



**By Email and U.S. Mail**

February 13, 2015

Jill Nylander, Executive Director  
Legal Services of Eastern Michigan, Inc.  
436 South Saginaw Street  
Flint, MI 48502

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Re: Follow-up Review, Recipient No. 423060

Dear Ms. Nylander:

I would first like to thank you and the Legal Services of Eastern Michigan, Inc. ("LSEM") staff for the courtesy and cooperation extended to the Legal Services Corporation's ("LSC") Office of Compliance and Enforcement ("OCE") Follow-up team on September 16-18, 2013. I write to inform you of the Follow-up Review ("FUR") team's findings and their assessment of LSEM's response to the draft FUR letter issued on June 10, 2014.

As you will recall, OCE conducted an on-site Case Service Report/Case Management System Review ("CSR/CMS Review") of LSEM on June 6-9, 2011. During that review, OCE identified several issues and Required Corrective Actions designed to assist LSEM in complying with the LSC Act, regulations, and applicable instructions. OCE listed 21 Required Corrective Actions in its Draft Report, which was issued on August 15, 2011, and in its Final Report, which was issued on October 14, 2011.

By letter dated October 14, 2011, LSC concluded that, based on the Final Report, training sessions should be held at each LSEM office to address several of the Recommendations and Required Corrective Actions. LSEM was informed that, in order for OCE to close those items, LSEM needed to advise OCE of the date(s) upon which the trainings would be provided. Additionally, OCE requested that, once the new policies referred to in Findings 18, 21, 26, and 31 were adopted by the LSEM Board of Directors ("Board"), a copy of each policy and the certification of the Board's adoption of the policies be forwarded to OCE for review.

By letter dated January 20, 2012, OCE informed LSEM that it had received and reviewed the documentation and policies provided by LSEM to evidence the trainings that were completed pursuant to several Required Corrective Actions, as well as adopted policies that were referred to in Findings 18, 21, 26, and 31 of the Final Report. OCE informed LSEM that, after careful review of the documentation provided, further action was required in order to fully close out Required Corrective Actions Nos. 3, 6, 7, 10, 18, and

20. LSEM was asked to provide the information necessary to address and close out the outstanding Required Corrective Actions no later than February 21, 2012.

By letter dated April 4, 2012, OCE informed LSEM that it had reviewed the documentation provided by LSEM in response to the January 20, 2012 letter. Specifically, LSEM was informed that the following documentation was reviewed: evidence of communication to LSEM staff regarding proper application of the elements of 45 CFR § 1626.4, Program Letter 06-02, and the Violence Against Women Act 2006 Amendments, submitted in order to address Required Corrective Action No. 3; the revised legislative and administrative advocacy and welfare reform policies, along with Board certifications for both, submitted in order to address Required Corrective Action Nos. 18 and 20; and the revised financial eligibility policy, which properly listed the authorized exceptions to the income ceiling as only those exceptions found in 45 CFR § 1611.5, submitted in order to satisfy Required Corrective Action Nos. 6 and 7. The above referenced documentation was reviewed and found to be sufficient to fully close out the respective Required Corrective Actions.

Additionally, by the same letter, LSEM was informed that Required Corrective Action No. 10 still remained outstanding. While LSEM's financial eligibility policy had been revised to include citations to authority to allow for the inclusion of exempt assets not found in 45 CFR § 1611.3(d)(1), LSEM was notified that the authority provided did not exempt the listed assets from attachment, as required by 45 CFR § 1611.3(d)(1). LSEM was asked to provide the information necessary to address and close out Required Corrective Action No. 10 no later than May 30, 2012.

By letter dated May 29, 2012, OCE informed LSEM that it was in receipt of LSEM's response to the April 4, 2012 letter concerning outstanding Required Corrective Action No. 10. LSEM was advised that Required Corrective Action No. 10 still remained outstanding. LSEM was advised to contact the Office of Legal Affairs ("OLA") if it disagreed with OCE's assessment and required further assistance. LSEM was asked to provide the information necessary to address and close out Required Corrective Action No. 10 by July 27, 2012, if further guidance from OLA was not being requested.

Pursuant to a telephone conversation with the CSR/CMS Review Team Leader, Ms. Kia Washington, on September 28, 2012, in order to close out Required Corrective Action No. 10 LSEM agreed to revise its policy and submit it to OCE for review and approval prior to LSEM's Board of Directors meeting in November 2012. Specifically, it was indicated that the policy would be revised to identify, as exempt assets, only those assets that are listed in 45 CFR § 1611.3(d)(1), and would include citations to specific federal/state laws that exempt additional assets from attachment.

By letter dated on that same day, September 28, 2012, OCE informed LSEM that it was in receipt of LSEM revised financial eligibility policy, which was provided in response to the electronic mail correspondence sent by OCE on August 6, 2012 and September 6, 2012. The correspondence requested that LSEM provide a response to the May 29, 2012 letter concerning outstanding Required Corrective Action No. 10, which was detailed in the Final Report for the on-site Case Service Report/Case Management System Review that took place on June 6-10, 2011. Specifically, pursuant to the May 29, 2012 letter and subsequent correspondence, LSEM was asked to forward a copy of its financial

eligibility policy showing the treatment of Individual Development Accounts and identifying personal and household effects as non-exempt assets.

By letter dated, December 11, 2012, OCE once again requested that LSEM provide the financial eligibility policy that was presented for the Board's certification in November 2012 to OCE on or before January 4, 2013, so that it could be reviewed for compliance in order to close out Required Corrective Action No. 10.

By letter dated February 19, 2013, OCE informed LSEM that it had received LSEM's revised financial eligibility policy and the draft Board minutes indicating that the policy was adopted by LSEM's Board during the Board meeting that occurred on January 16, 2013. This information was provided in response to electronic mail correspondence sent by OCE on January 8, 2013 and February 5, 2013. The correspondence requested that LSEM provide a copy of LSEM's Board's certification of LSEM's newly adopted financial eligibility policy, along with a copy of the final policy.

OCE's review of LSEM's revised financial eligibility policy revealed that it was compliant with the requirements detailed in 45 CFR Part 1611. Specifically, the policy included only those assets listed in 45 CFR § 1611.3(d)(1) as excludible assets, and incorporated the Recommendations that were presented for consideration in the electronic mail correspondence between OCE and LSEM dated January 8, 2013. OCE also informed LSEM that the remaining outstanding corrective action, Required Corrective Action No. 10, was closed. LSEM was further advised to retain all of the documents provided to close out the Required Corrective Actions in the event that they need to be reviewed in the future by an LSC review team.

On September 16-18, 2013, OCE conducted an on-site Follow-up Review to evaluate LSEM's compliance with the corrective actions listed in the Final Report. The Follow-up Review focused primarily on the practices, policies and/or procedures developed by LSEM in response to the Required Corrective Actions and Recommendations contained in the Final Report from the June 2011 CSR/CMS Review. Specifically, OCE reviewed LSEM's compliance in the following areas: Case tracking system/case management system - CSR Handbook (2008 Ed., as amended 2011), Chapter III; Case management policy and Intake; 45 CFR Part 1611 (Financial Eligibility); 45 CFR Part 1626 (Restrictions on legal assistance to aliens); 45 CFR § 1611.9 (Retainer agreements); 45 CFR Part 1636 (Client identity and statement of facts); 45 CFR § 1620.4 and § 1620.6(c) (Priorities in use of resources); CSR Handbook (2008 Ed., as amended 2011), § 5.6 (Description of legal assistance provided); CSR Handbook (2008 Ed., as amended 2011), Chapters VIII and IX (Closing codes); CSR Handbook (2008 Ed., as amended 2011), § 3.3 (Timely closing and dormant cases); CSR Handbook (2008 Ed., as amended 2011), § 3.2 (Duplicate cases); 45 CFR Part 1610 (Use of non-LSC funds, transfer of LSC funds, program integrity); 45 CFR Part 1614 (Private attorney involvement); 45 CFR § 1627.4 (Membership fees or dues); 45 CFR Part 1612 (Restrictions on lobbying and certain other activities); and 45 CFR Part 1637 (Representation of prisoners). During the course of the FUR, OCE visited LSEM's main office in Flint, Michigan and branch offices in Saginaw and Port Huron, Michigan. OCE conducted management and staff interviews, and case file, policy, and automated case management system ("ACMS") review at each office.

All the areas of review and corresponding Required Corrective Actions from the Final Report mentioned above were reviewed and found to be in compliance with a few exceptions. The review team's findings and corresponding Recommendations and Required Corrective Actions were provided to LSEM in a draft FUR letter which was issued on June 10, 2014. LSEM was advised to provide comments within 30 days of the release of the FUR letter. LSEM's comments were received on July 9, 2014.<sup>1</sup> The program's comments have been incorporated below, as appropriate, and are attached in their entirety. The FUR team's findings are detailed below.

1. Final Report Required Corrective Action No. 1 required that LSEM ensure that every walk-in applicant was appropriately screened in accordance with the requirements of 45 CFR Part 1626 and a written citizenship attestation, or evidence of review of alien eligibility documentation, be obtained for all walk-in applicants when applicable.

In its response to the above-referenced Draft Report, LSEM stated that Required Corrective Action Nos. 1 through 5 would be addressed through training sessions to be conducted in each office. As stated above, LSEM informed OCE that LSEM staff had been trained on this Required Corrective Action and after review of the information provided, OCE closed out this Required Corrective Action.

However, on-site intake interviews and document review conducted by the FUR team revealed that clients were provided with brief service during clinics before they were screened for eligibility, which violates the requirements of 45 CFR Part 1626. Additionally, the alien eligibility documentation obtained from LSEM was not dated and the citizenship attestation forms were not compliant with the requirements of CSR Handbook (2008 Ed., as amended 2011), § 5.5 (Citizenship and Alien Eligibility Requirement). Furthermore, LSEM failed to obtain citizenship attestations from clients who were initially screened over the telephone when they came into the office to drop off documentation.

LSEM management informed the review team that they would change the manner in which applicants were being screened for clinics in order to address the issue referenced above. Additionally, a new attestation form was drafted and provided to the FUR team. The new form was reviewed and found to be compliant. LSEM also created a walk-in sign-in sheet that would ensure that a citizenship attestation was obtained from clients who came into the office to drop of documentation.

The draft FUR letter recommended that LSEM provide staff with additional training concerning 45 CFR Part 1626 and CSR Handbook (2008 Ed., as amended 2011), § 5.5.

The draft FUR letter required that LSEM ensure that all documentation obtained to meet the requirements of 45 CFR § 1626.6 and CSR Handbook (2008 Ed., as amended 2011), § 5.5, is properly dated.

The draft letter also required that LSEM ensure that all case files have a citizenship attestation, when required, in accordance with 45 CFR § 1626.6 and CSR Handbook (2008 Ed., as amended 2011), § 5.5.

In response to these required corrective actions, LSEM's response to the draft FUR letter stated:

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<sup>1</sup> The letter is mistakenly dated June 8, 2014.

“As indicated in No.1, above, both the manual intake form and the walk-in sign up form have been put into place to help ensure that all files have a citizenship attestation, when required, and that the form is dated. Staff has been instructed that any ongoing correspondence or presentation of the client in person warrants compliance with 45 CFR Sec. 1626.6. These regulatory requirements were further reviewed with staff in February 2014 at case acceptance or staff meetings in conjunction with the annual self-inspection.”

Based on LSEM’s response, LSC is closing out these two (2) Follow-up Required Corrective Actions.

2. Final Report Required Corrective Action No. 2 required that LSEM ensure that an applicant’s gross income was recorded in the ACMS in all cases and ensure that intake staff screen for reasonable income prospects pursuant to 45 CFR § 1611.5(a)(4)(i), which mandates that LSEM inquire into every applicant’s reasonable income prospects during intake.

In its response to the Draft Report, LSEM stated that Required Corrective Action Nos. 1 through 5 would be addressed through training sessions to be conducted in each office. As stated above, LSEM informed OCE that LSEM staff had been trained on this Required Corrective Action and after review of the information provided, OCE closed out this Required Corrective Action.

However, on-site intake reviews conducted by the FUR team revealed that the manual intake forms in use at the time of the visit did not have a question regarding prospective income. On October 25, 2013, LSEM sent OCE an updated manual intake form that included a question regarding prospective income.

It is recommended that LSEM provide additional staff training concerning 45 CFR Part 1611 and CSR Handbook (2008 Ed., as amended 2011), § 5.3, with regards to screening for prospective income. LSEM must also provide OCE with the date on which the new form went into use.

3. Final Report Required Corrective Action No. 5 required that LSEM ensure that all intake staff accurately applied LSEM’s asset policy and the procedures associated with determining whether the asset ceiling has been reached.

In its response to the DR, LSEM stated that Required Corrective Action Nos. 1 through 5 would be addressed through training sessions to be conducted in each office. As stated above, LSEM informed OCE that LSEM staff had been trained on this Required Corrective Action and after review of the information provided, OCE closed out this Required Corrective Action.

However, on-site intake interviews and document review conducted by the FUR team revealed that the intake staff is not familiar with the new automobile exception in the asset policy.

It is recommended that LSEM provide additional staff training concerning 45 CFR Part 1611 and CSR Handbook (2008 Ed., as amended 2011), § 5.3, specifically in regards to the new asset policy.

4. Final Report Required Corrective Action No. 12 required that LSEM ensure that all case files contained written citizenship attestations pursuant to 45 CFR Part 1626 and CSR Handbook (2008 Ed., as amended 2011), § 5.5, where appropriate. The Final Report also referenced that LSEM submitted a copy of the citizenship attestation form currently in use at the time the Draft Report was issued with its comments to the Draft Report.

As noted in Paragraph No. 1 *supra*, several issues were noted during the FUR in regards to the screening and documentation requirements of 45 CFR Part 1626 and CSR Handbook (2008 Ed., as amended 2011), § 5.5. Additionally, two (2) sampled cases reviewed failed to have signed citizen attestations when required; therefore, LSEM is in non-compliance with 45 CFR § 1626.6. *See* Case No. 50-12-01961, Port Huron, Open, which is a case that was assigned to a pro bono attorney. At the time of the review, the case file was in the possession of the pro bono attorney and the review team was unable to determine whether a citizenship attestation was signed by the client. *See also* Case No. 10-12-03938, Flint, 2012; this was an extended service PAI case that did not have a signed citizenship attestation.

As also noted above, the draft FUR letter required that LSEM ensure that all case files have a citizenship attestation, when required, in accordance with 45 CFR § 1626.6.

#### **Follow-up Recommendation**

1. It is recommended that LSEM provide staff with additional training concerning 45 CFR Part 1626 and CSR Handbook (2008 Ed., as amended 2011), § 5.5.
2. It is recommended that LSEM provide staff with additional training concerning 45 CFR Part 1611 and CSR Handbook (2008 Ed., as amended 2011), § 5.3.

#### **Follow-up Required Corrective Actions**

1. LSEM should ensure that all case files have a citizenship attestation, when required, in accordance with 45 CFR § 1626.6 and CSR Handbook (2008 Ed., as amended 2011), § 5.5.
2. LSEM should ensure that all documentation obtained to meet the required of 45 CFR § 1626.6 and CSR Handbook (2008 Ed., as amended 2011), § 5.5, is properly dated.

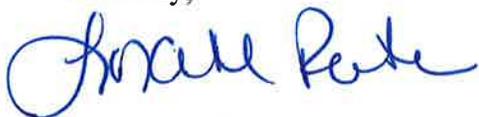
As noted above LSEM responded to the draft FUR letter by stating that both the manual intake form and the walk-in sign up form have been put into place to help ensure that all files have a citizenship attestation, when required, and that the form is dated. Additionally, LSEM reported that staff had been instructed that any ongoing correspondence or presentation of the client in person warrants compliance with 45 CFR § 1626.6 and that these regulatory requirements were further reviewed with staff in February 2014 at case acceptance or staff meetings in conjunction with the annual self-inspection.

Based on LSEM's response, LSC is closing out the two (2) Follow-up Required Corrective Actions and there are no further actions required regarding this review. If you have any questions or concerns

Jill Nylander, Executive Director  
Legal Services of Eastern Michigan, Inc.  
February 13, 2015  
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regarding this matter or any other compliance-related matter, please feel free to contact myself or Shila Mashhadishafie, Program Counsel, at (202) 295-1529 or at [mashhadishafies@lsc.gov](mailto:mashhadishafies@lsc.gov) .

Sincerely,

A handwritten signature in blue ink, appearing to read "Lora M. Rath". The signature is fluid and cursive, with the first name being the most prominent.

Lora M. Rath, Director  
Office of Compliance and Enforcement

Cc: Thomas Fancher, Board Chairperson  
Legal Services of Eastern Michigan, Inc.

Enclosure as stated.

## Shila Mashhadishafie

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**From:** Jill Nylander <jnylander@lsem-mi.org>  
**Sent:** Wednesday, July 09, 2014 5:04 PM  
**To:** Shila Mashhadishafie  
**Cc:** Stessy Mezeu  
**Subject:** Recipient NO.423060 Follow-up Review Response  
**Attachments:** Recipient No. 423060 Follow-up Review Response.pdf

Hello Ms. Mashhadishafie,

I hope this reply finds you well and enjoying summer!

Attached please find Legal Services of Eastern Michigan's Response to the OCE Follow-up Review Letter of June 10, 2014.

A hard copy will be placed in the mail to your attention tomorrow.

Thank you,  
Jill Nylander

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Jill Nylander  
Executive Director  
Legal Services of Eastern Michigan  
436 S. Saginaw St.  
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810.234.2621



ADMINISTRATIVE OFFICE

## **LEGAL SERVICES OF EASTERN MICHIGAN**

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June 8, 2014

Shila Mashhadishafie  
Legal Services Corporation  
3333 K Street, NW, 2<sup>nd</sup> Floor  
Washington, DC 20007

Re: Legal Services of Eastern Michigan - Post Final Report Corrective Actions

Dear Ms. Mashhadishafie:

In response to Ms. Rath's letter of June 10, 2014, please accept this letter as an update of LSEM's actions and intentions with regard to the LSC follow-up recommendations and required corrective actions since the OCE visit last fall.

In the weeks immediately following OCE's visit to LSEM in September 2013, the oral summation of The OCE Team's findings and its concerns were shared informally with the staff in each of the three offices at staff or case acceptance meetings. The Team's findings and suggestions regarding intake and eligibility screening and citizenship attestation and alien eligibility documentation were specifically addressed. Staff questions were answered.

### 1. Final Report Corrective Action No. 1

Implementation of the new manual intake form, which contains the prospective income question, and the new walk-in sign in sheet, which captures the citizenship attestation or need for alien eligibility documentation for walk-in clients, were both discussed at the staff meetings following the OCE Team visit.

After submission of the updated manual intake form to OCE on October 25, 2013, the form was posted to the internal program WIKI for staff use in early November 2013. LSEM Staff use this form primarily as necessary for in person intakes conducted outside of the office or when online intake is not accessible. The walk-in signup sheet, similarly implemented in November 2013, is used consistently in the Flint Office which has the highest volume of in-person intake completion and document drop off. Saginaw

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PORT HURON OFFICE  
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PORT HURON, MICHIGAN 48060

SAGINAW OFFICE  
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SAGINAW, MICHIGAN 48067

and Port Huron use the intake for citizenship attestation signature or alien eligibility documentation for walk in clients. The signup sheet is used for clients dropping off documents.

In November 2013, LSEM discontinued the Midland Ask the Lawyer Clinic which, in my understanding, may have given rise to the post-service screening concern. The Clinic was discontinued for other practical reasons. Clients in all other LSEM clinics are pre-screened for eligibility prior to any assistance being offered.

2. Final Report Corrective Action No. 2

As indicated in No. 1, above, the ACMS and the manual intake form now include a screening question regarding prospective income. The manual form with the addition of the prospective income screening question was implemented in November 21013.

3. Final Report Corrective Action No. 5

The new automobile exception to the asset policy is periodically reviewed with staff attorneys at case acceptance meetings and specifically with intake attorneys at Intake Practice Group meetings which the Program tries to hold quarterly. The most recent of these was held on June 27, 2014, and the matter was discussed again at length.

4. Final Report Corrective Action No. 12

As indicated in No. 1, above, both the manual intake form and the walk-in signup form have been put into place to help ensure that all files have a citizenship attestation, when required, and that the form is dated. Staff has been instructed that any ongoing correspondence or presentation of the client in person warrants compliance with 45 CFR Sec. 1626.6. These regulatory requirements were further reviewed with staff in February 2014 at case acceptance or staff meetings in conjunction with the annual self-inspection.

In addition to the above referenced measures, the Program hired four new attorneys in April 2014, and as part of their orientation, a daylong training was conducted on LSC Regulations and Restrictions. Specifically, income and asset eligibility, intake screening, and required documentation necessary to support the intake process were reviewed and discussed. This training was completed in part by an online group review of the LSC website including relevant law and the CSR manuals and FAQs, mock intake demonstration sessions, and specific discussion of the OCE Team September 2013 visit informal summary. Two attorneys who had been hired in the previous year sat in for review and reinforcement of these concepts as well.

Further, LSEM is currently in the process of coordinating a Program-wide meeting for the fall of 2014. It is intended that the meeting will be in part devoted to the OCE Follow-up Review Report

Shila Mashhadishafie  
Legal Services Corporation  
June 8, 2014  
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Recommendations and Corrective Actions. LSEM will conduct a formal training for all staff to reinforce and review the proper overall procedures for compliance with LSC Regulations and CSR guidelines. Also, to further ensure that the OCE Report and Recommendations and Corrective Actions are satisfied, LSEM will conduct a scaled back self-inspection of 2014 closed files in July 2014. The results of this inspection will be incorporated into the fall Program-wide meeting discussion.

Please advise if you require any additional information or if you have remaining concerns.

Sincerely,

Legal Services of Eastern Michigan

A handwritten signature in black ink, appearing to read "Jill Nylander", with a long horizontal flourish extending to the right.

Jill Nylander, Executive Director

**PLEASE SIGN IN AND PLACE UPSIDE DOWN IN THE APPROPRIATE BASKET**

FIRST INITIAL AND LAST NAME: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

**PURPOSE OF VISIT:**

**GENERAL INBOX:**

- GENERAL QUESTIONS
- NOTARY SERVICES

**DROP OFF INBOX:**

- DOCUMENTS FOR \_\_\_\_\_
- CHECK IF YOU WOULD LIKE A COPY MADE AT TIME OF DROP OFF

**APPOINTMENT INBOX:**

- WITH \_\_\_\_\_ FOR \_\_\_\_\_ (ie. Child support calculation, bankruptcy, public benefits)
- DIVORCE CLINIC
- DIVORCE QUESTION AND ANSWER CLINIC
- LANDLORD/TENANT CLINIC
- LEGAL ADVICE CLINIC

I hereby certify that I am a citizen of the United States  _____ Date                                  Client	<input type="checkbox"/> I am not a citizen of the United States. My residency status is: _____  For LSEM Purposes Only: Date verified _____ Documentation in File ___Y ___N
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**PLEASE SIGN IN AND PLACE UPSIDE DOWN IN THE APPROPRIATE BASKET**

PRINT FIRST INITIAL AND LAST NAME: \_\_\_\_\_ DATE: \_\_\_\_\_

PURPOSE OF VISIT: \_\_\_\_\_ TIME: \_\_\_\_\_

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**APPOINTMENT INBOX:**

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- DIVORCE QUESTION AND ANSWER CLINIC
- LANDLORD/TENANT CLINIC
- LEGAL ADVICE CLINIC

I hereby certify that I am a citizen of the United States  _____ Date                                  Client	<input type="checkbox"/> I am not a citizen of the United States. My residency status is: _____  For LSEM Purposes Only: Date verified _____ Documentation in File ___Y ___N
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