

Public Comments

- Janice Chiaretto, Statewide Legal Services of Connecticut
- Lynda Krupp, Legal Aid and Defender Association, Inc.
- Linda Warren Seely, Memphis Bar Association/Memphis Area Legal Services
- William Tanner, Legal Aid Society of Orange County
- David Udell, National Center for Access to Justice

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!

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TO: Mark Freedman, Senior Assistant General Counsel, Legal Services Corporation

FROM: Legal Aid and Defender Association, Inc.

DATE: June 25, 2013

SUBJECT: Comments Re: LSC Proposed Rulemaking for the PAI Regulation 45 CFR 1614

We offer these comments on behalf of the Legal Aid and Defender Association which provides civil and state and federal criminal defender legal services in the Metropolitan Detroit area.

We support and encourage adoption of Recommendation 2 of LSC's Pro Bono Task Force that Congress create and separately fund a Pro Bono Innovation/Incubation Fund. We see separate funding as necessary so that scarce resources are not drawn from other critically needed programs.

We emphasize that pro bono programs must be staffed and resourced at a level that insures appropriate support for pro bono attorneys. This support should always include appropriate screening of pro bono cases and planning of pro bono projects as well training, support materials and mentoring.

We welcome the Task Force Report's recognition that all pro bono work requires substantial funding for infrastructure investments to support pro bono volunteers. The level of pro bono involvement is directly related to the level of infrastructure investment. Without additional funding we cannot increase and appropriately leverage the full involvement of the private bar so we can begin to achieve access to justice for our clients.

We also support changes to allow LSC grantees to count work done by law students and law graduates as pro bono work. It is clear that projects designed to engage law students result in increased pro bono work as these law students become lawyers. However, it is difficult to channel scarce resources into pro bono projects for law students if those activities do not count in the pro bono case count monitored by LSC.

If these activities are supported by new PAI funding, LAD supports using PAI resources to increase screening, advice and referral programs by pro bono volunteers and staff supervision of pro bono volunteers in new incubator/innovation projects. LAD supports changes to allow grantees to count matters toward PAI requirements.



ACCESS TO JUSTICE

A COMMITTEE OF THE MEMPHIS BAR ASSOCIATION

These comments are submitted to the Legal Services Rulemaking Committee by Linda Warren Seely, President, Memphis Bar Association, Member of the House of Delegates for the Tennessee Bar Association, Member of the Tennessee Bar Association Access to Justice Committee, Member of the Memphis Bar Association Access to Justice Committee, Member of the Subcommittee on Faith Based Initiatives for the Tennessee Supreme Court Access to Justice Commission and Director of Pro Bono Projects for Memphis Area Legal Services.

TOPIC ONE:

How are legal services providers engaging new categories of volunteers? What are the needs of these new categories of volunteers?

One of the more exciting developments over the past 10 years has been the increase in the number of Bar Association and Court related Access to Justice or Pro Bono committees, taskforces and commissions. In my experience at the state and local levels, a broad range and category of new volunteers have made their way onto these committees, taskforces and commissions. From the Memphis Bar Association's Access to Justice committees inception paralegals (from private firms all the way to the Sheriff's department), social workers (from the Veterans Administration), law students, other agency service providers, judges, clerks and law professors have been welcomed as key stakeholders in the development of innovative programs and projects in the delivery of legal services in Memphis.

One project I will mention of the Memphis Bar Association and Memphis Area Legal Services is our monthly Saturday Legal Clinic. We began on the second Saturday of November in 2008 at a church, First Baptist Church on Broadway, in a lower income part of Memphis. We began with a handful of volunteer attorneys and a number of the church congregants who came out to feed us and ply us with coffee. Although we didn't have huge numbers of applicants, we had such a great volunteer turnout that we did it again, this time at a different church in a different part of Memphis. As we began to grow, we added a paralegal volunteer component, then law students started coming. Mediators wanted to offer their services and we split them off to serve weekly at our General Sessions Courts and used social work graduate students to coordinate their sessions. The clinic expanded significantly after the then Chair of the MBA Access to Justice Committee and MALS staff met with staff from the Memphis and Shelby County Library system to partner on a more permanent community venue for our clinic. The main library location in Memphis is a large, spacious building with 3 community rooms available for non-profits to use*

free of charge. The main library has a large parking lot and sits on the main bus line. As of 2013, we have institutionalized our Saturday Legal Clinic. We are open from 10 am until about 1 pm the second Saturday of each month at the main library in Memphis. Each month a different firm or corporate legal department or bar association acts as the event sponsor; in June the Ben F. Jones chapter of the National Bar Association served as the sponsor. The sponsor's job is to make sure there are at least 20 volunteer attorneys available at the clinic. We have paralegals and administrative assistants who regularly staff the clinic providing much needed and valuable coordination for the applicants, making sure forms are completed and kept in some order. Volunteer law students and students in the local paralegal studies programs often come to volunteer and will be assigned to work with one of the volunteer attorneys providing forms and internet research, helping the attorneys complete documents and other related tasks. A local investment group, the Marston Group and a local bank, Bank Tennessee, send over coffee and treats for the volunteers.

We encourage churches to also sponsor these clinics and sometimes we go into Senior Centers and other community centers to provide clinic operations.

Memphis Area Legal Services has volunteers and externs from law schools and paralegal schools and undergraduate schools. We have used social worker volunteers, community volunteers, retired lawyers and just about anyone who calls and says, "I want to help". They staff clinics, help applicants with forms, do research, make community education materials or packets, provide in house clerical help, represent clients, attend hearings, write newsletter articles; if it's something our community or clients need, we count on volunteers to help. We have office space available for volunteer attorneys who don't have an office- mothers with small children or attorneys who cannot find a job but want to contribute- and give them cases to handle.

The volunteers, all of them regardless of whether or not they are attorneys, need access to office space, a place to work if you will, they need to know we value their contributions through recognition events and awards, they need appropriate equipment including access to computers, the internet, copiers, fax machines, file folders, pens, paper to name a few items, and they need a sense that they are contributing to a cause greater than themselves.

What are the obstacles to full use of these volunteers?

The only volunteers we get to count for LSC purposes are the ones who are attorneys. Only cases handled by an attorney, a fully licensed attorney, are considered important enough to be included in our CSR reports. Memphis Area Legal Services has an ongoing relationship with the Cecil C. Humphreys School of Law, which is located in a newly renovated building, two blocks from our office. The law school offers clinical courses to the students and all of the 'cases' they handle are through MALS. The students are provided with a third year provisional law license and are supervised by attorney-clinical instructors. Unfortunately, only the hours provided by the attorney-clinical instructors are counted. None of the hours donated by the provisionally licensed lawyer-students count for those of us with LSC funding towards our LSC mandated PAI requirement. The law school has implemented a mandatory pro bono requirement for graduation and we would like to be able to take full advantage of this new development.

We have a number of paralegals who represent individuals at social security disability hearings, which is permitted by the Social Security Administration provided the paralegals pass certain testing requirements. We are not able to make use of cases handled by these paralegals as they don't 'count' as lawyers.

None of the work done by many of our volunteers is countable towards our PAI obligation because they aren't lawyers. This can be a huge disincentive to working with these nonlawyer volunteers for our agency. It's hard to understand why LSC encourages and even demands these relationships but won't let us count as part of our PAI requirement cases handled by provisionally licensed lawyer students directly supervised by our staff or paralegals authorized to practice in certain administrative tribunals or even mediators who are frequently licensed attorneys.

Should LSC implement regulations to allow PAI credit for training and supervision of these volunteers?

Yes, LSC funded agencies should be permitted a little more latitude with regard to the types of volunteers, cases and services provided by non-attorneys that count toward the PAI requirement.

Ensuring against fraud or waste and/or unintended consequences.

As for concerns in this regard, it might be helpful to fund some pilot programs to see what if any problems or unintended consequences arise. I will note, however, that there are plenty of legal aid type agencies that eschew LSC funding and have been very successful at growing their service delivery model and providing excellent services in their communities. It might be helpful to conduct a review of these agencies and model services after those programs.

*Please note that this particular description encompasses a description of how we handle advice and counsel/brief service clinics. All of the applicants are screened for eligibility and sufficient information is obtained from them to properly open a file consistent with LSC requirements including signing of Citizenship Attestations and limited scope retainer agreements. However, at a recent Tennessee Supreme Court Access to Justice Commission conference in Tennessee designed to encourage churches and bar associations to sponsor clinics, the point was made repeatedly that partnering with an LSC funded agency is a huge problem for the bar associations and churches because of regulatory compliance issues. The speaker indicated that LSC funded agencies were unnecessary to the success of these clinics, that LSC requirements inhibited applicants from coming because of the paperwork burden and was an unwelcome intrusion by the private attorneys. He encouraged those present to eschew a partnership with LSC funded entities to avoid these difficulties. The speaker in this instance is a well known attorney in the Access to Justice arena having served as the Chair of the Tennessee Bar Access to Justice committee.

LSC PRO BONO TASK FORCE WORKSHOP

Proposal for Allowing the Training and Supervision of Law Students, Law School Graduates, and Deferred Associates to Count Toward an LSC Recipient's PAI Funding.

I. Background

The LSC PAI requirement stipulates that “a substantial amount of funds be made available to encourage the involvement of private attorneys in the delivery of legal assistance.” **1614.2(a)**. The purpose and mission of the PAI requirement is “to generate the most possible legal services for eligible clients from available, but limited, resources” **1614.1(c)**. According to the LSC Pro Bono Task Force, engaging students and instilling a lasting commitment to pro bono work is wholly consistent with the aims of the PAI regulation.” **LSC Pro Bono Task Force Recommendation 2, PAI Revision, Topic 1** (pg. 20 of report)

II. New Categories of Volunteers that Can Be Engaged by Legal Service Providers and How Public Interest Organizations Can Meet These Volunteer Needs

A growing number of law students, recent graduates, and new attorneys are in need of opportunities to gain real-world legal experience and skills. This is due to increasing competition in the legal field, where firms and legal organizations desire future hires that already possess some practical skills. Also, a substantial proportion of graduates decide to become solo practitioners, and do so without any support system or post graduate training; instead they rely only on what they learned in law school. Most often, law schools do not offer students opportunities to be exposed to actual cases that would allow them to gain practical skills for the legal job market.

These law students, recent graduates, and new attorneys can turn to public interest organizations to gain real-world experience working with clients and cases. Public interest organizations provide an opportunity to meet with clients, appear in front of a judge, manage a caseload, and apply practical skills they will be required to use in their job or solo practice. Through incubator programs, students can continue working for a public interest organization after graduating, and even as they begin to establish their own solo practices.

Incubator programs can meet the specific needs of each new category of volunteers. Students need exposure to different areas of law during their education and to gain experience in areas where they may choose to practice. Training at a public interest organization provides students with exposure to many areas of law, including family and bankruptcy law, as well as housing, consumer, and government benefits issues.

Prior to passing the Bar, graduates need a job, but public interest organizations are reticent to hire students who have not passed the Bar. Incubators allow for students who wish to pursue a career in public interest to work at public interest organizations and not feel pressured to find a job at a firm strictly for financial reasons.

Future solo practitioners need the requisite skills to effectively execute the practice of law. Since these new attorneys often seek to establish their solo practice immediately upon graduation, in order to gain clients and bill for income, it is not economically feasible for them to undergo volunteer training to obtain these needed skills. An incubator, with paid positions, provides new attorneys with practical training and mentors to help them develop their skills as they concurrently establish their solo practice.

III. The Current Obstacles to LSC Grant Recipients' Full Use of These Volunteers

Under the current PIA scheme, there are a number of obstacles that restrict public service organizations from fully using the aforementioned groups of volunteers. For example, public service organizations currently lack a competitive edge in attracting and retaining volunteers. Law students face debt upon graduation and many cannot go without an income. Paid positions during summer for current students and/or new graduates will attract many more highly competent law students to public

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interest organizations. Increasing the amount of highly competent law student volunteers will increase the amount of people legal aid organizations are able to help.

Additionally, the current structure of PAI only allows funding for attorneys, so long as it does not comprise more than fifty percent of their total income. This creates a high level of uncertainty, as it is hard to predict one's annual income, and the income ratio of a volunteer attorney is not accounted for until the end of the year. As a result, public interest organizations may be reticent to give a volunteer attorney more cases if they believe they are close to providing the attorney with more than fifty percent of their income. Restricting the use of PAI funds to volunteers means fewer legal services will be provided to the low income individuals.

Further, volunteer attorneys serve as the mentors who train law students to their full potential. Limiting work done by volunteer attorneys for fear of exceeding the fifty percent threshold will also limit mentoring resources for law students. Proponents of incubators believe that the only thing standing between "public-interest-minded" law students who want to serve low-income communities is "a lack of proper training opportunities." (*Law school incubators and training firms: Reviving the apprenticeship model in the legal profession.* October 12, 2012. [http://lawschooldisrupt.com/2012/10/02/799/.](http://lawschooldisrupt.com/2012/10/02/799/))

IV. Reasons Why LSC Should Implement Conditions and Guidelines Allowing LSC Recipients to Claim PAI Credit for Supervision and Training of These Volunteers

Providing more resources to law students and new attorneys interested in public interest will not only encourage more private attorney involvement, but most likely recruit more attorneys to a public interest career.

For example, deferred associate programs are becoming more common, and many of these deferred associates find they prefer their public interest jobs. (*Ferguson, Russ. American Spectator, "After the Crash."* February 15, 2010. <http://spectator.org/archives/2010/02/15/after-the-crash>.) Providing more resources to these deferred associates increases the likelihood that they will continue to assist LSC recipients even when they return to their firm. These deferred associates are also the spokespersons for the legal aid society at their firms. Their positive experience, especially in an incubator setting, will incite an interest in public service for other attorneys at their firm.

Further, proper and in-depth training of law students allows them to perform duties the attorneys would be tasked with if the students were unable. As a result, the attorneys are able to spend more time helping clients, providing them with legal advice and representing them in court.

V. Incubators are Deserving of PAI Funds

Incubators can be effectively utilized to deliver legal service to low-income individuals. In fact, the majority of incubator programs in the country contain an access to justice component in their incubator model. Most incubators require their participants to commit a certain number of hours or cases to pro or low bono work. Many incubators' purpose is specifically to serve the low-to-moderate income communities.

For example, PILI is an incubator program in Chicago with a stated mission to cultivate a commitment to public interest and pro bono service. Their vision is a community of law students and lawyers at different stages in their career engaged in public interest, where they remain committed serving the legal needs of the underserved. CUNY's Community Legal Resource Network and Incubator for Justice prepares students for embarking on their own solo practice by teaching them necessary business skills. The program mentors and teaches the students to provide for successful businesses and individual justice missions. Participants must complete 12 hours a month of low bono work. California Western School of Law modeled their program after CUNY. The incubator is specifically for new

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graduates seeking to start their own solo practice or small firm that represents the poor. The Chicago Bar is also setting up an incubator that targets students wanting to establish a community practice that serves low-to-moderate income residents.

Further, incubators encourage private attorney involvement with public interest organizations. Law students and new attorneys participating in public interest incubators tend to enjoy the work performed in the incubator that they remain committed to serving the unrepresented. These participants are more likely to continue serving in a community-based practice after the incubator. After an incubator, an attorney can establish their own solo practice or join a small firm, but with a greater likelihood that they will continue to volunteer with an LSC recipient because they committed themselves to public interest work.

Incubators thoroughly train students and new attorneys to provide highly competent assistance to pro bono organizations and their clients. More students are "hanging out their own shingles" upon graduation, but lack the proper skills. Incubators create transferable skills to community-based practices that students would not obtain at a firm. It is easier for students to go from an incubator to a community-based practice than from a firm because they learn different skills at firms and at times must unlearn those skills to succeed in a public interest setting. (*"Law school incubators and training firms: Reviving the apprenticeship model in the legal profession."*)

IV. How LSC Can Ensure against fraud, waste or abuse related to implementing this recommendation?

1. Concern: Too many PAI funds will go toward law student hours and not private attorneys.
 - Resolution 1: Create a required proportion of number of law students to attorneys, where the number of law students cannot exceed a certain ratio.
 - Resolution 2: Designate a maximum percentage of PAI funds being attributed to law student and deferred associate efforts. This is not a required percentage, only a cap.
2. Concern: Legal Aid staff attorneys being let go for purposes of counting their volunteer efforts toward PAI funding.
 - Resolution: If a staff attorney leaves an organization, time accrued within two years after their leave can be counted toward PAI in only certain volunteer circumstances, particularly for incubators. If they serve as law student supervisors or incubator mentors, they will create monthly or quarterly reports about their performed responsibilities. Any duties performed in incubator or clinic settings can be attributed to PAI funds.
3. Concern: An attorney earning 51+% of their income from an LSC recipient.
 - Resolution: For attorneys seeking employment, or in the process of establishing solo practice, LSC recipients should be able to credit their time to PAI funds if the attorneys are actively applying to jobs or making regular steps toward setting up their practice. An attorney can document, monthly or quarterly, their employment activity. Even if they earn more than 50% of their income by the LSC recipient, the LSC can still claim PAI funds through their activity because they can prove they do not consider themselves staff attorneys.

NATIONAL
CENTER FOR
ACCESS TO
JUSTICE
at Cardozo Law School

“Thou Shalt Not Ration Justice”
– Hon. Learned Hand

parulemaking@lsc.gov

June 25, 2013

Mark Freedman
Senior Assistant General Counsel
Legal Services Corporation
3333 K Street NW
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Re: Comments, & Expression of Interest
in Appearing as a Panelist

Private Attorney Involvement Rulemaking
Legal Services Corporation
45 CFR part 1614 (78 FR 27339)
<https://federalregister.gov/a/2013-11071>

Dear Mr. Freedman.

I am submitting these comments in support of the recommendation which states:
“Resources spent supervising and training law students, law graduates, deferred associates, and others should be counted toward grantees' PAI obligations, especially in “incubator” initiatives.”

I. Outline of Key Points:

I support the recommendation. I request an opportunity to make the following points at the workshops hosted by the Legal Services Corporation in connection with the rulemaking:

1. Civil legal aid programs increasingly seek to involve law students in pro bono initiatives as a means of increasing access to justice for vulnerable people, but have limited resources for training and supervising the students.
2. Law students increasingly seek to volunteer in civil legal aid programs, in response to the following developments: the justice gap, the access to justice movement, the increased emphasis on skills acquisition in law school, and the new, nationally significant, 50 hour pro bono service bar admission requirement in New York.

3. To effectively train and supervise law student volunteers, it is important for civil legal aid programs to be able to use their resources in satisfaction of their PAI obligations.

II. Summary of Qualifications:

During the past two years, I have carried out research, engaged in public writing, and participated in conference sessions with justice system stakeholders, on how the justice gap, the access to justice movement, and the new 50 hour pro bono service requirement in New York are helping to reshape legal education. I have become knowledgeable about how changes in legal education and in pro bono service by law students are creating new opportunities for civil legal aid programs, while also increasing demands on those programs. This perspective should have a place in the workshops at which LSC's PAI regulation will be reconsidered. Information about my work (along with some examples) is available here:

- *Is New York's 50 Hour Pro Bono Service Rule Changing the Future of Law Student Pro Bono*, in Bloomberg Law (January 28, 2013)¹
- *Law Students for Strengthening Law School Pro Bono*, Facebook²
- *Software for Law Student Pro Bono*, NCAJ's Policy Recommendation (February 25, 2013)³
- *National Roundtable on Pro Bono and Professional Development*, NALP (moderated by LSC President, Jim Sandman) (January 31, 2013)⁴
- *List of Replicable Law Student Pro Bono Model Projects and Structures – NCAJ's Policy Recommendation* (Oct. 15, 2012)⁵
- *Report & Recommendations of the Law School Involvement Working Group of the Task Force to Expand Access to Legal Services in New York* (contributing author) (December 1, 2012)⁶
- *Bio, David Udell*.⁷

III. Checklist of topics and items to be addressed

I have attached the checklist of topics and items to be addressed.

¹ <http://ncforaj.files.wordpress.com/2013/02/tyler-udell-bloomberg-law-law-student-pro-bono.pdf>

² <https://www.facebook.com/LawStudentProBono>

³ <http://ncforaj.files.wordpress.com/2013/02/lspb-software-application-2-25-13.pdf>

⁴ <http://www.nalp.org/probonoandpdroundtable>

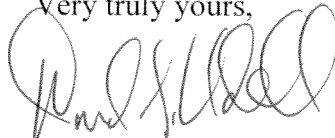
⁵ <http://ncforaj.files.wordpress.com/2012/10/final-models-memo-lspb-2p.pdf>

⁶ <http://ncforaj.files.wordpress.com/2012/12/report-recommendations-on-legal-ed-2012-tf.pdf>

⁷ <http://ncforaj.org/about-2/staff/david-udell/>

Thank you for your consideration.

Very truly yours,



David Udell

Name	David Udell, Executive Director, National Center for Access to Justice
Topic 1: LSC Pro Bono Task Force Recommendation 2(a) - Resources spent supervising and training law students, law graduates, deferred associates, and others should be counted toward grantees' PAI obligations, especially in "incubator" initiatives.	
x	How are legal service providers engaging new categories of volunteers? What are the needs of these new categories of volunteers?
x	What are the obstacles to LSC grant recipients' full use of these volunteers?
x	Should LSC implement conditions and guidelines to allow LSC recipients to claim PAI credit for the supervision and training of these volunteers?
x	How can LSC ensure against fraud, waste, or abuse related to implementing this recommendation? What caution should LSC exercise to ensure against any unintended consequences?
x	To the extent applicable, discuss how any approaches you recommend might be implemented.
x	Other issues related to Topic 1 (please specify in your submitted outline).
Topic 2: LSC Pro Bono Task Force Recommendation 2(b) - Grantees should be allowed to spend PAI resources to enhance their screening, advice, and referral programs that often attract pro bono volunteers while serving the needs of low-income clients.	
	How are recipients currently using integrated intake and referral systems?
	Do LSC's current PAI regulations inhibit full use of integrated intake and referral systems?
	Should LSC implement conditions and guidelines to allow LSC recipients to claim PAI credit for the resources used to create and staff integrated intake and referral systems?
	How can LSC ensure against fraud, waste or abuse related to implementing this recommendation? What caution should LSC exercise to ensure against any unintended consequences?
	To the extent applicable, discuss your organization's ability to execute any recommended approaches.
	Other issues related to Topic 2 (please specify in your submitted outline).
Topic 3: LSC Pro Bono Task Force Recommendation 2(c) - LSC should reexamine the rule, as currently interpreted, that mandates adherence to LSC grantee case handling requirements, including that matters be accepted as grantee cases in order for programs to count toward PAI requirements.	
	How are recipients currently using or supporting pro bono volunteers in brief service clinics?
	What are the obstacles to recipients' use of pro bono volunteers in brief service clinics?
	Should LSC implement conditions and guidelines to allow LSC recipients to claim PAI credit for the resources used to support volunteer attorneys staffing brief service clinics?
	If LSC were to allow recipients to claim PAI credit for the resources used to support volunteer attorneys staffing brief service clinics under circumstances where the users of the clinics are not screened for LSC eligibility or accepted as clients of the recipient, how could that change be implemented in a manner that ensures compliance with legal restrictions on recipients' activities and uses of LSC funds?
	How can LSC ensure against fraud, waste or abuse related to implementing this recommendation? What caution should LSC exercise to ensure against any unintended consequences?
	To the extent applicable, discuss your organization's ability to execute any recommended approaches.
	Other issues related to Topic 3 (please specify in your submitted outline).