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April 28, 2009

Clerk of the Supreme Court
PO Box 40929
Olympia WA 98504-0929

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SUPREME COURT
STATE OF WASHINGTON
2009 APR 29 AM 8:11
DONALD R. CARPENTIER
CLERK

Re: Comments to Proposed New Rule APR 28

Ladies & Gentlemen:

Thank you for taking public comments on Proposed New Rule APR 28. My comments concern the education section of the Certification Requirements. As currently proposed, only individuals “who graduated from a paralegal/legal assistant program that is approved by the American Bar Association or the Commission” and meet one of three (arguably four) additional degree and/or certificate requirements in paralegal studies (associates degree or other paralegal/legal assistant program, bachelor’s degree, or post-baccalaureate) are eligible to obtain the Legal Technician designation.

I believe there is a segment of the legal profession which is excluded solely under the educational criteria as the proposed rule is now drafted. An individual could have attended a college or university, obtained a bachelor’s degree (or post-baccalaureate degree), taken a significant number of courses in an allied field, but not obtained a paralegal certificate (perhaps because one was not offered as part of the undergraduate degree programs). **I believe, at the very least, the Commission should also evaluate (when requested) an applicant’s transcripts and find (or not find) an applicant’s studies to have satisfied the Education Section of the Certification Requirements based on an applicant’s studies in an allied field.**

As an example, I earned an associate’s degree from Shoreline Community College (“SCC”) (September 1988), studied for a semester at an Ivy League school, and earned two bachelors’ degrees from the University of Washington (“UW”) (Political Science and Society & Justice, both awarded June 1991). I have worked as a paralegal in private law firms in Seattle and Washington DC, interned as a paralegal in the United States’ Attorneys (Washington DC), served as a courtroom clerk (Snohomish County Superior Court) – all since 1990. As evidenced by my attached transcripts, I could not qualify under the educational requirements solely because SCC and the UW did not offer an undergraduate or graduate paralegal program at the time I graduated.¹ Of the 226 quarter hours and eight semester hours, 80 quarter hours and four semester hours were arguably substantive legal courses (the requirement is currently drafted at “45 quarter hours ... are substantive legal courses”). In addition, to my undergraduate education at a community college and a four year universities, I have attended numerous CLEs on a variety of legal topics since the early-1990s.

¹ Also, in 1996, I was a student in the class the *Professional Responsibility (Rules of Professional Conduct)* at the UW School of Law and successfully completed the course.

The proposed rule appears to penalize applicants for having pursued and earned undergraduate or post-baccalaureate degrees from four year universities in allied studies and worked a number of years as a paralegal (or in a similar legal position), instead of attending a paralegal program.²

Please note, the King County Bar Association ("KCBA") has a special designation for legal assistants and paralegals. Among other things, KCBA Registered Legal Assistants can "present agreed and/or ex parte orders as authorized under King County Local Rule 54 (f)³" and gives credit for similar studies. Similar to the Commission's proposed rule, the KCBA's criteria to be a Registered Legal Assistant includes having "substantial equivalent college education and/or work experience in the legal field."⁴ However, their criteria allows individuals who did not obtain a paralegal certificate, but do have a college/university education and work experience to be permitted their Registered Legal Assistant designation.

For the foregoing reasons, I urge the Commission to amend the proposed rules to include as part of the educational section of the Certification Requirements: Applicants who have graduated from a college or university and earned a bachelor's degree and/or post-baccalaureate degree from an accredited institution of higher education in an allied field to paralegal studies, e.g., criminal justice, society and justice, and/or pre-law, are considered to have satisfied this educational requirement, upon review of educational transcripts by the Commission and/or its staff.

I would be happy to make myself available to answer any questions.

Thank you for your consideration.

Best regards,



Chris Collison

Attachments: Shoreline Community College Official Transcript
Harvard University Academic Transcript
University of Washington Academic Transcript

² As a side note, in 1992, I shared a conference with a faculty member at Edmonds Community College ("ECC"). After reviewing my transcripts, she shared with me that of the 90 credits needed to obtain a paralegal certificate at ECC, it appeared as if I would need only take two additional classes (at that time, I already had 76 quarter hours and four semester hours). However, in order to be awarded the paralegal certificate, ECC had a residency requirement that a student must have attended ECC for at least 45 of the 90 credit hours (it's as if a student was penalized for having obtained four year degrees instead of only completing a two year program).

³ 2009 Legal Assistant Registration Program, Entitlements Section No. 3, located at www.kcba.org/legalassistant/.

⁴ 2009 Legal Assistant Registration Program, Qualifications Section No. 3(b), located at www.kcba.org/legalassistant/.

SHORELINE COMMUNITY COLL. 958
 16101 GREENWOOD AVE N
 SEATTLE WA 98133 SEATTLE WA

IST 110 CIVILIZATION AND CULTURE 86 *****
 CC 110 INTRO TO SOCIOLOGY 2.7 5.0 13.5 PHIL 120 INTRODUCTION TO LOGIC ***
 P/S CR CR ERN GPA CR 2.8 5.0 14.0 P/S CR CR ERN GPA CR 2.5
 QUARTER: 0.0 10.0 10.0 27.5 2.75 2.75 0.0 15.0 15.0 48.0 12.5
 ***** WINTER 87 *****
 CON 200 INTRO TO MICRO ECONOMICS W 5.0 0.0 0.0 ~~297 SPECIAL PROJECT~~ P 1.0 0.0
 NG 102 COMP AND LANG CONCEPTS 1.8R 5.0 0.0 SPAN 101 ELEMENTARY SPANISH P 2.0 10.0
 IST 111 CIVIL AND CULT WEST TRAD 2.6 5.0 0.0 SPAN 102 ELEMENTARY SPANISH P 5.0 0.0
 E 125 SKIING 4.0 5.0 13.0 P/S CR CR ERN GPA CR 5.0 10.0
 P/S CR CR ERN GPA CR 7.0 21.0 3.00 QUARTER: 6.0 11.0 11.0 10.0 2.00
 JARTER: 0.0 7.0 7.0 48.5 3.23

CON 200 INTRO TO MICRO ECONOMICS 3.7 5.0 18.5
 IST 112 CIV AND CULT CONTEMP WLD 2.7 5.0 13.5
 MATH 101 INTERMEDIATE ALGEBRA 3.3 5.0 16.5
 P/S CR CR ERN GPA CR 15.0 48.5 3.23
 JARTER: 0.0 15.0 15.0

PCMU 100 BASIC SPEECH CMU 3.5 5.0 17.5
 P/S CR CR ERN GPA CR 5.0 17.5 3.50
 JARTER: 0.0 5.0 5.0

RIMJ 131 INTRO TO LAW ENFORCEMENT 3.0 4.0 12.0
 VGLI 101 COMP AND EXPOSIT PROSE 3.4 5.0 17.0
 EOL 101 GENERAL PHYSICAL GEOLOGY 2.2 5.0 11.0
 P/S CR CR ERN GPA CR 14.0 40.0 2.86
 JARTER: 0.0 14.0 14.0

RIMJ 135 WINTER 88 *****
 RIMJ 273 CONSTITUTIONAL LAW 3.5 5.0 17.5
 NG 102 COMP AND LANG CONCEPTS 3.4 3.0 10.2
 MATH 107 MATH: A PRACTICAL ART 2.0 5.0 17.0
 P/S CR CR ERN GPA CR 18.0 54.7 3.04
 JARTER: 0.0 18.0 18.0

JSAD 250 LAW IN BUS I 3.1 5.0 15.5
 ASTU185W SPEC TOP:THE CONSTITUTIO 4.0 5.0 20.0
 ***** SPRING 88 *****

COLLISON CHRIS S 965091604 KING'S (CRISTA) 86 COLLISON CHRIS S GR10206
 9/17 FALL 86 MATRICULATED ASSOCIATE IN ARTS/SCIENCES 353 HAGGETT HALL WA 98195
 COMMUNITY SERVICE OPTION A# SUM88 SEATTLE

HARVARD UNIVERSITY
DIVISION/CONTINUING EDUCATION
Harvard Extension School
Harvard Summer School
51 Brattle Street
Cambridge, MA 02138
Phone - (617) 495-0977

ACADEMIC TRANSCRIPT

Susan E. Melie

Not valid without official seal and signature

ISSUED TO:

TRANSCRIPT OF:

Christopher Collison
3043 NE 100th St
Seattle, WA 98125

Student Name: Christopher Steven Collison
Student I.D.: [SSN Redacted]
Date Printed: October 23, 2000
Page Number: 1

COURSE	TITLE	CREDITS	EARNED	LEVEL	GRADE
Summer Term 1990					
GOVT S-1900	American Foreign Policy	4.00	4.00	UN	B minus
SOCI S-120	Family Violence	4.00	4.00	UN	B

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STUDENT NAME COLLISON, CHRISTOPHER STEVEN	HIGH SCHOOL	HS GRAD	DATE PRINTED 01/15/09	PAGE 1
STUDENT NUMBER 8822001	SOC SEC NO. [SSN Redacted]	GRADUATE 09/17/67	WASHINGTON RESIDENCY RESIDENT	SEX MALE
CLASSIFICATION NON-MATRIC	COLLEGE MAJOR Interdisc Undergrad Prog NON MATRICULATED	CURRENT STATUS	KALEENAS	PSEUD

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UNIVERSITY OF WASHINGTON DEGREES EARNED:
BACHELOR OF ARTS (POLITICAL SCIENCE)
SPRING 1991 (06/14/91)
UW:127.0 TRANSFER:102.0 EXTENSION: 0.0 GPA: 3.25

BACHELOR OF ARTS (SOCIETY AND JUSTICE)
SPRING 1991 (06/14/91)
UW:127.0 TRANSFER:102.0 EXTENSION: 0.0 GPA: 3.25

PRIOR DEGREE:
SHORELINE COMM COLL.
DEGREE: AA 1988

SUMMARY OF TRANSFER CREDIT:
HARVARD UNIVERSITY 12.0
SHORELINE COMM COLL 90.0
TRANSFER CREDIT ACCEPTED: 0.0

COMMENT:
HSTAA 383 COMPLETES FOREIGN LANGUAGE PROF REQ.

AUTUMN 1988	EPRMJ	3
POL S 202 INTRO TO AMER POL	5.0	3.1
POL S 203 INTRO INTERNATL REL	5.0	3.2
SOC 271 INTRO DEVIANCE	5.0	2.7
QTR ATTEMPTED: 15.0 EARNED: 15.0	GPA: 3.00	
WINTER 1989	POL S	3
ARCH 250 AMER ARCH & URB ENV	2.0	3.1
ATM S 101 WEATHER	5.0	2.8
L ARCH 352 HISTORY OF L ARC	3.0	3.1
SO JU 470 CRIM JUSTICE RSRCH	5.0	3.6
QTR ATTEMPTED: 15.0 EARNED: 15.0	GPA: 3.17	
SPRING 1989	POL S	3
POL S 204 INTRO TO COMPAR POL	5.0	3.0/I
SO JU 430 THE POLICE	5.0	*W
SO JU 473 CORRECTIONS	5.0	2.5
QTR ATTEMPTED: 10.0 EARNED: 10.0	GPA: 2.75	
SUMMER 1989	POL S	3
POL S 407 INTERNATL CONFLICT	5.0	3.5
QTR ATTEMPTED: 5.0 EARNED: 5.0	GPA: 3.50	
AUTUMN 1989	POL S	4
PSYCH 210 INTRO HUMAN SEXLTY	4.0	3.2
SO JU 400 SO JU SEMINAR	3.0	4.0
SO JU 405 WHITE COL ORG CRIME	3.0	3.8/I
SO JU 440 CRIM LAW & PROCED	4.0	2.8
QTR ATTEMPTED: 14.0 EARNED: 14.0	GPA: 3.39	

WINTER 1990	POL S	4
B CMU 301 BASC WRITTN BUS CMU	4.0	3.2
HSTAA 462 DPL HS US SNC 1901	5.0	*W
SO JU 418 INVESTIGATIVE METHS	5.0	3.7
QTR ATTEMPTED: 9.0 EARNED: 9.0	GPA: 3.48	
SPRING 1990	POL S	4
POL S 462 US SUPREME COURT	5.0	3.0
SO JU 430 THE POLICE	5.0	3.8
SOC 371 CRIMINOLOGY	5.0	2.4
QTR ATTEMPTED: 15.0 EARNED: 15.0	GPA: 3.07	
AUTUMN 1990	POL S	4
POL S 498 WCLA INTERNSHIP	15.0	CR
QTR ATTEMPTED: 15.0 EARNED: 15.0	GPA: 0.00	
WINTER 1991	POL S	4
AES 461 RACE REL IN AMERCAS	5.0	4.0
ATM S 102 CLIMATE	5.0	3.1
PSYCH 305 ABNORMAL PSYCHOLOGY	5.0	3.3
QTR ATTEMPTED: 15.0 EARNED: 15.0	GPA: 3.47	
SPRING 1991	POL S	4
HSTAA 383 MODERN LAT AMER	5.0	3.5
POL S 212 PHIL OF FEMINISM	5.0	3.5
PSYCH 495 INTRO TO LAW/SO SCI	4.0	3.7
QTR ATTEMPTED: 14.0 EARNED: 14.0	GPA: 3.56	

SCHOLARSHIP STATUS: DEAN'S LIST

----- DEGREE EARNED 06/14/91 -----
BACHELOR OF ARTS (POLITICAL SCIENCE)
UW:127.0 TRANSFER:102.0 EXTENSION: 0.0 GPA: 3.25

----- DEGREE EARNED 06/14/91 -----
BACHELOR OF ARTS (SOCIETY AND JUSTICE)
UW:127.0 TRANSFER:102.0 EXTENSION: 0.0 GPA: 3.25

SUMMER 1996	N MATR	6
LAW 410 PROF RESPONSIBILITY	4.0	3.2
QTR ATTEMPTED: 4.0 EARNED: 4.0	GPA: 3.20	

CUMULATIVE CREDIT SUMMARY:
UW CREDITS ATTEMPTED 4.0 UW CREDITS EARNED 4.0
UW GRADED ATTEMPTED 4.0 EXTENSION CREDITS 0.0
UW GRADED EARNED 4.0 TRANSFER CREDITS 0.0
UW GRADE POINTS 12.8
UW GRADE POINT AVG. 3.20 CREDITS EARNED 4.0

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RECIPIENT
CHRISTOPHER STEVEN COLLISON
WC

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Todd Mildon
Todd Mildon
University Registrar