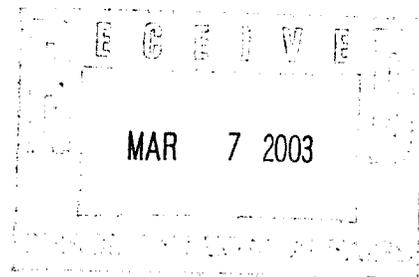


LEGAL ACTION OF WISCONSIN, INC.

ADMINISTRATIVE OFFICE

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March 4, 2003



Ms. Mattie C. Condray
Senior Assistant General Counsel
Legal Services Corporation
750 First Street, NE, Suite 1110
Washington, D.C. 20002

Dear Ms. Condray:

Legal Action of Wisconsin, Inc. appreciates the opportunity to provide comments on the Legal Services Corporation's (LSC) Limited English Proficiency (LEP) - Request for Comments. After thorough review of the Request for Comments, we do not believe that the LSC should impose an additional LEP regulatory burden on LSC grantees, which is not required by the LSC Act, particularly considering the already substantial LSC regulatory and reporting requirements, the stagnation of LSC funding and the rapidly declining IOLTA levels throughout the country. We concur with your conclusion that the LSC does not have the staff resources and/or the expertise to monitor and conduct enforcement in the LEP area.

These comments should not in any way imply that Legal Action does not fully support the goals of LEP and that we are not devoting a considerable amount of resources on implementing LEP requirements in all our offices and projects. Legal Action already has to comply with Limited English Proficiency requirements under its Violence Against Women Act (VAWA), Older Americans Act and TANF grants. It is likely that almost all LSC recipients must already comply with the LEP requirements because of receipt of other federal funding such as VAWA, OAA or TANF.



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Both the federal Department of Justice and the State of Wisconsin have issued specific guidance for implementing the LEP program. Any LSC issued guidance would only complicate the process. In addition, LSC guidance may even be in direct conflict with guidance from these other agencies, particularly the State of Wisconsin. The State of Wisconsin has already conducted a statewide language assessment and determined that Spanish and Hmong are major LEP language groups in Wisconsin. It would be a shame for the LSC to waste any of its limited resources available for legal services in an area that is already being handled thoroughly by other agencies. Instead, the LSC resources could be used to provide technical assistance in areas that are unique to the legal services community.

Legal Action recommends that the LSC refrain from issuing LEP guidance or even establishing an LEP information clearinghouse. Instead, LSC should suggest grantees seek out information from other existing sources, such as the Department of Justice who have the resources and expertise to provide updated information on a regular basis as the LEP compliance area evolves over the coming years.

If you require any additional information concerning these comments, please contact us

Sincerely,



Michael J. Maher
Administrator



Mary E. Triggiano
Managing Attorney
LEP Coordinator

MJM:caj