



## **N-LAAN Comments on LSC Strategic Planning Process**

These are the comments of the National Language Access Advocates Network (N-LAAN) on LSC's strategic planning process. N-LAAN is a coalition of language access advocates that supports and engages in effective advocacy to eradicate language discrimination and promote language rights. N-LAAN provides a forum for language access advocates nationwide to develop expertise, share resources and devise strategy. It serves as a voice for its members in advocating for better policies and laws and for more effective enforcement of language rights. Many of us, but not all, work for LSC grantees.

All of us share a desire to see the Legal Services Corporation's strategic planning process focus on language access and on effectively serving LEP clients with LSC dollars.

We hope that any new strategic plan adopted by the Legal Services Corporation maintains and enhances the Corporation's commitment to access to legal services by low-income LEP people. We offer to work with the Corporation to conduct a new language access self-assessment of LSC grantees. N-LAAN conducted such a national self-assessment in 2009. We are hoping to do an update, but would really like LSC to be a partner with N-LAAN in helping us design, distribute, and then analyze the survey tool. Routine updates would inform your strategic planning process.

We applaud the Corporation's use of TIG funds to encourage innovation with respect to serving LEP clients and its grant application to ensure proper planning by its grantees. The LSC Performance Criteria also speak to access to legal services for LEP clients, and we believe site visits should always include expertise on LEP issues in their teams and keep that as a central area of review, inquiry, and final comments.

The Corporation, however, can and should do more. LSC can and should collect data on the number and variety of LEP clients served by grantees. This will ensure that the Corporation is measuring grantee progress in creating meaningful access to services by LEP clients. The Corporation has already mandated that a grantee's case management system capture LEP client information – by requiring grantees to report on it, you will both ensure that it is being done and gain a deeper understanding of the level of services your dollars actually provide to LEP clients. Understanding and examining how grantees are serving LEP groups versus English speaking groups will help LSC programs allocate resources to underserved communities. To assist grantees, LSC should also provide pertinent data regarding specific language needs in each grantee's service area. This data can be extremely useful to grantees in developing appropriate outreach efforts and improving accessibility for their client constituencies. The data LSC provides is not intended to be used in a punitive way, but to provide additional supports and technical assistance to programs and to develop tools available through LSC to all grantees to improve LEP services.

As the leader in the nation's civil legal services community, the Legal Services Corporation can centralize and perhaps create economic efficiencies in the provision of training to bilingual staff who serve as interpreters, training to advocates who work with interpreters, and substantive law training with respect to federal language access rights. For example, you might consider doing this by prioritizing TIG proposals that provide distance training on the above as well as cultural competence via LSNTAP and via advocate focused statewide websites. With respect to information you solicit on trainings provided, the Corporation is in a position to specifically ask when trainings similar to the ones outlined above were made available to a grantee's staff.

In short, do not step away from the commitments LSC has already made – indeed – go farther. All evidence shows that the client population eligible for services from your grantees is increasingly diverse and increasingly includes LEPs. The Legal Services Corporation must do all it can to ensure true access to meaningful legal services and effective language access advocacy.

We stand ready to assist you in any way through your strategic planning process. If you have any questions or seek further participation from N-LAAN, please feel free to contact Lillian Moy at [lmoy@lasnny.org](mailto:lmoy@lasnny.org) or Joann Lee at [jlee@lafla.org](mailto:jlee@lafla.org).