

**From:** Jan Chiaretto [mailto:JChiaretto@slsct.org]  
**Sent:** Friday, May 24, 2013 10:46 AM  
**To:** PAI Rulemaking  
**Subject:** Comments on PAI rule-making

The topic is vast and well covered . What I have to add may or may not be new , but my concerns are simple to boil down:

1. No new regulation, initiative or aspirational metric (ala the PQV) should involve anything costing an LSC recipient one cent more out of operating costs than the 12.5% already mandated. The additional costs volunteers add to a program's burden have already been discussed.
2. LSC should abandon the uniform 12.5% criteria altogether in favor of another way to encourage LSC programs to engage private bar. Professional legal aid programs are much more efficient to handle the legal needs of poor people on an organized basis. Volunteer professionals have an important place, but not at the expense of operating costs. Legal aid programs need to preserve their basic grant monies to sustain normal operations.
3. No doubt collaborations with the private bar result in many rewards. No need to rehearse them here. I am in favor of LSC developing competitive grant model , not unlike TIG, to encourage thoughtful PAI ventures that can demonstrate impactful results.
4. I would hope that any new grant initiatives involving PAI might be of interest to lawmakers . LSC may buy political good will serving to improve the likelihood of better funding or at least "new money" that can be devoted to PAI, again like TIG.

Thanks for asking!

*Janice J. Chiaretto*

*Statewide Legal Services of Ct., Inc.*

*1290 Silas Deane Highway*

*Suite 3A*

*Wethersfield, CT 06109*

*860-344-8096 ext. 3017*

[jchiaretto@slsct.org](mailto:jchiaretto@slsct.org)