

Colorado Legal Services

1905 Sherman Street, Suite 400
Denver, Colorado 80203-1811
Telephone 303-837-1321 V/TDD
Fax 303-830-7860

Direct Line: 303-866-9399

January 24, 2002

Mattie C. Condray
Senior Assistant General Counsel
Office of Legal Affairs
Legal Services Corporation
750 1st Street, NE
Washington, D. C. 20002-4250

Re: Comments on Proposed Revisions
to Rule 45 C.F.R. Part 1639-
Welfare Reform

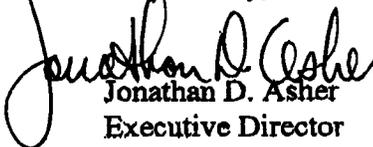
Dear Ms. Condray:

Colorado Legal Services supports the proposed revisions to the Legal Services Corporation Rule on Welfare Reform, 45 C.F.R. Part 1639, as published in the Federal Register on November 26, 2001. Colorado Legal Services supports the revisions which clarify that recipients of Legal Services Corporation funding may represent an individual eligible client who is seeking specific relief from a welfare agency. The proposed revision is consistent with the U. S. Supreme Court's decision in Velazquez.

While CLS supports the revision to the Rule it is recommended, however, that the definition of "existing law" in the revised Rule be eliminated and removed because that term is no longer used in the proposed Rule. The term was only used in a phrase in the Rule that is proposed to be entirely deleted. If the phrase in which the term is used is deleted, inclusion of a definition of the term would only lead to confusion and its inclusion is no longer necessary or helpful. Thus the definition of the term should be deleted from the Rule.

Colorado Legal Services appreciates the opportunity to comment on the proposed Rule and looks forward to the Corporation's consideration of these comments. If you have any questions in this regard, please inform me accordingly.

Respectfully,


Jonathan D. Asher
Executive Director



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