

**Standing Committee on
Legal Aid and Indigent
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April 14, 2007

Victor Fortuno
General Counsel
Legal Services Corporation
3333 K. St NW
Washington, DC 20007-3522

RE: 2007 LSC Regulatory Agenda

Dear Mr. Fortuno:

The American Bar Association Standing Committee on Legal Aid and Indigent Defendants submits these comments concerning the potential development of a regulatory agenda by the Legal Services Corporation.

No compelling facts show the need for regulatory change at this time. Discussions with bar and access to justice leaders around the country inform that efforts to address the legal problems of the poor are functioning effectively within the current regulatory structure. Complaints about LSC-recipient activities have decreased in recent years. The current regulations are working well and are fostering full compliance with relevant statutory mandates.

Regulatory changes are costly and disruptive. They often require complex and expensive changes in processes, procedures, and software. They require revising program manuals, conducting additional training, and taking other steps toward implementation. Absent a compelling demonstrated need, embarking upon such changes is inadvisable due to the resultant ripple effects and the increased cost throughout the system.

For these reasons, we recommend that LSC not undertake at this time the regulatory changes recommended by the LSC Inspector General.

Thank you for your consideration.

Sincerely,



Deborah G. Hankinson
Chair