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September 30, 2011

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Re: Report of the LSC Fiscal Oversight Task Force

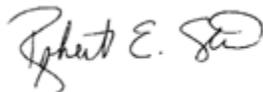
Dear Ms. Weir:

We appreciate the opportunity to comment on the July 28, 2011, LSC Fiscal Oversight Task Force Report to the Board of Directors. We commend the LSC Board and leadership for undertaking this important examination of fiscal controls and accountability.

In 1991 the ABA developed "Standards for the Monitoring and Evaluation of Providers of Legal Services to the Poor," which is enclosed. This set of Standards provides useful guidance in balancing the interests in accountability and client service. As LSC moves forward to put new procedures and controls in place to assure fiscal accountability, we suggest that an important focus remain on designing systems and processes that are effective while still ensuring that LSC grantees are able to meet their primary service obligations of providing legal assistance to low-income Americans.

Thank you again for providing this opportunity to comment.

Sincerely,



Robert E. Stein
Chair

Enclosure