

MATTIE CONDRAY

From: David Neumeyer [davidn@vlas.org]
Sent: Monday, December 23, 2002 10:32 AM
To: mcondray@lsc.gov
Subject: Comments on Proposed Revisions to 45 CFR Part 1611

Mattie C. Condray, Senior Assistant General Counsel
Office of Legal Affairs
Legal Services Corporation
750 First St., N.E., 11th Floor
Washington DC 20002

Dear Ms. Condray:

I am writing to submit comments on proposed revisions to LSC's financial eligibility regulation, 45 CFR Part 1611, as published for comment in the Federal Register of November 22, 2002.

A committee of six staff members of Virginia Legal Aid Society, including attorneys, paralegals, and a secretary, reviewed the proposed revisions for us. The Committee felt the proposed changes were basically helpful and should be supported with the following exception.

In 1611.3 (d)(1) the proposed exclusion for vehicles requires that the vehicles are required for work. Current VLAS policy provides an exemption for one motor vehicle per adult residence member of the household. With LSC's proposed limit of the vehicle exemption to situations when the vehicle is needed for work purposes, many VLAS clients who are disabled would be required to count their vehicle value against the asset ceiling. We recommend that the language be modified to read: "vehicles required for work, for medical purposes and to access the needs of daily life".

Thank you for these revisions.

Sincerely,

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