

April 20, 2021

Washington State Supreme Court
ATTN: Clerk of the Supreme Court
P.O. Box 40929
Olympia, WA 98504
Sent via email to supreme@courts.wa.gov

RE: Comment in Support of Proposed Amendment to APR 11

Dear Honorable Justices of the Washington State Supreme Court:

On behalf of the Board of Directors of Columbia Legal Services (CLS), I am writing in support of the proposed change to Admission and Practice Rule (APR) 11 that would require attorneys and other licensed legal professionals to spend at least one ethics credit per reporting period on the topic of “equity, inclusion, and the mitigation of bias in the legal profession and practice of law.”

In accordance with CLS’ values statement, we believe that our legal system must be fair, consistent, and accountable to all communities. That requires professionals who work within the legal system to receive education and training in not only diversity, equity, and inclusion, but also in how to recognize and reduce implicit/unconscious bias.

Implicit/unconscious bias is often defined as prejudice or social stereotypes in favor of or against one thing, person, or group in a way that is considered unfair. Many unconscious biases tend to be exhibited toward minority groups based on factors such as class, gender, sexual orientation, race, ethnicity, nationality, religious beliefs, age, disability, etc. As a result of unconscious bias, certain people benefit and other people are penalized.

Everyone holds unconscious beliefs about various social and identity groups, and these unconscious beliefs are often incompatible with one’s conscious values. For these reasons, we believe that it is important for all legal professionals to receive mandatory education and training in “equity, inclusion, and the mitigation of bias in the legal profession and practice of law.”

Moreover, we believe that this education will not be burdensome or costly since the amendment to APR 11 only requires legal professionals to commit 1 ethics credit on the proposed subject every 3 years, and the WSBA Board of Governors has promised to continue providing ethics CLEs on these topics free of charge.

We respectfully request approval of this amendment by the Supreme Court, and sincerely thank you for your consideration of what we consider to be a crucial first step to addressing the ingrained inequities against marginalized communities in the legal system.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'N' followed by a horizontal line and a large, sweeping flourish.

Naomi Kim
Columbia Legal Services Board President

From: [OFFICE RECEPTIONIST, CLERK](#)
To: [Linford, Tera](#)
Subject: FW: Comment in Support of Proposed Amendment to APR 11
Date: Tuesday, April 20, 2021 11:41:32 AM
Attachments: [Ltr to WA Supreme CT \(APR 11 Amdmt\) FINAL.pdf](#)

From: Naomi Kim [mailto:nsklaw@gmail.com]
Sent: Tuesday, April 20, 2021 11:39 AM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
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Please see the attached letter for a comment in support of the APR 11 proposed amendment.

Thank you for your consideration.

Regards,

Naomi Kim

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