

Minutes



Certified Professional Guardian Board Annual Planning Meeting

Monday, April 14, 2014 (9:00 a.m. – 3:00 p.m.)
SeaTac Office Center, 18000 International Blvd., Suite 1106,
SeaTac, WA

Proposed Meeting Minutes

Members Present

Judge James Lawler, Chair
Judge Robert Swisher, Vice-Chair
Commissioner Rachelle Anderson
Mr. Gary Beagle
Ms. Rosslyn Bethmann
Ms. Nancy Dapper
Mr. Andrew Heinz
Mr. Bill Jaback
Ms. Emily Rogers
Ms. Carol Sloan
Mr. Gerald Tarutis

Members Absent

Dr. Barbara Cochran
Judge Sally Olsen

Staff

Ms. Shirley Bondon
Ms. Carla Montejo
Ms. Sally Rees
Ms. Kim Rood

1. Call to Order

Judge James Lawler called the meeting to order at 9:10 a.m.

2. Welcome and Introductions

Judge Lawler welcomed Board members and members of the public to the meeting.

3. Chair's Report

Approval of Minutes

Judge Lawler asked for changes or corrections to the March 10, 2014 telephone conference proposed minutes. There were no changes or corrections.

Motion: *A motion was made and seconded to approve minutes from the March 10, 2014 meeting. The motion passed.*

Correspondence

Judge Lawler asked everyone to review correspondence from the University of Washington Educational Outreach. Dave Szatmary, Vice Provost of UW Educational Outreach will retire in the spring after a 30-year career with the University of Washington. A national search for his replacement is currently underway.

4. Public Comment Period (Please see attached)

5. Achieving Workable Unity

During the January 2014 Board meeting, stakeholder involvement was identified as a priority. As a result, reading materials were compiled to assist in understanding and achieving workable unity.

To provide a foundation for further discussion, staff presented the following:

Professional Regulation

The primary reason for regulation is to protect and act in the interest of the public. Generally there are two models of professional regulation – self regulation and government regulation.

Professional **self-regulation** is a regulatory model which is based on the concept of an occupational group formally regulating the activities of its members. **Government regulation** generally involves a rule of order having the force of law, prescribed by a superior or competent authority, relating to the actions of those under the authority's control.

Often professional guardians and others compare the Board to the Washington State Bar Association (WSBA), but the comparison is not on point. To a certain degree, attorneys are self- regulated, but WSBA is a hybrid body, it serves as both a regulatory body and an association. The Guardian Board, however, is a regulatory body only.

The enabling legislation for the Guardian Board is General Rule (GR) 23. Generally, the government regulates when the following conditions exist:

- The public does not have the capacity to evaluate the competence of the professional (before it may be too late).
- The public does not have the choice of practitioner.
- There is an imbalance in the power of the service provider and those who receive services.
- When the consequences of unethical practitioners are serious.

All the circumstances above are applicable to professional guardian; thus, it's reasonable to expect that professional guardians are government regulated rather than self-regulated.

Comparing a Regulatory Body to a Professional Association

The function of an association is to provide networking opportunities, publish information, conduct research, hold educational conferences, and to negotiate preferential rates for its members. The association's priority is its membership. Dues are collected from members who expect to get something back from the association.

The function of a regulatory body is to establish credentialing criteria, to provide a code of ethics and professional standards, to investigate and enforce requirements and restrictions to protect the public. A regulatory body places a stamp of approval

on certified or licensed professionals for the public's protection. The regulatory body's main function is to serve the public.

The following is a list of "shall" items that the Board is bound to comply with:

- The Board **shall** process applications . . .
- The Board **shall** adopt standards . . .
- The Board **shall** implement a training program . . .
- The Board shall adopt and implement disciplinary procedure
- The Board **shall** collect fees . . .
- The Board shall hold meetings.

The listing above mirrors a regulatory body. There is nothing noted above other than "training" that might be viewed as related to an association.

A comment was made, that in order to effectively regulate, a body needs to educate, gain consensus and ensure that the people being regulated are part of the process. People should be the first priority while regulation should be used as a last resort. Voluntary participation with guidelines and standards needs to be promoted.

Stakeholder Involvement

The Board reviewed the history of stakeholder involvement from House Bill 1771 to General Rule 23. Involvement had not significantly changed over the years. Stakeholder representation has been consistent with government regulation and GR 23 as provided below:

*"(c) Certified Professional Guardian Board. (1) Establishment. (i) Membership. The Supreme Court shall appoint a Certified Professional Guardian Board ("Board") of 12 or more members. The Board shall include representatives from the following areas of expertise: professional guardians; attorneys; advocates for incapacitated persons; courts; state agencies; and those employed in medical, social, health, financial, or other fields pertinent to guardianships. **No more than one-third of the Board membership shall be practicing professional guardians.**"*

The last sentence of the paragraph above was added four or five years ago, to ensure that sufficient positions were available to enable significant participation by all stakeholders.

Stakeholder Identification Exercise

Meeting participants were asked to identify stakeholders and for each stakeholder identified select a stakeholder type and an involvement type from the lists below.

Stakeholder types:

1. Decision-makers – Those with the formal power to make decisions.
2. Decision-blockers – Those with the power to block decisions.
3. Those Affected – Those affected by decisions.
4. Subject Matter Experts – Those with relevant information or expertise.

Involvement types:

1. Representative - Representatives of a particular stakeholder groups might be members of the regulatory body. The assumption is that these individuals can effectively speak about or act in the interests of the group community they represent.
2. Consultant - Individual and group stakeholders are consulted about their perspectives and concerns. Their views are considered by the decision-makers when making decisions. Comment coordinators may be assigned to consult with; forum discussions may be held or surveys administered.
3. Advisor - Group stakeholders form advisory panels, meet to discuss issues and share advice with the regulatory body.
4. Are Informed - Some stakeholders need to be informed about issues and plans via Listservs, and the website etc., but not invited to play an active role.

During the exercise and discussion, participants recommended the following:

- The Board should form an advisory committee which would include a representative from SCORE (retired business persons who advise small businesses) or the small business development council. These individuals could advise guardians in applying state regulations to their own businesses.
- Develop statewide discussion groups to gain and share knowledge regarding statewide regulatory and business issues.
- Reach out to guardians statewide via email. Use the certified professional guardian Listserv to send out email notification to guardians regarding topics to be discussed in order to gather feedback prior to the meetings.
- Utilize press releases to obtain more participation from family members of incapacitated persons.
- Contact parent coalitions who have contact with many other subgroups in the community. Because these participants are active parents who are committed to the welfare of incapacitated person they would be more likely to participate with the Boards and serve on advisory groups.

The Board decided that a structured listing of professional contacts needs to be formulated in order to reach out to stakeholder organizations. A primary contact person should be identified for each organization. To facilitate discussion, Board members could travel to various associations and CPG locations to participate in meetings.

Staff agreed to develop a Communications Plan, which would include the suggestions discussed.

10. Proposed SOP 413, Reg. 102.4 and Reg. 702.2

Andy Heinz presented the following proposed revisions on behalf of the Regulations Committee:

Application Regulation 102.4

102.4 "Designated CPG" means the certified professional guardians within an agency working for an agency who have the final decision-making authority for incapacitated persons or their estate on behalf of the agency. ~~The designated CPG is responsible for the actions of the agency(ies) for which they serve as designated CPG (Adopted 1-9-12)~~

Certification Regulation 702.2

702.2 "Designated CPG" means the certified professional guardians within an agency working for an agency who have the final decision-making authority for incapacitated persons or their estate on behalf of the agency. ~~The designated CPG is responsible for the actions of the agency(ies) for which they serve as designated CPG (Adopted 1-9-12)~~

Proposed SOP 413

413 Responsibilities of Certified Professional Guardian Agencies

413.1 The designated Certified Professional Guardian (CPG) is responsible for the actions of the agency for which they serve as designated CPG.

413.2 A CPG is bound by the Standards of Practice not withstanding that the professional guardian acted at the direction of another person.

413.3 A designated CPG shall make reasonable efforts to ensure that the conduct of non-guardian agency employees is compatible with the professional obligations of the professional guardian.

Regulations 102.4 and 702.2 address the question of who is responsible for the actions of employees of a professional guardian agency and of the agency itself.

January 2012, the Board decided that a certified professional guardian agency must be owned by certified professional guardians only. It was previously decided that each agency must designate two CPGs who would be responsible for the actions of the agency. After consulting with an Assistant Attorney General the Regulations Committee believes GR 23 must be amended to include the requirement of one-hundred percent CPG ownership in order to safeguard against non CPGs having majority control over CPGs, essentially controlling how the agency was operated. Per GR 9, a process needs to be followed and submitted to the Supreme Court, wherein the court will decide if the general rule needs to be amended.

The proposed revision discussed above, and the question of whether a certified professional guardian agency should be one-hundred percent owned by CPGs should serve as the test case for the Communications plan.

6. **Executive Session (Closed to Public)**
7. **Reconvene and Vote on Executive Session Discussion (Open to Public)**
Applications Committee

Mr. Jaback presented one application on behalf of the Applications Committee.

Motion: *A motion was made and seconded to conditionally approve Elizabeth Swain's application. The motion passed.*

Grievances¹

Staff presented Grievance #2012-044

Motion: *A motion was made and seconded to file a complaint for decertification in the matter of Grievance # 2012-044. The motion passed. Carol Sloan abstained.*

Staff presented Grievance #2011-018, 2013-052, 2014-003

Motion: *A motion was made and seconded to file a complaint for decertification in the matter of Grievances #2011-018, 2013-052, 2014-033. The motion passed. Carol Sloan abstained.*

2010 – 2013 Grievance Report

Motion: *A motion was made and seconded to publish the grievance report. The motion passed.*

¹ Members of the Standards of Practice Committee did not vote.

8. Responsibility for Viable Guardianship Businesses

Bridge Builders' Correspondence

The Board discussed a letter submitted by Ms. Mindi Blanchard, President of Bridge Builders' Ltd., to Judge Lawler expressing her concern over the current cost and potential income associated with being a business owner and CPG in today's economy. During the discussion the following comments were made:

- The Board needs to be made aware of the challenges on the business side of being a guardian or guardian agency. In some instances, grievances against CPGs can be viewed as an individual making poor business decisions because their venture is struggling financially. Guardian agencies and small businesses are concerned that regulations will make it very difficult to remain soluble. A representative from the small business development council should be invited to the Board's meetings in order to listen to the concerns of CPGs and provide a business perspective on these matters. Because of the significant economic investment vs. low return, some CPGs are considering leaving the guardianship profession and taking a job in the private sector. More guardians are needed, not less.
- Guardians need to communicate with the Board when they think changes need to be made to regulations. The Board needs to be made aware of problems in order to review and possibly revise regulations. As a rule, however, regulations are created in response to problems. The Certified Professional Guardian Board would not be necessary if all CPGs followed the standards of practice.
- Mentors and support groups for guardians are extremely helpful to individual and agency success. Guardians with expertise in specific areas should be encouraged to act as consultants to other guardians or act as advisors to mental health facilities in discharge planning. Another idea to help reduce the cost of guardianship would be to use interns. Currently, interns are recruited by guardians in the state of Florida to assist with lesser duties in addition to gaining knowledge about the profession. Interns are able to get a flavor for the guardianship profession without having to make the initial monetary investment of the CPG.
- Due to the cost of doing business as a CPG, an increase in the monetary compensation for certified CPGs should be considered as there has not been an increase in several years.

Wrap Up and Adjourn

Meeting adjourned at 2:40 p.m. Next meeting, a teleconference, is scheduled for May 12th, 2014, 8:00 a.m. to 9:00 a.m.

Recap of Motions from April 14th, 2014 Meeting

Motion Summary	Status
Motion: <i>A motion was made and seconded to conditionally approve Elizabeth Swain's application. The motion passed.</i>	Passed
Motion: <i>A motion was made and seconded to file a complaint requesting decertification in the matter of Grievance #2012-044. Carol Sloan abstained.</i>	Passed
Motion: <i>A motion was made and seconded to file a complaint requesting decertification in the matter of Grievance #2011-018, 2013-052, 2014-003. The motion passed. Carol Sloan abstained.</i>	Passed
Motion: <i>A motion was made and seconded to publish the grievance report. The motion passed.</i>	Passed

Action Items	Status
<i>Staff will draft a Communications Plan.</i>	In Process

Remarks Made by Tina Baldwin at the CPG Board Meeting on April 14, 2014

Good morning,

My name is Tina Baldwin.

Honorable Judge Lawler, I was very pleased to read your letter supporting the WINGS application and your pledge to involve the CPG Board in the "development of best practices to improve the guardianship system". Thank you.

The time for guardianship reform is ripe.

I think Mark Stroh, Executive Director of Disability Rights WA, in his letter also supporting the WINGS application succinctly stated the problem which affects the overall quality of all guardianship services.

"Most counties in WA have little or no monitoring of even basic compliance with guardianship reporting." To this, I will also add for preventing isolation of the ward from family or friends without due process.

My situation is a perfect example.

My daughter's Guardian of the Person:

1. filed her Initial Personal Care Plan 13-plus months late.
2. Her Annual Court Report is 7-plus months late.
3. Her Letters of Guardianship are expired.
4. She has provided just one monthly accounting report in 4 years. Since May, 2013, she has failed to comply with a court order to provide monthly accounting from 2012 to the present. This is nearly one year ago.

These problems pale in comparison, however, to her isolating my daughter from me and from her maternal family.

- This CPG has allowed my daughter to spend only 32 hours with me and none with my family since the last week of Dec., 2011. She allows no phone contact.
- She has done this against the well documented wishes of my daughter and without evidence that to do so is in the best interests of my daughter.

On March 25th, through my attorney, I submitted motions and memoranda to have the CPG removed.

The appointment of this CPG in the first place has been appealed.

I trust this Board will agree with me that litigation should be the last resort for eradicating isolation and for ensuring Certified Professional Guardians are accountable for their services.

I am a lay guardian, but I have used the CPG Standards of Practice since they were first published as a guideline for my services to my daughter.

So, today, I stand before you both as a lay guardian and a family member of a person who receives services from a CPG to say that reform addressing compliance and isolation is essential for providing services that are truly in the ward's best interests. On behalf of my daughter and as a mom, I am asking you to address isolation without due process right away. Thank you.

Certified Professional Guardianship Board Communication Plan

A. Purpose:

Stakeholders including family members of incapacitated persons, professional guardians, senior and disability advocates and others are seeking greater involvement in developing standards, rules and regulations to guide the guardianship profession. To continue effectively and efficiently performing its regulatory mission, the Certified Professional Guardianship Board developed this Communications Plan to facilitate the consideration of diverse perspectives in an environment that supports and respects differences and commitment to group initiatives.

B. Communication Objectives:

1. Develop understanding and appreciation for the shared goal of protecting the public.
2. Build understanding, trust and support for the rulemaking process.
3. Create a process that is transparent and helps stakeholders understand what the Certified Professional Guardianship Board does and hold it accountable.

C. Targeted Audiences:

	Stakeholder Name
1.	Board Members per General Rule 23
2.	Certified Professional Guardians
3.	Washington Association of Professional Guardians (WAPG)
4.	Incapacitated Persons
5.	Family Members and Friends of Incapacitated Persons
6.	County Bar Associations/Elder Law Sections
7.	Superior Court Judges' Association Guardianship and Probate Committee
8.	Guardians Ad Litem
9.	Alzheimer's Association
10.	WA Health Care Association & Leading Edge
11.	Traumatic Brain Injury (TBI) Council

	Stakeholder Name
12.	Long-term Care Ombudsman
13.	Lay/Family Guardians
14.	Guardianship Monitoring Programs
15.	AARP
16.	Disability Rights Washington (DRW)
17.	National Association of Mental Illness (NAMI)
18.	Association of Area Agency on Aging
19.	Department of Social and Health Services—APS, DDA, HCS, DBHR
20.	SCORE
21.	OPG Stakeholder Listserv
22.	Supreme Court
23.	Legislators
24.	Developmental Disabilities Council
25.	Washington State Residential Care Council of Adult Family Homes
26.	SEIU Healthcare
27.	Arc of Washington
28.	Superior Courts
29.	Columbia Legal Services
30.	Other Stakeholders that may be identified later.

D. Communication Strategy:

The Board plans to use five broad communications channels—board meetings/teleconferences, stakeholder engagement meetings, public comment periods during regular board meetings, the Web, and email to share information and seek input and feedback into the development of rules, regulations and Standards of Practice for the practice of professional guardianship.

Board Meetings/Teleconferences

Stakeholders are encouraged to attend Board meetings and teleconferences. The Board meets the second Monday of each month, except for February, July and December or when a holiday conflicts. Generally, the Board meets in person at the SeaTac Office Facility, 18000 International Blvd, SeaTac, WA in January, April, June and October. The April meeting is usually the Board’s annual planning meeting, in which stakeholders participate. Teleconferences are generally held in

March, May, August, September and November. Teleconferences are conducted via Adobe® Connect™ a web conferencing platform for web meetings, eLearning, and webinars. Participation instructions are provided on the meeting agenda, which is posted on the Web approximately one week before each meeting. The Board's meeting calendar is also posted on the Web, to view see http://www.courts.wa.gov/programs_orgs/guardian/?fa=guardian.CPGBoard.

Public Comment Periods

Each in-person meeting includes a public comment period. Comment guidelines are provided below. Individuals who participate in the public comment period will be encouraged to provide staff a written copy of the comments made during the comment period, which staff will attach to meeting minutes.

Regulation 600, the procedure for adoption, amendment and repeal of regulation also provides an opportunity to provide written comments. The notice and comment portion of Regulation 600 is provided below.

Public Comment Guidelines

A public comment period shall be held at all regularly scheduled in-person meetings of the Certified Professional Guardianship Board. The public comment period shall be the first item on the agenda after the chair report, shall not exceed thirty minutes total and will be subject to the following general guidelines:

1. Speakers must sign in to speak and must list name and topic.
2. No speaking when others are speaking.
3. Only the Chair may interrupt.
4. No personal attacks or accusations.
5. Comments will be limited to three minutes per speaker.
6. No repetition of comments from previous meetings.
7. Written comments may be submitted in lieu of, or in addition to public comments.

600 Procedure for the Adoption Amendment and Repeal of Regulations

601 Intent.

The intent of the Certified Professional Guardian Board (Board) is to give notice and the opportunity for public comment whenever the Board intends to adopt, amend, or repeal its regulations, except as otherwise stated in these regulations.

602 Notice.

602.1 Except as otherwise stated in these regulations, the Board will give notice whenever it intends to adopt, amend, or repeal a regulation (regulation change.) The Board must give notice at least thirty (30) calendar days before the meeting at which the Board intends to act on the proposed change. The notice will include the following information:

602.1.1 The text of the proposed change to the regulations. The notice may also include an explanation of the purpose of the proposed change.

602.1.2 The date, time and place of the meeting at which the Board intends to adopt the proposed change.

602.1.3 The name, address and telephone number of the person to whom written comments on the proposed change may be sent via U.S. mail. In the Board's discretion, the Board also may accept comments via electronic mail.

602.1.4 The date by which comments must be received by the Board.

602.2 To give notice of a proposed regulation change, the Board will do the following:

602.2.1 Publish the notice electronically on the Board's website.

602.2.2 Send the notice to the Washington Association of Professional Guardians.

602.2.3 Send an announcement via electronic mail to the state's certified professional guardians, stating that notice of a proposed regulation change is on the Board's website.

602.2.4 Give notice in any other manner that the Board deems appropriate.

Stakeholder Engagement Meetings

Stakeholder engagement meetings/teleconferences are defined as small group meetings with target audiences. A stakeholder group may host an engagement meeting and invite board members to participate or a Board member may host an engagement meeting and invite stakeholders to participate. The meeting host will be responsible for all meeting arrangements and cost, including reporting back to the Board.

Web

The Board will post request for comments on the Guardianship Program webpage and stakeholders are encouraged to e-mail written comments, which will be posted on the Web for public viewing. Comments must adhere to posting guidelines.

See http://www.courts.wa.gov/programs_orgs/Guardian/?fa=guardian.display&fileName=rulesindex

Email

AOC staff will obtain email addresses for the stakeholders identified on the stakeholders' list and utilize the list to send the following:

- a) News articles;
- b) Stakeholder Engagement Meeting Announcements;
- c) Informational emails; and
- d) Requests for written comments.

E. Initial Process:

To initiate communication and inform stakeholders of the process, AOC staff will complete the following:

1. Develop a contact list for stakeholders, organizations and individuals;
2. Send the following to all contacts:
 - i. A letter explaining the plan to seek input;
 - ii. The Communications Plan;
 - iii. The first request for comment and back up materials; and
 - iv. Public comment posting guidelines.

The following tables describe key audiences, stakeholder types, involvement types and the communication mediums that will be used to communicate with each.

Table 1 – Stakeholder Communications

	Stakeholder Name/Contact	Stakeholder Types	Involvement Types	Communication Media
1.	Board Members per GR23	Decision-Makers	Representatives	All
2.	Certified Professional Guardians	Person Affected Subject Matter Experts	Consultants	All Email (listserv)

	Stakeholder Name/Contact	Stakeholder Types	Involvement Types	Communication Media
3.	Washington Association of Professional Guardians (WAPG)	Persons Affected Subject Matter Expert	Advisor	All
4.	Incapacitated Persons	Persons Affected Subject Matter Experts	Consultants	
5.	Family Members and Friends of IPs	Persons Affected Subject Matter Experts	Consultants	All
6.	County Bar Associations/Elder Law Sections	Subject Matter Experts	Advisors	Stakeholder Meetings Web Email (listserv)
7.	Superior Court Judges' Association Guardianship and Probate Committee	Subject Matter Experts	Advisors	Email (listserv)
8.	Guardians Ad Litem	Subject Matter Experts	Consultants	Stakeholder Meetings Web
9.	Alzheimer's Association	Subject Matter Expert	Advisor	All
10.	WA Health Care Association Leading Edge	Subject Matter Experts	Advisors	All
11.	TBI Council	Subject Matter Expert	Advisor	All
12.	Long-term Care Ombudsman	Subject Matter Experts	Advisors	All
13.	Lay/Family Guardians	Subject Matter Experts Persons Affected	Consultants	All Email (listserv)
14.	Guardianship Monitoring Programs	Subject Matter Experts Person Affected	Advisors	Web Email
15.	AARP	Subject Matter Expert	Advisor	All
16.	Disability Rights Washington	Subject Matter Expert	Advisor	All
17.	National Association of Mental Illness	Subject Matter Expert	Advisor	All
18.	Association of Area Agency on Aging	Subject Matter Expert	Advisor	All
19.	DSHS – APS, DDA, HCS, DBHR	Subject Matter Experts	Advisors	All
20.	SCORE	Subject Matter Expert	Advisor	All
21.	OPG Stakeholder Listserv	Persons Affected Subject Matter Experts	Persons to Inform	Email (listserv)

	Stakeholder Name/Contact	Stakeholder Types	Involvement Types	Communication Media
22.	Supreme Court	Decision-Makers Decision Blockers		Stakeholder Meeting Email
23.	Legislators	Decision-Makers Decision Blockers	Persons to Inform	Email
24.	Developmental Disabilities Council	Subject Matter Expert	Advisor	All
25.	Washington State Residential Care Council of Adult Family Homes	Subject Matter Expert	Advisor	All
26.	SEIU Healthcare	Subject Matter Expert	Advisor	All
27.	Arc of Washington	Subject Matter Expert	Advisor	All
28.	Superior Courts	Persons Affected	Persons to Inform	Web Email (listserv)
29.	Columbia Legal Services	Subject Matter Expert	Advisor	All

Table 2. - Stakeholder Types

Stakeholder Types	Description
Decision-Makers	Those with the formal power to make decisions.
Blockers	Those with the power to block decisions.
Persons Affected	Those affected by decisions.
Subject Matter Experts	Those with relevant information or expertise.

Table 3. - Stakeholder Involvement Types

Involvement Types	Description
Represent	Representatives of particular stakeholder groups might be members of the regulatory body. The assumption is that these individuals can effectively speak about or act in the interest of the group community they represent.
Consultants	Individual and group stakeholders are consulted about their perspectives and concerns. Their views are considered by the decision-makers when making decisions. Comment coordinators may be assigned to consult with; forum discussions may be held or surveys administered.
Advisers	Group stakeholders form advisory panels, meet to discuss issues and share advice with the regulatory body. (Formal Group)
Inform	Some stakeholders need to be informed about issues and plans via listservs, the website etc., but not invited to play an active role.

Correspondence



Mindi R. Blanchard, M. Ed., CPG
President

RECEIVED
APR 21 2014
BY:

April 15, 2014

Washington State Administrative Office of the Courts
Certified Professional Guardian Board
PO Box 41170
Olympia, WA 98504-1170

RE: April 14th Board Meeting

Dear Judge Lawler,

I want to thank you for allowing the CPGs who attended the April 14th Board Meeting to provide input. I'm sure that had CPGs known that input would be allowed more CPGs would have taken the time to attend.

I also want to thank you for discussing my letter regarding the challenges of a guardianship business more thoroughly. I think that Judge Swisher made a very valid point about needing some provision to provide guardians for the less populated counties. The current cost of certification almost certainly prohibits many who would like to be CPGs on a part-time basis. While I am a firm advocate of education, there needs to be more flexibility in order to accommodate the needs of the rural counties.

I fully understand that this board is a regulatory board and as such needs to keep a certain amount of professional distance from CPGs in order to do their job but a little courtesy can go a long way to improving the Board's image with CPGs. The courtesy of being notified that CPGs would be encouraged to participate in the planning meeting would most assuredly guaranteed a larger participation. Even with me; had I not read the agenda when it was posted, I would not have known that my letter was on the agenda. While I am a very proactive sort of person, it would have been nice to have had the courtesy of an email or phone call notifying me that the Board wanted to discuss my letter in more detail and that my attendance was encouraged.

Respectfully,

Mindi R. Blanchard, M.Ed., CPG

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