



1140 Connecticut Ave. NW, Suite 900
Washington, DC 20036-4019
T: 202.452.0620
F: 202.872.1031
www.nlada.org

December 21, 2006

Thomas Meites, Esq.
Chairman, LSC Operations and Regulations Committee
Legal Services Corporation
3333 K Street, NW, 3rd Floor
Washington, DC 20007-3522

Dear Chairman Meites:

As the Chairperson of the Client Policy Group of the National Legal Aid & Defender Association, I am writing to address the proposed changes to Part 1621 of the Legal Services Corporation Regulations dealing with Client Grievance Procedures. I am specifically requesting that the Legal Services Corporation retain the current language in Section 1621.1 the Purpose Statement.

Client grievance procedures play a vital function in the delivery system of legal services for low income people and clients. Clients and applicants for services need to be afforded an opportunity to bring their concerns and complaints to the program leadership including the boards of directors of grantee programs. Client feedback from complaints, client letters, and client satisfaction surveys provide a check on the quality of representation and services provided by programs. Complaints and concerns about the denial of services and the quality of legal assistance should be welcomed, addressed and resolved in a timely and effective manner. It is my belief that the Legal Services Corporation, other funders, Executive Directors of LSC grantee programs, and boards of directors of LSC grantee programs should welcome client feedback.

The client grievance procedure insures that programs are accountable to the clients they represent and serve. Congress recognized this idea as being fundamentally important to the effectiveness of legal services programs. The Notice of Proposed Rulemaking for Part 1621 states in the Supplementary Information: Background that the regulation is intended to help, "insure that legal services programs are accountable to those whom they are expected to serve."

I am concerned that the proposed changes to Section 1621.1 will water down and weaken the intent of Congress and the purpose of having client grievance procedures. I have read and reviewed the Notice of Proposed Rulemaking. This notice proposes to remove language that says:

By providing an effective remedy for a person who believes that legal assistance has been denied improperly, or who is dissatisfied with the assistance provided, this part seeks to insure that every recipient will be [accountable to] those it is expected to serve, and will provide the legal assistance required by the Act.

I believe that the removal of the words “providing an effective remedy” will greatly weaken this regulation governing client grievance procedures. Clients who submit a grievance in the form of a complaint about the denial of services and or the quality of services received should expect that their complaint will be effectively resolved. Eliminating reference to an effective remedy will allow programs to create and enforce client grievance procedures that do not address the concerns of the client. Leadership of grantee programs could implement procedures that create a process that doesn’t resolve the problem and provides clients with a process that sends them in circles without a resolution of their complaint. This is not acceptable. It clearly undermines the intent of Congress to every program is “accountable to those it is expected to serve.”

Many times the problem that brings clients to legal services program is based on the denial of due process rights from a public agency. I find it troubling that the proposed revision for a client grievance procedure is one that lessens the rights clients have when seeking assistance from a legal services program. Legal services programs represent clients every day in actions against other agencies because the due process rights of the agency are inadequate and fail to resolve or remedy the complaint or situation.

It is disappointing and unbelievable that the Legal Services Corporation might adopt a regulation that will lessen the legal rights of clients by eliminating their right to a resolution or remedy of their complaint against the program. I urge the Legal Services Corporation to keep the current language and refuse to adopt the proposed change that calls for deleting the language, “By providing an effective remedy. . . those it is expected to serve, and will provide the legal assistance required by the Act.”

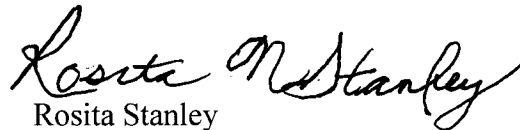
I am also troubled by the recommendation of the LSC staff to add language that says, “This Part is not intended to and does not create any entitlement to legal assistance.” It is my firm belief that this language does not belong in a client grievance procedure that is intended to hold programs accountable. The LSC regulations speak to issues of eligibility and spells out grounds for denying services in other places. It is not necessary to place this additional language into the regulation. It is not appropriate to add this language in the client grievance procedure. It adds insult to injury for a complaining and disappointed client to be told that they are not entitled to assistance. Placing this language in the purpose section of the regulation covering client grievance procedures undermines the purpose of this important regulation.

I am well aware of the movement to create a Civil Gideon. While I know that the establishment of a defined right to counsel in civil matters is a state matter, I believe the ABA resolution passed in August 2006 that calls for a defined right to counsel is a significant development for low income people. It will assist us in our efforts to close the justice gap and address the increasing unmet need.

As an advocate, ambassador and gatekeeper for equal justice, I believe that clients must work as partners with program staff, program leadership, boards of directors, funders, and community partners to meet the legal needs of low income people. It is my firm belief that we cannot afford to water down our efforts toward building a network of well funded quality programs that meet client needs in all fifty states.

Approving the proposed changes to Section 1621.1 will cause damage to the credibility of legal services programs and the legal services community with low income people. Denying clients a resolution or remedy to their grievance about the denial of services or the quality of representation is fundamentally unjust and unfair. Enclosed you will find petitions and letters received by the Client Policy Group and Client Section of the National Legal Aid & Defender Association. These letters and petition signatures represent the concerns and opinions of clients of programs located around the country. I urge the Legal Services Corporation to keep the original language of Section 1621.1 and disapprove the adoption of the proposed changes.

Respectfully submitted,

A handwritten signature in black ink that reads "Rosita M. Stanley". The signature is written in a cursive, flowing style.

Rosita Stanley
Chairperson
Client Policy Group

cc: Helaine Barnett
Frank Strickland
Karen Sarjeant
Jo-Ann Wallace



Indiana Legal Services, Inc.

NORMAN P. METZGER, EXECUTIVE DIRECTOR
JOSEPH E. SIMPSON, DIRECTOR OF ADMINISTRATION

BOARD OFFICERS:

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Paul A. Leonard, Jr., 1st Vice-President
Carolyn Barlow, 2nd Vice President
Jennifer Sommer, Secretary
Mark Dinsmore, Treasurer
Norman P. Metzger, Assistant Secretary

Charles A. Wynder Jr.
Vice President for Program Leadership and Support
National Legal Aid & Defender Association
1140 Connecticut Ave. NW, Suite 900
Washington, DC 20036

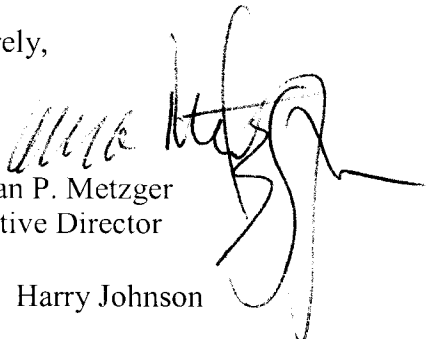
December 11, 2006

RE: Petition regarding proposed changes to LSC Regulation Part 1621.1

Dear Mr. Wynder:

On Friday, December 8, 2006 and Saturday, December 9, the Indiana Legal Services Board met and hosted a client training event. During the meeting and training, the enclosed petition was circulated to clients and client-eligible board members. Fourteen (14) individuals signed the petition regarding LSC Regulation Part 1621.1. Please use this petition as the expression of the clients' interests in disapproving the proposed change to the purpose section of the regulation. Thank you for your kind attention to this matter and the enclosed, signed petition.

Sincerely,


Norman P. Metzger
Executive Director

C.C. Harry Johnson

Enclosure/eb



Legal Services Corporation
America's Partner for Equal Justice

OFFICE OF ADMINISTRATION
151 North Delaware Street, Suite 1640
Indianapolis, Indiana 46204
Phone (317) 631-9410 FAX (317) 631-9773
Indiana toll free: 1 (800) 869-0212
www.indianajustice.org

**PETITION
REGARDING
PROPOSED CHANGES TO THE
CLIENT GRIEVANCE PROCEDURE
LSC REGULATION PART 1621.1**

BE IT KNOWN, that the undersigned individuals agree that the purpose section of the regulation covering client grievance procedures for federally funded legal services programs should remain unchanged and remain as originally drafted; and

BE IT ALSO KNOWN that we disagree with the proposed changes in the purpose section of this regulation referred to as Part 1621.1. We do not believe that the remedy language should be removed from this regulation. We also disagree with the recommendation that the regulation should include language that receiving legal assistance through legal services programs is not an entitlement.

THEREFORE, we call upon the Board of Directors of the Legal Services Corporation to disapprove any recommendation to change the purpose section of LSC Regulation 1621.

Dora H. Hare

Lorna M. Hanley

Carleen Smith

Jimmie C. Jackson

Kimberly S. Washington

John E. Johnson

Paul Nealey

Deanna Walker

[Signature]

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Harold Johnson

Walter Williams

Elsie M. Williams

Ann Agout

Shawn Shrig

Cynthia West

Gella Mae Rogers

Mary Hedgcock

Stella Moore

John M. Equiano Jr.

Frank McLeod

Danford Larkin

Laura Robbins

Grandelyn Stanley-Tampkin

Sam E. Lee, Jr. M.D.

Gloria Siner

Ruthie H. Wheeler

Alberta D. Hosten

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Samuel J. Morris
Ronald H. Gray
Pearley Blunt
P. Blunt Jr
Wette Long
Etchel Santora
Greg Johnson
Spalls Loya
Marion A. Arkaway

Charlie F. Morris Sr
Thelma E. D'Antonio
Op Anne Wright
Geneva E. Reid
Georgia Masby
Don E. J.
Emma Bradley
Mary V. Adams
Emma L. Brown

THE WESTIN
CHARLOTTE

Nov. 10, 2006

Charlotte, NC.

Dear Members of the Legal Services
Corp. Board of Directors:

Hello! My name is
Public Stephen and I'm on
the Board of Directors from
North West Legal Services of Texas,
which I am a client member.

I'm writing the changes
in reference to the regulator
in reference of the
as behavior of the
at 1021. The problem for the
experience of client members
clients. As a client member
would like for it to stay
would like for it to stay
as it is worked now.

Sincerely,
Stephen

Public Stephen

Client Board Member,
North West Legal Services,

4328 Springdale Dr.,

Dallas, TX 75242

THE WESTIN
CHARLOTTE

Donna ~~Deery~~ - Board
Member
Pulse Manager

133 Broad Meadow St # 11
Meyers Brook, Mass 01752

H. 1-508-624-4468

work. The Meadow program
25 Portland Street

Ashland, Mass 01721

1-508-231-4516

I will be rejoin team
Prison, on parole, Probation
and out of Drug Court.

~~Donna Deery~~ is ~~off~~
concerned ~~about~~

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REGARDING
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THEREFORE, we call upon the Board of Directors of the Legal Services Corporation to disapprove any recommendation to change the purpose section of LSC Regulation 1621.

Kaylanta Brown

[Signature]

[Signature]

[Signature]

Sheryl Smiley

Beverly Jones

Ruth Johnson

Margaret Berry
Angela Patton

[Signature]

Summel Spruill

[Signature]

Shirley Adams

Myrtle Darby

Dear members of the legal services Corporation's
Board of Directors, I am a client and
I would like to thank you for all your
support & help you have given to
poor people across the states.

As a client I feel that the statement
1621.1 protects us & is safety net
for clients & myself

Sincerely,
Gloria Renee

DEAR MEMBERS OF THE LEGAL SERVICE CORPORATION BOARD
OF DIRECTORS,

I WOULD LIKE TO TAKE THIS TIME TO THANK YOU FOR
ALL THE SERVICES YOU HAVE PROVIDED ME WITH AS A
CLIENT OF LEGAL SERVICES.

I AM WRITING YOU IN REFERENCE TO THE CHANGES OF
1621.1 PURPOSE. I AM ASKING THAT YOU DO NOT CHANGE
THE PURPOSE BECAUSE I FEEL THAT THIS IS AN INJUSTICE
TO ME AND THAT THERE IS NO EUE PROCESS TO PROTECT
ME FOR THE SERVICES THAT I AM TO HAVE AS A
LEGAL SERVICE CLIENT.

— THANK YOU FOR YOUR CONSIDERATION.

LINDA J. MORRIS
PENNS. LEGAL AID NETWORK

Nov 10, 2006

Dear Member of Legal Service Corporation

I am asking you please don't change
1621.1 purpose. It really help us
to stay focus and protect us.

We know that you care about clients
because of what you do.

Thank you

Sonia Brooks

1231 N. Fremont St

Phila Pa 19122

wellpride@aol.com

Phila. Welfare Rights Orgs

November 10, 2006

Dear Members of Legal Service Corporation Board of Directors:

Please do change 10211 purpose statement
It help us in many ways.
Please do not change!!

Thank you
Mary G. G. G.

November 9, 2006

Dear LSE Boardmembers:

Please do not change 1681.1

Clients need a process by which the

Clients can challenge the services of

Legal Aid services if the services is

not properly delivered

Lucille Taylor

534 N. Fair

Oklahoma City OK 73104

November 10, 2006

Legal Service Corporation Board of Directors:
Members:

I want to first thank you for
all your support and help you have
given to poor people across the
States.

I am requesting that the Legal
Service Corporation board of Director's
please do not change or add
to regulation 1621.1 Purpose Statement.

I am a client and can speak
for myself. I feel that 1621.1
Statement protects many clients
like myself. It is a safety net.
It speaks very clearly and give
guidance for clients.

Again, we thank you for all that
you do.

2nd 69 Ave

Phila. Pa 19124

Thank-You

Yvette Long

315-586-1634

Nov. 10th 2006

Dear Member of the Legal Services Corporation
Board of Directors:

Thank you for years of support.
I would like to request as we move
forward focus on the future that you
Reconsider and NOT change the Language
in 1621.1 which inside every Recipient
has a Right.

LSC was design to provide service to
Protect the Process & we need each other.

Sincerely,

Guan Harley-Tanphi
Client Council Member
Legal Aid Inc. San Diego, Ca.

Dear Members of the Legal Service Corporation
Board of Directors:

I thank you for the services you have provided, the purpose of
this letter, is to ask that you make no changes to the languages
of 16:2(1) I was told at the NLADA Conference, Nov 9, 2006

That you all are considering making changes.

We the client feel that we need a protection process
now and in the future, therefore I feel the language
we already have is good enough.

I look forward in hearing more from you, on our behalf.

Thank you

La Junta Robbins

5850 Res Service #C

San Diego, Ca. 92139

823-D Hardy Drive
Charlottesville, Virginia 22903
11-10-06

Dear Members of the Legal Services Corporation Board of Directors. My name is Jeff Johnson, I am a Client Board member, I am taking this time to urge you to reconsider your decision in Changing 1621.

1621.1 Purpose

The original language is very simple, in which all clients can understand. In your change document the wording is in very legal terms which most clients would need an attorney to explain.

1621.2 Committee

you did not change, you kept it very simple.

1621.3 Complaints

In the original language is pretty straight forward. In your change document the wording once again is in very legal terms.

1621.4 Complaints

In the original language is pretty straight forward
but again the your change document is one again
is in very legal terms.

I ~~am~~ have been involved in my community long
enough to know that change can be good as
long as change does not hurt the people we
serve in our low income community. In your
change document seems to appear that this
change will be taking away the due process
from all of our clients weather we serve on
the board or not.

I thank you for all you have done on
behalf of our low income clients for what you
are about to do.

Thank you and may God bless all of
you in Jesus name.

Sincerely yours,
Gay A. Johnson.

Nov 9, 2006

To the members of the Legal services
of The Corporation Board of Directors

Please do not Change 1621.1

The purpose it was put there, was to help
Poor People, who don't have the means or
money to pay a Lawyer. I am glad that some
one came up with 1621.1 so that every poor
Person can have legal assistance.

Even with all that we do there are still a lot
of people out there, that don't where to go, or
how to receive legal assistance. I am a
Client member from Houston Texas. I am a disable
Person who was wronged, and the legal aid
there helped. So I became a Client member so
I could go out and help others.

I think we all should be held accountable to
applicant for legal assistance. I feel like you
are changing the 5th amendment. So will you
reconciler what the change could do to people
like my self.

Thank you

Pearly M. Blunt

Client Council member

Houston Texas

Dear Members of the Legal
Services Corporation Board
of Directors

The purpose of this letter is to bring
to your attention the recent notification of
changes being made to regulation 1621.1,

which is the purpose under the Client
Grievance Procedure.

I am a Client Board Member who has the
clients welfare at heart, To take away or
Add the language that I have read take away
the justification of even providing legal
assistance to the poor; the present language
at gives a clients that they have hope that
something will come of them needing assistance
and can rely on a mechanism that they have a
recourse if they are refuse assistance or not
handle professionally. I am asking you to think
about what the legal service to the poor
stands for, 1

There should be a trust between the
clients and the Service organizations that is
supplying the assistance.

Sincerely
Robert Blunt sr
7950 Bellmont Ave #11
Houston, TX 77061

November 10, 2006

Dear Members of the Legal Services Corporation
Board of Directors,

I was at the National Legal Aid and Defender Association Conference in Charlotte, North Carolina. I was informed that you are in process of changing the Purpose of 1621, Client Grievance Procedure.

I have reviewed part 1621 and feel that this change will greatly impact many clients and client board members all over the United States of America. In changing the purpose of section 1621, clients will no longer have a voice about the legal system, it will take away the accountability of the Legal Assistance agencies, and most importantly - clients' best of fair justice.

As a client board member of the Mid Minnesota Legal Assistance in Minneapolis, Minnesota - I ask the board to reconsider this change and think about its original purpose and mission when 1621 was first

originated and why it was
originated. Thank you for taking
your time and patience in reading
my letter and my concerns with
this change to 1621.

Sincerely,

Mandoo Young