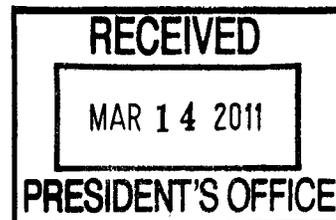


Massachusetts  
Legal  
Assistance  
Corporation

7 Winthrop Square, 2nd floor • Boston, Massachusetts 02110-1245 • phone: 617.367.8544 • fax: 617.426.0656

26 January 2011



James J. Sandman  
President  
Legal Services Corporation  
3333 K Street, NW  
Washington, DC 20007

Re: Comments on Legal Services Corporation Strategic Plan

Dear Jim:

Thank you and the LSC Board of Directors for inviting comments regarding the LSC Strategic Plan. It is gratifying to see that LSC is reexamining its Strategic Directions and that the corporation is reaching out to the broader legal aid community in this process.

As the National Association of IOLTA Programs liaison to LSC, I submit the enclosed comments on behalf of NAIP for your consideration. Please let me know if I can answer any questions or provide any further information to you with regard to these comments.

On a more local note, I understand that you will be in Massachusetts in April to attend a Northeast Project Directors meeting and I hope to see you then.

Yours truly,

A handwritten signature in black ink, appearing to read "Lonnie A. Powers".

Lonnie A. Powers

cc: Betty Balli Torres

NATIONAL ASSOCIATION OF IOLTA PROGRAMS  
Comments on LSC Strategic Planning: 11 March 2011

The National Association of IOLTA Programs (NAIP) submits these comments in response to the publication by the Legal Services Corporation (LSC) in the Federal Register (75 FR 80850) soliciting suggestions for updating, revising and modifying LSC's current Strategic Directions document and developing a new strategic plan for LSC for 2011-2015.

LSC has asked for comments on the following:

- To what extent are the goals, objectives and strategies set forth in the Strategic Directions 2006–2010 document still appropriate? To what extent are they obsolete?
- Beyond those identified in response to the question above, what are realistic yet meaningful goals?
- How may LSC most effectively achieve its identified goals? What revised objectives and/or strategies are appropriate for LSC to consider?

NAIP appreciates the opportunity to comment on LSC's Strategic Plan as a way to continue and enhance the collaborative relationship between LSC and the members of NAIP, who collectively are the second largest source of funding for civil legal assistance in the nation. In some states, the state funder is the largest source of funding for civil legal services to the poor. We have not directly addressed the specific questions asked by LSC but rather have concentrated on the issue of how the members of NAIP as state funders can best work with LSC to achieve our shared goals.

NAIP is composed of Interest on Lawyers Trust Account (IOLTA) programs which often manage state funding from appropriations, filing fees and other public and private sources. We believe the considerations in these comments are also relevant for other state-level entities which provide funding for legal services. The sources and amounts of state-level funding varies from state to state as does the ways in which state funders interact with legal aid programs and the degree to which LSC-funded programs have access to state funds. While recognizing that LSC has a mandate to operate nationally, we urge LSC, to the extent possible, to allow for flexibility in state-level approaches that recognize both the leadership of state funders in the access to justice system and our common goal of expanding access to justice through high quality legal assistance.

**Comments on LSC Mission:** NAIP continues to support the mission of LSC but we recommend that LSC consider modifying the current Mission Statement to clarify what we believe has always been the intent - the connection between equal access to justice and high quality legal assistance - by editing the Mission Statement to read as follows:

To promote equal access to justice in our Nation by providing high quality civil legal assistance to low-income persons.

## **Suggestions for the Strategic Plan to promote and encourage coordination and collaboration between LSC and state level funders:**

1. Establish regular communication and coordination between LSC and state funders as a primary goal, with collaboration on initiatives where appropriate and possible. Establish systems to regularly include state funders as recipients of LSC communications to grantees and other relevant information.
2. State as a high priority working with state Access to Justice Commissions (or similar state access to justice entities) and state funders to expand access to additional funding and to stabilize funding for legal aid programs.
3. Consider whether and how LSC and state funders can best engage in joint publicity campaigns to educate the community on the need for increased access to legal assistance.
4. If LSC is not already doing this, require LSC-funded programs to detail how they will/are collaborating with ATJCs (or similar state access to justice entities), the judiciary, the organized bar, state funders and other providers of legal assistance to expand access to justice. In addition and consistent with the LSC Performance Criteria, consider asking how these efforts relate to the Ten Principles for a Civil Justice System adopted by the ABA in 2006.  
<http://www.abanet.org/legalservices/sclaid/downloads/06A112B.pdf>
5. Consider whether and how NAIP and LSC can work on a joint initiative to measure how well the Ten Principles are being carried out in states around the country and on other efforts to assess and communicate about the effectiveness of program services.
6. Establish a process to determine the feasibility of conducting joint site visits with those state funders who are able and willing to collaborate with LSC and the Office of Program Performance on such evaluations for the purpose of improving legal aid program quality.
7. Consider partnering with interested state funders on pilot projects or efforts to develop or test new delivery initiatives or system improvement goals such as achieving appropriate program salary structures.<sup>1</sup>
8. Regularly involve NAIP and state funding programs in the development of LSC regulations, policies or practices, including those that affect the ability of LSC-funded programs to collaborate with other legal assistance programs or with state funders.

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<sup>1</sup> See, for example, the comments on improving program salary structures submitted to LSC by “31 Leaders in the Legal Services Community.”