



PRESS, OUTREACH, & UPDATES:

APRIL 16, 2025

PRESS

- ❖ More Redundancies at Big Four Firm E/Y's Legal Practice, The Law Society Gazette, March 20, 2025
- ❖ Big Four: The Slow Death of KPMG, EY, PwC and Deloitte's Legal Dream, City AM, March 25, 2025
- ❖ Australian Firm Eyes Major UK Expansion with PE Backing, Legal Futures, March 25, 2025
- ❖ HOFA Banned for Concealing Firm's Dire Finances from SRA, Legal Futures, March 25, 2025
- ❖ Prominent EY UK Lawyer Joins Squire in 5-Person Team Move, Law.com, March 25, 2025
- ❖ What KPMG's Move into Legal Industry Means for Chicago, Crain's Chicago Business, March 25, 2025
- ❖ Big Four Legal Losses, LawFuel, March 28, 2025
- ❖ Huge Growth in Income and Profit at Co-op Legal Services, Legal Futures, April 4, 2025
- ❖ Competing Bills Focus on Identifying Third-Party Funders of Lawsuits, Arizona Capitol Times, April 5, 2025
- ❖ US Grants First ABS Licence to Overseas Law Firm, Legal Futures, April 7, 2025
- ❖ KPMG Partners with Google Cloud to Build Agentic AI Platforms for Legal Services Clients, Law.com, April 9, 2025
- ❖ Paralegal Fabricated Email to Cover Up Error, Legal Futures, April 10, 2025

ENTITY REGULATION PILOT PROJECT

- ❖ *will be used for stats and info about entity regulation after implementation, e.g., number of applications received, entities authorized, etc.*

UPCOMING MEETINGS & EVENTS

- ❖ April 30, 2025, POLB Retreat, In-Person/Hybrid at the WSBA Office
- ❖ May 2-3, 2025 WSBA Board of Governors meeting, Port Angeles & Remote
- ❖ May 21, 2025, POLB Meeting, Remote via Zoom

PILOT PROJECT: ENTITY REGULATION (PLAYGROUND)

	DESIGN AND IMPLEMENTATION	MAINTENANCE AND GROWTH						
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	YEAR 1 (FY26)	YEAR 2 (FY27)	YEAR 3 (FY28)	YEAR 4 (FY29)	YEAR 5 (FY30)	YEAR 6 (FY31)	YEAR 7 (FY32)	YEAR 8 (FY33)
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REVENUE

APPLICATION FEES (\$1,000)	\$15,000	\$35,000	\$35,000	\$20,000	\$20,000	\$20,000	\$15,000	\$10,000
ANNUAL FEES (\$5,000/\$2,500 NP)	\$57,500	\$202,500	\$347,500	\$430,000	\$512,500	\$595,000	\$657,500	\$702,500
TOTAL REVENUE	\$72,500	\$237,500	\$382,500	\$450,000	\$532,500	\$615,000	\$672,500	\$712,500

EXPENSES

OUTREACH & COMMUNICATION	\$10,000	\$10,000	\$8,000	\$6,000	\$4,000	\$2,000	\$2,000	\$2,000
SOFTWARE HOSTING	\$3,600	\$3,726	\$3,856	\$3,991	\$4,131	\$4,276	\$4,425	\$4,580
TOTAL DIRECT COSTS	\$10,000	\$10,000	\$8,000	\$6,000	\$4,000	\$2,000	\$2,000	\$2,000
SALARY AND BENEFITS	\$97,203	\$104,116	\$108,112	\$115,374	\$119,486	\$127,099	\$129,193	\$135,222
OVERHEAD	\$27,611	\$28,440	\$29,293	\$30,172	\$31,077	\$32,009	\$32,970	\$33,959
TOTAL INDIRECT COSTS	\$124,815	\$132,556	\$137,405	\$145,546	\$150,563	\$159,109	\$162,162	\$169,181

INCOME/(LOSS) \$	(62,315) \$	94,944 \$	237,095 \$	298,454 \$	377,937 \$	453,891 \$	508,338 \$	541,319
Cumulative Income/Loss	\$ (62,315)	\$ 32,629	\$ 269,724	\$ 568,179	\$ 946,116	\$ 1,400,007	\$ 1,908,345	\$ 2,449,664

PILOT PROJECT: ENTITY REGULATION (PLAYGROUND)

	DESIGN AND IMPLEMENTATION	MAINTENANCE AND GROWTH						
	YEAR 1 (FY26)	YEAR 2 (FY27)	YEAR 3 (FY28)	YEAR 4 (FY29)	YEAR 5 (FY30)	YEAR 6 (FY31)	YEAR 7 (FY32)	YEAR 8 (FY33)
REVENUE								
APPLICATION FEES (\$500)	\$7,500	\$17,500	\$17,500	\$10,000	\$10,000	\$10,000	\$7,500	\$5,000
ANNUAL FEES (\$5,000/\$2,500 NP)	\$57,500	\$202,500	\$347,500	\$430,000	\$512,500	\$595,000	\$657,500	\$702,500
TOTAL REVENUE	\$65,000	\$220,000	\$365,000	\$440,000	\$522,500	\$605,000	\$665,000	\$707,500
EXPENSES								
OUTREACH & COMMUNICATION	\$10,000	\$10,000	\$8,000	\$6,000	\$4,000	\$2,000	\$2,000	\$2,000
SOFTWARE HOSTING	\$3,600	\$3,726	\$3,856	\$3,991	\$4,131	\$4,276	\$4,425	\$4,580
TOTAL DIRECT COSTS	\$10,000	\$10,000	\$8,000	\$6,000	\$4,000	\$2,000	\$2,000	\$2,000
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TOTAL INDIRECT COSTS	\$124,815	\$132,556	\$137,405	\$145,546	\$150,563	\$159,109	\$162,162	\$169,181
INCOME/(LOSS) \$	(69,815) \$	77,444 \$	219,595 \$	288,454 \$	367,937 \$	443,891 \$	500,838 \$	536,319 \$
Cumulative Income/Loss	\$ (69,815)	\$ 7,629	\$ 227,224	\$ 515,679	\$ 883,616	\$ 1,327,507	\$ 1,828,345	\$ 2,364,664

WASHINGTON STATE
BAR ASSOCIATION
Regulatory Services Department

TO: Practice of Law Board
FROM: Bobby Henry, WSBA Staff Liaison to POLB
DATE: April 9, 2025
RE: ISSUE SUMMARY: Entity Regulation Pilot Project Budget

We are seeking input from the Practice of Law Board regarding the fees and expenses for the entity regulation pilot project budget to be recommended to the Budget and Audit Committee and ultimately the BOG and the Court.

In the board meeting materials, there is a budget projection spreadsheet. Key assumptions in the budget are:

- Modest number of applications the first year (15) followed by higher application numbers (35 per year) that decrease over time. This is based on the fact that there are already entities licensed in other jurisdictions which may be ready to provide legal services in Washington, and that the pilot project is just that—an experiment with no guarantee of continuing operation.
- An application approval rate of 80% the first year and 85% thereafter; this is also designed to account for any attrition.
- A full-time entity regulation staff person to be hired for FY 2026.

Revenue Fees. Annual fees and application fees for Arizona range from \$2,000 to \$12,000. In Utah the annual fee is \$5,000 and the application fee is \$250. Based on data from other states and fees paid by lawyer applicants and WSBA members, the following fees are used in the projections:

- \$1,000 entity application fee (compare to lawyer application fee of up to \$970)
- \$5,000 annual entity authorization/license fee
- \$2,500 annual non-profit entity authorization/license fee

An alternative projection assuming a lower application fee of \$500 is also provided.

Expenses. The only direct expenses identified are outreach and software hosting for the application process. Indirect expenses include staffing and related overhead.

Given the above assumptions, the pilot project is projected to have revenue outweighing expenses by the end of the second year after implementation.

Staff will gather feedback and input from the board to report back to the budget and audit committee.

Entity Regulation Pilot Project
 Subcommittee Composition

Project Leads: Nikki Chen and/or Paris Eriksen will help schedule, attend, take notes and monitor tasks for all subcommittee meetings.

(!) Subcommittee Lead: at the Kick-Off Meeting for each subcommittee, please identify a subcommittee lead.

Name	Summary	Members	Key Deliverables
Application	Application Form Design, Content and Functionality	Jon Dawson <i>(as needed)</i> Renata Garcia Bobby Henry POLB and OGC <i>(as needed)</i>	<ul style="list-style-type: none"> • Identify policy questions and conduct research to inform the development of the application. • Develop application functional requirements for ILG. • Implement application review and approval workflow – automate review and validation steps, if possible. • Develop process for applicant review, investigation, recommendation, and authorization,
Budget	Budget Development & Monitoring for FY26 and beyond	Renata Garcia Tiffany Lynch <i>(as needed)</i> POLB <i>(as needed)</i>	<ul style="list-style-type: none"> • Add funds to FY25 budget during reforecast. • Outline budget and fee considerations, renewal cadence and requirements. • Submit FY26 budget request including revenue from fees and any staff requests. • Work with POLB in proposing fees (application and participation) for the BOG’s approval and ultimate adoption by the Court.
Data	Data Analysis and Security	Jon Dawson Bobby Henry Ziliang Huang <i>(as needed)</i> Craig Shank	<ul style="list-style-type: none"> • Build reporting and data collection and analytics systems. • Identify and implement data security requirements. • Ensure systems integrity and data privacy pass testing and meet WSBA standards.

Communication	Communications, outreach and stakeholder engagement	Renata Garcia Bonnie Sterken Sara Niegowski Craig Shank <i>(as needed)</i> Heather Sprouse	<ul style="list-style-type: none"> • Wordmark/logo for the pilot project. • Identify comprehensive list of stakeholders and develop equitable stakeholder engagement strategy • Invite, monitor, review and perhaps respond to stakeholder input. • Host Listening Sessions • Marketing/outreach to existing businesses and potential applicants including law firms • Web presence • Communication Calendar • Issue press releases and other communications as needed.
Policy	Policy research and development	Nina Crosby Doug Ende Renata Garcia Bobby Henry Laurie Powers <i>(optional)</i> Saleena Salango POLB <i>(as needed/TBD)</i>	<ul style="list-style-type: none"> • Define risk and benefit assessment framework, developing scoring rubric. • Identify goals of monitoring • Identify which reforms to regulatory rules by entities • Identify public protection measures • Identify any limitations or conditions on entities • Staff: Draft Guide for Entity Applicants/Participants based on the above policy decisions regarding rules tested for regulatory reform, hypothesis to test the reform, risk/benefits rubrics,
Public Protection	Public protection and enforcement	Doug Ende Thea Jennings Kirsten Schimpff	<ul style="list-style-type: none"> • Draft complaint and grievance procedures • Draft complaint form • Explore ways to assess consumer harm including client surveys, audits, and secret shopper audits.

ENTITY REGULATION PILOT | PROJECT BRIEF TASKS, DELIVERABLES, MILESTONES & TIMELINES

Phase 1: Application and Oversight Process Development

Context:

Step I of the Court Order details the application process which should include **1)** reviewing and recommending applications to the Practice of Law Board (POLB) regarding which applicants should be authorized to participate, **2)** identifying which reforms to regulatory rules should be tested and which data should be collected and analyzed, **3)** identifying any limitations or conditions on the entity's authorization to practice law, **4)** enforcing measures for public protection, and **5)** establishing a process for the POLB to recommend to the Court which applicants to participate in the pilot. [Click here](#) to read the complete Court Order.

Summary of milestones:

The work to accomplish Step I of the Court Order is characterized as 'Phase1' and divided into three key milestones:

- Milestone 1: Develop of Entity Pilot Project Ecosystem
 - Establish Project Structure
 - Research & Development of the Regulatory Framework
 - Application Portal Development
- Milestone 2: Pre-Launch Checks & Testing
 - Testing Functionality
 - Communication, Outreach, Finalize User Guide & Trainings
- Milestone 3: Launch Deadline (*major milestone*)
 - Go-Live

Tasks, Deliverables and Timelines:

Phase 1 – Milestone 1: Develop Entity Pilot Project Ecosystem

Otherwise known as 'project environment,' the project ecosystem are the surroundings and conditions in which a project is executed. Given that this project is connected to a community of other essential participants, the term ecosystem is intended to include the project environment for all participating groups.

Establish Project Structure

February - April 2025

1. **Identify and Confirm Key Decision Makers**

- WSBA recommends drafts to the Executive Director for approval with agreement from the Practice of Law Board. This includes:
 - Pilot project team structure, scope, task list and timelines.
 - Application content.
- In accordance with the Court [Order](#), "participants shall pay reasonable application and participation fees in amounts to be recommended by the WSBA Board of Governors and approved by the Court."
- WSBA reviews and recommends (by approval of the Executive Director or designee) drafts to the Practice of Law Board (POLB) for review, input and approval. This includes:
 - Recommendations for pilot participants.
 - Recommendations to the Court for authorizing orders (primarily drafted by the Regulatory Services Department (RSD) with drafts approved by the POLB.)

+ *Deliverables*

- ~~Identify decision-makers.~~
- Obtain agreement on key decision-making between Executive Director and Practice of Law Board.

2. **Form Pilot Action Team (PAT)**

Assemble a team consisting of 1 representative from each group: Equity and Justice Team, Office of General Counsel, Office of Disciplinary Counsel, Regulatory Services Department, Practice of Law Board (volunteer) and, Project Lead Team (PLT) to oversee the project.

- The role of PAT is to:
 - Align and collaborate on tasks across all parts of the project ecosystem in a strategic and structured way,
 - execute the timeline,
 - ensure projects milestones are achieved,
 - navigate barriers, and
 - develop recommendations for process and/or policy (subject to appropriate approvals).

+ *Deliverables:*

- ~~Confirm participation from various groups and hold first meeting in February 2025.~~
- ~~Define roles and responsibilities of each team member.~~
- ~~Assign subcommittees, specific tasks and areas of oversight.~~

3. Determine Meeting Cadence for PAT

- Kick-Off Meeting
 - Align with POLB meeting schedule.
 - Align with Court Reporting cadence: “The WSBA and the Board shall report to the Court at least quarterly, regarding the pilot project’s operation, including the ongoing monitoring and evaluation of participants, aggregate data and information and related data analysis and findings, and other relevant information related to pilot project.” (Step III of SC Order).

+ *Deliverables:*

~~Schedule PAT meetings for February 2025 – December 2025.~~

4. PAT recommends project scope for approval.

- Clearly outline project purpose, objectives, scope, purpose, constraints, expected outcomes and what success looks like in a Project Action Team structure and document.
- Finalize list of Subcommittees:
 - Application
 - Budget
 - Data
 - Communication
 - Policy
 - Public Protection

+ *Deliverables:*

~~Develop a high-level project timeline including major milestones, and a proposed launch date.~~

~~Identify relevant subject matter experts (SMEs) for subcommittees.~~

~~Draft PAT scope and timeline documents for POLB review.~~

~~PAT Finalize Recommendation & Recommendation to ED: March 11, 2025~~

~~Recommendation to POLB: March 14, 2025~~

~~POLB Meeting: March 19, 2025~~

5. Develop Communication Checkpoint Cadence

- Communication Subcommittee to establish a structured schedule for major milestones and deadlines to communicate to various stakeholders as ‘Communication Checkpoints’.
 - Stakeholders include the Court, the WSBA Executive Director, the Practice of Law Board, the Board of Governors, WSBA members, legal services providers (current and potential), moderate means population, and the

public in general – especially communities most impacted by the legal system, particularly those who qualify for civil legal aid and indigent defense.

- Quarterly Reports to the Court.
- Track on Checkpoint Communications , upcoming milestones, external dependencies.
- Ensure adequate and equitable stakeholder engagement so that individuals and communities most impacted by the pilot project are apprised of developments and have meaningful opportunities to provide input.

+ *Deliverables:*

- Determine branding needs and, if appropriate, develop a logo or wordmark for the pilot. *IN PROGRESS*
- Identify a comprehensive list of stakeholders and develop an equitable stakeholder engagement plan. *IN PROGRESS.*
- Create a Communication Calendar for February – December 2025 which includes the process to invite, monitor, review and respond to stakeholder input.
- Issue press releases and other communications as needed.
- First Quarterly (Q1) Report (Summarize activity from January – March 2025):
 - POLB Approval: April 2025
 - Send to Court: May 2025

Looking Ahead:

- Q2 Report (Summarize activity from April – June 2025)
 - POLB Approval: July 2025
 - Send to Court: August 2025
- Q3 Report (Summarize activity from July – September 2025)
 - POLB Approval: October 2025
 - Send to Court: November 2025
- Q4 Report (Summarize activity from October – December 2025)
 - POLB Approval: January 2026
 - Send to Court: February 2026

Identify and Address Areas for Policy Development

Tentative timeline: April - May 2025

6. Convene Policy Subcommittee:

- Examine previously identified policy questions and determine best approach to address the policy area.
- Review relevant current law, statutes, past rulings, policies and compliance guidelines that may affect entity regulation.

Updated 4.10.2025

- Compare WSBA existing regulatory policies and procedures against other jurisdictions to identify best practices—benchmark against other entity regulation frameworks to find areas for improvement.
- Consult stakeholders to understand current regulatory challenges – gather input from agencies and entities affected by regulation.
- Identify which reforms to regulatory rules an entity may test.
- Identify any public protection measures to be imposed on a participating entity.
- Identify any limitations or conditions on an entity’s authority to practice law.

+ *Deliverables:*

- Identify which reforms to regulatory rules should be tested by participating entities.
- Define risk and benefit assessment framework, developing scoring rubric.
- Identify goals of monitoring
- Identify any public protection measures to be imposed on participating entities.
- Identify any limitations or conditions on an entity’s authority to practice law.
- Draft Guide for Entity Applicants/Participants based on the above policy decisions regarding rules tests for regulatory reform, hypothesis to test the reform, risk/benefit rubrics.

7. Convene Data Subcommittee:

- Determine regular and unique data to be collected from each participating entity.
- Based on the determination of the regulatory rules to be tested, determine the data to be collected and analyzed by each participating/authorized entity including the mechanism to obtain the data.
- To identify if and how the pilot impacts access to justice needs, determine the data to be collected and analyzed by each participating/authorized entity including the mechanism to obtain the data.

+ *Deliverables:*

- Send data recommendations to ED and POLB for final approval.

8. Convene Budget Subcommittee:

- Outline budget and fees considerations, renewal cadence and requirements.

+ *Deliverables:*

- Submit budget request for WSBA FY26 Budget including revenue from fees and any staffing request. *IN PROGRESS.*

Drafting Regulatory Framework & Application Portal Development

Tentative timeline: May - June 2025

9. Define risk and benefit assessment framework

- Develop a structured approach to assessing risk and benefit levels.
- Create criteria for low, medium, and high-risk entities – establish scoring thresholds for regulatory assessment.
- Create criteria for low, medium, and high benefit entities — establish scoring thresholds for regulatory assessment.

+ *Deliverables:*

- Develop a scoring rubric to quantify risk and benefit levels.

10. PAT and SMEs to develop entity eligibility criteria & classification system.

- Identify which types of entities qualify for the pilot and how they will be classified.
- Define requirements for different entity types – establish distinct categories based on legal and business considerations.
- Establish clear guidelines for classification (e.g., size, industry, risk level, benefit level) – Outline rules for determining entity classifications.
- Develop process for applicant review, investigation, & recommendation of applicants.
- Develop process for participant monitoring and oversight, including data collection, review, and analysis.

+ *Deliverables:*

- Draft Guide for Entity Applicants/Participants based on the policy decisions regarding rules tested for regulatory reform, hypothesis to test the reform, risk/benefits rubrics, process for applicant review, investigation, recommendation, authorization, monitoring, oversight, data collection, review and analysis. *IN PROGRESS – OUTLINE CREATED*

11. PAT works with IT to develop Application and Participant Portal and Technical System Planning

- Identify and define core requirements and functions (registration, compliance, data tracking & reporting, equitable accessibility standards) – list necessary system capabilities.
 - Assess and determine if an intake and data tracking system is required.
 - Develop the online registration process – Create forms and workflows for submitting applications.
 - Connect participant monitoring and compliance tracking.

Updated 4.10.2025

- Build entity registration and approval system – Develop a digital platform for entity enrollment.

+ *Deliverables:*

- Implement application review and approval workflow – automate review and validation steps, if possible.
- Identify and implement data security requirements.
- Develop reporting and data collection and analytics systems.

Phase 1 – Milestone 2: Pre-Launch Checks

Tentative timeline: July – September 2025

Testing Functionality

Tentative timeline: July 2025

12. Perform security & data protection assessments

- Ensure systems integrity and data privacy.
- Conduct penetration testing and vulnerability assessments – simulate cyberattacks to identify potential security weaknesses.
- Verify compliance with data protection regulations – Ensure that the system adheres to relevant privacy laws and cybersecurity best practices.

+ *Deliverables:*

- Data security of application meets WSBA standards and requirements.

13. Conduct simulated application review exercise.

- Validate the effectiveness of internal review mechanisms from application acceptance through an IT tool to applicant assessment and investigation through recommendation and Board final review and court order(s).
- Test internal review processes before public rollout – simulate real-world scenarios where entities submit registrations, undergo risk and benefits assessments, undergo accessibility testing, and are reviewed for regulatory compliance and appropriateness for participation.
- Address systems weaknesses and regulatory gaps – review test results and make last minute refinements to policies, workflows, and application review protocols.

+ *Deliverables:*

- Application is ready to accept external applicants.

Communication, Finalize User Guide & Trainings

Tentative timeline: July – September 2025

14. Develop external materials

- Prepare training & support materials for full-scale rollout – Develop user education programs and support resources.
- Develop user guides and educational materials – Create tutorials, manuals, and FAQ documents to assist new users.

+ *Deliverables:*

- Deploy external communications to potential applicants in July.
- Publish User Guide, Tutorials and FAQ documents in September.

Complaint and Investigation Procedures

Tentative timeline: July – September

15. Outline compliance/complaint/grievance processes & enforcement mechanisms.

- Public Protection Subcommittee and Project Action Team to recommend and establish a reporting mechanism for ensuing entity compliance with the limitations and conditions set by the Court.
- Develop a structured approach to handling non-compliance
- Establish escalation steps for violations.
- Establish a framework for enforcement actions and penalties.
- Determine disciplinary measures and consequences.
- Design user-friendly and accessible complaint intake forms.
- Define case handling and resolution workflows – Outline procedures for reviewing and investigating complaints.

Phase 1 – Milestone 3: Full Public Launch

Tentative timeline: October 2025

Go-Live

Tentative timeline: October 2025

16. Open Entity Regulation System open to all applicants

- Remove early access restrictions (if applicable during the testing phase) – lift barriers to entry and transition into full-scale regulatory environment.
- Communicate open application to stakeholders & WSBA press release.

+ *Deliverables:*

- Launch application portal.
- WSBA Press Release

17. Conduct public outreach & training sessions

- educate entities and stakeholders on regulatory requirements.

+ *Deliverables:*

- Host informational webinars and workshops – Provide resources and interactive sessions to support a smooth transition.

18. Process for Authorizing Orders

- WSBA does intake review of application
 - Receives, reviews, and investigates applications
- Makes recommendation to POLB to accept or deny applications POLB to evaluate WSBA application recommendations.
 - Review and determine whether to adopt WSBA’s recommendation
 - Send approved applications to the Court along with a recommendation for an order authorizing participation in the pilot
 - Include information about denied applications in the quarterly report to the Court

★ *Key Milestone: Intake Application is Live.*

Phase 2: Procedure Development and Implementation

Context:

Step II of the Court Order includes: (A) Entity Reporting Procedures and (B) Complaint and Investigation Procedures.

Summary of milestones: Step II of the Court is outlined as Phase 2 with the below listed milestones.

Tasks, Deliverables and Timelines:

Milestone 1: Entity Reporting, Monitoring and Public Disclosure

- Entity Reporting Structure & Monitoring
- Public Disclosure
- Live Monitoring & Adjustments
- First Pilot Compliance Review

Phase 2 – Milestone 1: Entity Reporting Structure and Monitoring & Public Disclosure

Tentative timeline: October - March 2026

Updated 4.10.2025

Entity Report Structure & Monitoring

Tentative timeline: October - December

1. Entity Reporting Structure

- WSBA to develop reporting structure and frequency to collect data regarding entity provision of legal services, their compliance with their authorizing orders, and their adherence to the rules of ethics.
- WSBA conducts data analysis and review of reports.
- Maintains reports securely and safeguard against unauthorized disclosure of confidential client information or trade secrets collected through reports or by other means.

2. Determine Renewal and Authorization Modification Process for Participation

- Process to renew authorization and collect annual fee.
- Process to alter conditions of authorizing order.
- Process for an entity to withdraw from the pilot.
- Process for seeking removal of an entity from the pilot.

3. Public Disclosure

- Provide notice of pilot participants to the public (posting on WSBA.org) and through other communication channels and media outlets.

Live Monitoring & Adjustments

Tentative timeline: April – June 2026

4. Track real-world compliance and access to justice data from pilot participants.

- Assess how effectively the system captures compliance behaviors.
- Track the outputs and outcomes of the pilot project as it relates to access to justice. For example, number of people served, types of legal issues addressed, cost to the public to use the service, etc.

5. Refine risk and benefits classification system.

- Adjust the system's assessment model based on pilot data.

First Pilot Compliance Review

Tentative timeline: April-June 2026

6. Conduct full compliance review of pilot entities.

- Evaluate whether pilot participants meet regulatory standards.
- Evaluate compliance levels and policy effectiveness.

7. Adjust enforcement measures & regulatory tools.

- Update system rules and corrective action policies.

- Modify enforcement actions based on pilot results – Revise penalties, warning procedures, and compliance interventions.

8. WSBA to provide a report to POLB.

- WSBA reports to POLB regarding individual entity compliance and data analysis
- If concerns are identified regarding compliance, rules of ethics, WSBA may investigate at POLB’s request.
- WSBA may suggest to POLB refining of parameters of the test being conducted by a particular entity or any additional measures that may be necessary to protect the public which may include removal from the pilot. Alternatively, POLB may request such modification to an authorizing order.

★ *Key Milestone: First Review Complete. Implementation of Full-Scale Compliance Review Processes.*

Phase 3: Data Collection and Regulatory Innovations

Context:

In order to accomplish Step IV, the Court Order states that the project shall conclude when sufficient data and information is collected to determine how to proceed with respect to studying entity regulation and other regulatory innovations. The pilot shall end 10 years after the date that the first entity is granted authority by the Court to participate.

WSBA and POLB shall make recommendations to the Court as to whether the applicants shall be permitted to continue to provide legal services under court orders detailing accompanying rules and regulations. Board and WSBA will make specific data-driven recommendations regarding whether to implement additional entity regulation.

(paraphrased)

Recommendation:


If the first entity is authorized in 2026, then the termination date of the pilot is 2035. If that’s the case, consider the last application acceptance year as 2032 (five-years prior to the completion of the project) so as to ensure that we have a minimum of at least five years of data for each participating entity.


Project Brief Approvals:


- ~~Recommended by the Project Action Team on 3.28.2025~~
- Approved by the Executive Director on 4.9.2025
- Supported by the Practice of Law Board on *[DATE]*.

Updated 4.10.2025

WSBA Entity Regulation Pilot Project

Milestone 4
Winter/Spring 2026 
Entity Authorization, Reporting
& Monitoring

Milestone 3
Fall 2025/ Winter 2026 
Full Launch

Milestone 2
Summer/Fall 2025 
Pre-Launch Checks

Milestone 1
Spring/Summer 2025 
Develop Design & Implementation
of the Pilot Project

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