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December 9, 2024

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Clerk of Supreme Court
Attention: Deputy Clerk - Rules
PO Box 1688
Madison, WI 53701-1688

**CLERK OF SUPREME COURT
OF WISCONSIN**

RE: Petition 24-05 Adjustment to Attorney Assessment for Public Interest Legal Services Funding

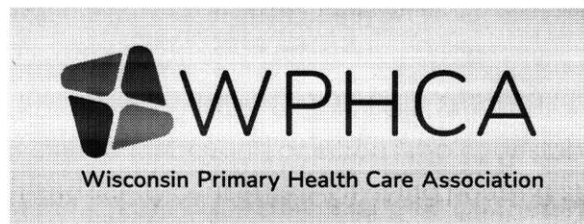
To the Justices of the Supreme Court of Wisconsin:

I am writing on behalf of the Wisconsin Primary Health Care Association in support of Petition 24-05 to increase the Public Interest Legal Services Fund (PILSF) assessment. The Wisconsin Primary Health Care Association (WPHCA), representing Wisconsin's nineteen Federally Qualified Health Centers (also known as Community Health Centers), envisions a future where all individuals and communities in Wisconsin achieve their highest health potential. Ensuring access to legal services to address health-harming legal needs is essential to that vision.

In 2023, Wisconsin Community Health Centers served 287,632 patients, providing 1.14 million total visits for preventative medical care, behavioral health services, dental care, and enabling services such as case management. According to 2023 data, 76% (205,500) of Community Health Center patients live at or below 200% of the Federal Poverty Level and 20% are uninsured. In 2024, WPHCA started a pilot Medical Legal Partnership, connecting Community Health Center patients with free civil legal services, in recognition of the health-harming legal needs that patients face across Wisconsin. This work highlights the need for accessible, high-quality civil legal services, especially for low-income residents. We believe that increasing access to civil legal aid is vital to the stabilization and dignity of our communities. This Petition is an important step in that direction.

An individual's ability to access civil legal aid can be lifesaving. Civil legal aid keeps people in their homes and in family-sustaining jobs, empowers individuals and families by resolving consumer debts and ensuring rightful access to income supports, secures support and protects the rights of crime victims, and helps to extricate survivors of domestic violence from abusive situations so they can achieve safety and independence.

Access to legal help is distressingly difficult, particularly for low-income Wisconsinites. While one in seven Wisconsin residents are financially eligible for civil legal aid, legal aid providers



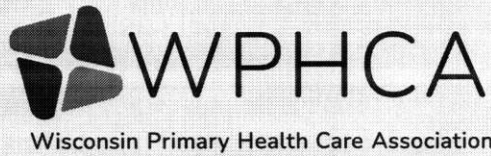
are only able to provide help for 7% of the civil legal problems faced by Wisconsin's low-income residents. The gap between the need for services and their availability holds individuals and families back from achieving safety, stability, and economic security. At WPHCA, we understand that increasing the Public Interest Legal Services Fund is one critical mechanism for increasing access to civil legal aid for our community and all of Wisconsin.

As part of WPHCA's new Medical Legal Partnership, Community Health Centers hope to connect approximately 300 patients annually with civil legal services to address issues such as public benefit challenges and housing issues. As employers, community partners, and providers of care, Community Health Centers see patients caught in complicated systems, often without recourse to see issues remedied. Challenges such as unmitigated pests in the home, lack of reliable utilities, or a Medicaid denial can have long-term consequences for individuals and families.

At WPHCA, we see how housing instability can spiral a family deeper into poverty. We also know that the impacts can extend far beyond one household, destabilizing entire communities and creating public health and safety concerns. Achieving housing stability is a key component of breaking the cycle of poverty and achieving economic security. Civil legal aid providers play a critical role in helping low-income tenants understand their rights, resolve disputes with landlords, secure habitable housing, and stay housed. Unfortunately, we know that for every tenant who can access legal help, many more are turned away simply due to lack of capacity of civil legal aid providers. Community Health Centers consistently cite housing concerns as a key social driver of health.

Community Health Center patients rely on maintaining government benefits to meet their most basic needs, including food, shelter, and healthcare. We also see the frustration and panic when individuals are denied benefits or face issues with the benefits they rely on. Each benefit program has its own web of eligibility guidelines, rules, timelines, and policies, which can cause even more confusion in an already complicated benefits system. We work with civil legal aid providers to help individuals whose benefits - ranging from unemployment compensation to BadgerCare, from FoodShare to Disability benefits, and more - have been wrongfully denied, reduced, or terminated. Legal aid providers help people navigate overpayment claims and other issues that put these critical benefits at risk. Unfortunately, we know that for every low-income Wisconsinite who can access help with their benefits issue, many more are turned away due to lack of capacity.

There are far more low-income Wisconsinites with civil legal problems than there are lawyers to help them. The reality is that many of those people face multiple legal problems concurrently. An investment in civil legal aid is an investment in justice and the future health of



Wisconsin's legal system. Supporting an increase in PILSF moves us toward a future of due process for every Wisconsinite and recognizes the leadership role the legal profession can take in closing the justice gap. We hope the legal community will pave the way for increased access to justice through this investment in civil legal aid.

Therefore, we urge you to adopt Petition 24-05 to increase the PILSF assessment fee, which would increase the provision of civil legal services to low-income Wisconsinites. The positive impact of the Petition would reach far beyond the financial value of the assessment itself. Thank you for providing us with the opportunity to comment in support of this proposed rule.

Stephanie Harrison
Chief Executive Officer
Wisconsin Primary Health Care Association
sharrison@wphca.org
608-571-6239