



September 8, 2011

Mr. Mark Freedman
Senior Assistant General Counsel
Legal Services Corporation
3333 K Street NW
Washington, DC 20007

Re: Poverty Data and LSC Funding Distribution Request for Comments

Dear Mr. Freedman,

The South Carolina Access to Justice Commission (Commission) received notice about the request for comments regarding the recommendations of the Legal Services Corporation's (LSC) Board of Directors relating to poverty data collection and LSC funding distribution. Comments from the South Carolina Legal Services and the NLADA include practical and well-reasoned suggestions and support for their recommendations. The Commission reviewed the specific recommendations and submits the following comments for your consideration.

1. We recommend that LSC utilize the American Community Survey (ACS) data to determine the number of individuals in poverty
2. We recommend that LSC basic field funding should continue to be determined on a per person basis.
3. We recommend that program funding be reallocated among geographic areas every five (5) years based on updated poverty population determinations by the ACS.

Thank you for your consideration of our comments to these important issues.

Sincerely,

Stuart M. Andrews
Vice-Chair South Carolina Access to Justice Commission

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