objectives of the LSC are to increase funding and expand the ways it provides legal assistance. The truth, however, is that the LSC leadership has repeatedly demonstrated an inability to efficiently administer existing funds. The OIG has declared in past audits that executive spending practices appeared excessive and inappropriate, "particularly in light of its mission in distributing taxpayer dollars to fund legal services to the poor." But a condemnation by the OIG is sadly nowhere to be found, and the matter of repeated misappropriation of funds is largely ignored by both the LSC and the OIG in the full Strategic Plan.

The OIG seems to forget its very purpose by repeatedly ceding authority for oversight to the LSC itself. Abuses and ignorance of Congressional standards have plagued LSC grantees in the past. It is neither within the interests nor the capabilities of the LSC to enforce the Congressional standards for behavior among its grantees, yet this is what the OIG proposes.

**OFFICERS**

Edwin J. Feulner, President  
Phillip N. Truluck, Executive Vice President  
Stuart M. Butler, Vice President  
Becky Norton Dunlop, Vice President  
Michael G. Franc, Vice President  
Rebecca Hagelin, Vice President  
Kim Holmes, Vice President  
Edwin Meese III, Reagan Fellow  
Ted E. Schelenski, Vice President  
Michael A. Spiller, Vice President  
John Von Kannon, Vice President  
Bernard Lomas, Counselor  
Robert E. Russell, Jr., Counselor

**BOARD OF TRUSTEES**

David R. Brown, M.D., Chairman  
Richard M. Scaife, Vice Chairman  
J. Frederic Rench, Secretary  
Douglas F. Allison  
Larry P. Arnn, Ph.D.  
The Hon. Belden H. Bell  
Holland H. Coors

Midge Decter  
Edwin J. Feulner  
Steve Forbes  
Robert J. Herbold  
Jerry Hume  
Kay Coles James  
Lee Klinetobe

The Hon. J. William Middendorf II  
Nersi Nazari  
Thomas A. Saunders III  
Brian Tracy  
Phillip N. Truluck  
Barb Van Andel-Gaby  
Marion Wells

**PATRON OF THE HERITAGE FOUNDATION**

The Right Honourable The Baroness Thatcher, LG, PC, OM, FRS

**HONORARY TRUSTEES**

Kathryn Davis  
The Hon. Frank Shakespeare

Mr. David Maddox  
November 15, 2006

Page 2

In the Strategic Plan, the OIG asserts that the *LSC and its grantees* are mainly responsible for accountability improvements, and effectively asks the inmates to run the asylum. It is in the interests of the taxpayers, who fund the LSC, to know that efforts are being made to ensure that their tax dollars are being spent wisely and appropriately. Simply deferring the job to the LSC does nothing to serve these interests.

While the LSC may consider the OIG an important tool in fulfilling its mission, the LSC certainly does not respect the OIG's role as a responsible overseer. In response to nearly every audit in the past year, the LSC has either directly ignored or disagreed with at least half of the recommendations made by the OIG. The OIG must be determined to enforce accountability and change within the LSC, not content to deliver another ineffectual slap on the wrist. Of course, such determination is unexpected when the OIG stands to gain a budget increase of nearly \$1 million directly from the LSC.

The ultimate failure in the Strategic Plan outlined by the OIG can be found in its initial pages. In its vision statement, the OIG asserts that it wants to be a "valued resource," and a "positive contributor" to help the LSC to achieve its mission. But the OIG will never help the LSC by providing audits that are ignored and forgotten, or by waiting for the LSC to take the initiative. The OIG should focus less on becoming a "constructive critic," and instead do more to fulfill its role as a force of accountability for a program rife with waste and irresponsibility.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edwin J. Feulner', written in a cursive style.

Edwin J. Feulner, Ph.D.  
President

EJF/ar