

WASHINGTON STATE BAR ASSOCIATION

To: Budget and Audit Committee

From: Tiffany Lynch, Director of Finance
Cate Schur, Assistant General Counsel
Paris Eriksen, Manager of Volunteer Engagement

cc: Terra Nevitt, Executive Director
Renata Garcia, Chief Regulatory Counsel
Cathy Biestek, Managing Regulatory Counsel

Re: Proposed Changes to Volunteer Payments for the Limited Practice Board

Date: November 17, 2025

ACTION: Recommend to the Board of Governors approval of proposals outlined in the memo regarding payment to volunteers of the Limited Practice Board.

Background

As part of a broader operational initiative launched in FY 2025 and continuing into FY 2026, the WSBA has prioritized a comprehensive review of volunteer stipends and related policies. This effort is aimed at aligning compensation practices across all WSBA entities and ensuring consistency, transparency, and equity in how we support our volunteers.

Project Overview

The current project involves a detailed review of existing stipend practices, governing rules, and bylaws, including those that prohibit compensation. Our goal is to establish a unified policy that clearly outlines the types of payments allowed, the rationale for those payments, and the process for routine review to ensure appropriateness. In FY 2025, we gathered data on WSBA volunteers and created a [unified policy \(Chapter 6, section VIII, page 57\)](#) for stipends and payments based on current policies and practices. We then looked at the work performed by volunteers to identify inconsistencies in stipends and payments for similar duties. In FY 2026, we have begun drafting recommendations to address these inconsistencies and will be exploring additional stipend and payment options beyond current allowances.

Identifying Inconsistencies in Exam-Related Compensation

During the course of this review, the Limited Practice Board's (LPB) responsibilities related to exam grading, question drafting and review were identified as areas of inconsistency with existing stipend policy. Specifically, while the Board of Bar Examiners (BOBE) receives stipends for similar work, including grading the written portion of the Uniform Bar Exam and reviewing and updating the Washington Law Component Test, the LPB currently performs similar duties without compensation, due to the restrictions outlined in APR 12(b)(3).

Both boards grade exams twice per year which requires training, time commitment, and professional judgment to ensure exam integrity. The LPB’s grading and drafting activities are comparable in scope and complexity to those of the BOBE, yet only the latter is currently compensated. This discrepancy highlights the need for a more equitable and consistent approach to volunteer compensation across WSBA entities.

Current Limitation: APR 12(b)(3)

Under APR 12(b)(3), members of the Limited Practice Board “shall not be compensated for their services.” They may only be reimbursed for “actual reasonable and necessary expenses incurred in the performance of their duties.” Our internal review did not identify a specific rationale for this prohibition, and we believe it may be appropriate to revisit this restriction in light of the broader policy goals outlined above.

Proposals

To resolve the discrepancies identified, we propose the two payment structures below for the Limited Practice Board.

Exam Grading

The LPB administers two exams annually, with grading responsibilities divided between essay and performance problem components. Based on the existing structure used by the BOBE, we propose the following payment structure:

Role	Estimated Hours	Proposed Stipend	# of Graders Per Exam	Annual Cost
Essay Grader	2 hrs/exam	\$110exam/grader	3	\$660
Performance Problem Grader	2 hrs/exam	\$110 exam/grader	9	\$1,980
Total			12	\$2,640

Exam Writing and Review

The LPB Exam Committee meets multiple times per exam cycle to review and revise questions, with additional independent time spent drafting new content. Based on the existing structure used by the BOBE, we propose the following payment structure:

Activity	Estimated Hours	Proposed Stipend	Annual Cost Range
Review Meetings (3–5 members)	8 hrs/year	\$440 per year/member	\$1,320–\$2,200
Question Drafting (1–5 questions)	2 hrs/question	\$110/question	\$110–\$550
Total			\$1,430–\$2,750

LPB Feedback

We submitted the proposals to the LPB, which reviewed them during their meeting on October 14, 2025. The LPB generally supported the proposals and agreed that providing payment for exam preparation and grading is appropriate. They did not offer any other feedback or suggested changes. When asked about the reason for the restriction on compensation under APR 12(b)(3), the LPB members were unsure. One Board member speculated that the restriction might exist because volunteer work is usually not compensated.

Recommendations

We advise that the Budget and Audit Committee recommend the approval of the proposed payment structures for the Limited Practice Board, to become effective starting in FY 2027. To implement these proposals, an amendment to APR 12(b)(3) is required to allow for compensation. If the Budget and Audit Committee recommends these proposals for approval by the Board of Governors, the revised APR language will be provided at that time.

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To: Budget and Audit Committee

From: Tiffany Lynch, Director of Finance

Cc: Terra Nevitt, Executive Director
Renata Garcia, Chief Regulatory Counsel
Cathy Biestek, Managing Regulatory Counsel

Date: November 19, 2025

Re: 2027 License Fees for Limited Practice Officers and Limited License Legal Technicians

ACTION: Recommend approval of the 2027 License Fees for Limited Practice Officers and Limited License Legal Technicians provided in this memo.

BACKGROUND

WSBA license fees are established by Court order and have historically been set for specific calendar years. In December 2024, the Court issued an order establishing the 2026 license fees for all license categories, including lawyers, Limited Practice Officers (LPOs), and Limited License Legal Technicians (LLLTs). While there has been no discussion or intent to change the LPO and LLLT fees, the Board's November 14, 2025 approval of the 2027 lawyer license fees should also have explicitly reaffirmed the existing LPO and LLLT license fees to maintain consistency with the Court's prior order.

CURRENT FEES

The fees currently set for 2026 are as follows:

License Type	License Fee
Active LLLT- Admitted prior to 2022	\$229.00
Active LLLT- Admitted 2022 or 2023	\$114.50
New Active LLLT- 50%	\$114.50
New Active LLLT- 25%	\$57.25
Active LPO- Admitted prior to 2022	\$200.00
New Active LPO- 50%	\$100.00
New Active LPO- 25%	\$50.00
Active LPO- Admitted 2022 or 2023	\$100.00
Inactive LLLT or LPO	\$100.00

Both LPO and LLLT fees are reflected in WSBA's financial statements as individual cost centers. Historically, fees for these two license types have been reviewed and adjusted only as needed. The last changes occurred in 2019, when fees increased by \$25 for LLLTs and \$100 for LPOs (at the full active fee rate). At this time, there is no indication or rationale for reassessing these fees.

REQUEST

We are requesting that the Budget and Audit Committee approve the 2027 fees for LPOs and LLLTs at the same dollar amounts as those currently set for 2026. This action is necessary to align with the previous Court order. If approved, we will include language in the request to the Court that the fees remain in effect until changed by a future Court order, thereby eliminating the need for annual reaffirmation when no changes are proposed.