



January 16, 2015

Received
Washington State Supreme Court

JAN 30 2015

Ronald R. Carpenter
Clerk

Hon. Ronald Carpenter
Clerk of the Supreme Court
Temple of Justice
PO Box 40929
Olympia, WA 98504-0929

RE: Comments to Proposed Admission to Practice Rule (APR) 11

Dear Chief Justice Madsen and Members of the Court,

The Access to Justice Board has unanimously endorsed the new proposed APR 11 (addressing Mandatory Continuing Legal Education (MCLE)) that is currently before the Court for adoption. We recommend that it be adopted without revision. We endorse the GR 9 submission and the report of the WSBA MCLE Task Force.

The proposed new APR rule is the result of a process that we believe was exemplary. As the Court is aware, the MCLE rule has been subject to piecemeal revisions since originally adopted. At the urging of the Court and others, the Washington State Bar Association (WSBA) formed a Task Force to perform a complete review of APR 11 and recommend revisions. The Task Force was broad-based with representatives from many different constituencies including the WSBA, the MCLE Board, the ATJ Board, CLE sponsors, educators and practicing lawyers from different parts of the state. Over many months the Task Force received input and discussed extensively and unanimously endorsed the final product.

While we are aware that some CLE sponsors oppose the elimination of the "live" credit requirement, we believe that the process was an example of rulemaking at its collaborative best and should be adopted as written. The constituencies involved in drafting the new rule have often been at odds in the past over the MCLE rule, but came together in a spirit of compromise and collaboration to come up with a rule that will serve the public's interest and the interests of lawyers in providing the best possible service to clients. The new rule balances the need for substantive law training (with a new 15 hour minimum credit requirement) with equally important needs like cultural competence, bias training, ethics and the ability to effectively carry on the business aspects of a law practice. It also recognizes that classroom learning is often the least effective learning tool and that experiential learning (such as pro bono work), mentoring relationships and other methods need to be utilized. The new rule also recognizes that many lawyers use their legal training and skills to do many things that serve the public and clients that do not often involve applying substantive law knowledge.

There is broad-based support in the Access to Justice Community for the revised APR 11 and we urge the Court to adopt it as submitted.

MEMBERS

- Hon. Lisa L. Atkinson
- Kirsten Barron
- Breean L. Beggs
- Hon. Anita Crawford-Willis
- Ishbel Dickens, Chair
- Nicholas P. Gellert
- Lynn Greiner
- Geoffrey G. Revelle, Chair-Elect
- Andrew N. Sachs
- Dr. Marion Smith, Jr.

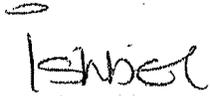
STAFF

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THE ALLIANCE
for Equal Justice
SUPPORTER

Sincerely,



Ishbel Dickens
Access to Justice Board Chair

CC: Stacy Bjordahl, MCLE Board Chair
Robin Haynes, Board of Governors Liaison to the MCLE Board
Paul Bastine, Board of Governors Liaison to the ATJ Board
Ann Danieli, Board of Governors Liaison to the ATJ Board
Paula Littlewood, WSBA Executive Director
Jean McElroy, WSBA General Counsel & Chief Regulatory Counsel
Kathy Todd, Staff Liaison to the MCLE Board