

TO: Justices of the Washington Supreme Court

FROM: Limited License Legal Technician Board

RE: Supreme Court Report Supplement

DATE: June 1, 2020

LLLT Board's Requests

1. Approve Administrative Law as a new practice area. *See LLLT Board Report to the Court at 24-25.*
2. Approve Eviction and Debt Assistance as a new practice area. *See LLLT Board Report to the Court at 51-52.*
3. Rule Revision: Approve a reduction in the legal experience hours requirement but add a clinical work experience requirement. *See attached suggested amendments to APR 5 and Appendix APR 28 Regulation 9, based on available online version of the Rules (official version not readily available).*
4. Rule Revision: Approve a permanent core curriculum waiver and allow other paralegal certification options. *See attached suggested amendments to Appendix APR 28 Regulation 4, based on available online version of the Rules (official version not readily available).*
5. Affirmatively support the LLLT program.

Administrative Law

The LLLT Board and the Office of Administrative Hearings are requesting that the Court approve LLLTs to be licensed to practice at administrative hearings. OAH will provide some of the training. The Unemployment Law Project supports licensing of LLLTs for unemployment hearings and they have expressed a willingness to provide training and supervision for initial hearings. The Community Colleges have indicated a willingness to work with the LLLT Board and the law schools to develop an "administrative law practitioner" curriculum. All interested parties are willing to expedite development and implementation of the education and training for an administrative law practitioner.

A key principle of APR 28 is to protect the public from harm by unregulated, unlicensed legal service practitioners. We strongly support a conclusion that trained and regulated legal professionals better protect the public from harm than unregulated legal services practitioners.



Recognition that lay representation is allowed by the Office of Administrative Hearings in many areas does not preclude the need for LLLTs to be licensed in administrative law. Instead, it highlights the public demand for affordable legal advice and assistance in administrative hearings and the need for our legal system to provide innovative solutions.

The current pandemic crisis is expected to greatly increase demand for administrative hearings, particularly in the areas of unemployment, health insurance, and public education. These are areas of law where very few attorneys practice but people often need some legal assistance.

Eviction and Debt Assistance

The Civil Legal Needs Studies from 2003 and 2015 found that housing and consumer debt were areas of concern. This was before the current COVID-19 crisis exacerbated these problems.

Statutory changes in 2019 give a court the discretion to consider equitable arguments for nonpayment of rent. At an order to show cause hearing, RCW 59.18.410 allows the court to stay a writ of restitution and enter a repayment plan if for example, “nonpayment of the rent was caused by exigent circumstances that were beyond the tenant’s control...” Tenants need legal assistance to provide the court with the “good cause” that would make a payment plan “fair and just for both parties.”

The current moratorium on evictions will expire. We anticipate that evictions will proceed with some sort of additional equitable considerations. Landlords need to understand the law and to comply with statutes and court rules. The LLLT Board proposal would limit assistance to only small-time sole proprietor landlords. A LLLT could not assist a property management company or a large corporate landlord. A LLLT assisting both clients and the “mom and pop” landlords will help the clients and assist judicial economy.

The debt assistance would allow consumer debtors to seek advice from a LLLT and would allow a LLLT to assist people (no collection agencies or corporations) with collecting small judgments. Often people who are awarded a small claims judgment cannot find assistance. Many of those judgments are in favor of tenants seeking return of their damage deposit.

Need for the public to have meaningful access to the courts in the proposed areas

The astonishing speed of the spread of COVID-19, and the subsequent cessation of much of our economy and public lives is likely leading to devastating consequences for many Washingtonians. People with low and moderate incomes will be disproportionately impacted.

Two large organizations that are already seeing rapidly expanding need, the Unemployment Law Project (ULP), and Eastside Legal Assistance Program (ELAP). Both have expressed their support for LLLTs to practice in eviction and debt assistance. Even after the pandemic subsides, the public’s need for affordable assistance in these areas will remain.

The LLLT Board believes it will be able to begin educating students in administrative law within 4-6 months, and that within 12-18 months LLLTs can be licensed to perform this work. The collaboration



with the OAH, Unemployment Law Project and the Community Colleges and law schools for training, education and supervision should limit the budgetary impact on the WSBA.

The LLLT Board believes educating students in eviction and debt assistance could start within 3 months, and that within a year, the existing LLLTs could be licensed in this area. Collaboration with other organizations and schools for the educational component will help streamline training and lessen the budgetary impact.

RULE CHANGES

Legal Experience Hours

The LLLT board recognizes that the 3,000 hour-substantive law-related experience requirement was initially set out of an abundance of caution, as no comparison basis then existed. The LLLT Board recommends reducing the hour requirement to 1,500 but adding a clinical experience requirement in the area of practice to ensure the quality of experience requirements remains high.

Reducing the hours requirement to 1,500, equal to the LPP program in Utah, would ensure practitioners remain experienced without overly burdening the LLLT candidate. Fifty-eight LLLT candidates have completed the practice area education, and we believe many are delayed in becoming licensed because they are having difficulty accumulating the necessary work experience hours.

Waiver, Years of Experience, and Paralegal Certification Options

The LLLT board believes the experience waiver which will be sunset should remain in place. The experience requirement initially set (10 years) was established out of an abundance of caution. The Board has heard repeatedly that the experience requirement is high and often prohibitive for those candidates not able to attend classes offered at community colleges.

The LLLT Board also recognizes the requirement that a waiver candidate obtain national paralegal certification is duplicative because all LLLT candidates, including waiver candidates are required to obtain a separate national certification. Changing the rule for the required national paralegal test will remove the need to take an extra exam for a less difficult certification.

Support the LLLT Program

The LLLT Board's mandate under APR 28C(2)(a) is to recommend new practice areas, and we undertake this effort seriously. We ask that the Court affirmatively show support for the LLLT Board when it proposes a new practice area, even if that new practice area is ultimately not approved. Demonstrating the Court's enthusiasm to consider recommendations put forth would greatly assist the LLLT Board in its efforts to fulfill this mandate.

The Bar (WSBA) is charged with providing reasonably necessary administrative support for the LLLT Board. Proposing new practice areas requires a level of administrative support commensurate with the actions we must undertake to draft a well-vetted recommendation. Supporting the LLLT Board's



authority to utilize its budget based on its needs would assist in maintaining clear lines of communication between the LLLT Board, WSBA and the BOG.

The budgeting process was only imposed by the BOG on the LLLT Board within the last several months. Our hard work on quickly developing a long-range plan for becoming self-sustaining is being disregarded and dismissed by the BOG. Our attempts to raise money (estimated at \$15,000) was thwarted because the BOG voted to not allow the LLLT education to be offer through the WSBA, even though this is similar to any CLE being offered. At a recent Budget and Audit Committee meeting, a BOG Governor made the comment that everyone knows the BOG is using the budget process to kill the program, but they won't say that. There are legitimate concerns for the LLLT program to improve their financial expenses. The LLLT Board reasonably believes that the BOG is using the budget process to kill the LLLT program. The LLLT concept originated by the Practice of Law Board in accordance with GR 25, authorized by the Court, and implemented by the LLLT Board and the WSBA, leads the nation in providing a model for delivery of needed legal services to underserved populations. As with the medical profession and the nurse practitioners, implementation of a new model for delivery of services that benefits the public will take time and continue to cost money. The LLLT Board request the Court continue to support and expand the program.

Conclusion

There is essentially a two-tiered legal system; one for those who can afford an attorney, and another for those who cannot. LLLTs are in the trenches, providing legal advice and assistance to those who otherwise could not or would not seek attorney assistance. The potential for this kind of a program being a benefit to the public is recognized by other states and even other nations.

A multi-level system such as in law or the medical profession, can by offering a limited license, deliver a range of options to the public while protecting the public's interests and offering affordable choices. We are convinced that expanding the LLLT practice areas and reducing barriers to entry into the program is a direct benefit to the citizens of Washington State.

The LLLT Board understands the importance of program cost neutrality and with WSBA staff has developed a tool to help it do so. Opening the pipeline to more licensed LLLTs means not only more revenue for the WSBA, but more importantly, more access to the legal system for the underserved population needing legal assistance.

The LLLT Board is grateful for the opportunity to discuss these matters with the Court. Any of the Board members are available for further information.



GR 9 COVER SHEET

**Suggested Amendment to
ADMISSION AND PRACTICE RULE 5
PREADMISSION REQUIREMENTS; OATH; RECOMMENDATION FOR
ADMISSION; ORDER ADMITTING TO PRACTICE LAW
Submitted by the Limited License Legal Technician Board**

A. Name of Proponent:

Limited License Legal Technician (LLLT) Board

Staff Liaison/Contact:

Renata de Carvalho Garcia, Innovative Licensing Programs Manager
Washington State Bar Association (WSBA)
1325 Fourth Avenue, Suite 600
Seattle, WA 98101-2539 (Phone: 206-733-5912)

B. Spokesperson:

Stephen R. Crossland
Chair of the LLLT Board
P.O. Box 566
Cashmere, WA 98815 (Phone: 509-782-4418)

C. Purpose:

The suggested amendment to APR 5(c) parallels and is presented in conjunction with the suggested amendments to Appendix APR 28 Regulation 9. The purpose of the suggested amendment is to remove specific reference to the requirements outlined in Appendix APR 28 Regulation 9.

A non-substantive amendment being recommended is a typographical correction to reference "section" (a) rather than "subsection" (a).

Both suggested amendments are being submitted simultaneously to the Court.

Conclusion

The LLLT Board believes that it is important that this proposed amendment be adopted and effective as soon as possible.

- D. **Hearing**: A hearing is not requested.
- E. **Expedited Consideration**: Expedited consideration is requested.
- F. **Supporting Materials**: Suggested Rule Amendment to APR 5(c).

SUGGESTED AMENDMENT TO ADMISSION AND PRACTICE RULE 5

APR 5

**PREADMISSION REQUIREMENTS; OATH; RECOMMENDATION FOR
ADMISSION; ORDER ADMITTING TO PRACTICE LAW**

(a) – (b) Unchanged.

(c) LLLT Applicants. In addition to the requirements in subsection (a) above, LLLT applicants must:

(1) demonstrate financial responsibility pursuant to APR 28(I); and

(2) demonstrate ~~completion of 3,000 hours of substantive law-related work~~ experience pursuant to APR 28 Regulation 9.

(d) – (m) Unchanged.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

GR 9 COVER SHEET

**Suggested Amendments to
ADMISSION AND PRACTICE RULES
APPENDIX APR 28 – REGULATION 9
Submitted by the Limited License Legal Technician Board**

A. Name of Proponent:

Limited License Legal Technician (LLLT) Board

Staff Liaison/Contact:

Renata de Carvalho Garcia, Innovative Licensing Programs Manager
Washington State Bar Association (WSBA)
1325 Fourth Avenue, Suite 600
Seattle, WA 98101-2539 (Phone: 206-733-5912)

B. Spokesperson:

Stephen R. Crossland
Chair of the LLLT Board
P.O. Box 566
Cashmere, WA 98815 (Phone: 509-782-4418)

C. Purpose:

Unlike lawyers and Limited Practice Officers, Limited License Legal Technicians (LLLTs) are required to obtain law-related experience prior to becoming licensed. Such a requirement was developed to ensure members of this new profession are experienced and qualified to provide legal services.

Currently, LLLT candidates are required to demonstrate that they have at least 3,000 hours of substantive law-related experience supervised by a lawyer. The number of hours originally suggested by the LLLT Board were not based on empirical data but rather on the belief that more is better. Nearly five years since the first LLLT became licensed, the LLLT Board has sufficient information and experience to recommend a

more tailored approach. The LLLT Board has learned that the experience requirement poses a barrier for some LLLT candidates creating a bottleneck in the licensing process.

The LLLT Board therefore suggests that the number of hours of substantive law-related experience be reduced to 1,500 hours – the same as required in Utah. The LLLT Board also envisions developing specific practice area clinical work experience requirements for licensure in specific practice areas. For comparison purposes, Utah's Licensed Paralegal Professionals must obtain 1,500 hours of substantive law-related experience including 500 hours of experience in family law and 100 hours of experience in forcible entry and detainer or debt collection.

The LLLT Board suggests adding language to Regulation 9 that would authorize the LLLT Board to require that applicants for licensure in a practice area complete clinical work experience hours for that specific practice area, which could be included in the 1,500 hours of substantive law-related work experience if supervised by a licensed lawyer. The clinical work experience requirement would be flexible enough to allow for LLLT candidates volunteering for legal services organizations to obtain their clinical hours without certification from a supervising lawyer. Thus far, the LLLT Board has contacted two organizations (The Eastside Legal Assistance Program and Unemployment Law Project) who are willing to collaborate with the LLLT Board in providing an opportunity for LLLT candidates to obtain their clinical work experience hours.

As discussed in the GR 9 cover sheet for the suggested amendments to Appendix APR 28 Regulation 4, LLLT candidates face many challenges in obtaining certification from a supervising lawyer. As such, the LLLT Board recommends allowing

candidates who obtained the required experience at an organization providing legal services to be able to provide the name and contact information of the supervising organization in lieu of the name and bar number of the supervising lawyer. This change parallels suggested amendments to Regulation 4. Both proposed amendments are being submitted simultaneously to the Court. The LLLT Board also recommends giving the Washington State Bar Association the authority to verify an applicant's compliance with the requirements.

Finally, considering the suggested amendment to APR 5(c) to remove reference to Appendix APR 28 Regulation 9, the LLLT Board recommends removing the reference to APR 5(c).

Conclusion

The LLLT Board believes that it is important that these proposed amendments be adopted and effective as soon as possible.

- D. Hearing:** A hearing is not requested.
- E. Expedited Consideration:** Expedited consideration is requested.
- F. Supporting Materials:** Suggested Rule Amendments to Appendix APR 28 Regulation 9.

SUGGESTED AMENDMENTS TO ADMISSION AND PRACTICE RULES

APPENDIX APR 28 - REGULATION 9

**APPENDIX APR 28. REGULATIONS OF THE APR 28 LIMITED LICENSE LEGAL
TECHNICIAN BOARD**

**REGULATION 9. SUBSTANTIVE LAW-RELATED WORK EXPERIENCE
REQUIREMENT**

A. General Requirement for Licensure as an LLLT

Each applicant for licensure as a limited license legal technician shall show proof of having completed ~~3,000~~ 1,500 hours of substantive law-related work experience supervised by a licensed lawyer ~~as required by APR 5(e)~~. The experience requirement shall be completed no more than three years before and 40 months after the date of the LLLT practice area examination that the applicant passed. The proof shall be provided in such form as the Bar requires to validate, but shall include at a minimum:

1. the name and bar number of the supervising lawyer or name and contact information of the supervising organization providing legal services at which the hours were performed;
2. certification that the work experience meets the definition of substantive law-related work experience as defined in APR 28;
3. the total number of hours of substantive law-related work experience performed under the supervising lawyer; and
4. certification that the requisite work experience was acquired within the time period required by this regulation.

B. Specific Practice Area Clinical Work Experience Requirement

The LLLT Board may also require that applicants for licensure in a practice area complete clinical work experience hours for that specific practice area, which in the discretion of the LLLT Board may be included in the 1,500 hours of substantive law-related work experience if supervised by a licensed lawyer. Proof of completion of this requirement shall be provided in such form and manner as the Bar requires.

GR 9 COVER SHEET

Suggested Amendments to ADMISSION AND PRACTICE RULES APPENDIX APR 28 – REGULATION 4 Submitted by the Limited License Legal Technician Board

A. Name of Proponent:

Limited License Legal Technician (LLLT) Board

Staff Liaison/Contact:

Renata de Carvalho Garcia, Innovative Licensing Programs Manager
Washington State Bar Association (WSBA)
1325 Fourth Avenue, Suite 600
Seattle, WA 98101-2539 (Phone: 206-733-5912)

B. Spokesperson:

Stephen R. Crossland
Chair of the LLLT Board
P.O. Box 566
Cashmere, WA 98815 (Phone: 509-782-4418)

C. Purpose:

The LLLT Board has noted that the current requirements to obtain a limited time waiver are not accessible for many experienced paralegals. The primary purpose of these proposed amendments is to create a permanent and accessible pathway for paralegals with significant legal experience to obtain a waiver of the core education (not practice area education) requirements for licensure as an LLLT. In developing the proposed amendments, the LLLT Board considered whether each change would make the license more affordable and more accessible, yet still maintain the academic rigor of the training for this license.

The following describes each proposed amendment and the amendment's

purpose and intended effect:

Appendix APR 28 Regulation 4

The LLLT Board suggests renaming the waiver to “Core Education Waiver” as that name would more appropriately describe the nature of the waiver, which is to waive the core education requirement for entry into the program. This change is recommended throughout the Regulation.

Appendix APR 28 Regulation 4A

With the purpose of providing an affordable and accessible path for law-career and experienced professionals to be able to enter the profession, the limited time waiver was originally recommended by the LLLT Board and adopted by the Court in 2013. The initial limited time waiver was set to expire on December 31, 2016. In July 2016, encouraged by the waiver’s effectiveness in attracting qualified individuals to enter the profession, the LLLT Board recommended and the Supreme Court adopted an extension of the deadline to December 31, 2023. The LLLT Board seeks to remove the deadline and recommends that the waiver become part of a permanent path for licensure.

Non-substantive changes include sentence structure and a specific reference to APR 3(e)(2)(A) and (B). The LLLT Board also believes that the sentence stating that the LLLT Board cannot waive the practice area curriculum requirement would no longer be necessary if the word “only” is added to the preceding sentence.

Appendix APR 28 Regulation 4B

The current limited time waiver allows an LLLT candidate to replace two school-based educational requirements (an AA degree or higher, and 45 credits of core LLLT

educational curriculum) with the following practical experience: at least 10 years of paralegal work experience; passage of one of three advanced paralegal examinations offered by national paralegal organizations; and current active certification with a national paralegal organization as a certified paralegal, registered paralegal, or professional paralegal. ***The waiver does not waive the practice area education requirement;*** all LLLT candidates are required to obtain the practice area education regardless of their experience level.

The LLLT Board has been engaging in a thoughtful analysis of the LLLT program, including the program's sustainability and effectiveness, and most importantly, its impact in addressing the unmet civil legal needs in our state. Part of this process includes addressing the perceived low number of licensed LLLTs, especially in rural communities. On the one hand the program is criticized for its low numbers, and on the other hand, the program is criticized for having overly burdensome or even prohibitive licensing requirements. The LLLT Board wants to acknowledge its responsibility for initially developing the licensing requirements adopted by the Court. As the first state to create such a limited license, it seemed appropriate to start with stringent requirements to address opposition and ensure protection of the public. The LLLT Board is now learning that what was intended to protect the public could actually be harming it by contributing to the existing barriers to accessing qualified and licensed legal services.

The LLLT Board has received feedback that the 10-year experience requirement for the core education waiver is excessive and significantly narrows the pool of paralegals eligible to apply. While there is no scientific study or analysis for equating real life paralegal experience and classroom paralegal education, 10 years of work

experience is unquestionably more than what should be reasonably required in order to demonstrate knowledge equivalent to that obtained through a two-year degree.¹ The LLLT Board recommends reducing the work experience requirement for a waiver to seven years. For comparison purposes, in Utah, Licensed Paralegal Practitioner candidates applying for a waiver must demonstrate seven years of substantive law related experience.

An anticipated response to the LLLT Board's request to reduce the number of years of experience required for the waiver is that LLLTs will be less qualified. However, it is important to remember that all LLLT candidates are required to complete the practice area courses and pass multiple exams. In addition, WSBA data shows that LLLT candidates who entered the program through a limited time waiver are more likely to pass on the first time taking the licensing exam than are LLLT candidates who complete the core education courses.

The LLLT Board strongly believes that changes to the waiver are necessary to create a viable pathway to the profession for a diverse group of candidates, especially candidates in rural communities who may not have access to required core education in their communities. The LLLT Board believes that reducing the experience requirement for the waiver will make the LLLT license more accessible without impacting the academic rigor of the program.

In addition to reducing the experience requirement to seven years, the LLLT

¹ An AA degree consists of 90 quarter credit hours. One credit hour is equivalent to 450 minutes which means that candidates entering the profession through the core education route will have at least 675 hours of instruction. On the other hand, a candidate coming through the limited time waiver route will need at least 10 years of experience which is roughly equivalent to 19,000 hours (52 weeks in a year, minus 4 weeks to account for vacation and time off = 48 weeks x 40 hours per week x 10 years= 19,200 hours). Seven years of experience, as proposed by the LLLT Board, is roughly equivalent to 13,440 hours.

Board recommends that LLLT candidates be allowed to self-certify and that the Washington State Bar Association be given the authority to validate the information provided. It has been brought to the LLLT Board's attention that, unfortunately, some supervising lawyers are not willing or are unable to sign the certification for paralegals with whom they work. Some current LLLTs and LLLT candidates have shared that there is a lack of support from their lawyer employers. Requiring that the years of experience be certified by the supervising lawyer poses an additional barrier for LLLT candidates, especially those who have worked for multiple lawyers, for lawyers who are now deceased or have terminated their practices or moved, or for solo practitioners or others who are unwilling to confirm the experience and thereby risk losing their paralegal employee to a new career.

As explained above, LLLT candidates face many barriers in obtaining certification by the supervising lawyer. As such, the LLLT Board recommends making it possible for candidates who obtained the required experience at an organization providing legal services to be able to provide the name and contact information of the supervising organization in lieu of the name and bar number of the supervising lawyer. This change parallels suggested amendments to APR 28 Regulation 9 as it relates to law-related work experience. Both proposed amendments are being submitted simultaneously to the Court.

The LLLT Board also suggests eliminating the active paralegal certification requirement. Considering waiver candidates possess recent paralegal experience (currently 10 years in the last 15 years and as proposed by the LLLT Board, at least seven years in the last 10 years), the LLLT Board finds the paralegal certification

requirement to be excessive and a potential financial burden for some applicants. The LLLT Board would like the ability to provide additional paralegal certification examination options to candidates and is therefore requesting that the requirement that it be a national level exam be removed.

Other amendments to Regulation 4B include eliminating pronouns and correcting a typographical error.

Appendix APR 28 Regulation 4C

The amendments suggested to APR 28 Regulation 4C are required for naming consistency throughout Regulation 4.

Appendix APR 28 Regulation 4E

The LLLT Board is recommending that the waiver become a permanent pathway for licensure. Therefore, Appendix APR 28 Regulation 4E would no longer be necessary.

Conclusion

The LLLT Board believes that it is important that these proposed amendments be adopted and effective as soon as possible.

- D. Hearing:** A hearing is not requested.
- E. Expedited Consideration:** Expedited consideration is requested.
- F. Supporting Materials:** Suggested Rule Amendments to Appendix APR 28 Regulation 4.

SUGGESTED AMENDMENTS TO ADMISSION AND PRACTICE RULES

APPENDIX APR 28 - REGULATION 4

1 APPENDIX APR 28. REGULATIONS OF THE APR 28 LIMITED LICENSE LEGAL
2 TECHNICIAN BOARD

3
4 REGULATION 4. ~~LIMITED TIME~~ CORE EDUCATION WAIVERS

5 **A. ~~Limited Time~~ Core Education Waiver, Defined.** ~~For the limited time between the~~
6 ~~date the Board begins to accept applications and December 31, 2023, If an applicant meets~~
7 ~~the requirements set forth in Section B of this Regulation, the LLLT Board shall grant a~~
8 ~~waiver of the minimum associate-level degree requirement and/or the core curriculum~~
9 ~~education requirements only, as set forth in APR (3) 3(e)(2)(A) and (B). if an applicant meets~~
10 ~~the requirements set forth in Regulation 4(B). The LLLT Board shall not grant waivers for~~
11 ~~applications filed after December 31, 2023. The LLLT Board shall not waive the practice~~
12 ~~area curriculum requirement. The limited time core education waiver application will be~~
13 ~~separate from the application process for admission set forth in these regulations.~~

14 **B. Waiver Requirements and Applications.** To qualify for the ~~limited time~~ core
15 education waiver, an applicant shall pay the required fee, submit the required waiver
16 application form ~~and~~, and provide proof, in such form and manner as the Bar requires, that
17 the applicant he/she has:

- 18 1. ~~Passed an LLLT Board approved national paralegal certification examination;~~
- 19 2. ~~Active certification from an LLLT Board approved national paralegal certification~~
20 ~~organization; and~~
- 21 3. ~~Completed 10~~ seven years of substantive law-related experience supervised by a
22 licensed lawyer within the 15 years preceding the application for the waiver, provided the
23 experience was gained within the 10 years preceding the application for the waiver. Proof of
24 10 years of substantive law related experience supervised by a licensed lawyer shall include
25 the following: Verification shall be provided in such form as the Bar requires subject to
26 review and approval by the LLLT Board, to validate, but should include at a minimum:

(a) the name and bar number of the supervising lawyer(s); or the name and contact
information of the supervising organization providing legal services at which the experience

SUGGESTED AMENDMENTS TO ADMISSION AND PRACTICE RULES

APPENDIX APR 28 - REGULATION 4

1 | was obtained.

2 | (b) certification ~~by the lawyer~~ that the work experience meets the definition of
3 | substantive law-related work experience as defined in APR 28, and

4 | (c) the dates of employment or service.

5 | **C. Review of ~~Limited Time~~ Core Education Waiver Application.** The Bar shall
6 | review each ~~limited time~~ core education waiver application to determine if the application
7 | meets the waiver requirements. Any application that does not meet the ~~limited time~~ core
8 | education waiver requirements as established by this Regulation shall be denied by the Bar
9 | on administrative grounds, with a written statement of the reason(s) for denial.

10 | **D. Review of Denial.** An applicant whose application for waiver has been denied by the
11 | Bar may request review by the LLLT Board chair. Such request shall be filed with the Bar
12 | within 14 days of the date of the notification of denial. The applicant shall be provided with
13 | written notification of the chair's decision, which is not subject to review.

14 | **~~E. Expiration of Limited Time Waiver Approval.~~** ~~Approval of the limited time waiver~~
15 | ~~application shall expire December 31, 2025. After expiration of the approval, any subsequent~~
16 | ~~application for licensure by the applicant shall meet all of the standard requirements for~~
17 | ~~admission without waiver.~~