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THE ALLIANCE
for Equal Justice
SUPPORTER

June 20, 2005

Victor M. Fortuno
Vice President for General Counsel
Legal Services Corporation
3333 K St., NW
Washington, DC 2007

Delivered by e-mail to vfortuno@lsc.gov

RE: Access to Justice Board comments on LSC's 2005-06 Regulatory Agenda, specifically, Part 1610 – Program Integrity

Dear Mr. Fortuno:

The Washington State Access to Justice (ATJ) Board was established by state Supreme Court Order to improve and expand the civil justice system for low and moderate income people. Consistent with that Order, the ATJ Board serves as the statewide planning and policy board for civil legal aid in this state, which includes the LSC-funded Northwest Justice Project.

The ATJ Board is in the process of reviewing its current state plan to address significant demographic, funding and organizational changes that have occurred during the past few years, and which affect the delivery of civil legal aid to low income people. Part 1610 historically has worked as a constraint on efficient planning because its provisions dictate in large part how our delivery system is established and operated. The ATJ Board is now charged with addressing the findings in the Supreme Court's recently released Civil Legal Needs Study. It will be difficult for the ATJ Board to integrate these findings into our delivery system given our available resources and the requirements of Part 1610, so that the identified needs of low income people in our state are effectively addressed.

As a partial solution, the ATJ Board respectfully requests that the Legal Services Corporation consider making such revisions to 1610.8 so that it will be consistent with Judge Block's decision in *Dobbins/Velazquez*. In that way, this decision will be applicable to all recipients of LSC funds. This regulatory change would greatly assist the ATJ Board in its ability to engage in a meaningful revision of its state plan to address the identified needs of low income people.

Thank you for your consideration of this request.

Sincerely,

Christine E. Crowell, Chair
Access to Justice Board

cc: Patrick McIntyre, Executive Director
Northwest Justice Project