

LEGAL SERVICES ASSOCIATION OF MICHIGAN

Mike Chielens

Co-chair
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September 17, 2012

Board of Directors
Legal Services Corporation
c/o Mark Freedman, Senior Assistant General Counsel
Office of Legal Affairs, Legal Services Corporation
3333 K Street NW
Washington, DC 20007

Ann Routt

Co-chair
420 N. Fourth Ave.
Ann Arbor, MI 48104

Kenneth Penokie
Secretary/Treasurer

Re: Further Notice of Proposed Rulemaking on Termination, Limited Reductions in Funding,
and Procedures; Recompensation; Enforcement; Suspension Procedures

Dear LSC Board of Directors,

We're writing on behalf of the Legal Services Association of Michigan (LSAM) to comment on the proposed rulemaking on termination, limited reductions in funding, recompetition, enforcement and the suspension procedures. LSAM's members are the thirteen largest civil legal services organizations in Michigan.* Our member organizations collectively provide legal services to low-income individuals and families in over 50,000 cases per year.

We support the positions and supporting arguments offered in the comments submitted to the LSC Board of Directors by the National Legal Aid and Defender Association (NLADA). We are troubled by the lack of clear standards and the resulting lack of due process. We continue to share the concerns expressed by NLADA that the proposed changes will have unintended consequences on our clients.

While we are appreciative of the efforts to date to consider previously-raised concerns, we encourage the continued dialogue with NLADA to ensure a fair process that will enhance, as opposed to impede, our ability to provide quality legal services to our client communities.

Thank you for this opportunity to comment on this important issue impacting access to justice.

Respectfully,

Ann L. Routt
Co-Chair



Michael C. Chielens
Co-Chair

* LSAM's members are: the Center for Civil Justice, Elder Law of Michigan, Lakeshore Legal Aid, Legal Aid and Defender, Legal Aid of Western Michigan, Legal Services of Eastern Michigan, Legal Services of Northern Michigan, Legal Services of South Central Michigan, Michigan Indian Legal Services, Michigan Migrant Legal Assistance Program, Michigan Legal Services, Neighborhood Legal Services, and the University of Michigan Clinical Law Program.