

Richard Sloane

From: Steven Eppler-Epstein <SEppler-Epstein@connlegalservices.org>
Sent: Wednesday, July 11, 2012 2:09 PM
To: Richard Sloane
Cc: ..Project Directors; Deborah Witkin; Astrid Lebron
Subject: Connecticut comments on LSC Draft Strategic Plan
Attachments: Connecticut Comments on LSC Draft Strategic Plan (final).pdf

Dear Mr. Sloan,

Please accept the submission of the attached comments from the coalition of LSC- and non-LSC-funded legal services programs in Connecticut.

Thank you.

Sincerely,

Steve Eppler-Epstein

Steven D. Eppler-Epstein
Executive Director
Connecticut Legal Services
62 Washington St., Middletown, CT 06457
SEppler-Epstein@ConnLegalServices.org

Connecticut Legal Services is committed to providing access to justice as a means of improving the lives of low-income people.

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**Connecticut
Legal
Services, Inc.**
62 Washington Street.
Middletown, CT 06457
(860) 344-0447

BY EMAIL

July 11, 2012

Richard L. Sloane
Chief of Staff and Special Assistant to the President
Legal Services Corporation
3333 K St., NW
Washington, D.C. 20007

**Greater
Hartford
Legal
Aid, Inc.**
999 Asylum Avenue, 3rd floor
Hartford, CT 06105-2465
(860) 541-5000

Dear Mr. Sloane:

We write to comment on the draft Strategic Plan for the Legal Services Corporation, notice of which was published in the Federal Register.

**Legal
Assistance
Resource
Center of
Connecticut, Inc.**
44 Capitol Avenue, Suite 301
Hartford, CT 06106
(860) 278-5688

We are the principal legal aid programs for the state of Connecticut, including both one LSC-funded and numerous non-LSC-funded programs. We join in thanking the Corporation for its ongoing efforts on behalf of the national effort to provide civil legal aid to the low-income population that is so dramatically underserved and so much in need of help.

We applaud the Corporation for engaging in strategic planning, and we support much of the draft plan. In particular,

- we support the three primary goals as stated;
- we support the first initiative (promoting best practices) and third initiative (supporting program enhancement) identified towards the first goal of maximization of services;
- we support the second goal (serving as a leading voice for access to justice) and its initiatives, as long as the efforts to secure additional funds does not compete with the fundraising efforts of local legal services programs; and
- we support the third goal of superior LSC fiscal management.

**New
Haven
Legal
Assistance
Association, Inc.**
426 State Street
New Haven, CT 06510
(203) 946-4811

We would urge changes in two areas of the strategic plan:

**Statewide
Legal
Services, Inc.**
425 State Street
Middletown, CT 06457
(860) 344-8096

First, the plan should include a statement that LSC will lead efforts to close the Justice Gap that LSC has identified, and specifically that LSC will lead efforts to convince Congress and the Administration to fund LSC field programs at levels adequate to achieve access to justice for all low-income people in all states. The lack of such a statement suggests that LSC believes that increased federal funding is not a strategic goal; we cannot imagine that is LSC's position, as it would represent a major abdication of LSC's role.

Second, any effort to measure the efficiency of legal aid programs should take into account (among other factors) the difficulty of the cases undertaken, the potential impact of the cases, the difficulty of the client's circumstances, challenges posed by the legal decision-making environment and legal opposition, and the costs of operating in that geographic area. Otherwise, "efficiency" measures will simply point towards programs that pay their employees badly, programs in areas of the country with an inexpensive cost of living, or programs that mill cases with an eye to short-term quantity rather than long-term impact.


Also, any measurement effort should specifically recognize the types of work that are more difficult to measure, and recognize that although measurement is more difficult this does not mean the work may not be extremely important to low-income clients.

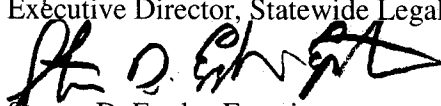
Again, thank you for all the work of the Legal Services Corporation, and your consideration of these comments.

Sincerely,

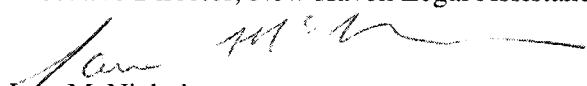
Branford D. Brown

Branford D. Brown
Executive Director, Greater Hartford Legal Aid


Janice J. Chiaretto
Executive Director, Statewide Legal Services


Steven D. Eppler-Epstein
Executive Director, Connecticut Legal Services


Patricia R. Kaplan
Executive Director, New Haven Legal Assistance Association


Jane McNichol
Executive Director, Legal Assistance Resource Center of Connecticut