

**From:** Jorge Baron [mailto:jorge@nwirp.org]  
**Sent:** Friday, March 07, 2014 8:01 PM  
**To:** 1626 Rulemaking  
**Subject:** Comments to FNPRM

Stephanie Davis  
Assistant General Counsel  
Legal Services Corporation  
333 K Street, NW  
Washington, DC 20007

Dear Ms. Davis,

I am writing to submit a written comment on behalf of Northwest Immigrant Rights Project (NWIRP) to the Further Notice of Proposed Rulemaking (FNPRM) published in the Federal Register on February 5, 2014.

Northwest Immigrant Rights Project is a nonprofit legal services organization providing immigration legal services to low-income individuals in Washington State. We do not receive funding from the Legal Services Corporation (LSC) but many of our clients may qualify for assistance from LSC-funded organizations. For this reason, the proposed changes to eligibility regulations are of concern to our organization.

We urge LSC not to adopt a requirement of presence in the U.S. for any individual eligible for protection under any of the humanitarian forms of protection in the relevant federal statutes. As LSC recognized in the Federal Register notice, there are several possible interpretations of the relevant provisions and we believe that the legislative intent of the statutes is to protect as many individuals as possible and that LSC should therefore adopt the reading of the relevant provisions that would make as many individuals eligible for services. We therefore urge the adoption of regulations that will allow eligibility for LSC funded services even when victims are not physically present in the U.S.

Please do not hesitate to contact me if you have any questions. You may reach me at 206-957-8609 or via email at [jorge@nwirp.org](mailto:jorge@nwirp.org).

Thank you for your consideration of these comments.

Sincerely,



Jorge L. Baron  
Executive Director