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**Date:** Tuesday, February 22, 2022 1:59:48 PM

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**From:** Steven Posalski [mailto:sposalski@posalski.net]  
**Sent:** Tuesday, February 22, 2022 1:58 PM  
**To:** OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>  
**Subject:** GR 23 Comment

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To whom it may concern,

This comment is in regard to GR 23, "RULE FOR CERTIFYING PROFESSIONAL GUARDIANS AND CONSERVATORS," specifically GR23 (c) (1) (i) which states:

Membership. The Supreme Court shall appoint a Certified Professional Guardianship and Conservatorship Board (Board) of 12 or more members. The Board shall include representatives from the following areas of expertise: professional guardians and conservators; attorneys; advocates for individuals subject to guardianship and conservatorship; courts; state agencies; and those employed in medical, social, health, financial, or other fields pertinent to guardianships and conservatorships. No more than one-third of the Board membership shall be practicing professional guardians and conservators.

As a Certified Professional Guardian, I believe it is unconscionable that GR23 restricts Guardians & Conservators to no more than 1/3 of the Board's seats. Guardians/Conservators deserve the same representation on their governing board that is enjoyed by doctors, lawyers within their own governing boards. Practicing Guardians and Conservators are the only demographic to have a real-world experience and perspective to understand how Guardianships/Conservatorships work and what is productive and what is not. The limitation imposed on Guardians/Conservators for serving on the board has resulted in the past in abuses of authority by the Administrative office of the Courts, the establishments of rules, procedures and Standards of Practice that have served to exacerbate the current growing shortage of Guardians for those with limited income and resources, and a Board that fails to consider the long term negative effects on CPGs' and CPGA's ability to survive in the marketplace. Like the Governing Boards of other professions, at a minimum, a majority of the Board's members should be practicing CPG's.

**Steven G. Posalski, CPG**

