June 20, 2005

Victor M. Fortuno
Vice President for General Counsel
Legal Services Corporation
3333 K St., NW
Washington, DC 2007

Delivered by e-mail to vfortuno@lsc.gov

RE: Access to Justice Board comments on LSC’s 2005-06 Regulatory
Agenda, specifically, Part 1610 – Program Integrity

Dear Mr. Fortuno:

The Washington State Access to Justice (ATJ) Board was established by
state Supreme Court Order to improve and expand the civil justice system
for low and moderate income people. Consistent with that Order, the ATJ
Board serves as the statewide planning and policy board for civil legal aid
in this state, which includes the LSC-funded Northwest Justice Project.

The ATJ Board is in the process of reviewing its current state plan to
address significant demographic, funding and organizational changes that
have occurred during the past few years, and which affect the delivery of
civil legal aid to low income people. Part 1610 historically has worked as a
constraint on efficient planning because its provisions dictate in large part
how our delivery system is established and operated. The ATJ Board is
now charged with addressing the findings in the Supreme Court’s recently
released Civil Legal Needs Study. It will be difficult for the ATJ Board to
integrate these findings into our delivery system given our available
resources and the requirements of Part 1610, so that the identified needs
of low income people in our state are effectively addressed.

As a partial solution, the ATJ Board respectfully requests that the Legal
Services Corporation consider making such revisions to 1610.8 so that it
will be consistent with Judge Block’s decision in Dobbins/Velazquez. In
that way, this decision will be applicable to all recipients of LSC funds.
This regulatory change would greatly assist the ATJ Board in its ability to
engage in a meaningful revision of its state plan to address the identified
needs of low income people.

Thank you for your consideration of this request.

Sincerely,

Christine E. Crowell, Chair
Access to Justice Board

cc: Patrick McIntyre, Executive Director
Northwest Justice Project