

<b>DISCUSSION :</b> <b>Suggested Amendments to APR 11</b>
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MCLE Board will review the suggested amendments discussed at prior MCLE Board meetings, hear public comments/feedback, and review written comments/feedback received from the online public survey. In addition, the Board will conduct an equity assessment of the suggested amendments.

**Background:** At its April meeting, the MCLE Board directed staff to distribute the suggested amendments to APR 11 to all members for comment. After the MCLE Board met in April, staff reviewed the proposed amendments and revised the amendments for clarity. The revisions did not change the effect the amendments would have or otherwise affect the intent of the Board. The suggested amendments as announced for public comment are in the meeting materials.

On May 8, 2023, a public comment survey requesting feedback regarding the suggested amendments was posted to the WSBA website. The MCLE Board Page informed WSBA licensed legal professionals (and interested members of the public) that they may make a public comment regarding the suggested amendments at the June 16, 2023 MCLE Board meeting. The report and recommendation on the suggested amendments was made fully available in its current state. The survey closed on June 9, 2023.

On May 15, 2023, an official WSBA email soliciting feedback from all WSBA members was sent. Additionally, the following groups or their WSBA staff liaisons were contacted to solicit feedback on the preliminary suggested amendment:

Access to Justice Board (ATJ), WSBA Diversity Committee, Board of Bar Examiners, Client Protection Board, Committee on Professional Ethics, Continuing Legal Education Committee, Court Rules & Procedures Committee, Character and Fitness Board, Disciplinary Board, LLLT Board, Limited Practice Board, Law Clerk Board, Pro Bono and Public Service Committee, Practice of Law Board, MCLE Accredited Sponsors, Diversity Stakeholders List Serv, Minority Bars List Serv, Local Bar List serv, WSBA Section Leaders List Serv.

As of June 9, 2023, 924 responses were collected via the online survey. Out of those responses, 149 were in favor of the suggested amendment, and 626 were not in favor. The remaining 149 were partially in favor. All of the comments are included as materials for this meeting.

**Possible Discussion Topics:**

- Based on the feedback received regarding the suggested amendments should the MCLE Board continue to move forward with the suggested amendment?
  - Should any revisions be considered based on the feedback?
  - Should the Board revisit the specific terminology for the Technology Security Ethics credit type?
- Based on the equity analysis discussion, should any revisions be considered?
- Are there any concerns or revisions needed to the suggested amendments as revised by staff?
- Should the MCLE Board bring the suggested amendment to the August 2023, Board of Governors meeting?

<b>Potential timeline for suggested amendment:</b>		
April 17, 2023	MCLE Board Meeting	COMPLETE-Workgroup presents report and recommendation to MCLE Board. MCLE Board will vote whether to move forward with suggested amendment. Reach out to stakeholders for initial feedback. Vote on opening for member and stakeholders comment period
May 8, 2023		Open of written comment period.
June 9, 2023		Close written comment period.
June 16, 2023	MCLE Board Meeting	Public comment period during meeting. Hear member, public, and other stakeholder comments. Discuss feedback. Taking into consideration feedback, MCLE Board to vote on whether to make any proposed edits, and whether to proceed with suggested amendment. If proceeding, MCLE Board to nominate Board members to present to BOARD OF GOVERNORS and work on presentation materials.
July 7, 2023	Agenda items due	BOARD OF GOVERNORS agenda items due
July 24, 2023	BOARD OF GOVERNORS Materials	BOARD OF GOVERNORS materials due.
August 11-12, 2023	BOARD OF GOVERNORS Meeting	Present to WSBA BOARD OF GOVERNORS and ask for support.
August 18, 2023	MCLE Board Meeting	Discuss feedback from BOARD OF GOVERNORS and vote on whether to move forward with suggested amendment. If proceeding, MCLE Board will nominate Board members to work on GR 9 coversheet.
August 21, 2023	BOARD OF GOVERNORS Meeting Materials deadline	If needed, send materials to or present at the BOARD OF GOVERNORS meeting September 8-9.
September 8, 2023		First draft due of GR 9 coversheet.
September 29, 2023		Final draft due of GR 9 coversheet.
October 15, 2023	<b>Suggested Amendment Deadline</b>	Send GR9 coversheet to Court by October 15 <sup>th</sup> .

**Supporting Documents:**

- **MCLE Board Memo dated May 5, 2023 RE: Preliminary Suggested Amendments to APR 11 Suggested Amendments to APR 11 – Draft June 9, 2023**
- **Information for Equity Analysis**
- **Summary Table of Nomenclature for Technology Security in Other Jurisdictions**

### Information for Equity Analysis

The purpose of the equity assessments is to understand how entities incorporated an equity lens into the action items presented to the Board of Governors. Equity is meeting impacted parties according to their needs to produce fair and equal outcomes for all. Please answer all questions completely in order to receive a comprehensive equity assessment.

- *IMPACTED GROUPS: Please describe the direct and indirect impacts of 1) the overall work of your entity and 2) this specific action on the categories below. If you do not believe the action has a direct or indirect impact on any of these categories, please explain why.*
  - *The general WSBA membership*
  - *WSBA staff*
  - *A subgroup of WSBA membership (e.g. LLLTs, family law practitioners, Minority Bar Association members, legal professionals from specific marginalized and underrepresented communities)*
  - *Members of the public in need of legal services (if applicable, please include specific client communities)*
  
- *PROCESS: How did you collaborate with impacted groups identified above? How did you integrate input or leadership from impacted groups into this project or proposed action? If you did not collaborate with or integrate input from impacted groups identified above, please explain why. What resources do you need to sustain relationships with impacted groups? If you do not plan to sustain relationships with impacted groups, please explain why.*
  
- *OUTCOMES: What are the intended outcomes of this specific action? Are there potential unintended consequences? Of the impacted groups outlined above, who benefits most from this action? Conversely, are there groups who may be burdened?*
  
- *EVALUATION: How will you measure the impact of the action, including unintended consequences and disparities among impacted groups? What resources do you need to evaluate the impact of this action and track any unintended consequences or disparities?*
  
- *FUTURE LEARNING: Learning to lead with an equity lens is an ongoing process. Please reflect on how you might improve on how you collaborate with impacted groups for future projects and actions. What additional trainings or resources would be helpful to your entity to improve in this area?*

## Suggested Amendments as of JUNE 9, 2023

The MCLE Board is considering the following suggested amendments to APR 11:

### APR 11

#### (c) Education Requirements

(1) *Minimum Requirement.* Each lawyer must complete 45 credits and each LLLT and LPO must complete 30 credits of approved continuing legal education by December 31 of the last year of the reporting period with the following requirements:

(i) at least 15 credits must be from attending approved courses in the subject of law and legal procedure, as defined in subsection (f)(1); and

(ii) at least ~~six~~ eight credits must be in ~~ethics and professional responsibility, as defined in subsection (f)(2), with at least one credit in equity, inclusion, and the mitigation of both implicit and explicit bias in the legal profession and the practice of law.~~ the topic of legal ethics which must include the following course subjects:

(A) At least five credits in general ethics and professional responsibility, as defined in subsection (f)(2);

(B) at least one credit in equity ethics, as defined in subsection (f)(8);

(C) at least one credit in technology security ethics, as defined in subsection (f)(9); and

(D) at least one credit in mental health ethics, as defined in subsection (f)(10).

...

(7) *Carryover Credits.*

If a lawyer, LLLT or LPO completes more than the required number of credits for any one reporting period, up to 15 of the excess credits, ~~2 of which may be ethics and professional responsibility credits,~~ may be carried forward to the next reporting period with the following limitations:

(A) Only two of the 15 allowed carryover credits can be in the course subject of general ethics and professional responsibility;

(B) Credits earned in the course subjects of equity ethics, mental health ethics, and technology security ethics cannot be fulfilled in whole or in part with carryover credit from a prior reporting period; and

(C) After the education requirements of subsections (c)(1)(ii)(B), (C), and (D) are met for the course subjects of equity ethics, mental health ethics, and technology security ethics, any additional credits earned for any one reporting period in these course subjects will count as general ethics and professional responsibility credits.

...

**(f) Approved Course Subjects.** Only the following subjects for courses will be approved:

...

(2) General ethics Ethics and professional responsibility, defined as topics relating to the general subject of professional responsibility and conduct standards for lawyers, LLLTs, LPOs, and judges, ~~including equity, inclusion, and the mitigation of both implicit and explicit bias in the legal profession and the practice of law, and the risks to ethical practice associated with diagnosable mental health conditions, addictive behavior, and stress;~~

...

...

(8) Equity ethics, defined as subjects relating to equity, inclusion, and the mitigation of both implicit and explicit bias in the legal profession and the practice of law;

(9) Technology security ethics, defined as subjects that educate and inform lawyers, LLLTs, or LPOs about their ethical obligations and professional responsibilities under the rules of professional conduct regarding cybersecurity and the privacy and protection of electronic data and communication. This includes protection of confidential, privileged, and proprietary information; client counseling and consent; storage protection policies and protocols; risk and privacy implications; protection of escrow funds; inadvertent and unauthorized electronic disclosure of confidential information, including through social media, data breaches and cyber-attacks; and supervision of employees, vendors, and third parties; and

(10) Mental health ethics, defined as subjects that educate and inform lawyers, LLLTs, or LPOs about their ethical obligations and professional responsibilities under the rules of professional conduct regarding mental health issues. This includes education concerning the ethical risks to the practice of law associated with, but not treatment for, substance abuse, addictive behaviors, stress management, work-life balance, anxiety disorders, depression, bipolar disorder, suicide prevention, schizophrenia, and other mental health issues.

...

**(j) Sponsor Duties.** All sponsors must comply with the following the duties unless waived by the Bar for good cause shown:

(1) The sponsor must not advertise course credit until the course is approved by the Bar but may advertise that the course credits are pending approval by the Bar after an application has been submitted. The sponsor shall communicate to the lawyer the number of credits and denominate whether the credits are “law and legal procedure” as defined under subsection (f)(1), “general ethics and professional responsibility” as defined under subsection (f)(2), “equity ethics” as defined under subsection (f)(8), “technology security ethics” as defined under subsection (f)(9), “mental health ethics”

as defined under subsection (f)(10), or “other,” meaning any of the other subjects identified in subsections (f)(3)-(7).

DRAFT

**From:** Mandatory Continuing Legal Education Board  
**Date:** May 5, 2023  
**RE: PRELIMINARY SUGGESTED AMENDMENTS TO APR 11**

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### Executive Summary

The Mandatory Continuing Legal Education (MCLE) Board formed a workgroup comprised of Todd Alberstone, Efrem Krisher, and Asia Wright. The workgroup met four times to review and discuss potential amendments to rule 11 of the Admission and Practice Rules (APR). Following the workgroup's extensive research, thoughtful discussions, and presentation of the suggested amendment before the MCLE Board, the MCLE Board is now soliciting feedback regarding an amendment to APR 11 as discussed below.

The MCLE Board is considering amending APR 11 to:

- require legal professionals to earn one credit per reporting period in the course subjects of both mental health ethics and technology security ethics;
- separate the course subject of equity from the general ethics and professional responsibility course subject while maintaining the requirement for legal professionals to earn one equity ethics credit per reporting period;
- reduce the number of required general ethics and professional responsibility credits from six to five; and,
- allow for additional credits earned beyond the required amount for any given reporting period in the course subjects of equity ethics, mental health ethics, and technology security ethics to count as general ethics and professional responsibility credits.

The suggested amendments do not increase the total number of credits required for a reporting period. Nor do they dilute the general ethics and professional responsibility or law and legal procedure requirements. Although the amendments reduce the general ethics requirement to five credits, they increase the total credit requirements in the area of legal ethics to eight credits, and create four distinct categories of legal ethics: (1) general ethics and professional responsibility; (2) equity ethics; (3) technology security ethics; and (4) mental health ethics. The division of legal ethics into separate categories will eliminate the current confusion between "general" ethics and "equity" ethics credits, as equity is currently a subcategory of ethics and the credits earned count toward the ethics and professional responsibility subject overall.

The suggested amendments will not place a financial burden on licensed legal professionals. In 2019, the WSBA Board of Governors passed a motion directing WSBA CLE to offer free CLEs in the topics of mental health ethics, technology security ethics, and equity, inclusion, and the mitigation of both implicit and explicit bias in the legal profession and the practice of law. The WSBA Board of Governors directed that



the CLEs be offered in-person and on-demand for free, addressing the concern that this requirement would pose barriers to access or a financial burden for licensed legal professionals.

These amendments would ensure lawyers, LLLTs, and LPOs focus on mental health ethics and technology security ethics topics (in addition to equity ethics topics) at least once every three years. These are serious topics that can greatly impact a licensed legal professional's competency to practice law and, if ignored, could result in serious consequences. The proposed requirements, therefore, are directed toward the protection of clients and the public, improving legal professional competency and integrity, and, ultimately, improving the legal community as a whole.

### Suggested Amendments

The MCLE Board is considering the following suggested amendments to APR 11:

#### APR 11

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(7) *Carryover Credits.*

If a lawyer, LLLT or LPO completes more than the required number of credits for any one reporting period, up to 15 of the excess credits, ~~2 of which may be ethics and professional responsibility credits,~~ may be carried forward to the next reporting period with the following limitations:

(A) Only two of the 15 allowed carryover credits can be in the course subject of general ethics and professional responsibility;

(B) Credits earned in the course subjects of equity ethics, mental health ethics, and technology security ethics cannot be fulfilled in whole or in part with carryover credit from a prior reporting period; and

(C) After the education requirements of subsections (c)(1)(ii)(B), (C), and (D) are met for the course subjects of equity ethics, mental health ethics, and technology security ethics, any additional credits earned for any one reporting period in these course subjects will count as general ethics and professional responsibility credits.

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**(f) Approved Course Subjects.** Only the following subjects for courses will be approved:

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(2) General ethics ~~Ethics and professional responsibility~~, defined as topics relating to the general subject of professional responsibility and conduct standards for lawyers, LLLTs, LPOs, and judges ~~including equity, inclusion, and the mitigation of both implicit and explicit bias in the legal profession and the practice of law, and the risks to ethical practice associated with diagnosable mental health conditions, addictive behavior, and stress;~~

...

...

(8) Equity ethics, defined as subjects relating to equity, inclusion, and the mitigation of both implicit and explicit bias in the legal profession and the practice of law;

(9) Technology security ethics, defined as subjects that educate and inform lawyers, LLLTs, or LPOs about their ethical obligations and professional responsibilities under the rules of professional conduct regarding cybersecurity and the privacy and protection of electronic data and communication. This includes protection of confidential, privileged, and proprietary information; client counseling and consent; storage protection policies and protocols; risk and privacy implications; protection of escrow



funds; inadvertent and unauthorized electronic disclosure of confidential information, including through social media, data breaches and cyber-attacks; and supervision of employees, vendors, and third parties; and

(10) *Mental health ethics*, defined as subjects that educate and inform lawyers, LLLTs, or LPOs about their ethical obligations and professional responsibilities under the rules of professional conduct regarding mental health issues. This includes education concerning the ethical risks to the practice of law associated with, but not treatment for, substance abuse, addictive behaviors, stress management, work-life balance, anxiety disorders, depression, bipolar disorder, suicide prevention, schizophrenia, and other mental health issues.

...

(j) **Sponsor Duties.** All sponsors must comply with the following the duties unless waived by the Bar for good cause shown:

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## **Background**

### **Equity Ethics Credit**

The preliminary amendments remove the course subject of equity from the general ethics and professional responsibility course subject and define equity ethics as its own course subject while maintaining the current requirement for legal professionals to earn one equity ethics credit per reporting period. Additionally, the suggested amendments clarify that the equity ethics requirement needs to be met each reporting period and cannot be satisfied with carryover credit.

### **Technology Security Ethics Credit**

The suggested amendments include a new requirement for all licensed legal professionals to complete one credit each reporting period in technology security ethics which is about the ethical obligations and professional responsibilities regarding the protection of electronic data and communication.

Legal professionals have an ethical and common law duty to take competent and reasonable measures to safeguard client information. They also have contractual and regulatory duties to protect confidential information. Rules 1.1, 1.3, and 1.4 of the Rules of Professional Conduct (RPC) address lawyers’ core



ethical duties of competence, diligence and communication with their clients. Possessing technological knowledge to safeguard client information as a fundamental requirement is explained in comment eight to RPC 1.1 which states that in order for legal professionals to, “[m]aintain the requisite knowledge and skill, a lawyer should keep abreast of changes in the law and its practices, including the benefits and **risks associated with relevant technology**, engage in continuing study and education and comply with all continuing legal education requirements to which the lawyer is subject.” (emphasis added) With the advent of the global pandemic and more and more legal professionals practicing “virtually,” it is imperative that lawyers, and all legal professionals, stay cognizant of their ethical responsibilities.<sup>1</sup>

**A Technology Security Ethics Credit Must be Mandatory Because Lack of Knowledge in This Area Can Result in Significant Consequences to Legal Professionals and Their Clients.**

With each passing year, cybercrimes become more rampant and cyber insecurity results in increasingly costly and catastrophic events. Electronic security breaches today are now so prevalent, that the question is not if, but when, it will happen. The Federal Bureau of Investigation Internet Crime Complaint Center (“IC3”) received 847,376 complaints relating to extortion, identity theft, and personal data breaches representing potential losses exceeding \$6.9 billion in 2021.<sup>2</sup> The IC3 receives an average of over 2,300 cybercrime complaints each day, with over 6.5 million complaints since the IC3’s inception in 2000.<sup>3</sup> Washington state is ranked as the 9<sup>th</sup> highest state where internet crime victims reside.<sup>4</sup> Washington state victims reported losing \$157,454,331 in 2021 as a result of internet crimes.<sup>5</sup>

In 2021, the IC3 received 19,954 compromised business email complaints resulting in adjusted losses at nearly \$2.4 billion.<sup>6</sup> The cybercrimes involved sophisticated scams targeting businesses, including law firms, and individuals, such as law firm clients, performing monetary transfers. Criminals will hack emails and spoof business representatives’ credentials to initiate fraudulent wire transfers.

Law firms are being specifically targeted. Such targeted attacks have become so frequent that the State Bar of Texas maintains an updated list on their blog notifying attorneys of recent scams.<sup>7</sup>

Additionally, back in October of 2018 the American Bar Association warned,

Data breaches and cyber threats involving or targeting lawyers and law firms are a major professional responsibility and liability threat facing the legal profession. As custodians of highly sensitive information, law firms are inviting targets for hackers. In one highly publicized incident, hackers infiltrated the computer networks at some of the country’s most well-

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<sup>1</sup> ABA Comm. on Ethics & Prof’l Responsibility, Formal Op. 498 (2021) (issuing cautionary ethics guidance on virtual law practices), [https://www.americanbar.org/content/dam/aba/administrative/professional\\_responsibility/aba-formal-opinion-498.pdf](https://www.americanbar.org/content/dam/aba/administrative/professional_responsibility/aba-formal-opinion-498.pdf)

<sup>2</sup> Internet Crime Complaint Center, *2021 Internet Crime Report*, at 3 (2022), [https://www.ic3.gov/Media/PDF/AnnualReport/2021\\_IC3Report.pdf](https://www.ic3.gov/Media/PDF/AnnualReport/2021_IC3Report.pdf).

<sup>3</sup> *Id.* at 18 n.16.

<sup>4</sup> *Id.* at 26.

<sup>5</sup> *Id.* at 27.

<sup>6</sup> *Id.* at 3.

<sup>7</sup> See Joanna Herzik, *Scams Continue to Target Texas Attorneys*, State Bar of Texas Blog (June 28, 2022), <https://blog.texasbar.com/2022/12/articles/law-firms-and-legal-departments/scams-continue-to-target-texas-attorneys/>.



known law firms, likely looking for confidential information to exploit through insider trading schemes.<sup>8</sup>

The IC3 report details a complaint filed by a victim law office in June 2021 regarding a wire transfer of more than \$198,000 to a fraudulent U.S. domestic account.<sup>9</sup> However, other law firms have reported bigger breaches with higher stakes at risk. In May of 2020, law firm hackers behind a ransomware attack on a New York celebrity law firm threatened to publish compromising information on former U.S. President Donald Trump if they did not receive their \$42 million demand.<sup>10</sup> As proof, the hackers gained access to sensitive client information and published legal contracts related to the law firm's client, Madonna.<sup>11</sup> The hackers also released 2.4 GB of legal data related to client Lady Gaga.<sup>12</sup>

One in four law firms that participated in the ABA's 2021 Legal Technology Survey reported their firms experienced a data breach at some time.<sup>13</sup> A breach includes incidents like a lost/stolen computer or smartphone, hacker, break-in, or website exploit.<sup>14</sup> The actual number of victim firms could be higher as the firm may have experienced a security breach and never detected it.<sup>15</sup> The survey revealed that only 53% of law firms have a policy to manage the retention of information/data held by the firm, and only 36% of respondents have an incident response plan.<sup>16</sup>

Law firms are not the only legal targets. In May of 2020, a ransomware attack hit Texas courts and took down the courts' websites and case management systems for the state's appellate and high courts.<sup>17</sup> While there is no evidence that hackers accessed sensitive or personnel information, the hack left Texas' top civil and criminal courts without a working case management system or internet in their offices which forced staff to put out rulings over Twitter.<sup>18</sup>

Cybercriminals attacked our own Washington State Bar Association ("WSBA") website, malicious code was introduced to the website targeting credit card numbers entered into the website.<sup>19</sup> The myWSBA.org portal was taken offline in mid-November 2020, causing a major disruption for members who wanted to log into their Fastcase and Casemaker accounts, purchase a Continuing Legal Education ("CLE") product, pay their license fee, and report Mandatory Continuing Legal Education credits.<sup>20</sup> As a precaution, the

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<sup>8</sup> ABA Comm. on Ethics & Prof'l Responsibility, Formal Op. 483 (2018) (discussing lawyers' obligations after an electronic data breach or cyberattack), [https://www.americanbar.org/content/dam/aba/images/news/formal\\_op\\_483.pdf](https://www.americanbar.org/content/dam/aba/images/news/formal_op_483.pdf).

<sup>9</sup> Internet Crime Complaint Center, *supra* note 2 at 11.

<sup>10</sup> Alex Scroxton, *Law Firm Hackers Threaten to Release Dirt on Trump*, ComputerWeekly.com (May 15, 2020, 10:19 AM), <https://www.computerweekly.com/news/252483193/Law-firm-hackers-threaten-to-release-dirt-on-Trump>.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> David G. Ries, *2021 Cybersecurity*, American Bar Association, [https://www.americanbar.org/groups/law\\_practice/publications/techreport/2021/cybersecurity/](https://www.americanbar.org/groups/law_practice/publications/techreport/2021/cybersecurity/) (last visited Dec. 4, 2022).

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> Jake Ble berg, *Texas High Courts Hit By Ransomware Attack, Refuse to Pay*, APNEWS.com (May 12, 2020), <https://apnews.com/article/hacking-tx-state-wire-technology-us-news-courts-474453285863aebab0a2fe239f493548>.

<sup>18</sup> *Id.*

<sup>19</sup> E-mail from Terra Nevitt, Interim Executive Director, Wash. St. B. Ass'n, to WSBA Members (Nov. 13, 2020, 13:32 PST) (email available for records request).

<sup>20</sup> *Id.*



WSBA asked members who purchased a CLE product or paid their license fee at myWSBA.org during the previous year to monitor their credit card for potential fraudulent activity.<sup>21</sup>

The fact is, anyone with a computer connected to the Internet is susceptible to a cyberattack from computer hackers who use phishing scams, spam email, instant messages and bogus websites to deliver dangerous malware to the computer.<sup>22</sup> Once the malware program is installed on the computer, it may quietly transmit the user's private and financial information without their knowledge.<sup>23</sup> During the period of March 2021 to February 2022, 153 million new malware programs, including ransomware programs, were discovered.<sup>24</sup> This is a 5% increase from the previous year.<sup>25</sup>

Unfortunately, the learning curve is steep for users who find their computers infected.<sup>26</sup> In 2020, almost 50% of business personal computers and 53% of personal computers that became infected experienced a second malware infection within the same year.<sup>27</sup> Continuing education in this field is necessary given the pace of technology development. Cyberattacks that will occur in a few years' time are not conceivable today.

**A Technology Security Ethics Credit Must be Mandatory Because Lack of Knowledge in This Area Can Result in Significant Ethical Dilemmas.**

The following are only a few examples of technology scenarios that lead to ethical pitfalls for legal professionals. CLEs on these topics can give members critical guidance that prevent negative outcomes for legal professionals and their clients.

*After A Cyber Breach*

Do firms have an ethical duty to notify their clients if a breach occurs? If so, there is a significant ethical issue not being addressed by lawyers given only 24% of the law firms nationwide reported a breach in the ABA 2021 Legal Technology Survey notified their clients of the data breach.<sup>28</sup>

*Public Wi-fi*

It has become commonplace for lawyers to connect to public wi-fi when working in coffee shops or hotels.<sup>29</sup> However, by doing so, the lawyer can expose confidential and privileged client information because the "packets" or pieces of information they send or receive from their devices can be intercepted and decoded.<sup>30</sup> Additionally, lawyers may be tricked into logging on to a fake wi-fi network set up by

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<sup>21</sup> *Id.*

<sup>22</sup> *The Dangers of Hacking and What a Hacker Can Do to Your Computer*, Webroot, <https://www.webroot.com/us/en/resources/tips-articles/computer-security-threats-hackers> (last visited Nov. 30, 2022).

<sup>23</sup> *Id.*

<sup>24</sup> Andra Zaharia, *300+ Terrifying Cybercrime and Cybersecurity Statistics (2023 Edition)*, Comparitech (last updated Feb. 8, 2023). <https://www.comparitech.com/vpn/cybersecurity-cyber-crime-statistics-facts-trends/>.

<sup>25</sup> *Id.*

<sup>26</sup> *Id.*

<sup>27</sup> Webroot BrightCloud, *2021 Threat Report Mid-Year Addendum*, 2021, at 8.

<sup>28</sup> Ries, *supra*.

<sup>29</sup> Alison Austin, *Public Wi-fi: Lawyers Beware of Coffeehouse Practice*, American Bar Association (May 20, 2017), <https://www.americanbar.org/groups/litigation/committees/trial-practice/practice/2017/beware-of-public-wifi/>.

<sup>30</sup> *Id.*



cyber criminals to look like the legitimate public wi-fi network.<sup>31</sup> And unknowingly, offer up their clients' information to criminals on a platter.

### *Chatbots*

Law firms are increasingly using Artificial Intelligence such as "chatbots" to deliver legal services and communicate with clients about their legal needs.<sup>32</sup> As such, do legal professionals have an ethical duty to train and supervise bots?<sup>33</sup> Can a legal professional or law firm be disciplined for the conduct of a chatbot? Chatbots have access to a person's personally identifiable information and other sensitive financial and medical data. Thus, are law firms in the United States that service international corporate clients subject to the requirements of the General Data Protection Regulation enacted in the European Union?

### *Texting*

Legal professionals use text messages to contact prospective clients.<sup>34</sup> If RPC 7.3 prohibits lawyers from directly soliciting prospective clients using real-time electronic contact, do text messages constitute real-time electronic contact?<sup>35</sup> If not, must the texts follow Rule 7.2, which requires communications to include the name and office address of at least one lawyer responsible for its content?<sup>36</sup>

Legal professionals also use texting to communicate with existing clients.<sup>37</sup> The use of text messages raises concerns whether and how confidentiality can be maintained in these communications and what steps a legal professional should take to ensure client information is protected. At a minimum, is the legal professional aware that others may have access to the client's mobile device? Additionally, text messages are not kept by the cellular provider indefinitely for future reference. Therefore, do legal professionals need to transfer and backup text messages from their mobile phones to their computers?

### *Use of Unencrypted Email*

The use of unencrypted email to communicate with clients is generally accepted.<sup>38</sup> However, the American Bar Association warns,

... cyber-threats and the proliferation of electronic communications devices have changed the landscape and it is not always reasonable to rely on the use of unencrypted email. For example, electronic communication through certain mobile applications or on message boards or via unsecured networks may lack the basic expectation of privacy afforded to email communications. Therefore, legal

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<sup>31</sup> *What Is An Evil Twin Attack?*, Panda Security (Dec. 13, 2021), <https://www.pandasecurity.com/en/mediacenter/security/what-is-an-evil-twin-attack/>.

<sup>32</sup> Lisa Dimyadi, *Chatbots for Lawyers*, Clio, <https://www.clio.com/blog/chatbots-for-lawyers/> (last visited Dec. 4, 2022).

<sup>33</sup> See e.g., Wash. Rules of Prof'l Conduct R. 5.1, 5.3 (2022).

<sup>34</sup> *Text Message Marketing for Lawyers*, CosmoLex, <https://www.cosmolex.com/text-message-marketing-for-lawyers-the-next-big-thing/> (last visited Dec. 4, 2022).

<sup>35</sup> See Wash. Rules of Prof'l Conduct R. 7.3 (2022).

<sup>36</sup> See Wash. Rules of Prof'l Conduct R. 7.2 (2022).

<sup>37</sup> Mark C. Palmer, *Ethical Considerations for Lawyers When Texting Clients*, 2Civility (Jan. 6, 2022), <https://www.2civility.org/ethical-considerations-for-lawyers-when-texting-clients/>

<sup>38</sup> ABA Comm. on Ethics & Prof'l Responsibility, Formal Op. 477R (2017) (discussing securing communication of protected client information), [https://www.americanbar.org/content/dam/aba/administrative/professional\\_responsibility/aba\\_formal\\_opinion\\_477.pdf](https://www.americanbar.org/content/dam/aba/administrative/professional_responsibility/aba_formal_opinion_477.pdf).



professionals must, on a case-by-case basis, constantly analyze how they communicate electronically about client matters, applying the Comment [18] factors to determine what effort is reasonable.<sup>39</sup>

**A Technology Security Ethics Credit Must be Mandatory Because Members Are Not Fulfilling Their Responsibilities of Competence and Diligence.**

Despite the duty to keep abreast of the risks associated with relevant technology and that legal professionals increasingly use technology in their practice, most legal professionals lack training and experience in technology security to recognize and prevent a cyber-attack. Long gone are the days of the clearly dodgy email from a Nigerian prince in need, now the emails look like legitimate communications from your bank, Amazon, shipping carrier, or even your friend. With phishing, vishing, smishing, pharming, and spoofing tactics continually evolving and becoming more sophisticated and harder to detect, legal professionals not keeping up with the trends are at serious risk of jeopardizing client information and funds. The following statistics are troubling:

- More than 70% of phishing emails, socially engineered fraudulent messages designed to trick a person into revealing sensitive information or deploy malicious software, are opened by their targets.<sup>40</sup>
- More than 59.4 million Americans fell victim to voice phishing, also known as “vishing” in 2021.<sup>41</sup>
- Less than 35% of the United States population can correctly define smishing, phishing scams operating through text or short message service messages.<sup>42</sup>
- Millions in the US, Europe, and the Asia-Pacific region fell victim to a sophisticated pharming scam where the attackers directed bank customers to a fake website which downloaded malware to collect banking credentials before being redirected to their bank’s real website.<sup>43</sup>
- During the first half of 2021, 62.6% of all identity deception-based attacks, or “spoofing” attacks, leveraged display name deception that impersonated a trusted individual or brand.<sup>44</sup>

Keeping clients’ information safe is no longer just about keeping hard paper copies secure. The rise of technology in the practice of law creates several risks and raises several ethical questions. The monetary and ethical risks of failing to keep up with the benefits and risks associated with technology are significant and therefore mandating continuing legal education in this area is necessary.

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<sup>39</sup> *Id.* (referring to Model Rules of Prof'l Conduct R. 1.6 cmt. 18 (2016)).

<sup>40</sup> Nikolina Cveticanin, *Phishing Statistics & How To Avoid Taking the Bait*, DataProt (Nov. 16, 2022), <https://dataprot.net/statistics/phishing-statistics/>.

<sup>41</sup> Trevor Cooke, *Vishing Statistics 2022: Costs of Voice Phishing Attacks*, EarthWeb (Nov. 12, 2022), <https://earthweb.com/vishing-statistics>.

<sup>42</sup> Ben Martens, *11 Facts + Stats on Smishing (SMS Phishing) in 2022*, <https://www.safetymartens.com/blog/what-is-smishing-sms-phishing-facts/> (last visited Dec. 4, 2022).

<sup>43</sup> *What Is Pharming and How To Protect Against It*, Avast.com, <https://www.avast.com/c-pharming> (last visited Dec. 4, 2022).

<sup>44</sup> Zaharia, *supra*.



### **Other Jurisdictions with Mandatory Technology Related Credits**

By adding a required credit in technology security, Washington will join other states that recognize the necessity and value of this type of education to the legal profession. In 2023, Florida, New York, North Carolina and The U.S. Virgin Islands require or will require credits related to technology including topics related to cybersecurity.

### **Mental Health Ethics Credit**

#### **A Mental Health Ethics Credit Requirement Must be Mandatory Because of the Prevalence of Mental Health Issues Among Legal Professionals**

The suggested amendments include a new requirement for all licensed legal professionals to complete one credit each reporting period in mental health ethics which would cover the ethical obligations and professional responsibilities under the rules of professional conduct regarding mental health issues.

Several recent studies concluded: Attorneys are prone to mental health issues, including substance abuse and addiction, depression, anxiety, and stress, more so than the general population. A nationwide study published in the Journal of Addiction Medicine in 2016 (the “ABA Study”)<sup>45</sup>, supported by the American Bar Association, studying licensed attorneys currently employed in the legal profession, who voluntarily completed surveys sent by their respective bar associations. The study found:

- a. 20.6% of respondents screened positive for hazardous, harmful, and potentially alcohol-dependent drinking, as compared with 6.4% of the general US population;
- b. 28% experienced symptoms of depression;
- c. 19% experienced symptoms of anxiety;
- d. 23% experienced symptoms of stress.

The study concluded, “attorneys experience problematic drinking that is hazardous, harmful, or otherwise consistent with alcohol use disorders at a higher rate than other professional populations.” Attorneys under 30 years old were found to be at the higher level of 32%. Further, the study found that the data underscore the need for resources devoted to address the issues of mental health and substance abuse within the legal profession, through prevention, as well as lawyers’ assistance programs and, where necessary, treatment intervention. That 2016 study cited data from a 1990 study, specific to Washington State lawyers, which found that 18% of lawyers in Washington, at that time, were “problem drinkers,” compared with an estimated 10% among American adults in the general population. The 1990 study found that 19% of Washington lawyers suffered from statistically significant elevated levels of depression, contrasted with estimated levels of depression in Western industrialized countries in the range of 3% - 9%.

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<sup>45</sup> Patrick R. Krill, Ryan Johnson & Linda A bert, *The Prevalence of Substance Use and Other Mental Health Concerns Among American Attorneys*, Journal of Addiction Medicine, pp. 46-52, 10(1) Jan/Feb 2016  
[https://journals.lww.com/journaladdictionmedicine/Fulltext/2016/02000/The\\_Prevalence\\_of\\_Substance\\_Use\\_and\\_Other\\_Mental.8.aspx](https://journals.lww.com/journaladdictionmedicine/Fulltext/2016/02000/The_Prevalence_of_Substance_Use_and_Other_Mental.8.aspx)





Similarly, a recent survey conducted by ALM Intelligence and Law.com (“ALM Study”)<sup>46</sup> found:

- e. 74% of respondents feel the legal profession has had a “negative impact” on their mental health;
- f. 44% use alcohol to deal with stress;
- g. 10% self-identify as having a problem with alcohol;
- h. 4% use illegal drugs or abuse prescription drugs to deal with stress;
- i. 64% feel they suffer from anxiety;
- j. 31% self-identify as depressed;
- k. 74% feel their work environment contributes negatively to their own or colleagues’ well-being;
- l. 18% have contemplated suicide at some point in their careers.

Beyond self-assessment by respondents, the ALM Study also found that 62% of respondents know a colleague who is depressed, and 50% know a colleague with an alcohol problem.

Moreover, actual and perceived stigma is a contributing factor to mental health and addiction issues in lawyers. The ALM Study found that 65% of respondents felt they could not take extended leave to tend to mental health issues, and 77% were fearful of what their employer would think if they sought treatment through an extended leave.

**Continuing Legal Education Can Assist in Ameliorating Attorney Mental Health Issues, and Therefore the Competence of Practitioners.**

The need to address these issues, and to do so as early as possible, relates directly to competence and fitness to practice law. The proposal to require one hour of MCLE credit every three years is a crucial link in addressing this problem. While other elements are necessary to address the problem, including lawyers’ assistance programs, available treatment, etc., the MCLE requirement is an entry point to provide a broad base of legal professionals with the knowledge they need for self-assessment, recognizing issues in colleagues, destigmatizing the need for help, knowledge and understanding of available tools and programs, including new developments.

A typical course may include current legal requirements and standards concerning competence and mental health issues, whether in oneself or colleagues; available resources, including lawyers’ assistance programs; data concerning the prevalence of mental health issues in the profession; deeper understanding of the nature of mental health issues; tools for self-assessment; common warning signs in colleagues, and deeper understanding of causes and treatments.

The courses accredited to fulfill this requirement should not be designed nor viewed as a substitute for treatment. Nonetheless, requiring every legal professional to devote one hour every three years to education concerning these crucial issues will elevate the profession, improve the overall quality of legal services, and, ultimately, encourage greater public confidence in the integrity of the profession.

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<sup>46</sup>ALM’s Mental Health and Substance Abuse Survey (2020), reported and summarized by Leigh Jones, *Lawyers Reveal the Truth Depth of Mental Health Struggles, ALM’s Mental Health and Substance Abuse Survey*, <https://www.law.com/international-edition/2020/02/19/lawyers-reveal-true-depth-of-the-mental-health-struggles-378-134739/> (February 19, 2020); see also, *By the Numbers: The State of Mental Health in the Legal Industry*, <https://www.law.com/2020/02/19/by-the-numbers-the-state-of-mental-health-in-the-legal-industry/> (February 19, 2019)



Moreover, this requirement may encourage members to seek the help they need, and others to be supportive of their colleagues, while maintaining standards of excellence in the practice of law.

### **Other Jurisdictions with Mandatory Mental Health CLE Requirements**

In 2017 the ABA adopted the Model Rule for Minimum Continuing Legal Education and Comments (“ABA Model Rule”)<sup>47</sup>, the first such promulgation since 1988. In addition to the inclusion of a diversity and inclusion requirement, one of the main highlights was the addition of a model mental health MCLE requirement. As the ABA stated:

*The Mental Health and Substance Use Disorder Credit recognizes that requiring all lawyers to receive education about these disorders can benefit both individual lawyers and the profession. This requirement is in part a response to the 2016 landmark study conducted by the Hazelden Betty Ford Foundation and the American Bar Association Commission on Lawyer Assistance Programs, entitled, "The Prevalence of Substance Use and Other Mental Health Concerns Among American Attorneys."<sup>48</sup>*

At the time, only five states had any form of mental health MCLE requirement. At present, at least eight states (as well as the U.S. Virgin Islands) adopted some form of this requirement.

The clear trend is toward states and other jurisdictions adopting some form of a mandatory mental health CLE, whether as a separate requirement, or couched in terms of a “professional competence” requirement. This trend suggests the importance and value of a mandatory mental health CLE. The CLE requirement elevates the importance of mental health and self-care for legal professionals. Introducing this requirement can destigmatize mental health and promote awareness and self-care. By adding a required credit in Mental Health Ethics, Washington will join other states who recognize the necessity and value of this type of education to the legal profession.

### **Conclusion**

Based on the above discussion detailing the importance of the subjects required in the potential suggested amendments, the MCLE Board is considering the above suggested amendments to APR 11. It is the belief of the Board that these requirements increase the protection of clients and the public and improve legal professional competency and integrity.

### **Timeline**

<b>Potential timeline for suggested amendment:</b>		
April 17, 2023	MCLE Board Meeting	COMPLETE - Workgroup presents report and recommendation to MCLE Board. MCLE Board will vote whether to move forward with suggested amendment.

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<sup>47</sup> See ABA Model Rule for Minimum Continuing Legal Education, American Bar Association (February 6, 2017), [https://www.americanbar.org/content/dam/aba/directories/policy/midyear-2017/2017\\_hod\\_midyear\\_106.pdf](https://www.americanbar.org/content/dam/aba/directories/policy/midyear-2017/2017_hod_midyear_106.pdf).

<sup>48</sup> ABA Model Rule Implementation Resources, American Bar Association (February 2017), <https://www.americanbar.org/events-cle/mcle/modelrule/>.



PRELIMINARY SUGGESTED AMENDMENT OF THE MCLE BOARD

April 25, 2023

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		Reach out to stakeholders for initial feedback. Vote on opening for member and stakeholders comment period
June 9, 2023		Close written comment period.
June 16, 2023	MCLE Board Meeting	Public comment period during meeting. Hear member, public, and other stakeholder comments. Discuss feedback. Taking into consideration the feedback MCLE Board to vote on whether to make any proposed edits, and whether to proceed with suggested amendment. If proceeding, MCLE Board to nominate Board members to present to BOARD OF GOVERNORS and work on presentation materials.
July 7, 2023	Agenda items due	BOARD OF GOVERNORS agenda items due
July 24, 2023	BOARD OF GOVERNORS Materials	BOARD OF GOVERNORS materials due.
August 11-12, 2023	BOARD OF GOVERNORS Meeting	Present to WSBA BOARD OF GOVERNORS and ask for support.
August 18, 2023	MCLE Board Meeting	Discuss feedback from BOARD OF GOVERNORS and vote on whether to move forward with suggested amendment. If proceeding, MCLE Board will nominate Board members to work on GR 9 coversheet.
August 25, 2023		First draft due of GR 9 coversheet.
Sept 1, 2023		Final draft due of GR 9 coversheet.
September 5, 2023	BOARD OF GOVERNORS Meeting Materials deadline	If needed, send materials to or present at the BOARD OF GOVERNORS meeting September 22-23.
October 15, 2023	<b>Suggested Amendment Deadline</b>	Send GR9 coversheet to Court by October 15 <sup>th</sup> .



<b>Summary Table of Terminology for Technology Security In Other Jurisdictions</b>		
Delaware	No Technology Security credit required, but course content such as this is included under the umbrella of a category termed “Enhanced Ethics” wherein “competence in the use of technology” is referenced	Found in The Delaware Rules for Continuing Legal Education Rule 1(H)
Florida	This credit type is required effective January 1, 2017. The name for the credit is nondescript and the pertinent rule section states “at least 3 of 33 credit hours must be in approved technology programs.”	Found in Rule 6-10.3
New York	Effective July 1, 2023, however, there will be a mandatory one credit hour requirement in Cybersecurity, Privacy and Data Protection.	Found in Rule 22-NYCRR-1500
The Virgin Islands	2 credits per reporting period are required in the area of “Technology Programming”	Virgin Islands Supreme Court Rules Rule 208

## Those Against the MCLE Board's Preliminary Suggested Amendments

Your Name	Your relationship to WSBA	Comments and Feedback
Amanda Masters	Licensed legal professional (Lawyer, LLLT, LPO)	
Jacquelyn Goetz	Licensed legal professional (Lawyer, LLLT, LPO)	
Jason Wilson-Aguilar	Licensed legal professional (Lawyer, LLLT, LPO)	
Danielle Dallas	Licensed legal professional (Lawyer, LLLT, LPO)	
Annie Cole	Licensed legal professional (Lawyer, LLLT, LPO)	
Chelsie Warner	Licensed legal professional (Lawyer, LLLT, LPO)	
aida almasalkhi	Licensed legal professional (Lawyer, LLLT, LPO)	
Laura Brindley	Licensed legal professional (Lawyer, LLLT, LPO)	
Andrew Fisher	Licensed legal professional (Lawyer, LLLT, LPO)	
Eric Allen	Licensed legal professional (Lawyer, LLLT, LPO)	
Christopher Davis	Licensed legal professional (Lawyer, LLLT, LPO)	CLE requirements are already a bit of a tangled mess. Adding a new category will only makes this worse. Therefore, while I understand the need for attorneys to understand the legal and ethical risks around technology, increasing the CLE burden in terms of both credits and compliance complexity seems a poor way to achieve the needed result.
Gary Grotz	Licensed legal professional (Lawyer, LLLT, LPO)	
Emily Carlin	Licensed legal professional (Lawyer, LLLT, LPO)	Please don't make CLE requirements more complicated.
Dominic Lindauer	Licensed legal professional (Lawyer, LLLT, LPO)	The proposed suggested amendment is unnecessary.
Susan Jones	Licensed legal professional (Lawyer, LLLT, LPO)	
Angela Sawyer	Licensed legal professional (Lawyer, LLLT, LPO)	
Margo Nguyen	Licensed legal professional (Lawyer, LLLT, LPO)	These can be offered within the required ethics requirement.
Toni Meacham	Licensed legal professional (Lawyer, LLLT, LPO)	We already have adequate requirements. This can be incorporated into the CLEs already required, not an additional requirement.
Rebecca Mader	Licensed legal professional (Lawyer, LLLT, LPO)	
Tom Overcast	Licensed legal professional (Lawyer, LLLT, LPO)	What will be the next special interest that will require additional credits in a specialized area that isn't applicable to me? Seems this is a slippery slope as has been case with the creation of sections of the bar.
Patricia W Eby	Licensed legal professional (Lawyer, LLLT, LPO)	I think it is good to have those ethics classes available. I do not agree they should be required every reporting period.
Breanna	Licensed legal professional (Lawyer, LLLT, LPO)	It is already hard enough to find CLEs that meet the requirements and to gain them in the allotted time with working - to require more specific CLEs would make it even harder and likely more expensive to attain.
Brooke Wright	Licensed legal professional (Lawyer, LLLT, LPO)	Lawyers need more focus on core ethics/RPCs, not these additional topics.
Wade Taylor	Licensed legal professional (Lawyer, LLLT, LPO)	CLE's are already burdensome. Adding additional requirements that are not in any way tailored to have relevance to an individuals practice only serves to make the requirements that much more unpalatable.
Christopher T. Benis	Licensed legal professional (Lawyer, LLLT, LPO)	Just makes it harder to stay licensed. I am close to retirement. Thus nonsense will probably force my hand.

Robbi Kesler	Licensed legal professional (Lawyer, LLLT, LPO)	While I believe those topics are valuable, I don't like adding additional categories as state specific mandatory for each reporting cycle. It's already hard enough to get all the CLEs, particularly for attorneys like myself that often get CLE credits at large national conferences and I'm not always sure they will count in WA.
Julie Murray	Licensed legal professional (Lawyer, LLLT, LPO)	
Kristi Denney	Licensed legal professional (Lawyer, LLLT, LPO)	
Catherine Blinn	Licensed legal professional (Lawyer, LLLT, LPO)	These are very narrow topics. The Bar should not require additional CLE hours on extremely narrow topics.
Martin Anderson	Licensed legal professional (Lawyer, LLLT, LPO)	MCLE is already a very wasteful and unnecessary exercise for most professionals (as evidenced by the fact that you exempt numerous categories of persons from compliance, e.g., Judges). Expanding the requirements just makes an unnecessary system more complicated.
D. Neil Olson	Licensed legal professional (Lawyer, LLLT, LPO)	
Sam Barker	Licensed legal professional (Lawyer, LLLT, LPO)	
Chris Williams	Licensed legal professional (Lawyer, LLLT, LPO)	Please don't make things too complicated. Professionals find out what they need to know, regardless of topic, so this could actually become limiting in terms of promoting enhanced knowledge across the bar. If a specific skill or issue is so important everyone should know it, send every lawyer a letter/email saying what it is. That is more targeted and more effective.
Brittany	Licensed legal professional (Lawyer, LLLT, LPO)	There are too many categories that CLEs must come from. It's hard enough already to make sure we're getting credits in the right categories. As a lawyer licensed in multiple states, this becomes a logistical nightmare. I suggest putting out more CLEs in these topics so that they are easier for lawyers to watch, rather than mandating specific categories.
Adam Walters	Licensed legal professional (Lawyer, LLLT, LPO)	It is already very difficult for those of us who practice and are licensed in multiple jurisdictions to keep track of all the various new Ethics requirements that states are imposing. Mandatory CLE's not related to one's practice area are ineffective anyway and just serve as an annoyance to most practitioners.
Annaliese Harksen	Licensed legal professional (Lawyer, LLLT, LPO)	
David Lake	Licensed legal professional (Lawyer, LLLT, LPO)	I'm licensed in other states that have similar mental health CLE requirements. From my standpoint, it is a waste of time and money. If there are mental health issues I need to address, I know there are resources available. My license should not hinge on whether I listen to a lecture on a personal/non-professional matter.
Carol Ann Churchill	Licensed legal professional (Lawyer, LLLT, LPO)	If you add more credits in one area, remove them from another. I am too old to care about IT and will probably die while shredding my legal files. I would have preferred to get the IT lessons about 20 years ago. Keep the on line courses going. I like to learn for the sake of learning, but do not want to be mandated to do anything.
Frederick Haist	Licensed legal professional (Lawyer, LLLT, LPO)	

Jordan Urness	Licensed legal professional (Lawyer, LLLT, LPO)	I'm opposed to the Suggested Amendment because the Board should be focused on continuing LEGAL education. Ethics of tech, mental health, etc. are great topics but are not central to the practice of law. We should also eliminate requirement to obtain a credit in the topic of equity, inclusion, and the mitigation of bias. The state bar should be focused on LEGAL education - not advancing a social, political, or religious agenda.
Stephanie Dikeakos	Licensed legal professional (Lawyer, LLLT, LPO)	
Lindy Laurence	Licensed legal professional (Lawyer, LLLT, LPO)	I don't see the need to add additional and specific ethics requirements to our MCLE obligations. I don't believe that technology security and mental health are topics that should be required for every attorney. If the Bar wants to make these CLEs available, then allow attorneys to self-select into those CLE events, but please do not add another burdensome requirement for attorneys who will not find this helpful, useful, or necessary to their practice.
Scott Peters	Licensed legal professional (Lawyer, LLLT, LPO)	Stop making this mandatory and dictating specific things we have to cover. If you want to say mental health ethics and technology security ethics will count as ethics, that is fine. But do not require it. Forcing people to take it will not be helpful. Those of us who want to take it will take it without being forced. Some of us get it through our work or from other things we are involved with. If you want to encourage people to do it then allow it to count. Forcing it upon people will never reach the outcome you want.
Ivana Guida	Licensed legal professional (Lawyer, LLLT, LPO)	I personally like to take mental health CLEs. However, as it already happens with the ethics CLEs, it's hard to find them and making those required would put additional stress on the completion of the CLE requirements. Since the goal of mental health CLEs is also to reduce stress, I am not in favor of creating additional requirements that can be hard to fulfill, therefore leading to the opposite result of instead creating more stress.
Shane Noworatzky	Licensed legal professional (Lawyer, LLLT, LPO)	
Brian G Gosline	Licensed legal professional (Lawyer, LLLT, LPO)	Many of us NEVER have any dealings in these particular area - we are bound by our ethics rules and those rules already govern us. They are broad enough to cover these areas. If courses are offered in those areas, then each attorney could choose for themselves what interests them.
Joseph Banks	Licensed legal professional (Lawyer, LLLT, LPO)	Once more, the Bar Association (who apparently has nothing else to do but come up with ADDITIONAL requirements for legal professionals) continues to increase the burden on members of the Bar by proposing to require NEW categories of MCLE credits. This has to stop. It is already an expensive and time consuming burden to get 15 credits yearly. Now, in addition to securing ethics and diversity credits, we now may need to also pursue "mental health" and "technology security ethics" credits? This is ridiculous. The Bar Association should not be adding to our burdens like this. Each attorney is best equipped to decide what education they should pursue; it should not be forced down our throats like this.

Charles W Bates	Licensed legal professional (Lawyer, LLLT, LPO)	This forces me to take CLE credits on topics that I do not deal with in my practice. More and More the bar association is "slicing and dicing" topics thinner and thinner. I would rather focus on topics that I do deal with daily and consider to be important for me.
Scott Jackson	Licensed legal professional (Lawyer, LLLT, LPO)	We already have enough ethics requirements, we do not need more.
Scott Frost	Licensed legal professional (Lawyer, LLLT, LPO)	We have to many specialized requirements already. To hard to keep track of and making people take mandatory topics helps no one.
Brendan Brophy	Licensed legal professional (Lawyer, LLLT, LPO)	
Eric Schuler	Licensed legal professional (Lawyer, LLLT, LPO)	It makes no sense to add more CLEs to the required amount. These additions will do little to nothing to help people understand mental health issues and security issues. Many people are set in their own ways and without actually having to deal with people with mental illness they will simply not understand or not participate. this is a useless attempt at education and only serves to add additional costs to licensing.
Brandon Keith	Licensed legal professional (Lawyer, LLLT, LPO)	
Joel Ard	Licensed legal professional (Lawyer, LLLT, LPO)	MCLE requirements are being sliced and diced into plenty of people's pet projects. The dismally low quality and applicability of the "equity" material is a great example of the diminishing returns on trying to create a detailed MCE curriculum. Stop while you are only a little behind.
Travis Lindsey	Licensed legal professional (Lawyer, LLLT, LPO)	It baffles me that WSBA views licensed attorneys as irresponsible children and that it is WSBA's duty to parent us all. I would much rather devote my precious time and CLE selections to courses that will assist with substantive knowledge and/or skills in particular subject areas relevant to my clients and practice areas.
Zak Griefen	Licensed legal professional (Lawyer, LLLT, LPO)	I think that the current MCLE requirements for ethics credits are sufficient. Thank you.
Arianna Cozart	Licensed legal professional (Lawyer, LLLT, LPO)	The micromanagement (?) of our CLE credits is getting ridiculous.
Kathleen Galioto	Licensed legal professional (Lawyer, LLLT, LPO)	I'm not in favor of increasing total required ethics credits. As it stands right now, you can simply allow lawyers/legal professionals to satisfy the ethics credit requirements by taking CLEs covering the 4 separate categories (mental health, technology security, etc.). Expand the scope of allowable topics that fit under the ethics umbrella but not the credit requirement.
Irving Sonkin	Licensed legal professional (Lawyer, LLLT, LPO)	The suggested amendment covers issues that I never come across as a licensed attorney.  The requirement is burdensome and not a good use of my funds nor my time
Kent Meye	Licensed legal professional (Lawyer, LLLT, LPO)	There is no need to further micromanage the types of classes that lawyers take to fulfill the MCLE requirement.
Michele Tyler	Licensed legal professional (Lawyer, LLLT, LPO)	
Mariah Harrod	Member of the public	MCLE should not impose further requirements unless it is absolutely certain that those requirements are accessible to all members. If these CLEs are abundant, then such a change is more reasonable than if the change happens completely top-down without considering the feasibility of fulfilling these new requirements.



Zack Naqvi	Licensed legal professional (Lawyer, LLLT, LPO)	Not in favor of additional MCLE requirements because of the additional inconvenience. If they shall be added, I do like the free, online MCLEs.
Alexander Paukert	Licensed legal professional (Lawyer, LLLT, LPO)	Respectfully, I do not see these additional credits creating a meaningful enough benefit to justify the cost and time commitment.
Mark Millen	Licensed legal professional (Lawyer, LLLT, LPO)	The ever increasing micromanagement of MCLE content by the bar is both unhelpful and unwarranted. Lawyers self interest, coupled with E&O carrier requirements, are more than enough reason to stay mentally healthy and to take reasonable efforts to secure data. Stop with the pet project MCLE content directives. WA state already emands far more MCLE per year than AK and CA (i am a member of all 3) and every state is demanding more and more specific courses which becomes an absurd burden for multi-state attorneys.
Cyrus Christenson	Licensed legal professional (Lawyer, LLLT, LPO)	Let me manage my own practice.
Scott S. Anders	Licensed legal professional (Lawyer, LLLT, LPO)	Quit adding unnecessary burdens.
Al Van kampen	Licensed legal professional (Lawyer, LLLT, LPO)	Please stop micromanaging the nature of CLE credits we choose. We are professionals entrusted with significant responsibilities to our clients and the public, and in a far better position that you to know which CLEs will be most helpful.
Robert Whatsitt	Licensed legal professional (Lawyer, LLLT, LPO)	
Rod Fonda	Licensed legal professional (Lawyer, LLLT, LPO)	I hesitate to ask what "equity ethics" might be. I think the WSBA has gone way overboard past law into politics. The primary focus for the WSBA should be lawyers as lawyers, not as political animals; that task is up to others, NOT the WSBA. To the extent that justice and equal treatment by the courts is concerned, fine. I have attended a number of Legal Lunchbox seminars that have gone way over the left edge. The WSBA needs to retreat from that expansion of its sphere of interest.
Paul M Larson	Licensed legal professional (Lawyer, LLLT, LPO)	There are enough CLE requirements. These courses will not make anyone a better lawyer, nor improve client services. Anyone who could benefit from this training, will ignore it and do what is in their nature to do.
Lewis Harrington	Licensed legal professional (Lawyer, LLLT, LPO)	The requirements in WA are already onerous compared to other Northwestern states. At this point the State should be paying us to take all of these NOT us paying you to eat up time I need to pay off student loans. To be clear..I am not saying it is a waste of time as it is a worthwhile subject but where does it end?
Katherine Mathews	Licensed legal professional (Lawyer, LLLT, LPO)	Obtaining ethics credits is difficult already. Trying to find CLEs that satisfy an ethics requirement this specific in addition to the already hefty ethics requirements will be unduly burdensome.
Randolph J St. Clair	Licensed legal professional (Lawyer, LLLT, LPO)	Not in favor. I get plenty of mandatory training from the US DOJ on these subject areas but nothing that would qualify for CLE credit in these proposed very specific/narrow "ethics" subject areas. Unless the bar is going to provide free online CLEs to take care of the new requirements, this seems a bit onerous and overboard to me.
Laura Henderson	Licensed legal professional (Lawyer, LLLT, LPO)	There are already enough hoops to jump through.

Jason McInnes	Licensed legal professional (Lawyer, LLLT, LPO)	This is going to be a slippery slope. Why mental health ethics and not some other form of ethics? If we need more ethics education, add an additional credit, but I don't think we should be adding more "kinds" of ethics credits. Technology familiarity in today's society is important, but maybe make that a skills requirement instead of an "ethics" requirement. I think we're going to end up going down a rabbit hole over why some topics get separate ethics credit requirements and others don't. Or create a rotating credit that is different every reporting period and can evolve as our concerns over ethics education evolve. Have the membership vote on what the new ethics topic should be for the reporting period.
Alexander Ransom	Licensed legal professional (Lawyer, LLLT, LPO)	There's no need to shoulder more CLE requirements on already-burdened attorneys.
Joseph Lipinsky	Licensed legal professional (Lawyer, LLLT, LPO)	
Joseph Beck	Licensed legal professional (Lawyer, LLLT, LPO)	I don't see this as necessary and it adds additional complexity to obtaining CLE credits. I don't support this.
Chris Cowgill	Licensed legal professional (Lawyer, LLLT, LPO)	Instead of mandating the types of ethics credits lawyers must take, WSBA should concentrate on offering more options to choose from.
Matt Lincicum	Licensed legal professional (Lawyer, LLLT, LPO)	I believe the ethics training materials should be limited to those aspects that are specific to the legal profession and associated professional responsibility. General aspects such as technology security, mental health, or equity for that matter, should not fall under this umbrella. Moreover, increasing the burden of training requirements should generally be disfavored, as such trainings provide no measurable benefits to the public or to the profession, and increase the costs of compliance and monitoring.
Paul Goulding	Licensed legal professional (Lawyer, LLLT, LPO)	this is getting way too complicated. So now we are supposed to somehow track down credits in technology and mental health? Too much.
Franco Becia	Licensed legal professional (Lawyer, LLLT, LPO)	
Mary Duncan	Licensed legal professional (Lawyer, LLLT, LPO)	It seems unnecessary
Bonnie S. Speir	Licensed legal professional (Lawyer, LLLT, LPO)	Are you serious?! Too much. Enough already. Just stop. Provide CLEs that will educate lawyers on the proposed new topics to fill the ethics requirement and let them choose what is pertinent to their practice. Lawyers have enough to worry about without complying with this suggested amendment. "The amendments would increase the total credit requirements in the area of legal ethics to eight credits, and create four distinct categories of legal ethics: (1) general ethics and professional responsibility; (2) equity ethics; (3) technology security ethics; and (4) mental health ethics." Unbelievable.
Elizabeth McAmis	Licensed legal professional (Lawyer, LLLT, LPO)	The sub-categories should not be added as professionals should be able to determine the ethics learning that is most applicable to their practice. The different sub-categories may also create barriers for some licensees, and potentially increase the cost of CLEs since certain categories would be mandated (again, a barrier for some licensees).
Faisal Akhter	Licensed legal professional (Lawyer, LLLT, LPO)	
Randall Wilburn	Licensed legal professional (Lawyer, LLLT, LPO)	

Peter T. Connick	Licensed legal professional (Lawyer, LLLT, LPO)	WSBA is really useless. We pay annual dues to have WSBA bother most of us and impose non-sensical requirements. Truly useless!
Steven P. Pyle	Licensed legal professional (Lawyer, LLLT, LPO)	We have enough requirements as it is and this simply adds another layer of self-management to the already lengthy list. My personal mental health would be best served to leave things as is. I am a professional and should be allowed to assess what it is I need to best keep myself abreast of the things I need to stay on top of my ability to offer the best in legal services. No mental health CLE course is going to direct my mental health. I will need to set in motion the things I need to stay healthy, or recognize that I need help and seek it out. A CLE requirement is not going to help in achieving optimal or even "good" mental health. As for the tech, it is and has been for years now, learn it or get left behind. And there is plenty of help available. Again, I do not believe we need someone to tell us how to stay abreast of the times. Now, if you were offering free hours to achieve this, that would be different. But, that is not on the table and we all know, nothing comes for free.
Rebecca Dellicker	Licensed legal professional (Lawyer, LLLT, LPO)	This is overly complicating things and frustrating access to easily completing needed CLEs. CLEs in these areas should be easily available to members (in fact, should be free), but making them required makes things too complex. I would personally rather go back to no specific categories of ethics credits in order to have attorneys focusing on whatever area of ethics they don't know as much about or wanted a refresher in rather than mandating a specific breakdown of credits.
Heidi Baxter	Licensed legal professional (Lawyer, LLLT, LPO)	I think ethics is ethics and creating more categories is ridiculous. Many attorneys don't even pay any attention to what the ethics topic is, they just punch the ticket. If you feel that we need mental health and technology security ethics credits, then just start making them block options at WSBA CLEs and let people choose what they think they need/want or can learn from. It would be like telling us we need 5 CLE credits from Real Property, 5 CLE credits from Criminal Law, 5 CLE Credits from Civil...
Susan West	Licensed legal professional (Lawyer, LLLT, LPO)	Stop slicing and dicing the CLE requirements please. This new rule imposes a blanket rule on everyone and you really have no idea which lawyers would really benefit from it (and for which this will be a waste of time). We're not all the same and you've done no work, as far as I can tell, to determine the breadth of practices in the WSBA. I know you've never asked me anything about my practice, and since what I do is very far outside the stereotypical legal practice, you can't possibly be taking into account what my CLE requirements really should be. Please stop assuming you know what we're doing out here in the field and assigning CLE requirements based on your assumptions. And please trust us to pick and choose based on what we believe we need education in. We got through law school and the bar; you can trust us to make good CLE choices.

Bruce Medeiros	Licensed legal professional (Lawyer, LLLT, LPO)	The additional defined areas of ethics are not necessary. Raising the required ethics credits to 8 is not justified and with the proposed additional types of ethics credits required will only place additional burdens on attorneys to seek out the credits in the specific areas. No meaningful change to the practice of law in Washington will result from the Suggested Amendment.
Christopher Marsik	Licensed legal professional (Lawyer, LLLT, LPO)	
Timothy McLaughlin	Licensed legal professional (Lawyer, LLLT, LPO)	This is getting ridiculous. Too many requirements.
Robert Miller	Licensed legal professional (Lawyer, LLLT, LPO)	Any benefits would be marginal, and we don't have time for this.
Craig Cahoon	Licensed legal professional (Lawyer, LLLT, LPO)	
Elizabeth MacLachlan	Licensed legal professional (Lawyer, LLLT, LPO)	This requirement would not increase the competency of lawyers in providing for their clients and would complicate the MCLE requirements unnecessarily.
Rachel Harper	Licensed legal professional (Lawyer, LLLT, LPO)	
Tom Sackmann	Licensed legal professional (Lawyer, LLLT, LPO)	These topics should be included where appropriate in CLE offerings but not established as separate requirements.
Jeff Tolman	Licensed legal professional (Lawyer, LLLT, LPO)	The WSBA seems to be placing many non-continuing EDUCATION requirements on the practitioners. The Legal Lunchbox series, for example - which I think is great - as often as not is about the practitioner - how to deal with stress, how to balance your life - than actual education about the law. These proposed areas are important, but let the lawyers determine their comfort level about these areas. Just my thoughts...
Yahya Shakir	Licensed legal professional (Lawyer, LLLT, LPO)	
Brett Nelson	Licensed legal professional (Lawyer, LLLT, LPO)	
Alan Zarky	Licensed legal professional (Lawyer, LLLT, LPO)	Everyone knows (though the Bar pretends not to, sort of like judges pretending not to know that many cops lie to avoid suppression of evidence) that most MCLE is just money-making for the companies that produce them. This is perhaps especially true of the ethics requirement (though at times a good ethics program can get to the tougher problems for which there is no solution but can give one a good way of thinking about it). Don't add to the requirement; if you feel compelled to require these, require 1/2 hour of each and include it in the current requirement.
Sherri Farr	Licensed legal professional (Lawyer, LLLT, LPO)	Ethics credits are not easily obtainable. I'd be in favor ONLY if the Bar offered these CLEs with creditors 2 to 3 times per year, making the ability to obtain the credits reasonable.
Anna Johnsen	Licensed legal professional (Lawyer, LLLT, LPO)	This suggested amendment would make it more difficult to receive CLE credit from the national on-demand CLE services that so many of us use. It's my understanding that some CLEs will be offered for free through a different service, but I think WA lawyers should be able to use their own discretion to evaluate which CLEs will best assist them and their practice areas. This amendment seems to complicate the process of getting all of the required credits by creating the four subcategories within the category of ethics.
Andrew	Licensed legal professional (Lawyer, LLLT, LPO)	We don't need more restricted requirements to meet the MCLE. An optional phase could be implemented to ensure there's enough classes for people to meet the requirement, then re-evaluated.
Awesta Masshoor	Licensed legal professional (Lawyer, LLLT, LPO)	

Lindsey Wagner	Licensed legal professional (Lawyer, LLLT, LPO)	
Charlotte Smith	Licensed legal professional (Lawyer, LLLT, LPO)	I'm a mom of three, it's hard enough earning these without more. If you must add, reduce requirements in other categories.
Jeannie Gorman	Licensed legal professional (Lawyer, LLLT, LPO)	I don't often lean libertarian but this proposal justifies why some do. There is a giant danger in legislating exactly what every single lawyer (oops: legal professional) needs to 'be educated on' and not treating them as adults, fully capable of understanding and embracing their unique sets of obligations. Leave it alone! Let us decide for ourselves what to spend massive amounts of CLE time and money on. Really. Please.
Susan Koeppen	Licensed legal professional (Lawyer, LLLT, LPO)	This would make obtaining ethics credits extremely complicated, and would probably drive up expenses. What if these courses are not frequently offered? Mandatory ethics training on specific ethics topics would cause me to give up my Washington state license upon retirement, which I will do in the next few years.
Sonja Halverson	Licensed legal professional (Lawyer, LLLT, LPO)	This is one more thing to manage for already overworked and overwhelmed attorneys.
No comment.	Licensed legal professional (Lawyer, LLLT, LPO)	No value for attorneys for this training
Jon Jurich	Licensed legal professional (Lawyer, LLLT, LPO)	
Sandra Trapnell	Licensed legal professional (Lawyer, LLLT, LPO)	
Richard Bueschel WSBA 17836	Licensed legal professional (Lawyer, LLLT, LPO)	Waste of time.
Ruth Kimball	Licensed legal professional (Lawyer, LLLT, LPO)	Too much micro managing. Attorneys should have more flexibility to learn what most helps them in their practice.
Jason Corbeille	Licensed legal professional (Lawyer, LLLT, LPO)	
Mel	Licensed legal professional (Lawyer, LLLT, LPO)	Too many subcategories for continuing legal education; there are plenty of CLEs currently offered that address these topics, no need to mandate them.
Michael R Addams	Licensed legal professional (Lawyer, LLLT, LPO)	I think this is overreach by the WSBA. There should be a requirement to get a certain number of credits total with the expectation that attorneys will decide for themselves what types of training would be most beneficial to their practice of law. The WSBA should not be deciding for its members.
Alexandra Gilbert	Licensed legal professional (Lawyer, LLLT, LPO)	
Curt Coyne	Licensed legal professional (Lawyer, LLLT, LPO)	Too much detailed regulation on everything, already. This is just bureaucracy expanding itself. Stop it. Do less not more.
Anita Yandle	Licensed legal professional (Lawyer, LLLT, LPO)	

Chris Rounds	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The MCLE requirements should be simplified instead of becoming more and more complicated. We are grownups, and we should have the discretion to choose the topics that will serve our own individual needs.</p> <p>A few years ago, we were inundated with CLEs on ethical concerns about technology. This proposal is way behind the times. My eyes roll into the back of my head when I see more CLEs being offered on this stuff.</p> <p>I'd also suggest that you take a look at the disciplinary notices. I see old-fashioned problems driving almost all of the cases. I don't see much if anything on technology-related problems.</p> <p>Don't fix things that aren't broken.</p>
Stephen Biddle	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Technology competency is the responsibility of the ethics oversight function of the BAR. Failure of some lawyer to maintain this competency consistency should not create a burden on all through this remedy of increase continuing education. The more appropriate action would be advisory guidelines on expectations and strong enforcement of failure (ransomware etc). As to the mental health issues. Provide better BAR mental health through the ABA benefits program first, not tax our mental health further with more pedantic presentation. For many of us mental health is not an issue of understanding but space and energy. By that, I mean many of us who struggle with this are painfully aware of the causes and best practices but simply do not have space to use them. Increasing continuing education does nothing to abate these issues. It only forces them into the awareness of those who were previously willfully blind.</p>
Michael J Edwards	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The addition of four new subcategories of ethics is absurd and unnecessary. The amendment fixes a problem that does not exist and appears only to create work/expense without good cause. Attorneys are required to maintain a minimum number of ethics CLE hours in keeping with the rules of professional responsibility. Adding additional categories that are not included or described in the rules of professional responsibility is unwarranted. Teaching lawyers that RPC 1.1 includes the obligation to be competent in matters of technology security and mental health ethics for example would be more helpful. Are the RPCs not already comprehensive enough? Adding new reporting requirements does not help folks who struggle with legal ethics and only creates an additional expense that is onerous for many attorneys including small or solo practitioners and those not living in King, Snohomish, or Pierce Counties.</p>
Nick Nilan	Licensed legal professional (Lawyer, LLLT, LPO)	This will make tracking CLE equity credits overly complicated and confusing.
shawn morgan	Licensed legal professional (Lawyer, LLLT, LPO)	Too many credits required already
Megan Frye	Licensed legal professional (Lawyer, LLLT, LPO)	Ethics credits are already difficult enough to obtain in each reporting period. Do not increase the requirement.
Jake Ferderer	Licensed legal professional (Lawyer, LLLT, LPO)	

Heidi E Appel	Licensed legal professional (Lawyer, LLLT, LPO)	I would like to see the bar association focus on its primary responsibility of disciplining unethical attorneys that are harming the public rather than micromanaging CLE choices.
Melissa Alegre	Licensed legal professional (Lawyer, LLLT, LPO)	
Victor Cerda	Licensed legal professional (Lawyer, LLLT, LPO)	
L. Brooks Baldwin	Licensed legal professional (Lawyer, LLLT, LPO)	Too many distinctions on the ethics credits. I think it's just too much minutiae for us lawyers to have to figure out which buckets our ethics programming will need to fit into - and how to find the more obscure required programming. I prefer requiring a straight number of Ethics credits and leaving it up to each attorney to choose (or resort to) those they can or are able to take to fulfill the (general) requirement.
Gregory Scott Hoover	Licensed legal professional (Lawyer, LLLT, LPO)	Too much. Keep things simple.
Eric P. Johnson	Licensed legal professional (Lawyer, LLLT, LPO)	I fail to see the real benefit of this proposed change. It just adds more complexity to the CLE requirement
Chadwick Proctor	Licensed legal professional (Lawyer, LLLT, LPO)	While technology breaches and mental health are very important issues, they don't necessarily apply to every attorney in practice. It would be great to see the development of these areas in ethics offerings; however, mandating such would counter productive.
Karen Terwilliger	Inactive member	As an inactive member, I'm still trying to keep up with my CLE annual requirements.  Increasing the number of ethics categories creates more reporting complexity without providing actual enhancements for ethics education. Better approaches would be to encourage members to earn their credits in Technology Security and Mental Health Ethics classes OR focus the WSBA CLE classes on those subjects. Complying with the CLE credit process is complex enough - we don't need more arbitrary credit classifications.
Heidi Irvin	Licensed legal professional (Lawyer, LLLT, LPO)	The rules are getting too complicated. Don't add to the problem.
STEPHEN O 'NEILL	Licensed legal professional (Lawyer, LLLT, LPO)	
David Gecas	Licensed legal professional (Lawyer, LLLT, LPO)	I appreciate having a wide variety of CLE topics to choose from. These topics are often suggested by Bar members who would like to learn more about a particular area. I previously practiced in a State where CLE's were available but not required. I attended many CLE's while I was there, and I did not get the feeling that fewer people attended CLE's. I prefer that system and am not in favor of increasing the number of required CLE's. With limited time for CLE training, I value the freedom to choose which CLE's will be most helpful to me.
Laura Waller	Licensed legal professional (Lawyer, LLLT, LPO)	
Stephen Kirby	Licensed legal professional (Lawyer, LLLT, LPO)	I think the ethics hours as they stand are sufficient. If the WSBA has concerns please modify rules not education.
Joseph Ward	Licensed legal professional (Lawyer, LLLT, LPO)	
Anita Redline	Licensed legal professional (Lawyer, LLLT, LPO)	No additional credit units. Keep the number of credit units but add the two types of credit units.

Devin McComb	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The increasing demands on lawyers should not originate from the WSBA - our clients and the overall economic environment create enough additional demands. Given the state of practice in Washington, I don't think requiring more CLE and requiring additional compliance tracking will benefit the practice of law. If WSBA wants to provide additional CLE to practitioners to address a concern, there are many venues/channels for those programs and WSBA could offer them for free to encourage participation. I have no doubt many would volunteer for these programs if they were offered in several forms and for free.</p>
Kevin Fay	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I am not a fan of the continued laundry list of requirements for MCLE. If this keeps up, the CLE requirements will turn into a set curriculum.</p> <p>There are many lawyers for whom both of these requirements would be irrelevant and a waste of time. We ought to let lawyers pick and choose what continuing legal education would be most relevant and helpful to their practice.</p>
Jeanette Henderson	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The proposal seems unnecessary. Just offer those kind of classes, but they should be optional in terms of fulfilling ethics credits.</p>
Michael Lasky	Licensed legal professional (Lawyer, LLLT, LPO)	<p>While the proposed action is well intentioned, I have practical experience from a state which did this sort of thing with CLE credit requirements, and it did not go well. There are three things wrong with this approach:</p> <ol style="list-style-type: none"> <li>1. It will never end. The temptation to create ever more categories of mandatory CLE will not stop with this idea. There will be other ideas which have equal merit.</li> <li>2. Washington does not have the clout of California and there will be few quality choices for such specialized courses. I know from my own experience in this other state. The quality of programming was not good and in 20 years, it never improved. (BTW, it was not California).</li> <li>3. Most WA attorneys are specializing and we need much CLE time as possible just to keep our skills current with in our specialty area. This will serve the public better.</li> </ol> <p>So please don't tamper with a successful cle system. If you do, this will only be the beginning of turning success into failure.</p>



None	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I oppose this proposed change. I don't know if you consulted new or younger attorneys, but mandating more CLEs (on topics unrelated to the practice of law) in this economic climate is not prudent. You should be focused on relieving strain on your members; not pushing something that should be taught in law school, on the job, or through common sense into required CLE categories. Many employers already have their own document security training - especially government lawyers - specific to their office/firm. It's not something evenly applicable to all attorneys, and, as such, should be included with the ethics CLEs, not it's own requirement.</p> <p>I also have concerns that your mental health requirement will not provide for sufficient accommodations for those that have religious objection to counseling, psychology, and "mental health" treatments. I would also, at the very least, recommend changing to "behavior health" because the medical field, and society, is moving away from the potentially loaded term "mental."</p> <p>I also do not understand the need to collect the names of individuals that provide responses. If you want honest feedback, this is not the way to go about doing it.</p>
Daniel J Roach	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Why doesn't the WSBA let practicing lawyers determine what we need to know to be of best service to our clientele?</p>
Felicia	Licensed legal professional (Lawyer, LLLT, LPO)	<p>We already have to meet ethics categories, it is just adding more complication to getting those credits. If you are going to add this, providing free CLE's on this subject would be very helpful. It's already expensive and time consuming to do all the CLEs required and keep up on trainings for our specific profession, which we often end up doing more than 15 credits per year due to this. Then to add on more ethics which probably wouldn't be covered in our standard CLE's would be difficult.</p>
Thomas R Lavallee	Licensed legal professional (Lawyer, LLLT, LPO)	
Christiana Muoneke	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The proposal seems to unnecessarily complicate CLE reporting requirements, with benefits likely accruing only to CLE providers.</p>

Sara Anderson	Licensed legal professional (Lawyer, LLLT, LPO)	<p>While I appreciate the intent behind this proposal is to assist with ensuring client security in an ever more technology-heavy environment + to address mental health, which are both great things, the requirement that every lawyer, every reporting period, obtain such specific requirements seems overbearing. Some lawyers use very little technology still, and it would be irrelevant to their practice to be forced to take a "technology security ethics" course. It is unclear whether the mental health applies to clientele or lawyers, but either way it seems forceful to require it--many lawyers have almost no contact with clientele, and it seems like those who are not seeking out courses related to mental health would not need it for themselves.</p> <p>All in all, I think that encouraging individuals for whom it is relevant to obtain these specific designations of credits could be useful, but requiring it feels forceful, overbearing, controlling, and generally unnecessary. In weighing the costs/benefits, I think it is simply making it more difficult for lawyers to get their CLE rather than truly adding to the education and abilities of practicing attorneys.</p>
Christien Drakeley	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Most of the classes of this ilk are woefully juvenile and taught by people who haven't a clue about the practice of law.</p>
Kerri Davis	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It is already impossible to determine which CLEs count toward specific requirements when they are not offered by the WSBA. With these rules, I can't tell if a CLE that is sponsored by my company, or in my field, would count before I sign up for and pay for it. How are we to determine which non-WSBA CLEs, events, conferences, etc would satisfy these requirements?</p>
Ellen Jackson	Licensed legal professional (Lawyer, LLLT, LPO)	<p>We already have too many specific "this many of that type" CLE credits. Getting more specific makes those of us who have to find seminars/conferences/classes that both meet the requirements AND are somewhat relevant to our actual practices go absolutely bonkers.</p>
Heidi Gassman	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I value ethics CLEs which cover diversity, equity, and inclusion, even though the requirement for these specialized credits is a bit of burden to me (I have to seek out specialty CLEs, and often pay for them). Adding two more subcategories, "technology security" and "mental health", however, is just too much. Will there be enough CLE providers for me to find an accredited CLE? Will it cost me additional money (I'm not a wealthy practitioner)? I also don't think that requiring these additional two ethics credits will change bad practices of bad attorneys. Please don't add these requirements to my mandatory CLE minimums.</p>
Ann Wilson	Licensed legal professional (Lawyer, LLLT, LPO)	<p>While I believe that offerings in the suggested categories would be helpful, we don't need more mandatory categories.</p>
Lindsey Golden	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Amendment takes away flexibility in choosing continuing education courses most relevant to a lawyer's career.</p>
Natalie Hocken	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Legislating this is not necessary or welcome. Include these options as part of the broader general ethics offerings, but adding additional requirements targeted on technology and mental health does not seem necessary.</p>

Lee Smith	Licensed legal professional (Lawyer, LLLT, LPO)	I am against segmenting professional ethics CLE into ever increasing checkbox categories. I believe that we should teach and emphasize basic ethics principles applicable across all disciplines. Quite frankly, if we can successfully teach lawyers to think about the fundamentals of ethics in everything that they do, the practice of law would be 10x better than teaching ethics as a CLE checkbox 'specialty'.
Sanya Hill Maxion	Licensed legal professional (Lawyer, LLLT, LPO)	I believe that we lawyers are required to take too many CLE credits already and the CLE classes are already too expensive. Instead of requiring us to now that 4 separate categories of ethics CLEs we should be able to only take 2 and we should be able to take the 2 categories that best align with our practice specialties and experiences. Enough is enough!
Mallory Sullivan	Licensed legal professional (Lawyer, LLLT, LPO)	I support the additional topic areas but they should replace, not add to, the existing requirements. As a government attorney, the existing requirements are already too expensive. While free CLE options exists to rely on them means wasted time on material that is not relevant to my work. My agency provides ample resources on these topics, but they would not qualify as for CLEs meaning I would need to pay for these additional credits even though I am already receiving this information.
Jeffrey C. Mirsepasy	Licensed legal professional (Lawyer, LLLT, LPO)	Leave well enough alone.
Patrick J Cronin	Licensed legal professional (Lawyer, LLLT, LPO)	I am not in favor of changing the requirements by additional adding ethics credits.
Alex Baehr	Licensed legal professional (Lawyer, LLLT, LPO)	
Wes Larsen	Licensed legal professional (Lawyer, LLLT, LPO)	Attorneys are grown-ups. We should be allowed to choose what types of CLEs will benefit our lives and specific practices ourselves. If an attorney feels they need technology security and/or mental health CLEs, I expect they'll make the decision to take those courses of their own volition. No need to force an additional curriculum on us.
Nancy Rogers	Licensed legal professional (Lawyer, LLLT, LPO)	Keep it simple. More categories for different types of credits just makes it more difficult to acquire and track credits. This is additional bureaucracy with no benefit.
john Black	Licensed legal professional (Lawyer, LLLT, LPO)	It will be difficult to obtain these specific credits. I am also not in favor of micro managing the individual lawyers. I would be in favor of the WSBA encouraging the CLE providers of Ethics to add the subject matters to future seminars but not require the lawyers to search out and find specific credits. Moreover, simply checking the box that you attended a mental health seminar, for example, is not going to address or even begin to solve mental health issues in the profession. You might as well require mental health check ups for each lawyer. There has to be another way.
Geraldine Griffin	Licensed legal professional (Lawyer, LLLT, LPO)	I have been a member of the Massachusetts bar for much longer than the WA state bar (since 1998). The Massachusetts Board of Bar Overseers does not require CLEs and yet it manages to maintain a well respected membership of lawyers. The WA state bar CLE requirements already seems excessive without adding further hoops through which lawyers must jump.
Nancy Bradburn-Johnson	Licensed legal professional (Lawyer, LLLT, LPO)	

Timothy Meehan	Licensed legal professional (Lawyer, LLLT, LPO)	
Marcus Cannon	Licensed legal professional (Lawyer, LLLT, LPO)	I agree with this in concept, but am not in favor of the proposed. One hour is inadequate relative to the need for these requirements. 3 hours per topic would equate to an hour per year for each, and would encourage attorneys to spend more time addressing these important issues.
Sean Brown	Licensed legal professional (Lawyer, LLLT, LPO)	
Erika Nijenhuis	Licensed legal professional (Lawyer, LLLT, LPO)	Different legal professionals encounter different ethics issues in their practice. If these two new areas are considered useful, they should become options for satisfying the legal ethics requirements rather than mandates, so that professionals can select the ethics courses most relevant to the practice. The suggested amendment just makes satisfying required CLE requirements more burdensome without targeting the burdens to the appropriate subset of the legal professional population.
William Humphries	Licensed legal professional (Lawyer, LLLT, LPO)	Not in favor
Kevan Montoya	Licensed legal professional (Lawyer, LLLT, LPO)	We have too many rules that are specific to too many subtopics. If someone thinks they need help in these areas, they can take a CLE in them. Otherwise, let us take general ethics credits.
Ambur Hoffmann	Licensed legal professional (Lawyer, LLLT, LPO)	
Megan	Licensed legal professional (Lawyer, LLLT, LPO)	
Laura Poellet	Licensed legal professional (Lawyer, LLLT, LPO)	
Gary A Western	Licensed legal professional (Lawyer, LLLT, LPO)	
Ben Edelman	Licensed legal professional (Lawyer, LLLT, LPO)	Lawyers can determine for themselves what training they need and what is appropriate for their practice.
Arthur Quigley	Licensed legal professional (Lawyer, LLLT, LPO)	<p>This is a terrible idea. I already have great difficulty obtaining ethics credits. Now, I am being asked to add two more.</p> <p>We already have an incentive to have secure computers, etc. No one wants to get hacked. Out of self-interest, lawyers are motivated enough to have technology security.</p> <p>The medical health ethics requirement is a partial doubling-down on the bias ethics requirement. Just stop.</p> <p>I think these proposals would be over-regulation. You could give us a choice to take a bias, security, or mental health credit, but don't add more specialized ethics credits and don't add more total ethics credits.</p> <p>This is TOO MUCH. Leave well enough alone.</p>
Nicole D Andrews	Licensed legal professional (Lawyer, LLLT, LPO)	
Jason Moscovitz	Licensed legal professional (Lawyer, LLLT, LPO)	This amendment validates the concerns of all attorneys who noted the likelihood of additional expansion to the MCLE requirements when the previous subject-matter delineation to the ethics credits occurred. The slippery slope simply is not a fallacy here and however valuable the subject matter in question may be, requiring more and more specific divisions of ethics credits should be opposed.
Deborah Flynn	Licensed legal professional (Lawyer, LLLT, LPO)	There are more than enough requirements and burdens on practitioners. Enough is enough.

James Oberholtzer	Licensed legal professional (Lawyer, LLLT, LPO)	Just stop. You are wasting our time on things like these two additional CLEs. They totally miss the point. And they use the coercive power of the Bar to ill effect. Offer the courses, the same people will take them and have their benefits. Make us take them and we will strive to minimize them. Is there an ongoing political dialogue that these relate to? Its the only reason I can imagine for doing this. By proposing mandatory courses too often you undercut your efforts when you really have a good reason. This may feel like the best of the bad choices; but, it is actually still a bad choice. Don't do it!
Michael Levy	Licensed legal professional (Lawyer, LLLT, LPO)	If you wish to make CLE providers money you are succeeding. This is overkill to our profession. You will have almost no rural lawyers left because of making it overly difficult to practice law. While well intentioned, there is no logical reason to put the onerous requirement on the backs of the legal profession. Going to some seminar for this topic will not give me or most attorneys enough knowledge to even deal with the subject in an intelligent manner. This is why we hire IT professionals and buy anti virus everything software to safeguard information. It makes very little progress for the immense cost involved
Sonia Pitts	Licensed legal professional (Lawyer, LLLT, LPO)	Getting ethics credits is already a challenge. This represents a significant increase in the ethics requirements and adds complexity by creating 4 distinct categories of ethics. It is common practice for equity, inclusion, privacy, data security and mental health (among other things) to be addressed holistically by employers; adding formal, professional ethics continuing education requirements seems unnecessary,
ROCKIE HANSEN	Licensed legal professional (Lawyer, LLLT, LPO)	Although the topic of technology security is important, I believe it is not required for all lawyers in the same way that we don't require training on how to keep the books or manage staff. It is more appropriate for a general ethics credit that is available to those who would utilize and benefit from the training. The mental health training is beyond ensuring ethical conduct and I question why it would be required every licensing period. Again, it could be available as a general ethics credit for those who are particularly interested.
Brad Goergen	Licensed legal professional (Lawyer, LLLT, LPO)	
Christie Fix	Licensed legal professional (Lawyer, LLLT, LPO)	It's already difficult and expensive to acquire credits when one is not in private practice -- making more specific requirements will make it that much more difficult.
Katrine de Raoulx	Licensed legal professional (Lawyer, LLLT, LPO)	While continuing legal education and awareness is crucial to the development of attorneys, adding additional responsibilities at this time is not the answer. If the addition of these two Ethics categories were accepted, then lower the requirements in other categories so the total number of required credits remains the same.
Michael white	Licensed legal professional (Lawyer, LLLT, LPO)	I'm not sure what the equity ethics would be but my preference would be to have mandatory CLE stick to skills and knowledge helpful to helping clients with legal problems.
James Miller	Inactive member	

Jennifer Tengono	Licensed legal professional (Lawyer, LLLT, LPO)	Before requiring attorneys and other legal professionals to take technology security ethics courses, please require courts to have electronic record keeping systems. Makes no sense to require legal professionals to adhere to certain ethical trainings when the courts do not have the technology to accept electronic documents or to adequately search through cases online (i.e., Asotin County). These courses should remain optional and the WSBA should make such classes more widely available before they become a requirement, especially since the WSBA often charges hundreds of dollars for their CLEs and offer very few free courses.
Rebecca Dombcik	Licensed legal professional (Lawyer, LLLT, LPO)	It should be an included option, but should not be mandatory or added in addition to CLEs we have to complete at all. We should have discretion to choose it, if applicable to are practice.
Kelly Wood	Licensed legal professional (Lawyer, LLLT, LPO)	
Andrew Phillips	Licensed legal professional (Lawyer, LLLT, LPO)	There are enough rules and regulations providing for the resolution with penalties for negligence in data security and to protect the rights of the mentally impaired. We don't need to clutter our business with separate requirements.
Tricia Johnson	Licensed legal professional (Lawyer, LLLT, LPO)	This is combersome and not necessary for the practice of law.
Mark Hood	Licensed legal professional (Lawyer, LLLT, LPO)	It seems to me that legal ethics is evolving, and while the additional subject areas may be important it also seems that some practitioners will never encounter the areas in which the bar wishes to expand CLE credit hours. Let each individual practitioner determine if their practice requires the proposed mandated areas. Do not force upon the entire bar areas of ethics that may not apply to an individual attorney's practice.
Ron Kinsey	Licensed legal professional (Lawyer, LLLT, LPO)	This is way too specific; over the top; while of some general interest, as MCLE it's too "special interest." Give the proponents some space in the Bar New to air their concerns.
David Cromwell	Licensed legal professional (Lawyer, LLLT, LPO)	The proposed change to ethics continues a recent trend to require CLE that is not generally applicable to all attorneys. This places a particular burden on those of us who practice out of state. I have no issue with requiring more ethics credits if that is the direction the WSBA wants to go, but we should have the freedom to choose what CLE is most applicable to our practice. For instance, while the diversity and inclusion requirement sounds good in theory the CLE I downloaded to satisfy this requirement offered me nothing I could apply in my profession. Instead it was simply an exercise in checking a box. I received far more effective training as a federal employee.
Alexis Merritt	Licensed legal professional (Lawyer, LLLT, LPO)	I do not agree with adding more specific requirements and cost to continue our license each year. If you really want members to earn these credits, make them free as a lunchbox.
Kristi Weeks	Licensed legal professional (Lawyer, LLLT, LPO)	Ethics credits of any type are already extremely difficult to attain. They are not widely available and when they are, they are almost always for purchase as opposed to free or discounted. As a government attorney, I have to pay for my own CLEs. Adding these types of specific requirements means I am forced to pay a high fee for them out of my own pocket.

Sara Smith	Licensed legal professional (Lawyer, LLLT, LPO)	
Brian S. Boon	Licensed legal professional (Lawyer, LLLT, LPO)	I do not support adding additional MCLE requirements. In fact, I wish you would reduce them. In my opinion, MCLE is a waste of time for the vast majority of lawyers. Competent practicing lawyers already stay up to date in their fields. I subscribe to several patent and trademark law blogs which send me updates about developments in my practice every week, including summaries of, and links to, important precedential decisions at CAFC and SCOTUS that impact patents and trademarks. It would be malpractice not to stay up to date. There is quite literally nothing that MCLE courses have ever taught me about my field of practice that I didn't already know, and there is no reason for me to learn about other fields of practice because they're not relevant to me. Regarding ethics and professional responsibility, we learned what we needed to know in law school. If we have questions, we can do research, ask colleagues, or call an ethics hotline. The same is true of mental health and substance abuse issues. If I need help, I'll seek it out. I don't need to keep taking the same courses over and over again every year giving me generic advice and telling me that help is available if I need it. I already know that.
Gregory Pendleton	Licensed legal professional (Lawyer, LLLT, LPO)	
Kelli Schmidt	Licensed legal professional (Lawyer, LLLT, LPO)	While I appreciate that mental health and technology security issues are important, adding two more hours in two separate categories to track seems unnecessary and redundant of information available under existing requirements. For example, technology security is an issue that can be addressed under ethics rules MCLEs and mental health can be addressed under equity MCLEs.
Craig Mason	Licensed legal professional (Lawyer, LLLT, LPO)	I believe such CLE's should be developed and be available, but not required.
james johnston	Licensed legal professional (Lawyer, LLLT, LPO)	Unnecessary amendment
Corey Kleer-Larson	Licensed legal professional (Lawyer, LLLT, LPO)	While I believe that these areas have merit, I believe the increase is not one that is beneficial to the legal community. The interpretation of equity is already highly politically charged. Trying to increase the requirements and subdividing ethics into these categories will only serve to foster resentment toward the WSBA by forcing attorneys to undertake additional expense.
Shelley Ajax	Licensed legal professional (Lawyer, LLLT, LPO)	This is completely unnecessary and a waste of time and our money as attorneys. If you want to include those topics to meet specifications of general ethics or legal credits, then add them. But don't make them a new requirement for additional CLE's in those areas.
David Stevens	Licensed legal professional (Lawyer, LLLT, LPO)	As a former federal civil rights investigator, I find that requiring others to attend lectures on "equity" is counter productive.
Chris Anderson	Licensed legal professional (Lawyer, LLLT, LPO)	It is already difficult to get sufficient ethics credits. By specifying the types of ethics credits that are required, the suggested amendment will only serve to further narrow the opportunities to obtain the required credits. I am therefore opposed to the amendment. Thank you.

Rebeka	Licensed legal professional (Lawyer, LLLT, LPO)	Getting ethics credits is already a challenge, and this will only make it harder. If WSBA is going to implement this I suggest they need to ramp up the number and type of accessible CLEs offered.
James L Sorenson	Licensed legal professional (Lawyer, LLLT, LPO)	We have enough seminars and specific monthly webinars for attorneys that cover these topics and more. On ethics WSBA should push more civility and items like returning calls and e mails to fellow attorneys.
Robert Van Dorn	Licensed legal professional (Lawyer, LLLT, LPO)	Why not encourage professionals in IT and mental health to offer interesting and helpful courses like this, but then let lawyers choose whether or not to attend them?
Julianne Peter	Licensed legal professional (Lawyer, LLLT, LPO)	Really, more requirements??? Hours to acquire??? Not opposed to the specific ethics suggested, but opposed to BURDEN attorneys with even more hours to acquire to meet the MCLE requirement total.
Charles Cresson Wood	Licensed legal professional (Lawyer, LLLT, LPO)	This amendment increases the MCLE bookkeeping, internal records bureaucratic burden, and attendant cost, associated with continuing legal education. Lawyers are already required, by the ethics code, to maintain competence in the areas where they practice. This existing obligation includes knowledge and skill in the special areas of ethics addressed in this amendment. The amendment is thus duplicative and unduly specific, leading to unnecessary regulation, unnecessary bookkeeping, and unnecessary costs.
Diana Anderson	Licensed legal professional (Lawyer, LLLT, LPO)	Technology Security ethics? I maintain a low tech practice and don't feel this would be very useful in my practice. As for mental health ethics...shouldn't it be the responsibility of the attorney to decide whether this topic would be helpful to his/her practice and respond accordingly? I wasn't happy with the amendment requiring Equity credits either, but stayed quiet. It feels like the Bar Association is getting too 'heavy handed' with requiring particular topics for credit and displays a distinct lack of trust in practicing professionals to get the information they need for their case/practice.
Sonia Agee	Licensed legal professional (Lawyer, LLLT, LPO)	The increased requirements do not serve any purpose except to increase the burden on professionals who are already addressing these issues, and to create unnecessary costs. The MCLE courses approved in this area are rarely if ever helpful, and we pay premiums for these credits. The special interests involved with these areas need to consider the scope of practice of attorneys in general, not just specialized areas.



Robert D. Bohm	Licensed legal professional (Lawyer, LLLT, LPO)	The proposed amendments are going to make it extremely difficult for lawyers to obtain ethics CLE credits in these areas. In my 45 years of practice I have never seen any programs from any file provider that would satisfy these two requirements. I also do not see how they provide any significant improvement to ethical behavior on the part of lawyers. I do not think that problems with technology security are a significant problem for most lawyers as they do what they can to make sure that their systems are protected from spam, phishing, and other intrusions. Regarding mental health problems, the issue is not ethics, but rather any individual who was suffering from mental health problems recognizing that they need to deal with it as opposed to avoiding the issue.
Connie Smith	Licensed legal professional (Lawyer, LLLT, LPO)	Please do not make reporting any more complicated, complex, or make any new requirements. Consider simplifying the requirements. Thank you for providing the free Legal Lunchbox trainings. If you have certain topics for attorneys and you make information available there that goes a long way towards reaching attorneys. Consider making those presentations available on demand and encouraging participation but please don't add requirements or subdivide types of ethics.
Mark Wittow	Licensed legal professional (Lawyer, LLLT, LPO)	This is imposing requirements on how to be a thoughtful person as distinct from legal competence. Perhaps it's a good idea, but seems a bit outside the scope of professional regulation.
Jacqueline Becker	Licensed legal professional (Lawyer, LLLT, LPO)	This is getting far too complicated. Let Lawyers pick their own CLE's.
Janell Felsted	Licensed legal professional (Lawyer, LLLT, LPO)	Absolutely do not agree with this at all in any way shape or form
Denise Farr	Licensed legal professional (Lawyer, LLLT, LPO)	It is hard enough to meet the MCLE requirements; this adds unnecessary complexity
Cynthia Cartwright	Licensed legal professional (Lawyer, LLLT, LPO)	Cle courses are expensive, bar dues are expensive and I am not in favor of added expense with additional requirements. Also some attorneys will not find the subject matter useful.
Carol Burton	Licensed legal professional (Lawyer, LLLT, LPO)	I'm fine with the subject matters, but am not in favor of increasing the number of credits required. I get frustrated about assumptions made that it's not a financial hardship to earn credits. Not everyone works for a firm that pays for our CLE credits. Some of us are not as financially well off as others.
Douglas Shae	Licensed legal professional (Lawyer, LLLT, LPO)	I support more CLE's on those topics. However I do not think it is important to make them mandatory. I am a retired Government Attorney. I have a lot of training in both those topics through my job and through CLE's. Again, should be encouraged but not required. Doug
Stephen Funderburk	Licensed legal professional (Lawyer, LLLT, LPO)	Practicing attorneys need less requirements from their state licensing board, not more. I recently read that employees already suffer through two days of emails and meetings per week, and in another article that work requirements are impeding workers family and social time. Perhaps that doesn't answer your question, but I am not in favor of more requirements.

Margaret Niver McGann	Licensed legal professional (Lawyer, LLLT, LPO)	CLE is so hard to manage across multiple state bars. As long as you still offer parity with other state bars it is far less annoying. The more you require certain subjects not only the less relevant to my practice does the material become but the harder it is to coordinate with other state bars.
ryan	Licensed legal professional (Lawyer, LLLT, LPO)	"equity" is a political issue, and is virtually always presented as such. The WSBA should at least pretend to maintain some degree of political neutrality; something it has generally done poorly.
Jens Omdal	Licensed legal professional (Lawyer, LLLT, LPO)	While the intent of this amendment is clearly to encourage legal professionals to address mental health concerns; there are better alternatives that are already available to address this issue. Through the WSBA, legal professionals have access to therapists and mental health professionals. Also, collaborative programs (like mentoring) provide resources for attorneys to discuss and address stressors before they develop into pathologies. Respectively, adding a CLE requirement will not have the intended outcome. Instead, the already existing platforms should be advertised and participation should be strongly encouraged for those experiencing mental health conditions.
Eric Sachtjen	Licensed legal professional (Lawyer, LLLT, LPO)	Let's focus on lawyers learning the law.
Lisa E;os	Licensed legal professional (Lawyer, LLLT, LPO)	
J. Powers	Licensed legal professional (Lawyer, LLLT, LPO)	This is too burdensome on the legal community.
paula plumer	Licensed legal professional (Lawyer, LLLT, LPO)	This is beyond our scope of expertise, and should be, but could be included under the umbrella of the general equity ethical training and obligations.
Joe Harris	Licensed legal professional (Lawyer, LLLT, LPO)	

Ken Masters	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Compartmentalizing ethics is generally a bad idea. The idea that there is such a thing as "Technology security ethics" (or "Equity ethics" or "mental health ethics") is not just nonsense (who purports to be an "expert" in such things?) but it is positively harmful.</p> <p>Ethics concerns rational justifications for moral judgments. Moral judgments are not, and cannot be, segregated into particular subject matters. If you understand how to make a moral judgment -- the subject that ethics studies and should instruct upon -- you should be able to make it in any context. Indeed, the single biggest failure of "legal ethics" (or "medical ethics" or whatever) is a tendency to suggest that "X ethics" is somehow distinct from ethics. That sort of thinking leads to "litigating" ethics -- seeing how close to some perceived "ethical boundary" you can get without crossing the line. There are no ethical boundaries: only moral judgments. It is unethical to think otherwise.</p> <p>Legal professionals need to learn how to make moral judgments (a/k/a doing the right thing). They do not need more instruction on how to litigate ethics in some particular subject area. Providing ethics training is a good thing. But purporting to subdivide ethics into various non-existent "categories" and then requiring 2 of these and one of those is counterproductive at best.</p> <p>Legal professionals are professionals: let us decide for ourselves how best to learn ethical principles in our own practice lives. Your misguided paternalism is unhelpful and unwonted.</p>
Kathryn C. Comfort	Licensed legal professional (Lawyer, LLLT, LPO)	<p>These are oddly specific requirements. What data shows that an hour of ethics in these areas will lead to some type of improvement in the practice of law? It also feels like it will be difficult to fulfill, and just require more time and money for the Bar to manage these requirements.</p>
Roselyn Marcus	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It is getting quite onerous to ensure you take courses now in all these required areas. Where are the courses to take? If the Bar doesn't offer it, how can we comply? And I have not seen any evidence or support that justifies this additional burden being placed on licensed attorneys.</p>
Chelsey Winchell	Licensed legal professional (Lawyer, LLLT, LPO)	<p>If you're adding categories, I'd recommend reallocating those credits from other already existing categories.</p>
Leyla Brammer	Licensed legal professional (Lawyer, LLLT, LPO)	
Will Li	Licensed legal professional (Lawyer, LLLT, LPO)	

Confidential	Licensed legal professional (Lawyer, LLLT, LPO)	I'm a licensed member of WA and three other bars. Have been practicing law for over 25 years. Am not in favor of the proposed additional MCLE requirements. Lawyers are professionals and should be treated as such. It is literally our job to stay abreast of legal developments in our practice areas and manage our law practices in a manner that is ethical and legally compliant. Adding additional specialty ethics credit requirements won't result in more ethical or competent lawyers, and it will only further enrich the very lucrative continuing education provider industry. Keeping my name confidential because I don't wish to find myself a target of a bar inquiry.
Carole S Fisher	Licensed legal professional (Lawyer, LLLT, LPO)	
Kennet Phillipson	Licensed legal professional (Lawyer, LLLT, LPO)	While the aim is noble, it simply makes things too complicated. Most of us get our ethics credits as part of full-day CLEs. This amendment will require most of us to seek out 4 separate ethics classes apart from our full-day CLEs. It is inconvenient. It is expensive. And the benefits of the specialized credits don't outweigh the inconvenience and the expense.
Jada Walker	Licensed legal professional (Lawyer, LLLT, LPO)	
Catherine Chaney	Licensed legal professional (Lawyer, LLLT, LPO)	
Heather Griffith	Licensed legal professional (Lawyer, LLLT, LPO)	It's more complicated than it needs to be. I don't understand why the change is needed. We already created two categories of ethics. It will be very confusing to have four. I would rather have an increase in the ethics requirements generally than this requirement for specific ethics classes.
Elizabeth McKenna	Licensed legal professional (Lawyer, LLLT, LPO)	
Sharon Ann Saito	Licensed legal professional (Lawyer, LLLT, LPO)	Compliance may be difficult if sufficient CLEs are not provided across the state on an on-going basis. Diversity CLEs should also be considered, with appropriate support to the membership, due to our historical and on-going issues of racism and disproportionality.
Barry Abbott	Licensed legal professional (Lawyer, LLLT, LPO)	This just adds more cost and will not result in anything significantly of value.
Jim Bledsoe	Licensed legal professional (Lawyer, LLLT, LPO)	The power to regulate is only surpassed by the power to refrain for regulating. How in the world have we existed as a state for 134 years without all this micro-managing. Amazing.
Judith Alber	Licensed legal professional (Lawyer, LLLT, LPO)	The CLE requirement is already challenging with the prior changes. What used to be simple and allowed for freedom to choose classes you are interested in, is becoming very difficult and stressful to complete. We need freedom to explore areas that are relevant and meaningful to each person. Please stop adding any more requirements.
Lynden Smithson	Licensed legal professional (Lawyer, LLLT, LPO)	
Robert G. Casey	Licensed legal professional (Lawyer, LLLT, LPO)	I think the proposed changes are too restrictive and unnecessary. The focus of the CLE requirements should be competence in the practice of law.
April King	Licensed legal professional (Lawyer, LLLT, LPO)	
Edward Younglove	Licensed legal professional (Lawyer, LLLT, LPO)	We employ technology experts to ensure confidentiality of our records and communication. Is there such a mental health crises impacting attorneys ethical conduct that we all need this training.

Rando B. Wick	Licensed legal professional (Lawyer, LLLT, LPO)	Washington's requirements are already complicated than the other state I am a member of, by far. In addition, as live CLEs become less available following Covid, these further requirements will be even tougher to meet rather than through online courses, which are, in my opinion, boring and often not focused on areas most important to my practice. My vote is to reject the suggested amendment/
Nicholas Snow	Licensed legal professional (Lawyer, LLLT, LPO)	
Audrey Ross	Licensed legal professional (Lawyer, LLLT, LPO)	When will the lunacy end? There are already too many categories of requirements and too many credits required. In addition, the added cost and time are burdensome.
Timera C. Drake	Licensed legal professional (Lawyer, LLLT, LPO)	I understand the importance of internet and data/technology security, which is why I leave it to the IT professionals to do it properly. I don't think an additional requirement for our annual CLE is needed in this area. While I firmly believe in mental health and think it might be valuable, it is ridiculously repetitive to those legal professionals who are aware of their mental health and are already doing a thorough and excellent job of managing it. The two areas, however, should be *options* for qualifying ethics credit annually. Add them to the CLE roster and provide ethics credits to people who voluntarily take the courses and see how it does. It could be a raving success all on its own, or a miserable failure.

Jeffrey S. Rasmussen	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I don't view the proposed new categories to be applicable to myself or to many members of the bar on a continuing basis.</p> <p>Re: the technology credit, I see that as an area of specific expertise that some attorneys need to know, but that most of us do not. In the firm I am in, that is handled by specific attorneys who spend a lot of time keeping up on changes, working with IT. They then impose limitations on what the rest of us are able to do, and other rules and protocols. I am required to defer to them, and do defer to their far superior knowledge on this complex area. Assuming they are doing their job well, this is one of the least difficult complex areas of practice for me, and one where a CLE would not be of benefit.</p> <p>For the mental health proposal, I think it a bit closer, but don't see it as something that should be required of all members of the bar. The attorney ethics issues can be difficult and complex, and handled by a specific subset of attorneys within a firm. The remainder of the issues that would fall within this seem to be more "self-improvement," not really attorney ethics. And many of us deal with mental health related issues as part of our subject matter, and requiring us to take CLES on basics regarding mental health, risk assessment, etc. would be a waste.</p> <p>More generally, there are a lot of areas in both subject matter and in attorney ethics which an attorney should know, but in general I think that should be left to the attorneys, based upon the wide variety of experiences and needs that they have, to have discretion to figure out what would be most beneficial.</p>
Mark Fowler	Licensed legal professional (Lawyer, LLLT, LPO)	<p>CLE is only valuable when it is applicable to your practice area. We need to allow licensed professionals the ability to decide which courses are valuable for their particular practice.</p>
Erika L. Yuen	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Do not increase the number of hours required - just change the allocation.</p>
Kimberly Raphaeli	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Overly burdensome.</p>
Howard Stambor	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Unnecessary. Just a windfall for CLE providers. Not useful for most lawyers.</p>
Ralph Flick	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I don't think we should pick and choose sub-topics like this (or more of them than we already have).</p>
Tana Joslin	Licensed legal professional (Lawyer, LLLT, LPO)	<p>We need only to include these subcategories of ethics to count towards the existing ethics requirements. The bar membership seeks out variety in CLEs in what we complete.</p>
Brian Masterson	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The Suggested Amendment further complicates the MCLE process without tangible evidence of the benefits to legal practitioners.</p>

Rachel Buker	Licensed legal professional (Lawyer, LLLT, LPO)	Government attorneys should be exempted from MCLE requirements as California does. <a href="https://www.calbar.ca.gov/Attorneys/MCLE-CLE/Requirements/Attorney-Exemptions">https://www.calbar.ca.gov/Attorneys/MCLE-CLE/Requirements/Attorney-Exemptions</a> Washington's continually changing requirements are overly burdensome in time and expense, and I have chosen to maintain my active license elsewhere due to these issues.
Lori Holt	Licensed legal professional (Lawyer, LLLT, LPO)	
Michael Vander Sys	Licensed legal professional (Lawyer, LLLT, LPO)	This is a horrible idea and unnecessary for the majority of the bar. I believe attorneys should have the OPTION to choose to do this CLE, but not the requirement.
Vernon Finley	Licensed legal professional (Lawyer, LLLT, LPO)	I think the future requirements should not be changed. Perhaps the MCLE Board should seek to encourage CLE programs in these areas but not make them a separate requirement. Cyber Security, Mental Health, Equity, etc, are all vital programs but they can be incorporated into the existing framework. Maybe CLE programs like "Legal Lunchbox" in Washington State could be used to convey specific information for the separate categories under the existing requirements. I would favor the "carrot" instead of the "stick" approach.
Elizabeth Peterson	Licensed legal professional (Lawyer, LLLT, LPO)	
Elizabeth Bejarano	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The requirement of adding a Mental Health ethics requirement is based on surveys conducted by the ABA et al. and not a survey conducted within Washington state. It seems as though the bar could offer CLE courses that cover attorney Wellness (a participatory introduction to YOGA as a general ethics credit for free via zoom? I am fully in support of that), and make those courses eligible to satisfy the general ethics requirement so those who feel that such a course would be helpful to them could participate. Any CLE that the bar feels is important can be offered for free via zoom if you want to increase participation within the bar. But it does not seem appropriate to mandate a mental health CLE requirement discussing addictions and unhealthy ways of dealing with stress when it is not appropriate to the larger percentage of our bar. We already have tools such as the Lawyers Assistance Program to help those in need, and it is well publicized as an available resource.</p> <p>Technology ethics requirement? Why not just provide a platform for attorney email that provides security. Give attorney members of the bar a secure email hosting option other than Gmail, where the bar is maintaining a secure environment for us. Provide a reasonably priced Wi-fi hotspot hosting option that provides security for telephones that we can opt in and pay for with our dues. We are paying enough dues that the attorneys should get some more practical benefits and assistance for their practice other than more educational requirements. Offer us solutions rather than mandated credits. Again, CLE's in technology could be offered for satisfaction of General Ethics credits, and can be offered for free and over zoom to attract participation.</p>

Madeleine	Licensed legal professional (Lawyer, LLLT, LPO)	Look, I'm not against lawyers being as highly educated as possible. But lacking a system for CLEs in which one doesn't have to be employed by a firm able to finance their CLEs in order to complete these requirements will make the practice of law just a bit less accessible. And it's already pretty inaccessible.
frederick a kasaeburg	Licensed legal professional (Lawyer, LLLT, LPO)	stop the social engineering and stick to matters of the law.
Beau Robey	Licensed legal professional (Lawyer, LLLT, LPO)	
Nathan	Licensed legal professional (Lawyer, LLLT, LPO)	Not in favor. Stop creating additional hurdles for members of the profession to remain in good standing.
William V. Hammer	Licensed legal professional (Lawyer, LLLT, LPO)	I think the bar is getting too far into the weeds and starting to micro manage in this area. If I work in the mental health law arena, then it would behoove me to take such a class. I disagree with mandating a class in each of the sub-ethics areas. I am held to account for continuing legal education. It should be left to me to decide which subjects best suit the needs of my practice.
Greg Raburn	Licensed legal professional (Lawyer, LLLT, LPO)	Do not add a new CLE credit requirement without decreasing a CLE credit requirement elsewhere.
Elen Wetzel	Licensed legal professional (Lawyer, LLLT, LPO)	Different licensed professionals have different needs for ethics training. Proscribing specific types of required ethics training limits the professional's ability to tailor the training to their needs and potentially increases the professional's time & cost burden for meeting CLE needs/requirements.
Prefer to remain anonymous	Licensed legal professional (Lawyer, LLLT, LPO)	



M. Jeffery Kallis

Licensed legal professional (Lawyer, LLLT, LPO)

First, Washington requires more CLE credits than most states. There has been no showing that those licensed in Washington have greater professional training problems, knowledge deficits or ethical defects than attorneys licensed in other states with lower CLE requirements. The addition of these specific topics has not been shown to address a demonstrable failure in the current CLE requirements knowledge base.

Adding more credits in specialized ethical and technology topics simply creates a greater burden on the members, and takes away their ability to select those CLE topics that the members have determined would benefit them, and their clients the most. However, the Board itself states that "These are serious topics that can greatly impact a licensed legal professional's competency to practice law and, if ignored, COULD result in serious consequences." The Board does not say that if these topics are ignored they WILL result in serious consequences, nor does it even indicate what the consequences could be or that they have even been shown to even exist.

If the Board feels that these topics are crucial to the Washington attorney's knowledge base, and must be added, then the board should establish a detailed cost benefit analysis indicating which members of the bar demonstrate a need for such remedial training and how the need for training manifests itself so that effective and efficient programs can be developed. Moving chairs on the Titanic will not prevent disaster, only research and planning will provide effective solutions to real problems.

Second, should there be data that can reliably forecast emerging ethical and technological shortcomings in the Washington State Legal Communities ethical behavior, and ability to do its jobs, then very specific and highly detailed course outlines need to be developed so that the members can assess whether the proposed topic(s)

Robert Carlson	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I cannot support this Suggested Amendment to the MCLE requirements because in my view there is no national consensus on the standards that ought to be applied to lawyer conduct in the “ethics” of equity, mental health, or technology security. Contrast that fact with the traditional ethics requirement that focuses on the Rules of Professional Conduct: those rules have been a national standard since they were adopted by the ABA in 1983, and every US jurisdiction follows them. The Rules and comments to the Rules are the subject of thousands of judicial decisions, ABA formal opinions, law review articles and similar documents such that they are amenable to study by law students and testing by bar examiners to an objective standard. The subjects of equity, mental health and technology security are not subject to this kind of objective standard, instead they are highly subjective concepts without a universal supporting consensus. So while these are appropriate topics for general CLE programs that lawyers may choose to attend, in my view a mandatory, subjective teaching on these topics should not be a condition of the continued right to practice law. If, in the future, a national consensus emerges on the standards that lawyers should be held to in one or more of these areas, I would support the WSBA imposing a mandatory education requirement. But at present I oppose the Suggested Amendment.</p>
Andrew Leon	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It is already cumbersome to find courses in multiple subjects and to add more would just increase this difficulty and likely the cost of MCLE credits.</p>
Kimberly Frinell	Licensed legal professional (Lawyer, LLLT, LPO)	
Bruce	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Without defining terms such as "equity ethics" and "mental health ethics" and considering that the voting options were "all or none," I cannot make an informed choice about "all.". I would rather see the Board concerned about substance abuse among legal professionals, including signs, symptoms, and treatment options.</p>
Allan A Bonney	Licensed legal professional (Lawyer, LLLT, LPO)	<p>There is no benefit gained by subject-specific CLE requirements. They just provide lock-in for companies that charge for CLEs. The people whom you hope to target with these requirements don't learn anything from them. The people who don't need them just find them annoying. Please don't do this. It doesn't work, but it feels like it should. Don't chase a feeling.</p>
Don McGowan	Licensed legal professional (Lawyer, LLLT, LPO)	

Bruce But hrr	Licensed legal professional (Lawyer, LLLT, LPO)	<p>suggested categories make little sense to me. The ethics rules promulgated by the Court are what ethics education should be about. There is plenty of room there for refreshment and contemplation relevant to legal practice.</p> <p>If it is considered desirable for lawyers to attend philosophical courses where diversity, technology or other issues are discussed that could be a part of the general requirement not pushed into ethics which needs to focus on familiarity and compliance with court rules</p> <p>As an example at the recent ABA meeting here I attended an interesting cle discussing the foundation theories of ethical conduct vis utilitarianism etc they then discussed various some specific rules and what theory was embodied specific situations etc lively debate followed. Far more relevant than most I have attended. Ethical behavior usually does not follow black letter but grey situations.</p> <p>I personally don't think lawyers need to attend classes on equity or anything else outside of compliance with RPC as part of an ethics requirement.</p> <p>As noted if it is considered desirable by the Supreme Court of WA that a lawyer should attend or be briefed on these subjects to adequately practice law then a specific requirement should be so established with a specific course on that.</p> <p>Another approach could be some suggested lectures and encouragement to attend.</p> <p>Legal practice today is much more complex t than when I was admitted. Practice then was more relaxed. However the same issues arise now as then: the most common being cheating a client, using trust funds, poor communication, inadequate representation.</p>
Liz Douglass	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The total CLE obligations in Washington state are onerous. There are numerous other states, e.g. Massachusetts, which have zero CLE obligations. Ratcheting more CLE obligations on busy Washington lawyers is not helpful. I'm fine to include additional Ethics credit requirements PROVIDED the total number of credits required is substantially lessened.</p>
Krystian Koper	Licensed legal professional (Lawyer, LLLT, LPO)	
Cara Wallace	Licensed legal professional (Lawyer, LLLT, LPO)	<p>This proposal would overcomplicate WSBA's ethics requirements. These are important topics, but WSBA's effort would be better spent developing free CLEs on these topics and making them easily accessible to members rather than mandating additional or different CLE requirements.</p>
Alex Koretz	Licensed legal professional (Lawyer, LLLT, LPO)	
Cherise Gaffney	Licensed legal professional (Lawyer, LLLT, LPO)	
Abraham L. Rocha	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I'm not sure it needs to be mandatory to cover these topics. We should have the option to take these kinds of trainings and not be forced to take them.</p>

Amy Totten	Law Student	I'd rather recommend education on those topics instead of mandating it. Finding specific topic CLE gets expensive, especially when you have a variety of topics to cover for multiple states.
Kyle Perkins	Licensed legal professional (Lawyer, LLLT, LPO)	No need to over complicate the CLE requirements. Enough already.
Clinton Lipscomb	Licensed legal professional (Lawyer, LLLT, LPO)	
Deborah A. Bianco	Licensed legal professional (Lawyer, LLLT, LPO)	The demands on lawyers are already great. Requiring additional hours of CLE credits that may have no bearing whatsoever on an attorney's practice area is expecting too much in the way of expenditure of both time and money.
Thomas Ledgerwood	Licensed legal professional (Lawyer, LLLT, LPO)	Ethics credits are already a challenge to fulfill without having specific categories of ethics credits needed.
Dawn Wolff	Licensed legal professional (Lawyer, LLLT, LPO)	While I strongly believe in ethics education, I also think you are making it too complex and too expensive for people to be able to get their necessary MCLE credits. Just one or two companies will be qualified to offer these specialized CLE credits, and they can then charge anything they want, and people will have no choice but to take the class or risk their licensure. Good concept, but execution in reality is problematic.
Mark Bardwell	Licensed legal professional (Lawyer, LLLT, LPO)	I'm skeptical of required trainings. I feel they generally are not needed and largely come at the expense of other opportunities that would be more valuable.
Patricia Petersen	Licensed legal professional (Lawyer, LLLT, LPO)	I do not believe these extra requirements rise to the level of the other existing ethics requirements. The information provided in these other proposed areas can be obtained elsewhere and without being mandated.
Julia Kyte	Licensed legal professional (Lawyer, LLLT, LPO)	
Yvonne Kinoshita Ward	Licensed legal professional (Lawyer, LLLT, LPO)	Is there a need for this, i.e., an identified, persistent trend of attorneys needed education in these areas? If not, then o. And if there are indications, offer free CLES on the topic. But this burden should not be placed on all attorneys due to perceived deficiencies in a few.
John Moore	Licensed legal professional (Lawyer, LLLT, LPO)	
Steve Bulzomi	Licensed legal professional (Lawyer, LLLT, LPO)	
Jessica Webb	Licensed legal professional (Lawyer, LLLT, LPO)	
John H Brolin	Licensed legal professional (Lawyer, LLLT, LPO)	It shouldn't be mandatory. It's hard enough and expensive enough to find qualifying WSBA CLEs now without adding in new specialized CLE mandates.
Erin Battersby	Licensed legal professional (Lawyer, LLLT, LPO)	I am not in favour of any rule changes that would make fulfilling CLE requirements more cumbersome. Also, I think as professionals we can direct or own continuing education toward matters pertinent to our practice. In my case, both of the suggestions would be of interest but, I would not want to presuppose that these would fulfill the needs of others.

Paul R. Cressman, Jr.	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The proposed amendment is not necessary and is over regulation of the practice of law. Maintain the present categories of legal ethics and require all lawyers to maintain the current CLE requirements in all areas. In my long experience in the practice of law, 46 years and counting, where lawyers fall short is in their knowledge of the law, both case law and statutory, and that leads to problems for their clients and their clients' adversaries, as well as the lawyer himself of herself. More attention should be paid to those areas. The practice of law is becoming more and more complex, and lawyers need to keep up to date in their respective practice areas. Adding more required CLE ethics requirements will only take away from more other necessary areas that lawyers need.</p>
George Bowden	Licensed legal professional (Lawyer, LLLT, LPO)	
Nora Schultz	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Ethics credits are difficult enough to get for attorneys who don't practice at big law firms. Please don't make this any more difficult or expensive than it already is.</p>
Andrea Blander	Licensed legal professional (Lawyer, LLLT, LPO)	
Vicki Parker	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Honestly, THE reason CLEs were required was to increase the likelihood that attorneys would continue to grow in their knowledge of the LAW particularly in their area or areas of practice.</p> <p>I am certain this is well-meant but this proposed expansion is a sad expression that attorneys know nothing about life, technology, mental health, etc. It is treating attorneys as children.</p> <p>The perceived purpose is better met by offering such classes. If attorneys are not choosing them, it is an indication that the attorneys do not wish to spend money and time on those classes. Attorneys who choose them are interested in them.</p> <p>The precious time an attorney has it spent working for their clients. That is the job we actually have. An extra hour is an hour taken away and adds to the cost which must be charged to clients.</p>
Michael Bissell	Licensed legal professional (Lawyer, LLLT, LPO)	<p>We don't need the WSBA telling us what to do all the time. We can figure it out. The seems like an effort by the organization (like a lot of its actions) to create a purpose for itself.</p>

or ethical or not ethical that more preaching from the pulpit is needed. No.

I have been. Licensed since 1971. Now I am mostly retired doing the occasional mom and pop last will and testament and do no serious estate tax planning or complicated gifting .that I refer out. I do represent a collection company. I barely make enough money to pay the exorbitant WSB as annual licensing fees andalpractice insurance

I have. NO need or desire to be preached to by young pups that do not have anything close to my fifty plus years of experience. The board of directors charge way too much for CLE presentations that focus too much on emotional funded issues. I don't need or want the board to try to help me feel good. I am fine thank you.

What the board should do is waive all CLE requirements for those lawyers who have been licensed continuously for fifty years or more, waive all licensing fees except a modest administrative fee.of \$75.00. Idaho annual licensing fee for elder lawyers makes sense. Common sense is .. something quite lacking in the WSBA

But when the. Board gets so much pleasure spending someone else's money then the spending limit disappears and we lawyers get foo foo emotional funded CLEs on how to feel good . . You won't lower the licensing fee for lawyers with more than Fifty years of experience or waive waive the CLe requirements for we very experienced ethical lawyers who don't want to listen to the young preacher because you want more money .

Go away.

Thomas M Smith, Sandpoint Idaho.

Thomas M Smith

Licensed legal professional (Lawyer, LLLT, LPO)

Ehren Brav	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The MCLE requirements are already too complex and burdensome. Compliance should be getting easier (and cheaper), not harder. Rather than imposing additional regulatory overhead on practicing attorneys, the Board's goals would be better served by providing *free* CLE credit in the areas it would like to emphasize. Moreover, with all due respect to the MCLE Board's judgment of which areas deserve this special focus, I believe many practicing attorneys would not view at least some of these subjects as particularly relevant to their own practices. Again, a better alternative would be to simply offer free CLE presentations on these subjects and use the Board's powers of persuasion of why these are important, rather than its regulatory power, to accomplish its objectives. If it is correct, than attorneys will "vote with their feet" and in the process the Board would learn more about areas of most concern to the profession. Finally, I'm additionally concerned that the Board will not stop with these subjects - why not requirements pertaining to access to legal services for underserved populations, the ethical ramifications of social media, the ethical ramification of AI on our profession, the privilege and confidentiality ramifications of digital recordkeeping...I could go on. My point is that, although these subjects are no doubt important to many practicing attorneys, the attorneys themselves should decide what is relevant to their practices within the broad umbrella of professional ethics - not the MCLE Board. It seems arbitrary for the Board to select these particular subjects over the numerous others that, one could argue, are equally if not more important to our profession. Many thanks for your consideration.</p>
Pamela A Okano	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I am generally a fairly liberal person, but the idea that WSBA feels it has to mandate what areas of ethics each attorney needs to take CLEs on doesn't sit well with me.</p>
Jennifer Taylor	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Respectfully, I do not support this. Ethics credits are challenging enough to obtain as it is, and I am willing to guess most practitioners squeak by at reporting time. Offering a greater variety of topics, including mental health (or technology ethics), to choose from, within existing the Ethics CLE requirements makes more sense than mandating them as separate components. Thank you for the opportunity to weigh in.</p>
June Campbell	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The Bar should trust lawyers to take the CLEs most relevant to their practice areas. Please don't adopt this amendment.</p>
Alyson Beck	Licensed legal professional (Lawyer, LLLT, LPO)	
Mark Clausen	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The current system is acceptable. Lawyers should be able to use their discretion concerning what CLEs to take within the current categories. For example, lawyers with no mental health issues should not be required to take CLEs for that issue instead of those that could be more relevant to the lawyer's practice.</p>

Stephanie Martz	Licensed legal professional (Lawyer, LLLT, LPO)	Just stop. You are going too far. This isn't in the purview of the bar association. This is just one more reason for me to question why I have to belong to an organization I do not believe in. It's bad enough that people like me who work for something other than a law firm have to pay out of pocket and struggle to find credits to meet your never ending add ons.
Jeanne Cushman	Licensed legal professional (Lawyer, LLLT, LPO)	
Janis Creim	Licensed legal professional (Lawyer, LLLT, LPO)	
Sean Butler	Licensed legal professional (Lawyer, LLLT, LPO)	I would be fine adding a new category of Ethics credits--and this one seems particularly pertinent in today's world, but it should NOT increase the number of CLE credits that we are required to earn each reporting period. I am also licensed in California, and Washington's required credits are already almost twice what I have to do for California. Adding more to that would be too much.
Justin Cheng	Licensed legal professional (Lawyer, LLLT, LPO)	Should not increase total credit requirement, but rather just change the type of credit needed.
Sunil Abraham	Licensed legal professional (Lawyer, LLLT, LPO)	
Ryan Leverone	Licensed legal professional (Lawyer, LLLT, LPO)	
Joseph Mohr	Licensed legal professional (Lawyer, LLLT, LPO)	
Tyler Winterton	Licensed legal professional (Lawyer, LLLT, LPO)	
John Dittman	Licensed legal professional (Lawyer, LLLT, LPO)	
Amy E. Jones	Licensed legal professional (Lawyer, LLLT, LPO)	I don't believe that requiring tech and mental health ethic CLE hours should be required. Those topics should be available to attorneys as CLE topics but by narrowing the ethic topics it will make it difficult for attorneys to find meaningful well run ethic CLEs timely and force attorneys to watch more recorded CLEs which are not as insightful as when a CLE is live, up to date and presented so that the attending attorney can ask questions. I think the pre-recorded CLE business is a money grab and this requirement feeds that.
David Goldfarb	Licensed legal professional (Lawyer, LLLT, LPO)	
Steven Abbott	Licensed legal professional (Lawyer, LLLT, LPO)	We already have enough stress with CLE requirements and I see little value in addressing these topics. If we do then the general number of CLE credit hours needs to be decreased and not increased if these topics are to be added. Thank you
Ariel Calmes	Licensed legal professional (Lawyer, LLLT, LPO)	CLE requirements are already difficult for many practitioners to achieve, and getting more and more expensive. Further requiring specialized types of CLE will impose additional financial burdens on already struggling attorneys. I would only support these requirements if the WSBA made them available to practitioners at no cost, the way other state bar associations provide sponsored CLE's at no or very low cost so that practitioners are able to meet their CLE requirements without great financial burden
Linda Waite	Licensed legal professional (Lawyer, LLLT, LPO)	
Jennifer Bucher	Licensed legal professional (Lawyer, LLLT, LPO)	
Bruce Gallagher	Licensed legal professional (Lawyer, LLLT, LPO)	



Kelly Mann	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It's fine to encourage attorneys to learn about these topics - perhaps by offering complimentary or low-cost CLEs on the topics. However, I believe requiring education on these specific topics for all attorneys is going too far.</p> <p>The Oregon State Bar does this; thus, the MCLE reporting process is cumbersome, and the requirements seem to change constantly. Don't follow Oregon in this practice, please.</p>
daniel c jacobson	Licensed legal professional (Lawyer, LLLT, LPO)	
Clarissa Bolante	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Leave the total credit requirements for legal ethics as is and allow individuals to choose the categories. Finding ethics credits is already challenging much less create requirements that will be hard to fulfill (unless WSBA plans on providing free CLEs for the new categories).</p>
Charles Lee	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I am not in favor of expanding the mandatory ethics credits. I am also not in favor of creating four separate categories of ethics credits. Finding free CLE opportunities that fit within a busy schedule is already difficult as is. Expanding and creating more categories will become a cost and time burden that will be felt most by newer attorneys. These changes are not necessary as the suggested topics can be addressed as additional general credit courses for those that are interested.</p>
Monica	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It is hard to find quality programming for specialized categories (I need to meet them in other states). I would prefer guidance be updated to cover these types of topics in general ethics credits</p>
Ben Ingram	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Requiring these specific CLE categories would make compliance more complicated and potentially require attorneys to take CLE that are completely irrelevant to their practice. The choice should be left to the individual members. If you want to emphasize these topics then offer free CLE to incentivize people to voluntarily study them.</p>
Amanda	Licensed legal professional (Lawyer, LLLT, LPO)	<p>How soon before you tell me what colour suit I have to wear. Enough already. Not every lawyer needs all this crap.</p>
Ron Phillips	Licensed legal professional (Lawyer, LLLT, LPO)	
Michele M. O'Loane	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Something has to give. I am a solo practitioner and adding the cost and lost revenue to meet EVEN MORE CLE credit requirements is so far over the line. Am I to understand from the email that LLT's also would have to complete "one credit of Technology Security Ethics and one credit of Mental Health Ethics each reporting period. The amendments would increase the total credit requirements in the area of legal ethics to eight credits, and create four distinct categories of legal ethics: (1) general ethics and professional responsibility; (2) equity ethics; (3) technology security ethics; and (4) mental health ethics?"</p>

Gregory Lyle	Licensed legal professional (Lawyer, LLLT, LPO)	The word "equity" is too imprecise. It can and does mean different things to different people. The goal of equity is non-discrimination, so it should be replaced with "(8) Non-discrimination ethics, defined as subjects relating to eliminating discrimination and the mitigation of both implicit and explicit bias in the legal profession and the practice of law." The word equity implies to many people a goal of equal outcome and representation by race or class, when the goal should be to eliminate discrimination in all its subtle forms.
Scott Ashby	Licensed legal professional (Lawyer, LLLT, LPO)	Please stop adding required courses. We are professionals and we know better than any board what cle credits we need to best fulfill our professional responsibilities. Please stop.
Brett Shearer	Licensed legal professional (Lawyer, LLLT, LPO)	Members don't need any more specific requirements from WSBA. If anything, the requirements should be getting more generalized so members can customize their own learning as it applies to their practice. Specific requirements benefit some groups but harm others who may already have the knowledge base or for whom the new required topic category is more tangential to their practice/another topic would be much more beneficial.
Andrew Tien	Licensed legal professional (Lawyer, LLLT, LPO)	Regardless of the merit of a lawyer taking credits in any particular topic, I am strongly opposed to the WSBA further imposing ANY extra requirements for practice in this state. Attorneys who have been admitted to practice and are in compliance to practice should be free to determine, individually, how and where to spend money and time staying up to date and competent in practice areas. Each practitioner has her own financial, time, and interest limitations that should not be managed by the Bar Association. If the WSBA would like to OFFER FREE CLE's in areas of public interest or areas of particular import, please do so. Then whomever wishes to, may avail themselves of the content. If such a plan was initiated, I suggest there be a broad variety of free CLEs offered to appeal to a wide variety of practitioners.
Leila Edwards	Licensed legal professional (Lawyer, LLLT, LPO)	

Katherine A. Davis-Delaney	Licensed legal professional (Lawyer, LLLT, LPO)	<p>This is an unbelievably bad idea. First of all, if we need more ethics credits -- for any number of reasons, none of which I agree with -- don't tell me what area of ethics I must know. Second, I can't deal with tech security. MEGO My Eyes Glaze Over. I have a lot of anxiety around tech and just about anybody who works in an office of any kind is inundated with this information. I got it doing temporary labor for Thurston County -- twice. Stoop labor and I got this training and I never went near a computer. Plus, paying for this deal. Come on.</p> <p>Of all the aggravating ideas, forcing us to get a CLE credit in mental health stuff takes the cake. Yes, it's good to learn about this. Yes, we want to be trauma-informed and compassionate. Why not have at least 2 free ethics "extra" credit for folks who want to know more. I took the WSBA recent Lawyer Training for Service as Judges Pro Tem for Counties &amp; Municipalities March 17-18, 2023 at UW-Tacoma. The module on dealing with the mentally ill parties was extremely effective. The audio played an ordinary exchange in the courtroom and loud sound effects overlay the sound in the courtroom. We heard loud talking/shouting/harassing voices layered on top of the courtroom, mimicking the auditory hallucinations endured by mentally ill parties. It was scary &amp; disturbing. Shout out to WSBA for presenting an unforgettable teachable moment.</p>
Jacqueline E Marks	Licensed legal professional (Lawyer, LLLT, LPO)	If this is approved, then take away required credits in another area.
Lynne Buchanan	Licensed legal professional (Lawyer, LLLT, LPO)	If more credits are added then others should be subtracted.
Donald Kellman	Licensed legal professional (Lawyer, LLLT, LPO)	Unnecessary and without legitimate purpose
Arthur Quigley	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Earlier I responded. I would like to supplement my response.</p> <p>I stated that I have difficulty complying with the ethics requirement as it stands. Usually, I have all of my non-ethics credits as the three-year reporting period nears an end. Then, I have to scramble to meet the ethics credit requirement.</p> <p>This proposal would only add to the scramble. First, it adds 2 more credits to be acquired. Then, the credits need to be on two subjects that are not widely offered around the country. I mostly attend out-of-state and foreign CLE's to meet earn my credits. Often these programs do not offer any ethics credits, let alone on the narrow subjects of technology security and mental health.</p> <p>My suggestion is that the ethics requirement be kept at 6 and that 1 of those credits discuss the elimination of bias OR technology security OR mental health issues. This choice will build awareness of these issues, without unduly burdening the bar with micromanaged regulation.</p>
Nathan Rush	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Ethics credits are difficult enough to acquire during the reporting period. I am in an area of practice that does not implicate many ethics issues. So, I end ip taking ethics CLE in areas of law that are impertinent to my own practice. These proposed requirements appear to require even more specialized ethics training that will be inapplicable to many attorneys' practice areas. For these reasons I oppose.</p>

John Geil	Licensed legal professional (Lawyer, LLLT, LPO)	The MCLE requirements are getting too complicated and detailed. As lawyers we already have a duty to keep up with the times with respect to the various competencies under the rules of professional responsibility. This proposed change would add an additional layer of unnecessary requirements given our self-policed duty as lawyers to be competent.
Mark Bucklin	Licensed legal professional (Lawyer, LLLT, LPO)	<p>"Equity ethics, defined as subjects relating to equity, inclusion, and the mitigation of both implicit and explicit bias in the legal profession and the practice of law".</p> <p>Excessively vague and ill defined. What is "equity"? This seems to be an excuse for political indoctrination by progressive Bar members. What bias in particular are you trying to mitigate? The presumption assumes a fact not in evidence since you fail to define what bias you believe needs mitigating.</p>
Arthur Quigley	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I keep on thinking about this proposal. At least in my case, I keep on thinking about it because I do not think the proposal is good. Here is one more thought.</p> <p>Seminar organizers often try to put an ethics component in a seminar to entice attendance. If there are three specialized ethics requirements, organizers will be motivated to try to address all three requirements in a day-long or longer program. This would eat up time available to discuss the substantive law on the seminar subject.</p> <p>In an attempt to address narrow concerns, education on wider areas of the law will be limited. I think the bar should be wary of unintended consequences of this proposal.</p>
Jim Patterson	Licensed legal professional (Lawyer, LLLT, LPO)	Piling on more targeted ethics requirements will not make lawyers better at their jobs. The equity ethics requirement has already shown itself to be at best an utter flop, but at worst an egregious political manipulation of our licensing process in WA. There is no need to double down on further targeted ethics classes and waste any more precious time (and money) of WA attorneys.
Mark Brubaker	Licensed legal professional (Lawyer, LLLT, LPO)	Trust professionals to choose CLE that is relevant to their practice.
Paul Benton	Licensed legal professional (Lawyer, LLLT, LPO)	The suggested amendment is not necessary and is onerously stringent for an issue that affects a super small minority of legal professionals. These issues should be addressed through disciplinary proceedings against members violating laws or ethics rules, which we are all aware of.

Mark J. Koslicki	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I oppose the proposed amendments to APR 11 to subdivide the requirements of the general ethics requirements to specifically require course subjects of both mental health ethics and technology security ethics.</p> <p>A proposal very similar to the current proposal was considered in 2019 and wisely rejected as a mandatory requirement. Rather the MCLE Board at that time recommended that those courses be made available.</p> <p>The “Preliminary Suggested Amendments to APR 11” dated May 5, 2023 says that “A Technology Security Ethics Credit Must be Mandatory Because Members Are Not Fulfilling Their Responsibilities of Competence and Diligence.” Yet the MCLE Board only offers general population statistics rather than stating how many Washington State attorneys have or have not taken a course on the topic. I have taken such a course as it was offered for free from the WSBA.</p> <p>The additional subject of equity, inclusion and the mitigation of both implicit and explicit bias in the legal profession was added as a requirement in 2022. Now the board is recommending two more additional requirements (mental health ethics and technology security ethics). The MCLE Board is proposing too many sub-categories and should continue to offer courses on these topics rather than requiring more and more subjects be mandatory.</p>
Dana Quam	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Please consider offering courses on those topics without imposing new obligations. The CLE obligations often do not provide substantive benefit to me in my work, and is just wasted time and money.</p>
Scott Schwieger	Licensed legal professional (Lawyer, LLLT, LPO)	<p>As a federal employee attorney advisor, it would be extremely burdensome to be required to take CLE classes offered essentially only in Washington especially given that I am in the Middle East. Also, diversity ethics has limited applicability to actual practice and likely impinges on the free speech rights of attorneys. If you are going to mandate such CLE credits, at least wait to see if the US Supreme Court finds that the concept of diversity has been hijacked by political interests in their College admissions cases before them now. I also oppose mental health ethics mandates because of the similar burden of finding relevant classes / credits and its tenuous relationship with the actual practice of 90% of attorneys.</p>

Robert Gudmundson	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The Bar Association is exceeding its mandate when it attempts to redefine legal ethics in terms of equity, technology security, and mental health. These topics go beyond the scope of the rules of professional conduct. While such inquiries are appropriate for lawyers to consider as matters of conscience, they are inappropriate for the court and bar association in their roles as legal regulators. This is because conscience and morality inform the law, the law does not inform conscience and morality. Conscience and morality are greater than the law. They are protected by the First Amendment.</p> <p>The Rules of Professional conduct protect clients' rights vis a vis their attorney and the courts' rights to candor and honesty. Let's not appoint ourselves as some sort of modern ecclesiastical court or super legislature by expanding the scope of legal ethics into a general morality code.</p>
Marne	Licensed legal professional (Lawyer, LLLT, LPO)	No thank you. Fewer, not more and more complicated.
Ken Weil	Licensed legal professional (Lawyer, LLLT, LPO)	NO
David Solis	Licensed legal professional (Lawyer, LLLT, LPO)	I can't afford to be an attorney. I left the profession around seven years ago and have thought of jumping back in, but the list of WSBA requirements keeps growing and the CLE credits are super expensive. I understand the desire of the WSBA to do more, but ultimately these type of actions just result in a less equitable profession and larger staffing at the WSBA.
Rachel McCall	Licensed legal professional (Lawyer, LLLT, LPO)	Ethics topics relating to technology and mental health are already very available in CLE courses and lawyers can choose to take those if they wish. I don't view mental health "ethics" as a legal issue that warrants lawyer education requirements. It is not unique to the law profession and there are other ways that lawyers can receive mental health education should they choose to. Ethics related to technology is also very much a part of the CLE offerings these days (and often the most interesting courses) so I don't see the need to mandate it specifically. The current amount of ethics CLE credits is already challenging to meet and adding an additional 2 credits for topics that aren't necessary doesn't seem worthwhile to an already overburdened workforce.
Michael Gusa	Licensed legal professional (Lawyer, LLLT, LPO)	No, no, a thousand times no. Anyone who thinks these would be useful can take them. The suggestion itself is bureaucracy run amok. Bureaucrats and would be bureaucrats always want to make what they view as a good idea as mandatory for all.
Cynthia Szeker	Licensed legal professional (Lawyer, LLLT, LPO)	Instead of adding to the amount of credits required you should make these additional categories as extra options available for obtaining ethics credits. Thank you.
Kelly Pankiewicz	Licensed legal professional (Lawyer, LLLT, LPO)	
Alton Gaskill	Licensed legal professional (Lawyer, LLLT, LPO)	
Lisa Johnson	Licensed legal professional (Lawyer, LLLT, LPO)	Stop adding regulatory requirements. People do not need to be so regulated at every single minute level, and that goes for MCLE credits, too. Categories beget categories.

James Smith	Licensed legal professional (Lawyer, LLLT, LPO)	The more specific and nuanced the WSBA makes earning credits in very specific categories, the more difficult it is for licensed attorneys to have full-day CLE conferences meet those specific requirements. This, in turn, requires licensed attorneys to have to seek rather expensive 1-2 hour CLEs just to meet those specific requirements. I am also licensed in California, a State that just added another category of "implicit bias and the promotion of bias-reducing strategies," on top of "competence issues," in addition to its general ethics requirements. These nuanced courses are harder to locate than general ethics credits, and are rarely covered in all-day training. I do not support this proposal.
Jeffrey Cox	Licensed legal professional (Lawyer, LLLT, LPO)	
M Colleen Barrett	Licensed legal professional (Lawyer, LLLT, LPO)	There are so many important legal ethics issues, by setting up sub-categories, it sets priorities for areas that may not be needed by folks who could benefit from other education. These areas are best taught in law school.
Inge Larish	Licensed legal professional (Lawyer, LLLT, LPO)	These additional requirements create unnecessary barriers to members of the bar as well as additional expenses for licensing fees that are already very high. It is not trivial to meet all these extra requirements especially since they are different than the requirements of for example California. This would be an unnecessary burden of members of the bar and in my opinion do not meaningfully add to the knowledge base of practitioners.
Neil Rust	Licensed legal professional (Lawyer, LLLT, LPO)	Respectfully, I believe the MCLE requirements are sufficiently burdensome as is, and do not need to be expanded. I have no objection to the proposed subjects being added, but if they are added the general law requirement should be correspondingly reduced hour for hour.
Sandra Richartz	Licensed legal professional (Lawyer, LLLT, LPO)	Its already impossible to find CLE's on substantive law. This change would simply lead to more CLE's that aren't teaching legal education. Ethics are important, but this goes too far.
Tuan Pham	Licensed legal professional (Lawyer, LLLT, LPO)	
Kathleen Doyle	Licensed legal professional (Lawyer, LLLT, LPO)	It is difficult to obtain ethics credits at the moment, without increasing the requirement. Moreover, these don't appear to be fundamental enough to require mandatory status.
Ilene Munk	Licensed legal professional (Lawyer, LLLT, LPO)	
George Kolin	Licensed legal professional (Lawyer, LLLT, LPO)	This is micro-management.
Kenneth Friedman	Licensed legal professional (Lawyer, LLLT, LPO)	Lawyers can be trusted to take the legal education classes that best suit them. I'd personally be in favor of removing all mandatory CLE requirements. I'm certainly opposed to increasing mandatory requirements in any way.

to eight credits, NO, thank you. WHY THE INCREASE? WHAT EVIDENCE THAT IT IS NECESSARY? No correspondending decrease in substantive requirements? WHY?

and create four distinct categories of legal ethics: (1) general ethics and professional responsibility; (2) equity ethics; (3) technology security ethics; and (4) mental health ethics.

This is, frankly, ridiculous. Legal ethics /professional responsibility are the ONLY topics that should be required. Have you data of a serious decline in legal ethics attributable to too few hours of CLE? If not, no increase is warranted.

Margaret Manning Licensed legal professional (Lawyer, LLLT, LPO)

We are already expected to sit through hours of programming on discrimination, mental health, etc. Most of it topics covered for decades. .We are a two-person firm. Law office practice and LEGAL ethics are far more valuable to us. THE REST IS BURDENSOME AND THE NEED FOR IT NOT ESTABLISHED. Even law office and tech management should be rolled into the general category.

EQUITY ETHICS? What IS that?

Have you surveyed the membership on the perceived value of the EXISTING requirements?

Much of it is a wasteful exercise. I do enjoy substantive law CLE in my specialty. The rest is already wasting my time. Adding more would be a mistake.

Stewart Mesher Licensed legal professional (Lawyer, LLLT, LPO)

Hard enough to get ethics credits, further specialization on top of what is already required is too much

Glen Miller Licensed legal professional (Lawyer, LLLT, LPO)

Military Attorney trying to keep up with the constant changes from WSBA CLE - it doesn't appear that WSBA is really aware that people are serving all over the world and don't have the ability or time to flex for all these new initiatives that are poor attempts at-one-size-fits-all. If you are interested in encouraging a particular CLE, offering free prerecord options will likely help get views.

Bonnie Dragotto Licensed legal professional (Lawyer, LLLT, LPO)

The requirements for CLE are already extremely robust and exceed that of many other jurisdictions. If ethics credits need to be increased based on an increase in disciplinary actions or other evidence that the current requirements are inefficient, that data should be shared with the regulated community. If such data shows an increase is appropriate, recommend allowing flexibility in the type of ethics credits that can fulfill the requirement. Many jurisdictions and CLE offerings do not parse out specific topics within ethics making the requirement a challenge to fulfill.



Scott Morris	Licensed legal professional (Lawyer, LLLT, LPO)	It is difficult enough to obtain the necessary credits every 3 years. Leave this to decision to the individual atty's needs.
Gary E. Hood	Licensed legal professional (Lawyer, LLLT, LPO)	<p>CLE should focus on ensuring practicing attorneys stay current on law and ethics. And it should allow each practitioner the flexibility to determine what areas and issues that practitioner needs to emphasize for that individual's circumstances. The further the WSBA continues to stray from that - such as requiring CLE credit for issues such as "mental health" on top of "equity" and the like, the further it strays from its appropriate role. While such myriad issues have their place, forcing an agenda on the profession through CLE is misguided.</p>
Felicia Watson	Licensed legal professional (Lawyer, LLLT, LPO)	<p>and mental health credits, but I do not believe these should be required under the Ethics category. With respect to the "technology security ethics" proposed requirement, I agree it is vitally important for attorneys to understand the risks data breaches and cyber-attacks can have on their businesses, and their clients. However, placing this under the "ethics" requirement severely limits what courses will comply. There are many courses (live and via webinar) focusing on cybersecurity risks and data breaches, that help inform legal practitioners of the risks, and reasonable steps to minimize those risks. But the proposal to designate this as an "ethics" course significantly limits choices for licensed legal professionals. Please remember that funds are limited for many licensed professions to take CLE courses which could have detrimental impact when a course on cybersecurity and/or data privacy (for example) does not qualify as "ethics" so the attorney would not select that because their training budget only covers so much, thereby missing out on potentially relevant information to their practice.</p> <p>The only way this proposal works is if the MCLE Board has courses developed and ready to go if the Suggested Amendment is approved. That said, for those practitioners who reside out of state, there will need to be an allowance for meeting the requirements via webinar replay (and not live). Moreover, while the MCLE Board report suggests that other states require some type of credits focused on technology and security, it does not appear that these requirements fall under the "ethics" category. Indeed, under the general professional requirements of diligence and competence, technology security easily falls within a general professional requirement. Why does the MCLE Board intend to place this under the "ethics" designation?</p> <p>For the Mental Health Ethics credit, I believe this too would be better placed under the general professional responsibility CLE requirements rather than be categorized under ethics. If the focus of the MCLE Board is to highlight the issues many legal professionals</p>
Fiona de Kerckhove	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It is already very difficult to find qualifying ethics credits without further specifying the type of ethics credits that are required. The only way this could be feasible would be if the WSBA would provide opportunities to obtain these types of credits at no expense and virtually (not just in-person) multiple times a year.</p>

Kimberly Kazda	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It may prove difficult for several attorneys to meet the requirement. WSBA is proposing that certain credits of ethics be categorized as certain types of ethics. When I receive my ethics credit through my employer they are classified as general ethics credit. Based on this new proposal, I will now have to seek out particular types of ethics credits, even though the ethics provided by my employer may cover the topics WSBA is seeking to require.</p> <p>Further, I am a government attorney who does not reside in Washington. I do not have the ability to attend ethics seminars presented by the WBSA unless these are remote. My employer has always provided a required ethics course which has fulfilled my ethics CLE requirements for the WSBA. My employer creates the required CLE courses to discuss matters that arise specific to our profession/employment. We often discuss these issues in ethics, but it is a general ethics course.</p>
Marc Perez	Licensed legal professional (Lawyer, LLLT, LPO)	<p>These proposed courses should not be mandatory.</p> <p>I find it increasingly more difficult to obtain my CLE credits at low cost. I'd be in favor of this amendment if the WSBA offered both credits at no cost to me.</p>
Jennifer Farmer	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It's difficult to obtain CLE credits. Most attorneys take a variety of CLE credits. I would prefer that our number of CLE credits not be increased if this is added. If this is added, it can perhaps be added under the Ethics umbrella.</p>
Kirsten Michelle Elliott Sinclair	Licensed legal professional (Lawyer, LLLT, LPO)	<p>There are many things that are important for a lawyer to know and stay current on, and the WSBA should not be in the position of micromanaging all of these aspects by parsing out multiple types of CLEs. Moreover, for those attorneys like me who live out of state and depend on entities like Westlaw's Legal Ed Center for CLE credits, it will be increasingly hard if not impossible to figure out what courses count for so many different types of CLE credit requirements. Modern life and practice is increasingly complex and detailed; having yet more special things to track is actually quite burdensome and taxing. In my opinion, mandatory CLE topics should be limited to what is absolutely essential to the practice of law. Please it to the practitioner to determine what else applies to them in their practice and area of law.</p>
Austin Michael Watkins	Licensed legal professional (Lawyer, LLLT, LPO)	<p>As an attorney in federal practice if WSBA continues down this path of "unique" CLEs, I will resign from the WSBA. I am already overwhelmed by the amount of unique compliance requirements of multiple bars and professional accreditations. Stop with the nonsense already and allow your members to be competent attorneys capable of understanding technology and mental health. These CLEs are offensive to younger members (me included) of the bar who are generally well versed in technology and mental health issues.</p>
Jennifer Cave	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Rather than mandating specific types of ethics credits, lawyers should be free to select the types of ethics credits most appropriate for their individual practices. These types of CLEs should be made available to lawyers to select from (and should count toward fulfilling the ethics requirement) but they should not be required to be completed as part of the license renewal process.</p>
Frank Lin	Licensed legal professional (Lawyer, LLLT, LPO)	

Scott Kirk	Licensed legal professional (Lawyer, LLLT, LPO)	Allowing attorneys the freedom to choose which specific type of ethics issues that are most relevant to their practice is critical to having an effective legal education program. The rules in Washington state are already too prescriptive - please don't make CLE any more prescriptive!
David R. Risley	Licensed legal professional (Lawyer, LLLT, LPO)	Small arrogant factions want to impose their priorities. Why not offer these courses and see if the Bar as a whole will find them useful.
Judge J.E.Sullivan	Licensed legal professional (Lawyer, LLLT, LPO)	Stop micromanaging and trying to control everything - your suggestions appear to arise from institutional co-dependence. By mandating and subcategorizing as you propose, you are simply making it harder and harder to understand your CLE requirements, and you create a labyrinth of confusion. Simply add these topics as a matter of choice. People will take them if the speakers are good, and the materials help them practice law. If you want to address mental health in the organization, please read Anne Wilson Schaeff's book, the Addictive Organization.
Rachel Hill	Licensed legal professional (Lawyer, LLLT, LPO)	
Erica	Licensed legal professional (Lawyer, LLLT, LPO)	
Larisa Sullivan	Licensed legal professional (Lawyer, LLLT, LPO)	CLE credits are already an expensive endeavor and there's no compelling reason to add to that burden. Additionally, the ethics credits that any individual attorney attends should ideally be relevant to their practice and the proposed additions would not be relevant to all.
Lisa Neal	Licensed legal professional (Lawyer, LLLT, LPO)	It is already challenging to find - and pay for - CLE programs that are relevant to the area of the law in which I practice. Not all of us work for large law firms that cover CLE costs, and the cost of programs is not low. These proposed additions are not directly relevant to any area of the law, and the vague but specifically outlined topics are going to be hard to find. "Equity ethics" is unspecific, but appears to envision a generalized instruction in "equity" that is not tied to the practice of law but is rather a general instruction on bias. "Technology security ethics" is already required, and the information proposed is already learned and discussed by lawyers and courts (and has been since the 1990s). "Mental health ethics" evidently has to do with already in-place ethics requirements for lawyers - but implies stress management and work-life balance will be a required topic, even if one does not have that issue (or is not an alcoholic, etc.). This requirement would be akin to requiring me to take patent law courses when I do not practice patent law. Similarly, to the extent the Board decides to require these sub-sets of "ethics" courses, they should be included in the Ethics Credits requirement, not be made new stand-alone requirements, and should not increase the CLE requirements. Further, there is no valid reason to not allow carryover to fulfill obligations for these specific requirements. Finally, to the extent these are "new" issues that the Board suggests be learned by lawyers, I do not agree that these issues impact my competency to practice law. As such, they are not validly required for renewing my license.
Erich Potter	Licensed legal professional (Lawyer, LLLT, LPO)	

Tonya Hebert	Licensed legal professional (Lawyer, LLLT, LPO)	The last thing we need is specific curriculum requirements to a level that is micro managing.
Roger W. Boardman	Licensed legal professional (Lawyer, LLLT, LPO)	
Lindsay Abraham	Licensed legal professional (Lawyer, LLLT, LPO)	Please do not make it more difficult to have to obtain CLE credits. It is already complicated enough to earn the appropriate credits. I would instead recommend offering free lunch and learn ethics credits in the areas you have proposed so that more people will take them, but not require them overall. Many lawyers work for entities that have separately required trainings of this nature that are specific to their business but don't qualify for CLE, and this would be duplicative as well.
Jeffrey M Hawkinson	Licensed legal professional (Lawyer, LLLT, LPO)	
Adrian Bateman	Licensed legal professional (Lawyer, LLLT, LPO)	
Jessica Moore	Licensed legal professional (Lawyer, LLLT, LPO)	The more specific topics are required the less practitioners have the flexibility to take continuing education in areas they personally require to learn and develop specific to their practice.
Paul Routt	Licensed legal professional (Lawyer, LLLT, LPO)	
elizabeth penoyar	Licensed legal professional (Lawyer, LLLT, LPO)	MCLE credits, and reporting, are getting more and more involved. It's time consuming, and confusing to keep these credits straight. How about just having monthly or weekly day long CLE's that cover just the mandatory ethics credits required.
Deneen Person	Licensed legal professional (Lawyer, LLLT, LPO)	
Kari Brady	Licensed legal professional (Lawyer, LLLT, LPO)	I think this should be included in the regular hours required, not additional hours added.
Laurie Gibbens	Licensed legal professional (Lawyer, LLLT, LPO)	I think the Suggested Amendment would make it significantly harder to meet the CLE requirements without any indication that the requirement would lead to an improved experience for members of the public. It would be very difficult to sort through offered CLEs to find ones that satisfy the credits needed in four separate subcategories of Ethics.
Rhonda Munson	Limited Practice Officer	
John Spalding	Licensed legal professional (Lawyer, LLLT, LPO)	
Elaine Nordgaard	Licensed legal professional (Lawyer, LLLT, LPO)	I believe the required training should be limited to education relating directly to the work that we do and not other training that our employers would like us to have or our mental health. Mental health is a personal choice. I can see that spreading into other peoples opinions and choices that don't directly affect our job.
Joe Williams, Jr.	Licensed legal professional (Lawyer, LLLT, LPO)	These requirements are not necessary for all attorneys and are a waste of time for those of us who do not need them. They should be optional or mandatory for those who engage in misconduct or negligence. I barely have enough time to complete the mandatory classes (in addition to the specialty classes or personal growth coursework I voluntarily complete on my own). There is a novel concept: professionals taking personal responsibility and acting like professionals. Thank you for trying to make the bar better, but this path of more mandatory "classes" are not helpful.
Keri Olson	Licensed legal professional (Lawyer, LLLT, LPO)	We have enough required credits already.

Richard Finnigan	Licensed legal professional (Lawyer, LLLT, LPO)	
Jarett Goodkin	Licensed legal professional (Lawyer, LLLT, LPO)	Attorneys already have significant workloads and often struggle to find the time to meet the current CLE requirements. Our jobs are already stressful enough in a post-pandemic world. While one might argue that the situation supports adding a mental health CLE component, creating more hoops to jump through is not the answer. The bar should not add these requirements. Licensed attorneys are in the best position to decide the courses that best suit their needs.
Alesia Pinney	Licensed legal professional (Lawyer, LLLT, LPO)	While these are interesting topics, they should not be required topics for all lawyers. A focus on offering really educational and low or no cost CLE in this area would enable anyone interested to learn.
Angela Kosoff	Licensed legal professional (Lawyer, LLLT, LPO)	Over the past few years, it has been extremely difficult to acquire ethics credits and adding more seems to be unreasonable. If it is going to be a requirement, we should be able to get these credits easier or have our company's mandatory training for these items go on the list for approved courses. Although I think it is important for the items to be known it is also important that it is not a burden on us to take additional classes at high costs to acquire them
Debra Defreyn	Licensed legal professional (Lawyer, LLLT, LPO)	I am a government lawyer. I receive a lot of technology training and am competent to do my job without additional requirements from the WSBA. I mean, we don't have to have mandatory grammar CLEs - is that next? I'm also opposed to Mental Health ethics being required. I'm not even sure what that means but I'm doubtful it applies to my work representing state agencies (as I have for 24 years). Thank you.

		<p>We are adding too many specific-subject credits that are hard to keep track of and hard to keep up with. Most of the information becomes repetitive and doesn't add much the second or third time I see it.</p> <p>A couple of rhetorical questions: What are these requirements trying to accomplish? What are the knowledge objectives? If the goal is to create an attorney who uses technology in a secure matter, that will not happen after a one hour CLE course. Likewise, you could easily teach someone some basics about mental health ethics in an hour, but that will not make that person a good person if they already have unethical intentions.</p>
Nicholas Stampfl	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Most of the recent changes to the CLE requirements have not helped me in my area of practice, as my employer already provides numerous, higher-quality trainings on similar subject materials that do not meet the MCLE board's requirements. Most of the CLEs offered or approved by WSBA are focuses on Washington State courtroom practitioners, but many of our attorneys work for federal agencies, as in-house counsel for corporations, or in other practice areas. Many of the CLEs I have attended that meet the credit requirements</p> <p>The subject matter for CLE-credits should be driven by individuals, not the board. If I need to know a subject to stay competent in my field of practice, I will learn it or study about it. No amount of one-hour trainings on ethics or diversity or mental health will make someone a good person or will put kindness in their heart. The discipline system exists for a reason--To address the bad actors.</p>
Phillip Curiale	Licensed legal professional (Lawyer, LLLT, LPO)	
Krystle	Licensed legal professional (Lawyer, LLLT, LPO)	
Attorney in Washington	Licensed legal professional (Lawyer, LLLT, LPO)	<p>MCLE is already over regulated and over administrated. Adding these requirements will not improve representation for clients, in fact I'd bet the correlation of taking these classes to rendering improved counseling is not even existent. The same lawyers that fail their clients in these specific areas of technology and mental health are still going to have the same problems, whether or not this mandatory requirement is enacted. It's more hassle, more expense, and more red tape that is not needed.</p>
Glenn Slate	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The problem with specialized CLE requirements is that is creates an unreasonable burden on too many small firm lawyers, by making them take classes they do not need. For example, I have a Masters degree in psychology. Why should I be required to take a CLE that provides information targeted to an audience that has significantly less training in the area than I already have?</p> <p>There is no free lunch. Every hour wasted satisfying unneeded bar requirements, raises costs, which raise rates and impacts access to justice.</p>
Brian Klein	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The proposed new MCLE credits are an unnecessary burden.</p>

Aaron Williams	Licensed legal professional (Lawyer, LLLT, LPO)	Recently, the CLE program has become increasingly focused on promoting unfounded politically left ideology rather than actual "legal" education. The "equity" ethics category for legal ethics is exactly such a non-legal course meant to indoctrinate attorneys in an anti-white racist and anti-male sexist view of our country, our society, and our state. This view is unfounded because it lacks any understanding of basic statistics, and that correlation is not causation. Such "education" creates an environment of racial harassment. It is illegal under both state and federal constitutions to discriminate against people on the basis of sex and race. It is also immoral and likely illegal to subject them to racial harassment in a required "CLE." The CLE Board seems to have forgotten that we still live in a free country and that racial discrimination against all people, including white people, is illegal. Promoting it is not legal education at all, no matter how much the adherents to this ideology disagree. Nothing needs to be changed with our ethics requirements. This is a solution in need of problem.
James Cushing	Licensed legal professional (Lawyer, LLLT, LPO)	Were not in the business of providing mental health care.
Douglas W. Scott	Licensed legal professional (Lawyer, LLLT, LPO)	Keep it the way it is with no added requirements.
Jesse Aston	Licensed legal professional (Lawyer, LLLT, LPO)	Generally, I do not agree with increasing the required credits due in any given reporting period. Instead, I think these new areas should electively permit members of the bar to substitute these credits under existing requirements. I am also concerned about what is meant by equity ethics and think further clarity is required to ensure that such a requirement does not become an agent of coercion and hypocrisy within the bar.
Kris Sundberg	Licensed legal professional (Lawyer, LLLT, LPO)	This is getting too complicated. CLE compliance is turning into a Byzantine administrative exercise. Please, no more special requirements. Thank you for considering this response.
Kelly Keller	Licensed legal professional (Lawyer, LLLT, LPO)	
Linda M Callahan	Licensed legal professional (Lawyer, LLLT, LPO)	
Peter Sisson	Licensed legal professional (Lawyer, LLLT, LPO)	I feel the current requirements for ethics CLEs are sufficient. Lawyers who feel the need for technology security or mental health education are able to and should seek that on their own. Adding these requirements for all lawyers is different than adding the equity/diversity requirement which I favored. That requirement serves to broaden all our perspectives in a beneficial way that is more generally applicable vs. the current proposals.
Micah Balasbas	Licensed legal professional (Lawyer, LLLT, LPO)	I am not in favor of any requirement related to what ethic credits I earn. I should be allowed to pick the ethic credits that are relevant to my work and that I feel is important. Requirements that I participate in specific areas are forcing someone else view point on my ethics.
Terence Lynch	Licensed legal professional (Lawyer, LLLT, LPO)	The members of the bar are intelligent and informed individuals. We should be trusting them to make intelligent and informed decisions about what CLE will best advance their quality of practice. Options like the proposed ethics CLE categories should be promoted, but not mandated.

John Panesko	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Of course lawyers feel stress. So do dentists and doctors and plumbers. Our solution to deal with stress is a reliance on firm Christian beliefs. That's probably not your solution.</p> <p>Of course the internet is a dangerous place. It's dangerous for everyone. Our solution for security is that no law office computer is connected to the internet except for one used for emails. That's probably not your solution.</p> <p>My point is that various lawyers will find various solutions that fit their lives, not yours. To force every lawyer to attend classes is to assume that every lawyer has a problem and that they will adopt your solutions. You are arrogantly wrong in that assumption.</p> <p>Lastly, I am suspicious about the term "equity ethics." Equity means whatever feels good at the time and ethics is a set of principles. Combining them means a set of principles that feel good at the time. That should not be the basis for anything. Maybe it's your code phrase for something else, I don't know.</p> <p>If you offered these proposed CLE courses voluntarily, you'd know exactly how many lawyers want your solutions to their assumed problems.</p>
Clifton Gilley	Licensed legal professional (Lawyer, LLLT, LPO)	We do not need more specialty CLE credits which will likely incur a premium cost to obtain. A "one-credit" requirement is ridiculously performative.
Juni Luyombya Ozzengett	Licensed legal professional (Lawyer, LLLT, LPO)	The APR 11 is sufficient as is.



Keith Burney

Licensed legal professional (Lawyer, LLLT, LPO)

MCLE requirements do very little to further a legal professional's learning and the proposed amendment will only further the already unnecessary burden placed on legal professionals to acquire MCLE credits. Furthermore, it will enrich the already bloated CLE provider network at the expense of legal professionals.

Because CLE providers are incentivized to sell their CLEs to the widest possible audience, these providers frequently offer only basic information about a topic. Thus professionals in a particular area of law are left sitting through CLEs about information they already know or worse they are forced to take CLEs in areas of law in which they never practice. This benefits only one party, the CLE provider.

Multiple bars across the country have no CLE requirements and the lawyers in those states are no less professional than they are in Washington. Those lawyers seek out opportunities to learn and grow that are meaningful and further learning in their chosen field because they want to be better. When they don't, they quickly learn the consequences of falling behind.

Forcing lawyers to sit through endless hours of CLE doesn't improve their professionalism. Nor does it make client's experience better. It simply enriches the CLE provider industry.

William Krause	Licensed legal professional (Lawyer, LLLT, LPO)	<p>technology, technology security, and mental health. Because there is a dearth of materials/courses out there that speak to these subjects. This is something the WSBA could focus some of its time and treasure (treasure provided by lawyers via annual dues) to create and maybe even make available for FREE to members. I would hazard a guess that if the WSBA made free cle's available to members on these subjects, they would be oversubscribed and the stated goal of educating lawyers on these subjects would be met, in surplus, and that would be a very good thing. But, the mere creation of the requirement does something else -- in a world where it is pretty common for lawyers to be charged \$75, \$100, or much more for a CLE course-- the requirement would create a dynamic where practicing attorneys would have to scurry around to find CLEs which fit each niche (perhaps we can, perhaps we can't) and likely pay a huge sum for what might be poor content, simply to fit each niche. Or risk being disbarred. Couple this with the fact that most CLEs aren't WA focused, so finding one produced in, say, New York or California which one could then take and apply to fit into the niche, creates a dynamic which is bound to be frustrating and counter-productive -- the goal isn't to make lawyers' lives much harder (at least, I hope it isn't), it is (I hope) to give us the opportunity for quality legal education in the subject matters of information security, mental health, etc. The reality is that the vast majority of lawyers float along during their three year MCLE cycle, taking courses which are of interest/use to them (ideally provided by a quality source, for free) and then end up scrambling at the end of year three to fill the rest of the slots. I strongly believe that if the WSBA created free CLE content in these subjects, you'd get something close to 100% of Washington attorneys taking these courses, without the mandate. If you create a mandate and don't address the creation of readily available content for each niche, you're just being a nag, not a problem solver. IF the first paragraph of the amendment said: "WSBA will create, and provide for free, at least two hours of in-person and on-line CLE content each year for each of the following requirements: (1) technology security, (2) mental health (and</p>
Katherine Bozzo	Licensed legal professional (Lawyer, LLLT, LPO)	<p>We don't need more oversight or more opportunities to be charged to attend MCLEs. In addition, many of the ethics CLEs I attend already cover these topics.</p>
Jennifer Whang	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Wsba already requires enough mcle and it would be burdensome to require additional specific types of credits, especially for those of us that practice outside of Washington. The process of getting credits approved by wsba outside of Washington is cumbersome, time consuming and frustrating. I have had credits linger in an unapproved state for reasons beyond my control and oppose additional requirements.</p>
Patrick Joseph Kirby	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Lawyers must be knowledgeable of all the Rules of Professional Conduct, including RPC 8.4(g), to be licensed. Respect for the dignity of every individual is a cornerstone for the legal profession to make justice possible. See RPC Preamble. In addition, this is common sense: treat others as you have them treat you. We have sufficient ethical rules and CLE's requirements regarding respect for all persons. We need to treat lawyers like adults.</p>

Kate Fairborn	Licensed legal professional (Lawyer, LLLT, LPO)	If anything, the WSBA should be lowering CLE requirements, while making more content available for free... You cannot simultaneously advocate for more affordable legal services, while ever increasing the cost of being an attorney, especially in an inflationary cycle. Roll back CLE hours.
Ken Yalowitz	Licensed legal professional (Lawyer, LLLT, LPO)	The issues relating to the proposed CLE requirements are not applicable to all practitioners and therefore should not be imposed as requirements across the board.
Richard Young	Licensed legal professional (Lawyer, LLLT, LPO)	Stick with law.
Daniel Rey-Bear	Licensed legal professional (Lawyer, LLLT, LPO)	I could see requiring this once or maybe once every five years, but not every reporting period. If these are required, the State Bar should provide these for free.
Lauri Lewis	Licensed legal professional (Lawyer, LLLT, LPO)	Instead of increasing the continuing legal education requirements, I suggest the WSBA include suggested and recommended CLE courses in emails or its website(s). WSBA has done a good job in the past of making these proposed CLE courses free to WSBA members. If such practice continues, then it is easier for WSBA members like me to attend and get the recommended CLE training.
Christine	Licensed legal professional (Lawyer, LLLT, LPO)	I am an out-of-state member of the bar and continuing to add special CLE categories makes it harder for me to fulfill the requirements with classes available virtually or local to me.
Bijan Jalili	Licensed legal professional (Lawyer, LLLT, LPO)	Ethics credits have traditionally been some of the hardest to fulfill, parsing out into various specific ethic requirements would make licensing more difficult and likely more expensive.

Joel B Gilman	Licensed legal professional (Lawyer, LLLT, LPO)	<p>While I appreciate the importance of the matters to be addressed in the proposed MCLE subjects, I am against making them mandatory topics for MCLE reporting. If these topics are of great importance, has the WSBA specifically addressed them in the Bar Exam questions? Do Washington's law schools include these issues in their course offerings?</p> <p>It would be very unwise to turn MCLE into a shopping basket filled with mandatory subject-specific course requirements, especially in regard to issues that are of current interest right now but may not be in future years. Technology Security Ethics, in particular, appears to be an issue of the moment, given the rush to put all information and communications "on the web" even though the technology is still rather primitive. It is certainly a timely issue, but I doubt that it will always be that way. Mental health is always timely, but it is always an issue for the entire society to deal with, not just lawyers.</p> <p>Other timely and important legal topics right now include Election Law. Should we not also include a mandatory CLE credit on the ethics of filing suit to overturn an election? Many lawyers across the country have been doing that recently, including right here in Washington (Culp v Wyman, King Co Sup Ct # 20-2-17720-2 SEA).</p> <p>I am opposed to the Suggested Amendment.</p> <p>Respectfully, Joel B Gilman, Seattle WSBA #13322</p>
John	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Ethics requirement should not be increased to eight credits. Not sure how anyone could view a mental health credit as a requirement. That is a personal health matter and related to the practice of law.</p>
J Scott Miller	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Although I do agree ongoing professional education is critical, the requirements are becoming confusing and onerous. Also please consider the cost of MCLE. As a sole practitioner it is extremely costly to pay annual licensing and MCLE costs, as well as taking time away from the actually practicing law (which pays for the annual licensing and MCLE costs).</p>

Neil McPherson	Attorney	<p>This is getting too complicated. It distracts from the policy of elevating "equity" as a special focus issue. It is easy enough to make attorney aware that their IT has to meet HIPPA security standards; the IT people know what that is, and it is a known standard. The Bar already has great resources for lawyers. Mental health is important, but see #1 &amp; #2. I see some leadership in the destigmatizing of seeking mental health help from the Bar. Probably during CLE's where presenters self-identified mental health diagnoses. Leadership, exemplars, education, commitment; not more bloody rules.</p> <p>vty, -nm</p>
Hanh Disch-Le	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I am not in favor of the amendment to raise the ethic credit requirement. I may support it as one of the existing ethic credit requirements, providing that the WSBA is flexible and willing to accept credits for this technology security credit. There has been many incidents when credits are not accepted by WSBA when other states accept them and they are completely legitimate. In order to change this requirement, I would highly recommend to review the existing CLE approval criteria. Most states allow 1 CLE credit for a 60 mins course, the WSBA requires more than 60 mins. As a professional, I find it time consuming to take time to take a course &amp; apply for credits and think that they are completely acceptable and get denied without specified season. It seems very subjective. The process needs more transparency and less burdensome CLE credit requirements. It should be consistent with the requirements of other states.</p>
Ed Stemler	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Adding additional categories is a HORRIBLE idea. There are already plenty of these types of CLE's available. Give attorneys some credit for being able to determine what classes help them in their field. Are you next going to start adding categories to general credits so that people must learn real estate even if they never practice in that area? Not allowing carry over is an even worse idea. I was not one of those in favor of eliminating bar associations, but please quit with the ever expanding attempt to control people who are generally smart and able to make their own decisions. For example, I don't need your AI attempting to tell me what to write!</p>
Marcus Chong Tim	Licensed legal professional (Lawyer, LLLT, LPO)	
Colleen M Cook	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The Bar should trust professionals to chose CLEs that are helpful to their practice and not make the completion of CLE requirements more complicated.</p>

Scott Strickland	Licensed legal professional (Lawyer, LLLT, LPO)	Placing even more burdens and restrictions on the practice of law only further drives disadvantaged communities and individuals out of the practice of law. MCLEs are already burdensome enough and rarely relate in anyway to the daily practice of law for many attorneys (those in labor law especially). Additionally, while the classes are well intentioned, I sincerely doubt that a couple MCLE videos will actually impact those who are most responsible for perpetuating the institutionalized racism and other problems that continue to plague the legal system.
Rick Eichstaedt	Licensed legal professional (Lawyer, LLLT, LPO)	Attorneys already have a substantial burden (time and funds) to complete existing CLE requirements. If this does proceed, I recommend that the equity, technology security, and mental health credits be a one time only (or perhaps every 10th year) and that these additional credits be provided free of charge by the Bar.
Tiffany Walsh	Licensed legal professional (Lawyer, LLLT, LPO)	Lawyers shouldn't be obligated to do ethics in tech or mental health. I think the courses should be available to take if one decides to take them but they should not be an obligation. Professional responsibility ethics are enough and can be broadly stated. Legal professionals should have the ability to pick which CLE courses they want to further their career, which the suggested amendments don't necessarily do.
Chris Waraksa	Licensed legal professional (Lawyer, LLLT, LPO)	It is better to allow individuals to choose the CLE credits that serve their needs for professional development rather than imposing requirements that will be inadequate and overbearing. Personally, I've never found a one credit CLE to be very helpful in meeting at ethical requirements.
Evan Loeffler	Licensed legal professional (Lawyer, LLLT, LPO)	
Laurie Thornton	Licensed legal professional (Lawyer, LLLT, LPO)	Please don't make CLE compliance harder and more expensive.
Matt Renda	Licensed legal professional (Lawyer, LLLT, LPO)	Increasing the total number of required ethic credits or granting general ethic credits for the specific areas of security and mental health would be fine; but General, Professional, and Equity ethics are all that should be required. Please do not expand the list of required ethics credits into a never ending list of possible sub-genres in a quest to cater to the new ethic flavor of the month. All of these can be included under general ethics.
Craig Briggs	Licensed legal professional (Lawyer, LLLT, LPO)	The current MCLE requirements contain broad enough coverage for the substantive material that would be created in these additional specific subcategories.
Barbara Frost	Licensed legal professional (Lawyer, LLLT, LPO)	
C. Rio	Licensed legal professional (Lawyer, LLLT, LPO)	
S. Korn	Licensed legal professional (Lawyer, LLLT, LPO)	
CYNTHIA RIOS	Licensed legal professional (Lawyer, LLLT, LPO)	
Alisha Suazo	Licensed legal professional (Lawyer, LLLT, LPO)	
Susan Hufman	Licensed legal professional (Lawyer, LLLT, LPO)	Too many categories and too much detailed micro-managing. Why not require 2 credits from 4 categories with each category needing 1 credit at least every three years? or something similar?
Daniel Seligman	Licensed legal professional (Lawyer, LLLT, LPO)	

John Eric Gustafson	Licensed legal professional (Lawyer, LLLT, LPO)	I oppose the continuing imposition of mandates by the Board for items that may have little relevance or importance to many members use of their license, indeed probably the majority. Members are smart enough to know what we benefit them, and the Bar can require this of new members or those who have shown need for the same.
Joshua green IV	Private practice let my license go dormant	Very little of the woke and progressive measures adopted actually advance the legal community. Lower standards, lower expectations, and less solid results follow. No.
Stephen John Henderson	Licensed legal professional (Lawyer, LLLT, LPO)	Now you want to slice up the ethics credits into bites that some bar committee deems are necessary? Why not trust us to decide what is necessary. If you explain the topics well and sell us on why we need the education, we can decide to take the classes. Don't mandate what courses we have to take within the broad category of ethics. Please don't treat us like children.
Darcy Scholts	Licensed legal professional (Lawyer, LLLT, LPO)	
margita dornay	Licensed legal professional (Lawyer, LLLT, LPO)	I could care less if these credits are added to the requirement of the CLEs but adding them IN ADDITION to our existing requirements is absurd. Either add them as a subcategory replacment credit but don't tack them on as additional credit requirements. We are too busy as it is with the existing requirements.
Jody Smoth	Licensed legal professional (Lawyer, LLLT, LPO)	This amendment has nothing to do with the practice of law and is merely more HR/DEI nonsense.
Thomas W. Cox	Licensed legal professional (Lawyer, LLLT, LPO)	
Scott Holleman	Licensed legal professional (Lawyer, LLLT, LPO)	This change would introduce unnecessary complication and expense. Everyone has their pet issue or sub-issue that they think people should take CLE courses on. I believe it is better to keep the current broad and general categories to allow greater flexibility as busy professionals are simultaneously going about their day-to-day work representing clients.
Alicia Levy	Licensed legal professional (Lawyer, LLLT, LPO)	
Paul Treyz	Licensed legal professional (Lawyer, LLLT, LPO)	Would add to confusion and waste of time spent in legal education
Christine Glenn	Licensed legal professional (Lawyer, LLLT, LPO)	
Kirsten Dutz	Licensed legal professional (Lawyer, LLLT, LPO)	
Bruce Huber	Licensed legal professional (Lawyer, LLLT, LPO)	1. I oppose the proliferation of categories and subcategories within the Continuing Education framework. There should be a presumption against new categories which could be overcome only by clear evidence, over a long period of time, that would justify subjecting the *entire* state bar to new CLE content each cycle into perpetuity. 2. As a more general matter, I am quite doubtful that mandatory exposure to CLE content will "move the needle" on the matters that the Amendment seeks to address.
Mike Fisher	Licensed legal professional (Lawyer, LLLT, LPO)	We already have a good MCLE program, and adding a requirement for more credits would make it onerous. Don't fix something that isn't broken.
Steven Ellis	Licensed legal professional (Lawyer, LLLT, LPO)	As an attorney in good standing, I find the proposed changes, as well as the memorandum purporting to support them, insulting and offensive. I oppose this amendment.

Mel Simburg	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It is a good idea to offer more CLE opportunities in mental health and technology security. It is a good idea to include those courses as ethics credits. It is a bad idea to require more ethics credits and a bad idea to require specific compliance in more categories. In addition to creating more confusion and more difficult record-keeping, compliance will be more of a challenge. Currently, many attorneys find it more of a challenge to comply with 6 ethics credits than to comply with overall CLE credit requirements. This proposed change would make compliance even more complex and more difficult. Furthermore, it is overkill. Solo attorneys without staff can decide for themselves whether mental health awareness would be a useful course or not. Most attorneys now are acutely aware of technology use and ethical issues. So, in many cases the new rule would require unnecessary courses. It would be better to make the offerings available, let attorneys choose what they need, and give them general ethics credits for all the courses.</p>
Tim Seeley	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I'm not necessarily opposed to increasing the ethics requirements, but I would suggest it is generally better to allow attorneys to tailor their CLEs to meet their specific needs and the specific needs of their practice versus mandating too many specific types of CLEs.</p> <p>IF A CHANGE IS MADE – THE WSBA MCLE TRACKING PAGE NEEDS TO BE TIMELY UPDATED TO TRACK THE REQUIREMENTS ACURATELY. I BELIEVE THAT THE GROUP REPORTING FOR 2023-2025 IS REQUIRED TO GET AT LEAST ONE EQUITY CREDIT, BUT I DO NOT BELIEVE THE MCLE TRACKING PAGE STILL HAS NOT BEEN UPDATED TO TRACK THAT REQUIREMENT. THE MCLE TRACKING PAGE NEEDS TO BE TIMELY UPDATED TO REFLECT CHANGES IN ANY CHANGES TO THE MCLE REQUIREMENTS.</p>
Sean D Hyde	Licensed legal professional (Lawyer, LLLT, LPO)	<p>This seems like an unnecessary categorization that creates an undue burden on licensed legal professionals, especially as we would try to adjust to the changes. Simply promoting/providing quality CLEs in these categories is less burdensome and would better serve the goals of the suggested amendment.</p>



these areas to help with their practices, if they believe they need it. However, it appears that this is another concept that has not been developed with government attorneys in mind. I do not see any indication that the committee spent time considering the impact on government attorneys in requiring more credits for government attorneys who are many times in a situation of paying for CLE credits themselves. Additionally, it does not appear to contemplate that government attorneys receive trainings and resources in these areas on a regular basis as part of their job in being a government employee and representing government clients.

This would now require additional work and cost for government attorneys where it is not needed because trainings and resources are already provided by government agencies and these resources will likely be more extensive than the CLE requirements being considered.

In addition, the technology background provided in the MCLE materials is solely related to private law firms. It does not consider local and state government agencies that have their own significant IT infrastructure and infrastructure requirements by local and state laws. Government attorneys can fulfill their requirements of competence and diligence by the mere fact that they are employed by agencies who make significant investments in training and infrastructure to ensure data and personal information is protected. Government attorneys do not need to pay for additional CLE credits for this purpose as we have sufficient resources and understanding to ameliorate any issues identified by the MCLE committee.

Lastly, government attorneys have access to numerous resources made available through their agencies and unions to assist with mental health issues. At the state level, we have specific programs we can access through both our health care plan and This appears to be agenda oriented micro management. The only one of the four proposed categories that is in the RPC's is category #1. All four categories are valid concerns and they - as well as others - should be offered as CLE's. They should not be required.

Adding additional layers of required subject matter for CLEs in neither necessary nor desirable. Classification of some of the existing CLE content is questionable if not arbitrary. Adding addition complexity to CLE reporting is unwarranted. This proposal should be rejected. Don Stone

This is unnecessary and burdensome. A waste of time.

All of the mandatory CLCLA requirements are getting out of hand. First of all legal professionals can decide what they need for Cle on our own. There should be no mandatory requirement. It is a waste of money. Also the change in the ethics requirements, seem to benefit those who have problems in certain areas. I believe the bar association is treating all of its members like children requiring mandatory subjects that have no bearing on the practice. All of this should be considered.

Brian J. Considine, WSBA #39517 Licensed legal professional (Lawyer, LLLT, LPO)

Eric Krening Licensed legal professional (Lawyer, LLLT, LPO)

Donald G Stone Licensed legal professional (Lawyer, LLLT, LPO)

Mimi Buescher Licensed legal professional (Lawyer, LLLT, LPO)

Richard peyser Licensed legal professional (Lawyer, LLLT, LPO)

Albert Wheeler	Licensed legal professional (Lawyer, LLLT, LPO)	I think we've got enough regulation to sufficiently protect the public. At some point you're making it too difficult to maintain a quality of life in the practice of law. Added unneeded regulation increases stress in the profession and actually increases mental health pressures. This is beyond that point. Please. Enough already.
Karina Salazar	Licensed legal professional (Lawyer, LLLT, LPO)	My concerns are as follows: (1) These sound like very niche areas of ethics in that I am not sure where I would be able to obtain those MCLE credits outside of the WSBA CLE store. (2) Further, I don't think either category is necessary. Many in our profession still use paper primarily and mental health is being addressed by almost every employer as well. The first is not readily applicable to many and the second is already covered by many.
Ron Bueing	Licensed legal professional (Lawyer, LLLT, LPO)	While these are areas in which I have interest and would likely attend ethics classes, I see no reason for further mandates.
Andrew Hay	Licensed legal professional (Lawyer, LLLT, LPO)	<p>We have enough rules already. We should be working on reducing rules or keeping the number of rules from increasing.</p> <p>If you want to spread knowledge of ethics in these areas, make the programs available and promote them. But it is already burdensome enough to keep track of and meet licensing requirements. As people in the legal community and just as everyday people in our complex society we are surrounded by rules that increase in number and complexity over and over again. We don't need more rules.</p> <p>People in all localities and walks of life share great frustration with our civil institutions. Some of this is because we feel overwhelmed by the mass of regulations that have to be navigated when our lives intersect with our institutions. The bar association is an important civil institution. Changes to the regulatory framework should be made only if the changes decrease the number and complexity of rules. This proposed change makes things more complicated and burdensome and will therefore harm this institution beyond the perceived benefit. We want to see changes that ease and simplify our licensing requirements.</p>
Kelly Elford	Licensed legal professional (Lawyer, LLLT, LPO)	Creates more restrictions than is needed. At the moment, attorneys and other legal professionals may choose what ethical items they feel is most helpful to them and their practice. Whether they utilize the information is another question. However, mandating all attorneys do minimum amounts in increasing categories is unduly restrictive, and potentially nothing more than a feel-good box to check, assuming that people will actually listen.

Joshua Dabbling	Licensed legal professional (Lawyer, LLLT, LPO)	<p>"Equity ethics" immediately smacks of POLITICS. The bar should be SEPARATE FROM POLITICS as much as humanly possible. We should be able to act ethically despite what party is in power this week. I have my own beliefs, the bar need not apply the politics of a majority political stance upon a minority of us who aren't woke. I will refuse to take woke "ethics" and will encourage other attorneys to refuse to take woke "ethics."</p> <p>I already know better than to store my client's information on systems that can be hacked or use systems that aren't secure. Furthermore, I'm a solo guy, not a big tech firm. Do you really think I stand a chance against a professional hacker? No! So I don't even store that sensitive info on my system. I do not need an hour lecture every three years or so on why I need to be careful, I'm conscious enough of the real world.</p> <p>I am generally opposed to CLE's in the first place because I am already constantly PRACTICING my trade. No one ever makes the classes that would actually be useful in my line of work and taking a CLE for 8 hours on lines of practice I won't ever be a part of helps no one. I do not believe we need even more! When I go to the classes I see people generally ignoring the class anyway because they too either already know the topic because they practice it or may ignore it because it's not their branch of law. 99% of the class is catching up on email and ignoring the presenter, please don't add another two hours to this farce.</p> <p>If anything we need less of the sanctimonious lecturing. I am 100% for the ethics, just not the requirement for the ethics class. I assure you that sitting through even more hours of watching others ignore the lecturer will not convince me even more that my reputation and that of my profession matters to me.</p>
Christopher Dellert	Licensed legal professional (Lawyer, LLLT, LPO)	Please avoid micro managing the CLE process - allow the lawyers to select areas where they feel the need for more education.
Bruce W Hilyer	Licensed legal professional (Lawyer, LLLT, LPO)	

Steven A. Reisler	Licensed legal professional (Lawyer, LLLT, LPO)	<p>merit of the proposals.</p> <p>1. There clearly are technical security issues involved in the current practice of law. I have lectured on related topics - not to lawyers, but to techies who see these issues and their consequences from the software/hardware perspective oblivious, for the most part, to the overlay of legal complications.</p> <p>Technical security issues are not, in a nutshell, unique to the practice of law. They inhere in the drive toward digitizing processes that, frankly, may be inappropriate for digitizing (such as medical records). It's very similar to the way the courts have entered into public-private partnerships (so called) in order to "save money" or because "that is the way business is done these days." It's not an ethics issue. It's a political-economic-technology issue at its core. And it is an educational problem. Most people - lawyers not excepted - do not have a real clue how the Internet, the Cloud (so called) or any of their ancillary systems work or why they are irremediably insecure.</p> <p>Ultimately, I sense that wrapping this up as another mandatory "ethics" will lead to what I have seen with other CLE mandates: the larger tech companies - either directly or through their approved licensees or consultants - simply will offer a palette of "ethically approved" solutions to the irremediable problems. They will, in fact, solve nothing and educate no one. The main achievement will be to direct more business to the usual tech companies who market "solutions" that will have been approved with the WSBA's imprimatur, thereby making them "ethically secure," even when they are not actually secure.</p>
Adam Papini	Licensed legal professional (Lawyer, LLLT, LPO)	<p>2. Re mental health ethics, again, I think that the Bar is missing the forest for the trees. Without a doubt, there are ethical issues entwined with mental health issues and the it is already difficult to obtain Ethics credits, and I believe this is a requirement that is unnecessary because the two proposed areas of Ethics can easily be accommodated within the current requirements.</p>
Darren Thompson	Licensed legal professional (Lawyer, LLLT, LPO)	<p>As a government employee, I get plenty of training on technology security and I have more than enough access to mental health resources and trainings. These topics should be optional for lawyers to pursue if they wish, and should not be mandated by WSBA as additional reporting requirements.</p>
Meghann Morrill	Licensed legal professional (Lawyer, LLLT, LPO)	
Carol Koppelman	Licensed legal professional (Lawyer, LLLT, LPO)	

Andrew Van Winkle	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The technology security ethics requirement as proposed will not be relevant to many institutional lawyers. To the extent it is relevant, institutional lawyers already have annual institution-wide cyber security training. I have worked in county, state, and federal government and all three have several hours of annual information/technology security training. In my current position as a state employee, I receive approximately 8 hours of mandatory technology security training annually. I do not need the WSBA mandating that I do more redundant training. While a lawyer could probably petition the Bar to have that existing training count toward this credit, it would be easier if the requirement was limited to just those lawyers who are in private practice. If adopted, the proposal should limit the technology ethics credit to only those lawyers who are required to maintain an IOLTA account and thus those who are unlikely to have a technology security training program in place.</p> <p>I support mandating a MH credit every reporting period. I do not support mandating the credit be related to the intersection of ethics and MH. It is imperative for lawyers to become better educated about mental health in all contexts of the law, not just in the context of professional ethics. Lawyers should have discretion to satisfy the requirement with any form of MH training.</p>
Robert Baartlett	Licensed legal professional (Lawyer, LLLT, LPO)	<p>This is not needed. There are too many CLE sub-requirements currently. It should be up to the attorney to decide what types of the 6 ethics credits they need. Stop the paternalistic behavior.</p>
Heather Cantua Phillips	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The requirements to study particular ethics topics may be seen by lawyers as too prescriptive. Individual lawyers are in the best position to know which ethics topics are most important for them to learn about, give their practice, expertise, etc. The time of the MCLE Board would perhaps be better spent looking for ways to improve the quality of course offerings, particularly in ethics topics that the Board deems most important. A carrot rather than a stick . . .</p>
David Heiner	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I am a former law clerk with Washington Court of Appeals, Div. III, and I am licensed to practice law in Washington, Idaho, and California. I currently work as an associate attorney at Rogers Joseph O'Donnell in San Francisco. While the additional CLEs may be well-intentioned, I strongly discourage the committee from making these a mandatory requirement. Especially for out-of-state lawyers, this will create an additional administrative burden to seek out these specific Washington credits. I support any initiative that encourages these types of CLEs, but including it as a mandatory requirement creates a burden on Washington's lawyers. Anecdotally, I can tell you I already receive this type of training annually both in firm training and through other CLEs. Thank you for considering my comment.</p>
Henry D Stegner	Licensed legal professional (Lawyer, LLLT, LPO)	
Geoffrey Hulsey	Licensed legal professional (Lawyer, LLLT, LPO)	

Glade Kim Risenmay	Licensed legal professional (Lawyer, LLLT, LPO)	WSBA has already imposed too many types of ethics CLE requirements upon the members of the Bar.
George C. Rondeau, Jr.	Licensed legal professional (Lawyer, LLLT, LPO)	We do not need to impose a CLE requirement for every aspect of being a lawyer.
Andrew Marcuse	Licensed legal professional (Lawyer, LLLT, LPO)	I do not favor a proposal (1) to increase the number of required ethics credits, (2) to subdivide the ethics credit requirement into any further required subcategories, or (3) any proposal to do both (1) and (2). If I had a vote, I would vote "no" on the MCLE Board's proposed amendment to APR 11 regarding the same. Thank you.
Sarah Salgado	Licensed legal professional (Lawyer, LLLT, LPO)	
Greg Petrie	Licensed legal professional (Lawyer, LLLT, LPO)	Totally unnecessary. I think the attorneys can decide what areas are most useful to them for CLEs.
Erin Jackson	Licensed legal professional (Lawyer, LLLT, LPO)	
Joseph Edgell	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The CLE requirements area already too complicated and too onerous. Creating a bunch of categories and subcategories is overly complicated and unnecessary. I already have enough difficulty figuring out what categories I need to stay compliant and then find CLEs that meet the requirements at a price that I can afford (I am a government lawyer and my employer does NOT normally pay for my CLE).</p> <p>Frankly, as the requirements to practice get more and more difficult, it just pushes me to retire early and find something else to do. You really don't want to drive people away from government service, but that's what these out-of-touch additional regulatory proposals do. Not everyone works at a law firm with unlimited CLE budgets and people hired to help lawyers comply. This is just another example of how the WSBA is out of touch with its constituency. Let's apply the KISS principle here and keep it simple. Let the attorneys decide what categories they need and have only one ethics category.</p>
Loreva Marie Preuss	Licensed legal professional (Lawyer, LLLT, LPO)	These proposed changes make the CLE requirements more onerous and prove that, once again, WSBA doesn't trust licensed attorneys in this state to know what kinds of CLEs we need. We are not idiots.
Timothy Barnes	Licensed legal professional (Lawyer, LLLT, LPO)	The CLE requirements are currently sufficiently costly and time consuming. Adding additional hours will do nothing to improve the preparedness of attorneys.
Ioulia Roussinova	Licensed legal professional (Lawyer, LLLT, LPO)	Increased burden on legal professionals who obtain similar credits through other CLEs.
Avrohom Feinstein	Licensed legal professional (Lawyer, LLLT, LPO)	

Nicholas Kiewik	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Many licensed legal professionals maintain practice and licensure that will rarely if ever overlap with the considerations of CLE-approved trainings in these areas. If the WSBA wishes to emphasize the importance of these topics, more training and education should be available as CLE-approved hours under the current CLE credit requirements. The WSBA sets a poor standard of by rapidly expanding CLE requirements into niche areas that are currently favored in public and organizational discussions. Expansion and specialization of credit requirements should be approached very conservatively with the benefit of data and documentation concerning interest and utilization of the proposed expansion topics. Many small office and solo-practice professionals already find that meeting CLE requirements can be difficult and even more so for mandatory ethics requirements. Creating more opportunity for interested practitioners to access resources in these areas while not creating new CLE credit requirements is the best means of populating this information to practitioners without increasing licensure burdens and setting a standard of hasty additions to those burdens.</p>
Jeffrey Possinger	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It is a good idea to offer more opportunities for CLE Credit, and to expand those opportunities by making more topics available.</p> <p>But the penchant for the WSBA leadership in its various committees to take every “good idea” they stumble upon and then quickly move to make it mandatory is already too much. I am personally a strong advocate of attorney health and well-being – but creating even more requirements placed upon attorneys as is proposed here – is ironically going to have the opposite effect.</p> <p>I will add that I am always leery of any idea that is “so good you need to be forced to do it.”</p> <p>To that end, my thoughts are that programs related to health and wellness (or variants on those themes) should qualify as “ethics credits” but allow our bar membership to make its own decisions about what programs they want to choose to satisfy their credit requirements.</p>
Craig Larsen	Licensed legal professional (Lawyer, LLLT, LPO)	Concerned about adding more complexity to CLE requirements/reporting
WILLIAM MURPHY	Licensed legal professional (Lawyer, LLLT, LPO)	IF you increase ethics credits please reduce regular credits by the same amount
Joseph L. Mrstik	Licensed legal professional (Lawyer, LLLT, LPO)	Enough MCLE requirements already.

James S. Fitzgerald, WSBA No. 8426

Licensed legal professional (Lawyer, LLLT, LPO)

I have always substantially exceeded the number of required CLE hours, including those designated for ethics. I do this to gain knowledge in various areas. I believe the number of required CLE hours, including ethics hours, is sufficient. Those who care will do it anyway; those who do not will find a way to obtain credit without learning the substantive content. I support leaving the required hours and categories at current levels. Having ethics courses that focus in the four areas is fine and even desirable, but I do not believe it to be necessary to require as a rule change that courses be taken in each area. That should be up to the practitioner.

Jill Peitersen

Licensed legal professional (Lawyer, LLLT, LPO)

Lawyers' lives are filled with constant red tape and hurdles we must jump through, not only so that we can help ourselves, but also help the many others who turn to us for solutions in times of trouble, and after all of the INCREDIBLE AMOUNTS of BS we were forced to endure during COVID to assist our clients, the community, and still keep the court system's judges and administrators happy, your solution is TO ADD MORE RED TAPE to what we must do to remain lawyers. If I were one of you, sitting on this committee to figure out ways to HELP our WA bar members be better people and lawyers, I WOULD FIND A BETTER WAY.

Farid Piroozmandi

Licensed legal professional (Lawyer, LLLT, LPO)

Finding and completing Ethics CLEs has proven to be more difficult and more expensive than regular CLEs.

Jason Logan

Licensed legal professional (Lawyer, LLLT, LPO)

You're making the whole thing too complicated to keep track of. Another 20 years we'll have 45 separate categories for the 45 credits. But most of you are probably too young to see that.



Adding these two additional categories of ethics requirements, thereby having four separate ethics categories, adds complexity that is not necessary. I prefer that you trust lawyers to choose ethics classes that are most pertinent to them. If a lawyer doesn't know as much about technology security, trust them to have awareness of that and take an appropriate course. Same with mental health. The MCLE requirements are complicated and confusing as it is; I don't think we need to make them even more so.

Sarah Nagae

Licensed legal professional (Lawyer, LLLT, LPO)

As a separate note, the description "metal health ethics" doesn't seem accurate of the courses that we take involving mental health. "Mental health ethics" implies that a course would be about ethical issues involving mental health treatment (e.g., equality of patient access to metal health providers and treatment facilities, lawful decision-making by psychologists and psychiatrists, etc.) but what we're actually taking about are simply courses on the mental health and wellbeing of attorneys. For example, how to identify a mental health issue in yourself or a colleague, how to get treatment, when it may be affecting your practice, how to support your wellbeing and that of your co-workers, etc. These are classes that fit into the category of "ethics" (as opposed to "general practice") but aren't rightfully described as "mental health ethics." A better description would be "mental health and wellbeing," or something along those lines, even if the classes that fit that description do receive ethics credit.

Daniel Jones

Licensed legal professional (Lawyer, LLLT, LPO)

The WSBA already has one of the highest annual bar dues in the nation. Members still have to pay for CLEs, even those sponsored by the organization we belong to. What this amendment is really asking is 'can we get more money from our members by increasing the CLE requirements?' If this is an altruistic amendment seeking to really improve the legal profession and the practice of law it will come in the form of free CLEs sponsored by the WSBA. If you really want to improve the legal profession, the added CLE requirement should be on how to operate a client trust fund since that's what most attorneys get suspended or disbarred for.

James Danielson

Licensed legal professional (Lawyer, LLLT, LPO)

Eric Jorgensen

Licensed legal professional (Lawyer, LLLT, LPO)

For non-practicing attorneys this is an additional burden we must satisfy. As a non-practicing attorney I will be forced to have to search for and pay out of pocket the cost of CLEs to meet this. In addition this will not improve the practice of law or the level of service to the public. I recommend offering more of these types of CLEs but not require this.

Michael J. Folise, Esq.

Licensed legal professional (Lawyer, LLLT, LPO)

Do not do. Too many licensing requirement as it is now.

Jack

Licensed legal professional (Lawyer, LLLT, LPO)

Keith Thomson

Licensed legal professional (Lawyer, LLLT, LPO)

Carnissa Lucas-Smith

Licensed legal professional (Lawyer, LLLT, LPO)

Melisa Evangelos

Licensed legal professional (Lawyer, LLLT, LPO)

Catherine Wright Smith

Licensed legal professional (Lawyer, LLLT, LPO)

Enough already with the subsidies for CLE providers. You used up all credibility on required CLEs with the "woke" policing!

Laura Schulman	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It would be wonderful for the WSBA to offer more CLEs on technology security and mental health ethics, but to increase the required hours and make these particular categories mandatory for all practitioners is excessive and unnecessary. First and foremost, there are a large number of attorneys for whom these topics are barely relevant. For example, government attorneys and attorneys at large firms with cybersecurity support would have no need for technology security training, and attorneys dealing with corporations and contracts would find mental health ethics courses only very tangentially relevant. These represent only a few examples, but even these few practice areas represent a large swath of attorneys for whom these requirements would simply engender resentment.</p> <p>It makes much more sense to make these more available to those who would find these topics relevant for their practice. It does not make sense for the WSBA, an organization which is supposed to support lawyers as professionals, to add more and more requirements so as to make CLE requirements onerous rather than edifying.</p>
Frank Abramonte	Licensed legal professional (Lawyer, LLLT, LPO)	<p>While requiring ethics CLEs in general is reasonable, creating sub-categories of "hurdles" to jump through will be cumbersome, and will not end with the four proposed categories (e.g., Oregon now requires Elder Abuse reporting CLE credit). While each individual instance is laudable, the micro-managing will not end.</p>
Bonnie Stern Wasser	Licensed legal professional (Lawyer, LLLT, LPO)	<p>These two topics are integral to law practice management. I would wrap them into any training required in that topic or related topics.</p>
Andrekita Silva	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I have no issue with increasing the number of ethics credits that must be completed. I have a HUGE HUGE issue with the formation of subcategories and dictating how much is to be taken in each sub category. Please don't add these additional sub categories. Encourage presenters to address issues of mental health and technology security in their CLE if it is at all germane. Apart from that, if an attorney wants to know more in these areas, they can seek out CLE's in those areas and take them.</p>
Chris Hydak	Licensed legal professional (Lawyer, LLLT, LPO)	<p>These are superfluous and simply add to the complexity of maintaining a law degree. Unless there is a metric to measure something like "improvements in mental health outcomes" tethered to the CLE requirement, and a plan to sunset the CLE requirement if there is no improvement, then these should not be added merely in an effort to "do something."</p>
Jason Kampman	Licensed legal professional (Lawyer, LLLT, LPO)	
Brian P Russell	Licensed legal professional (Lawyer, LLLT, LPO)	<p>This should not be forced upon the membership.</p>
Cathy Schulz	Licensed legal professional (Lawyer, LLLT, LPO)	<p>If two more credits are being added, take away two from that same group. Remaining at six credits.</p>

Thomas Boeder	Licensed legal professional (Lawyer, LLLT, LPO)	subdividing ethics CLE requirements into different subjects makes the whole CLE filing rules even more unreasonably burdensome -- the burden increased by the vagueness of these categories and challenges to availability of CLE programs that fit these requirements while supplying truly useful training. Too much bureaucracy
Gary Andrews	Licensed legal professional (Lawyer, LLLT, LPO)	At some point, the WSBA needs to trust the attorney membership to utilize the CLE process to improve the competence of its members. Forcing each and every member to take rote, boring and, often, misguided programs fails everyone. As a mostly retired attorney of 45 years, I still do a number of mandatory arbitrations for the courts. Each year I question whether I continue to maintain my membership in the WSBA. Proposals like this will tip the balance toward resignation.
April Anderson	Licensed legal professional (Lawyer, LLLT, LPO)	I'm not in favor of adding additional ethics credits to CLE requirements, and I am not in favor of mandatory categories of ethics credits.
Virginia Clifford	Licensed legal professional (Lawyer, LLLT, LPO)	Just add those options in CLE offerings. Too many mandates already- this would just require more!
Ken Harer	Licensed legal professional (Lawyer, LLLT, LPO)	
Aaron Caplan	Licensed legal professional (Lawyer, LLLT, LPO)	While I agree all of the items are valid topics, I am not convinced that the added complexity to the CLE system is worth it. I think it would be better for WSBA to urge members to take things in these subjects, keeping the general pattern of voluntary choice among topics.
Jeanette Laffoon	Licensed legal professional (Lawyer, LLLT, LPO)	I have no problem with generally requiring CLE to stay current. This micro-managing of what you think we need to study is, however, over-reaching. Further, CLE companies charge as much as they can get away with, and this type of granular requirement allows them to do it. If this goes through, may I suggest that you provide a FREE on-demand, auto-reporting CLE class that covers all the specific ethics classes you deem necessary.
James M. Kasischke	Licensed legal professional (Lawyer, LLLT, LPO)	There is no academic proof that CLE positively aids the perceived problem. As an out of state attorney working for the Federal government, it is much more difficult to obtain CLE in specialized topics.
Ann Riedel-Thomas	Licensed legal professional (Lawyer, LLLT, LPO)	45 Credits every three years is ample education, with sufficient ethical credits! When choosing credits, let each legal professional continue to determine topics of interests, including technology/security, mental health, etc. I am weary of the WSBA/Board's "big brother" attitude.
Anna Bodi	Licensed legal professional (Lawyer, LLLT, LPO)	The MCLE Board is attempting to impose ever more specific CLE requirements on attorneys in the state. These requirements are bureaucratically burdensome rather than educational. While the Board may deem these topics important to attorneys in the state, it is overstepping to require all active attorneys in the state to meet ever more specific CLE requirements. The Board has not demonstrated how these additional requirements will benefit either attorneys or their clients.
Al Armstrong	Licensed legal professional (Lawyer, LLLT, LPO)	We are all adults here. WSBA, stop pretending that you are going to advance some great social goal with these increasingly preachy "ethics" requirements.
Christen Fairborn	Licensed legal professional (Lawyer, LLLT, LPO)	Please limit CLE burden

Steve Gross	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It is difficult enough to schedule CLEs. Adding specific area training only makes it more complicated and expensive for attorneys, especially sole practitioners, to comply with the requirements.</p> <p>It's this kind of micromanagement that in part is driving the push to have a non-mandatory bar, in my opinion.</p>
Marion Leach	Licensed legal professional (Lawyer, LLLT, LPO)	<p>It would be helpful to see the data indicating that we need further ethics credits in these areas. Do lawyers need more education regarding mental health or mental health ethics?</p>
Deborah F Tofte	Licensed legal professional (Lawyer, LLLT, LPO)	<p>From: Deborah Tofte (CW Title) &lt;dtofte@CWTitle.net&gt; Sent: Thursday, May 18, 2023 2:56 PM To: MCLE &lt;MCLE@wsba.org&gt; Subject: [External]New Amendment</p> <p>Please do not pass the Amendment. It is difficult enough to get the general Ethics Credits. It is very hard to find speakers on Ethics without having to get all those different types. It would only be feasible if WSBA provided free lunchbox webinars that cover each Ethics subject several different times during the year, so the LPO's could obtain the required MCLE credits.</p> <p>I think we need to trust our common sense and not make this a requirement. Going overboard in my opinion.</p> <p>Debbie Tofte LPO9684 and also an educational sponsor through NAPMW Seattle Puget Sound Association.</p>

Miryam Gordon	Licensed legal professional (Lawyer, LLLT, LPO)	<p>into more required tiny pieces. I am also concerned about that aspect. I don't know if it would make that significant amount of difference to try to focus ethics CLEs on several different areas of importance rather than as a block.</p> <p>However, having said that, cyber-security is an extremely important and looming issue for legal practitioners. I have tried to attend CLEs on this topic specifically in order to try to keep up with best practices. I don't know if having a requirement for an ethics CLE is important, because it could be added as a requirement under the general CLE grouping instead. I do believe it is pretty crucial for us to know what our "best" should look like to protect us and our clients.</p> <p>As for a mental health requirement, the report makes it clear that the requirement is based on fears of legal practitioners descending into substance abuse and mental health quandaries over time, but the wording of the proposal did not lead me to clearly understand that it was the mental health of the practitioner that was the focus as opposed to working with clients who turn out to have those issues. I would encourage - should the requirement pass - that the words be refined to be very clear who is at risk. But again, I do not think at all that a one-hour every-three-years requirement in this area is going to rescue, educate, or support practitioners who find themselves in this situation.</p> <p>If a new RPC were crafted for this reason, and perhaps a CLE created on changes to the RPCs, that makes some amount of sense. CLEs that include that rule in various ways could work well "sprinkled in" (as it were) to topics for which this makes sense. It would be better to simply create this rule and seed an awareness of the need for self-assessment periodically inside other required CLEs than to carve out a specific one-time hour. The departmentalization that seems to now be a new norm seems more like a</p>
Richard P. Sybert	Licensed legal professional (Lawyer, LLLT, LPO)	I oppose MCLE generally. It accomplishes nothing except to enrich a cottage industry of providers. Further, I oppose the WSBA's attempts to, through specifying what topics must be covered, control what lawyers think and say. This is just Woke nonsense.
Leann Yang	Licensed legal professional (Lawyer, LLLT, LPO)	Ethics credits are already difficult to acquire, and this puts an additional burden on practitioners to get specialized CLE in very specialized fields, which are unnecessary.
Dylan R Cardoza	Licensed legal professional (Lawyer, LLLT, LPO)	
Stewart Feil	Licensed legal professional (Lawyer, LLLT, LPO)	If you want to make any random topics available as ethics credits that is fine. Requiring specific ethics credits in the three additional made up categories I disagree with. Not everyone needs mental health help. Not everyone needs cyber security training through the bar because they get it elsewhere. And NOBODY needs the equity courses you are offering. They are pure Marxist propoganda and have no place in legal ethics.
William Schaefer 40699	Licensed legal professional (Lawyer, LLLT, LPO)	Interesting subject matter. Just roll it into the General category. Keep it simple please.

Tamara Tissue	Licensed legal professional (Lawyer, LLLT, LPO)	
Lucinda S. Whaley	Licensed legal professional (Lawyer, LLLT, LPO)	Lawyers take a sufficient number of ethics credits currently. It is also important that lawyers stay current with the quickly changing substantive law.
Lisa Scott	Licensed legal professional (Lawyer, LLLT, LPO)	Please stop adding more and more arcane regulations to our CLE credit requirements. It is complicated enough to figure out the number and types of credits we need in the various categories. Most of us lawyers seek out courses that are suited to our practice areas and to keep up on the latest trends, so please let us decide. We do not need to be micro-managed any further. Thanks, Lisa Scott Attorney, Bellevue, WA
Kevin Fay	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Mental health is not an ethical obligation - there are lots of lawyers w/ depression who continue to provide excellent service to their clients. Member wellness absolutely is important; squeezing it into a *mandatory* program is not - plus an enormous waste of valuable time to those lawyers not afflicted.</p> <p>One hour for cybersecurity doesn't scratch the surface, and will likely devolve into a sales pitch for "approved" VPN, encryption, and cloud-storage products. For many lawyers - those in large firms, those who serve in-house to corporations, and those in government services - it would also be a waste of valuable time since these issues are dealt with on an organizational scale by others.</p> <p>Bottom line - the best of intentions do not make ideas good.</p>
Wayne Lieb	Licensed legal professional (Lawyer, LLLT, LPO)	I am opposed to any additional mandatory categories of CLE. Practitioners should be able to determine what additional educational resources they need. Many times obtaining classes in the smaller categories is difficult.
All ethics programs should be a matter of choice and remain at a level of 6 hour per reporting period.	Licensed legal professional (Lawyer, LLLT, LPO)	See above.
Dee Knapp	Licensed legal professional (Lawyer, LLLT, LPO)	Although awareness of both tech security and mental health issues are important for attorneys, the proposal is confusing and unnecessary.
Marla Zink	Licensed legal professional (Lawyer, LLLT, LPO)	
Michael Vaughn	Licensed legal professional (Lawyer, LLLT, LPO)	I urge the Board not to pursue a rule which applies a one size fits all mentality to the diverse group of legal practitioners in our State. Let lawyers continue to decide what will best enrich and develop themselves and their careers, not mandate how they should think and what they should learn. This sort of paternalism may have a place in children's education, but it does not amongst educated adults. For some lawyers, these requirements may be beneficial, but for others they may be superfluous or inapplicable. It is better to let the practitioners decide for themselves what sorts of CLEs best suit their needs. Thank you for your time and consideration.
Kris Kuenzli	Licensed legal professional (Lawyer, LLLT, LPO)	

Workgroup dated April 25, 2023. I am writing in opposition to the two proposed amendments to the APR 11 ethics requirement: technology security and mental health.

First, these topics do not involve ethics. Ethics suggests moral issues such as veracity and honesty. Technology security refers to office management, not ethics. Mental health issues do not constitute ethics either. Mental health is a private medical matter between a patient and his/her doctor. The WSBA should refrain from bootstrapping these two topics into ethics because they do not fit that category.

Second, technology security is a vast area and cannot be addressed by a one-hour credit every 3 years.\* Lawyers are already highly motivated, without a mandated CLE, to seek knowledge in this area. Technology security should remain as an elective CLE.

Third the WSBA does not qualify to mandate topics in the mental health field. The WSBA is a trade association rather than a medical association. Mental health is a private personal matter and should remain as an elective CLE.

If the WSBA truly cared about the stress levels of Washington attorneys, it would simplify the CLE process rather than enlarge it, stay out of politics and social engineering, eliminate some of its programs, reduce its staff and lower its dues. In other words, the WSBA is part of the problem regarding the mental health levels of attorneys.

Being forced to join an organization in order to practice law violates the First Amendment right to freedom of association. It also creates a monopoly by the WSBA which is a bad thing in any republic.

The WSBA has become part of the nanny state with its constant social engineering, I am not in favor of increasing the number of credits required; however, I am not opposed to broadening what type of credits "count" for a reporting period. Alternatively, you could increase the ethics credits but decrease a corresponding amount of non-ethics credits. In sum, I do not favor making CLE compliance more burdensome for members of our bar.

Patricia Michl

Licensed legal professional (Lawyer, LLLT, LPO)

Steven Meredith

Licensed legal professional (Lawyer, LLLT, LPO)

		<p>A primary purpose of the WSBA should be protection of the public. In evaluating ethics courses, the MCLE Board should look to actual attorney misconduct and preventing it. WSBA disciplinary actions are the best data we have on attorney misconduct, and therefore the conduct ethics courses should address. Review of disciplinary violations reported in the bar journal indicates that the proposed amendment to APR 11 does not address common violations.</p>
LEE ROUSSEL	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Disciplinary cases indicate that most violations continue to occur in the area of diligence, timeliness, communication and finances. The more other mandates are piled on, the more attention would be diverted from these, which actually matter to clients.</p> <p>The background information is not persuasive, since it relies on general data or concerns (as with phishing) rather than specific facts or problems involving Washington attorneys.</p> <p>Finally, the Board, and indeed the WSBA, should treat Washington attorneys as adults and the professionals they are, able to make intelligent decisions about what courses they need in their personal circumstances</p>
Raymond Bert Wilkins	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Ethics CLE credits are already more difficult to obtain than other CLE credits and increasing the number of credits and the various categories will make it harder for attorneys to obtain sufficient credits each reporting period.</p> <p>Instead of adding to the total number of Ethics credits and categories, the WSBA should allow attorneys to satisfy the Ethics CLE requirements with courses/presentations on data security and mental health awareness.</p> <p>In addition, many companies already require their employees to have period training on data and technology security, and these trainings may not meet the WSBA requirements requiring additional trainings to be done in to what the employer requires.</p>
Julia Phillips	Licensed legal professional (Lawyer, LLLT, LPO)	too complex, keep as is



Why do you need this?	Licensed legal professional (Lawyer, LLLT, LPO)	I think we are adults. I understand the focus on mental health, but I don't think you need to add a bunch more legal education requirements to address it. You could just approve some courses in those areas so if someone wants to take them, they can and it will meet the over all requirements. We don't need to be babysat.
Mark J. Carroll	Licensed legal professional (Lawyer, LLLT, LPO)	
J. Powers	Licensed legal professional (Lawyer, LLLT, LPO)	Ease our burden. Do not create more.
Wendy	Licensed legal professional (Lawyer, LLLT, LPO)	I attend a wide range of CLEs already which include the proposed topics. There is no need to make the requirements more complicated. More categories means tracking and reporting becomes more complicated. Totally unnecessary and potentially more expensive for the BAR to administer.
Summer Stahl	Licensed legal professional (Lawyer, LLLT, LPO)	How many different "issues" are we going to have to take as ethics classes before everyone says "stop". I appreciate that some attorneys have blinders on about certain subjects but I'm not sure taking ethics credits will change attitudes. This will require 2-3 classes per year on these topics. I'm sorry, but I just don't see it doing what is desired. Thank you for all that you do for the Bar - including putting up with grumbling by members like me.
Sue Harwood	Licensed legal professional (Lawyer, LLLT, LPO)	I already get more than enough training in these topics at my job as a government employee. It's fine to offer ethics CLEs on these topics, but we shouldn't be forced to attend CLEs for which we already get plenty of training. Perhaps there could be an option for fulfilling such requirements by allowing credit for employer-offered training on these topics?
James Lake	Licensed legal professional (Lawyer, LLLT, LPO)	In 2019, WSBA CLE was directed to offer free CLEs in the topics of mental health ethics, technology security ethics, and equity. Presently, no free, live or on-demand courses appear in the CLE store for mental health ethics and technology security ethics and only one free course appears for equity ethics, being offered on only one day in 2023. Although four years have passed since the directive, obtaining CLE on these topics remains a financial burden.

Inez Petersen

Licensed legal professional (Lawyer, LLLT, LPO)

At least consumers can boycott Disney, Bud Light, Target, North Face and the like. But lawyers have no choice and no voice really when it comes to the WSBA going "woke." It is my opinion that the Bar's emphasis on CRT/DEI has turned it into a political action committee. Its goal is no longer professional in nature, it is purely political. Even news of attorney job openings is controlled by the Diversity Stakeholders. If an attorney does not belong, he/she (oops, am I using correct pronouns?), is not made privy of those job openings.

And to hire a new person to head up more DEI within the WSBA is not a shock under the circumstances. But mission creep seems to fit the situation.

Please make CLE credits optional for content that is political in nature. That goes for content which relates to technical skills or mental health too.

My dream, of course, would be to make membership in the WSBA optional. Then those of us (probably a majority) who do not approve of the direction of the WSBA can divert our income to something other than dues and CLE's. (And don't get me started on what a money-making racket CLEs are.)

If I might ask, how many WSBA employees and/or committees and working groups are already working on Woke Part II--mandating that ESG become part of a lawyer's daily life?

Inez Peteresen, WSBA #46213

Gerald R Neal (3323)

Licensed legal professional (Lawyer, LLLT, LPO)

Law students are advised to reject unsupported, biased, conclusory allegations. The members of the WSBA should follow this well advised principle. Supporters of Section (f) (8) appear to be unaware of the Human Rights Commission, RCW 49 60 030, 42 USC 1983, 42 USC 1988 and Section 1, Amendment XIV of the Constitution. The above provisions clearly provide a remedy for proven discrimination, including injunctive relief and an award of fees and costs.

The Bar Association should not allow a few members to force this highly political matter on the entire membership. At best, Section (f) (8) should be voluntary.

William L. Cameron

Licensed legal professional (Lawyer, LLLT, LPO)

best to not offend them. In this case that is likely to be impossible. If the reader finds the following offensive, the offense is no less than the offensiveness of APR 11(c). Thomas Sowell, an economist, has cogently pointed out, "One cannot be a physician or an attorney without a license, for the obvious reason that people without the requisite training and skill would be perpetrating a dangerous fraud if they sought to practice in these professions. However, once the government has a rationale for exercising a particular power, that power can be extended to other circumstances far removed from that rationale." Sowell, Thomas. Basic Economics (p. 264). Basic Books. Kindle Edition. The Bar Association has become a social service agency run by a coven of bureaucrats that justify their existence and expense with endless, suffocating regulation. I have two primary objections to APR 11(c) and these proposed changes. The first is that they are ill advised in that they are a waste of time and of no relevance to legal competency. The second is that they are the needless, bureaucratic restrictions on the time lawyers have for legal education in the first place. While it may be politically expedient to put up a front for the public to show lawyers are cleaning their own house, only a fool would believe that a couple of hours of instruction on maintaining your trust account would somehow ensure that lawyers do not commit burglaries, embezzle their clients' money or perjure themselves. You are honest or you are not. The Court should insist that lawyers be competent to practice law. A bar examination is good. We are not children or imbeciles and remain competent without prompting from niggling bureaucrats. People with 20 years of education can manage their professional competence without micromanagement. I have been using computers for word processing and legal research since the 1970's. I am not sure what anyone could tell me in an hour's time that I either do not already know or that would be useful. Attorneys in large firms are unlikely to be managing security, and solo practitioners are not likely to benefit from general computer security instructions. If Kaspersky can be hacked for years without knowing it, anyone with

Carla J. Higginson

Licensed legal professional (Lawyer, LLLT, LPO)

While these are important topics, the memo does not support the position that these are more important than other ethics topic, for example, trust account management, conflicts of interest, and succession planning. The solution to providing education on the topics proposed by the MCLE Board is by asking the WSBA to create appropriate outreach. The general ethics credits and general course requirements are being diluted by adding the proposed mandatory ethics topics. It also places a person's license at risk if they miss taking a specific course, and there seems to be an implication that attorneys and others will not care about mental health or technology issues unless they are forced to take courses in these areas. I suggest that this is not at all the case. Please do not move forward with this proposal.

## Those Partially in Favor the MCLE Board's Preliminary Suggested Amendments

Your Name	Your relationship to WSBA	Comments and Feedback
F. McNAMARA JARDINE	CLE Sponsor	In favor of th MH education requirement
seth rosenberg	Licensed legal professional (Lawyer, LLLT, LPO)	more technology. less mental health.
Owen Kilfoyle	Licensed legal professional (Lawyer, LLLT, LPO)	I agree with the requirements of the materials, but it should be taken from the general credits and not added onto the total.
Melissa Cunningham	Licensed legal professional (Lawyer, LLLT, LPO)	It is already quite challenging to meet the ethics credit requirement of 6. While I can see the value in these particular subject matter areas, I would be more in favor of allocating 2 out of the current 6 ethics credits to these specialties.
Cory Rein	Licensed legal professional (Lawyer, LLLT, LPO)	Seems fine so long as the attorney only has to satisfy the ethics portion using any combination of the 4 ethics categories?
Aaron Atkission	Licensed legal professional (Lawyer, LLLT, LPO)	
Alissa Harris	Licensed legal professional (Lawyer, LLLT, LPO)	I'd be in favor if it did not increase the total necessary credits.
Grace Huang	Licensed legal professional (Lawyer, LLLT, LPO)	For those not engaged in representation of clients this requirement should not apply. Especially if there are not abundant free credits on the topics available.
Jay Griffiths	Licensed legal professional (Lawyer, LLLT, LPO)	I'm in favor of the Technology Security Ethics credit, but do not have a strong opinion on the requirement for a mental health ethics credit. I certainly recognize the value that this could have for certain attorneys struggling with mental health or who know those who do, but I'm not sure it needs to be required. I also urge the Board to reconsider the required Equity credits. These are all reasonable credits for attorneys to obtain as a general ethics credit option, but shouldn't be specifically required given that they aren't directly related to the practice of law and just create new marketplaces for required seminars that are typically offered by non-practitioners.
Taryn Basauri	Licensed legal professional (Lawyer, LLLT, LPO)	Mental health and technology security are important issues that should be covered, but should not increase the overall credit requirement.
Nicole Tingelstad	Licensed legal professional (Lawyer, LLLT, LPO)	Ethics CLEs always seem difficult to come by. I don't mind the different types, but would prefer that they remain 6 in total, with one each of the 4 different types or 3 out of the 4 types/year. Otherwise, we at least need more of each type of CLE offered so it's not so difficult to come by/schedule. Or the same dang thing each year.
Don Marshall	Licensed legal professional (Lawyer, LLLT, LPO)	Increasing the number of hours of ethics required is OK as long as it does not increase the total number of hours required. Designating different categories of ethics required is unnecessary. Ethics is ethics. Let the lawyers decide which courses within that category they want to learn about

Judith Morton	Licensed legal professional (Lawyer, LLLT, LPO)	I'm in favor of providing this type of training and allowing them as ethics credits, but not making them mandatory. It's quite a bit to keep track of, and as a public service attorney, challenging to find free or low-cost CLEs to meet existing requirements.
Eva Luchini	Licensed legal professional (Lawyer, LLLT, LPO)	I'm in favor of it if these CLEs are provided free of charge by the WSBA.
Karen Forner	Licensed legal professional (Lawyer, LLLT, LPO)	I don't think social justice should be part of the Bar. The practice of law and the Board's support of same should be politically neutral. The "equity" change seems like a political stance. It ends up being divisive.
Jason J. Greene	Licensed legal professional (Lawyer, LLLT, LPO)	I am a solo litigator offering my services on a pro bono, low bono, and moderate means basis. I am in the trenches of the law and people's lives every single day. I have a very unhealthy work-life balance. CLEs, while I find some of them helpful, are already, frankly, a massive time burden. I am living the substance of CLEs every single day. I understand that some lawyers have the benefit of having admin time or 'down time' to do CLEs on their employers' clock. Not all of us have that benefit. Some of us are trying to keep the lights on and keep the wheels of justice turning. If you are going to add a required topic, please consider deducting it from the "general" CLE total credit requirement instead of requiring even more total credits. Thank you.
Tracey Czar	Licensed legal professional (Lawyer, LLLT, LPO)	I don't think it should add 2 credits. I like the idea of those categories and would support it being a part of the current credit requirements but not adding additional credit requirements.
Emily Guildner	Licensed legal professional (Lawyer, LLLT, LPO)	The credit requirements with specific category requirements feel a bit like micromanaging. While I think its a good idea to increase the ethics requirements, I'm not generally in favor of mandating specific categories as I believe it is our general responsibility to seek CLE credits in areas we need to improve or educate ourselves on.
Luke Sanders	Licensed legal professional (Lawyer, LLLT, LPO)	I would be in favor of adding such requirements, but only if they take the place of current requirements. I.e., if the CLEs are part of the current requirement number and not added on top. It does not make sense to add a Mental Health CLE and then add to our burden. It is counterproductive and borders on nonsensical to say to someone struggling with stress and mental health: "here's one more thing you need to do! Take this training on why your mental health is important!"
Ashley Langley	Licensed legal professional (Lawyer, LLLT, LPO)	I am in favor of the new credit requirements (i.e., one credit of Technology Security Ethics and one credit of Mental Health Ethics each reporting period). I am not in favor of increasing the total ethics credits required to 8 ethics credits.

Lance Farris	Licensed legal professional (Lawyer, LLLT, LPO)	I am in favor in principle but only on the condition that total credits are reduced proportionally; so that fewer general credits are required. I am not in favor if more total credits will be required.
Dylan Waits	Licensed legal professional (Lawyer, LLLT, LPO)	I am in favor of creating more ethics CLE requirements, but only if there are more free classes made available to help meet this new requirement and the total number of CLE credits is not increased.
Peter Nguyen	Licensed legal professional (Lawyer, LLLT, LPO)	Please clarify whether this rule would affect compliance with the submission of Comity Certificates from other states of licensure for attorneys.
Nikki Thompson	Licensed legal professional (Lawyer, LLLT, LPO)	Ok with the additional credit hours, but concerned about the specific requirements. Perhaps too much in the weeds.
Kaley Chan	Licensed legal professional (Lawyer, LLLT, LPO)	I'm in favor of adding these requirements, but not on top of the existing ethics CLE. Instead, I recommend incorporating these requirements into the current requirements - maintaining the same number of required ethics credits.
Peter Heineccius	Licensed legal professional (Lawyer, LLLT, LPO)	I am only in favor if the WSBA also provides free recorded webinars in these areas sufficient to meet the reporting requirements. It is already a challenge for some of us to meet our CLE requirements, and creating new specific categories makes it even more challenging to find affordable courses that work with our schedules.
Lauren Gersch	Licensed legal professional (Lawyer, LLLT, LPO)	In my experience, many members of the bar work in an organization that has technology security handled by their IT department. Requiring members to search out and take such an ethics class would be a burdensome requirement that would not enhance their practice of the law.  If the law can be drafted in such a way that lawyers who work in an organization that conducts its own technology security, then I would be in favor of making this change.
sarah wixson	Licensed legal professional (Lawyer, LLLT, LPO)	It is sometimes difficult to get the required ethics, to get the different subspecies of ethics credits will be even more of a challenge.
Brenda Molner	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the one credit of Technology Security Ethics. Opposed to the additional proposed changes

Thomas R. McGarry	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The problem with Ethics CLE's is that there are not a lot of relevant opportunities to earn such credits in my view. I think Equity, Technology, and Mental health credits are a good idea in addition to general Ethics.</p> <p>How many times do attorneys realize they are short of ethics credit and desperately struggle to find credits regardless of how relevant the credits may be to the attorney/practice? If there were ample opportunities to earn MCLE ethics credits relevant to areas of practice at little or no cost to practitioners, I would strongly support the idea. Categorizing the types of required further makes finding relevant classes even more difficult. I believe attorneys will take any ethics MCLE class towards the end of the reporting period regardless of how useful the credits might be for a given area of practice just to be compliant without regard to actually learning anything useful.</p>
K Unbehaun	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Wholly in favor if there are multiple opportunities for free CLEs on these additional topics. (WSBA already offers free mental health CLEs pretty regularly. Should not be too burdensome to offer a free technology CLE periodically.) Less in favor if practitioners must incur additional costs in fulfilling these additional requirements.</p>
Rachael Ream	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I believe that the additional type of credit would be a positive addition, but it should not increase the total CLE requirement because it would be too burdensome. Further, these specialized credits are always the most difficult to obtain. The Bar should provide a free online version of making them mandatory.</p>
Bob Casey	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Although I applaud ethics requirements, and maybe applaud increasing their overall number ... I think this proposal is too complicated. I don't think ethics should be subdivided into sub-categories that each has its own requirement. Just too complicated.</p>
Holly Ferguson	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I think all lawyers should have training around mental health issues, but the topic of technology security ethics feels really specific. I'm in the K-12 legal world, and it's just not something that comes across my desk. I wonder about creating some sort of system where you need X credits per time period, split across at least 2 categories. Or even X credits per time period with at least Y in general ethics and the remainder spread across the other 3 categories. Requiring such technical credits when you're not working in the area I think results in people sitting through CLEs but doing something non-related just so they can check the box. I feel like the equity and mental health areas cover everyone regardless of what area you practice in. (In fact I had a great equity CLE on Friday!)</p>

Lisa Feldman	Licensed legal professional (Lawyer, LLLT, LPO)	I understand encouraging these areas, but for those not working for a large private firm who pays for CLE classes, it could be challenging and unfairly expensive to earn these specialized credits. I think if the WSBA offered these for free on demand it would be reasonable.
Aaron Shawn Hicks	Licensed legal professional (Lawyer, LLLT, LPO)	I oppose the mental health CLE because one cannot fix their mental health by taking a CLE. I support the technology security credits because that topic must be learned from some source, and a CLE is a good source. I STRONGLY oppose the so-called "Equity" credits because they are racist, bigoted and forced speech.
C. Scott East	Licensed legal professional (Lawyer, LLLT, LPO)	<ol style="list-style-type: none"> <li>1. I would not restrict ethics carryover credits so much. Allowing a max of 3 would be preferable.</li> <li>2. My sense is that one should not be entitled to satisfy all General Ethics requirement with those upon which the current proposal is based.</li> <li>3. Increasing the number of ethics credits required seems to me to be unduly burdensome despite the mitigation afforded by free online courses. If tall can be accessed at times other than scheduled for live presentations, that is okay (i.e., it may be the case but it didn't catch my eye on first pass.)</li> </ol> <p>Regardless, thanks to the committee for their efforts.</p>
Matthew Mearns	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Mental Health ethics credits will not improve the mental health of the bar. This is a stressful profession steeped in a competitive culture of overwork. Lawyers are largely already aware of the mental health issues embedded in our profession. All this rule change does is create more hoops for lawyers to jump through to remain licensed and employed.</p> <p>If you want to protect lawyers' mental health, you have to do things like cap billable hours, and cap prosecutorial and criminal defense caseloads. The causes behind collective mental health decline are myriad, but the easiest fix now is to change how much we work. Until we have time (and for those of us in public service, money) to pay for therapy, telling us to get therapy will be as effective as repeating "work-life balance" over and over again without changing the culture that led us to need that (largely meaningless) phrase in the first place.</p>



Amie Peters	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I am strongly in favor of the mental health credit. This is essential to increasing awareness about this important issue throughout the legal community.</p> <p>However, the technology security ethics issue is too narrowly focused to be useful as a repetitive MCLE credit. I worry this will amount to fear mongering from vendors, who are looking to make a buck and not properly addressing the appropriate Washington standards. It is also already covered under the current broad ethics topic and is regularly covered by the various MCLE vendors.</p> <p>Instead, I'd suggest an advisory MCLE ethics standard that recommends lawyers make sure to attend MCLEs on a diverse spectrum of topics, including technology security, advertising ..., as well as more traditional topics like communications, IOLTA accounts, etc.</p>
John J. Ryan	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I am in support of educating lawyers on data security, especially with many older practitioners not as knowledgeable of risks and risk management with data. However, I am adamantly opposed to the "mental health" proposal. It appears to be a thinly veiled attempt to tell the public, "See, look what we are doing to make our lawyers aware of the mental health challenges inherent with the practice of law"! It is a window dressing at best.</p>
Ondrea Hidley	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I like the idea of focusing on Technology Security and Mental Health but I do not think these should be added as additional credit requirements. Rather, I recommend they be part of the already required number of hours.</p>

Christopher Britt	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Though I feel it is important to the profession, with regard to equity based ethics, I would like to state that I am not in favor of such ethical courses being required. Questions of equity are not a situation that most attorneys face on a regular basis. Prosecutors, guardians, or those who work on behalf or with government enforcement should have those trainings but those who work in real estate for the private citizenry, for instance, would have no such use and these rules should apply to most if not all attorneys. My feelings are identical for mental health ethics.</p> <p>Regarding technological ethics: it is apparent that technology is rapidly advancing and to the extent that all attorneys need ethical practice, this would be a welcome and refreshing change. In the pre-covid era, attorneys and judges often stated their distrust of technology and covid put the entire industry into a full sprint for things such as "docuSign" and "e-filing" to gain traction and become commonplace. Providing direction BEFORE such matters become punishable is far more satisfying than to find out you are in technical violation of rules.</p>
Larry Jefferson	Licensed legal professional (Lawyer, LLLT, LPO)	<p>Not in favor of the mental health requirement. I think there many attorneys that do not practice in those areas, and it would be a waste of time and money.</p>

Sara Beigh	Licensed legal professional (Lawyer, LLLT, LPO)	<p>While I am supportive of addressing, and educating, legal professionals regarding behavioral health (that is inclusive of substance abuse and mental health) issues, I believe this proposed amendment has issues with its wording and reasoning. First, the wording of the ethic credit and definition should be Behavioral Health Ethics, as that is an umbrella of everything you are actually attempting to focus on. Second, your list of mental health disorders is a bit offensive, as you could just state mental health disorders (there are a lot of them). If you are not going to do that, you should at least group them all sequentially, and then put suicide prevention. Third, "The need to address these issues, and to do so as early as possible, relates directly to competence and fitness to practice law." This legitimately makes it sound like a person with a behavioral health disorder should be carefully monitored by their colleagues, because their fitness to practice law could be compromised at any moment. The bar moved away from requiring prospective attorneys with known behavioral health disorders from providing documentation and proving they were fit to practice law. Back when I joined the bar in 2004, it was a requirement. This just sounds like going back to the stigma, even though you state below that you are trying to destigmatize behavioral health issues.</p> <p>I would encourage you to at a minimum, change the name of the requirement to Behavioral Health Ethics. I would also encourage you to consider what you are asking for in the requirements of such a credit. It is important that we are fit to practice law, and we look out for our colleagues, but those with known behavioral health disorders should also not be made to feel like they are constantly being watched.</p>
Charles Carter	Licensed legal professional (Lawyer, LLLT, LPO)	I support adding Technology security ethics as part of CLE. But hours requirement should not increase
David Billetdeaux	Licensed legal professional (Lawyer, LLLT, LPO)	While I agree that these are important areas for education, it will create a hardship for attorneys on the east side of the state, who already find it hard to locate affordable CLEs that are not based in Seattle. If the WSBA makes these trainings easily accessible via zoom/webex, then I have no issue.
Kaustuv Mukul Das	Licensed legal professional (Lawyer, LLLT, LPO)	I am in favor of requiring one credit of Technology Security Ethics (with a commensurate change to the number of ethics credits to seven credits). I am not in favor of requiring one credit of Mental Health Ethics credits because (in light of the proposed definition of Mental Health Ethics in section (f)(10)) those topics are already covered - or should be covered -- in the five (5) general ethics and PR course materials. Note that I am relying on the existing definition of general ethics and PR and not the revised definition (which is, in my opinion, unnecessarily trying to carve out MHE courses).

Kassandra Zwick	Licensed legal professional (Lawyer, LLLT, LPO)	I really like the idea of adding ethics for mental health; but I dislike adding to the total required MCLE requirements.
Megan Muir	Licensed legal professional (Lawyer, LLLT, LPO)	The additional categories seem fine but I would be in favor only if the Bar Association was able to provide free or very low cost video-on-demand CLE sessions that met the various criteria. It is already more difficult to find relevant and inexpensive or free ethics credits than it is general legal credits. Particularly for those outside of large law firms, creating new requirements in subcategories creates new financial and timing challenges. If such CLE courses are readily available, free or very inexpensive, and accessible online via webcast (i.e., not at a specified time), then they seem to be valuable areas of education. Otherwise, perhaps adding those areas as eligible for credit within ordinary general legal CLEs could provide the education aspect without the challenges of new requirements.
Anamarie Marlow Maltzman	Licensed legal professional (Lawyer, LLLT, LPO)	I believe the topics are good additions and support them!!! I absolutely do NOT support adding additional hours to our requirements. Replace the new courses by deleting other hours requirements.
Kelly Mangiaracina	Licensed legal professional (Lawyer, LLLT, LPO)	I like the idea of the focused credits. I believe they should replace existing credits instead of being in addition to them.
Whitney Hawke	Licensed legal professional (Lawyer, LLLT, LPO)	I think the two (2) new ethics credits (tech security and mental health) are important, but I feel they should replace two (2) the general ethics credits rather than being added as additional credit requirements.
Katelyn Oldham	Licensed legal professional (Lawyer, LLLT, LPO)	I'm in favor of the MH ethics class because real harm to clients/the public can happen; I am not in for of the technology ethics b/c the potential for harm seems less significant & (most) lawyers seem to care about encryption and file sharing, etc. in a safe way
Kristina M. Ash	Licensed legal professional (Lawyer, LLLT, LPO)	I think that adding the categories and requiring security and mental health credits is fine, but it is difficult enough to get worthwhile ethics credits each year. I am strongly against increasing the total amount of ethics credits.
Wendy	Licensed legal professional (Lawyer, LLLT, LPO)	The continuing education requirements have become convoluted. I don't object to tech and mental health related education; but please note that these subjects are already offered and utilized because they fulfill our need to find new credits.
Patricia L. Morgan	Licensed legal professional (Lawyer, LLLT, LPO)	I am definitely in favor of the idea of the proposed mental health component. I am neutral due to lack of information, lack of knowledge of colleagues' impression, and lack of general knowledge on the technology component. I shall stay tuned.

Benjamin Keim	Licensed legal professional (Lawyer, LLLT, LPO)	I generally like the idea and understand the reasoning. However it adds complexity and one more thing for me to keep track when managing my CLE compliance. For now, I would prefer the additional at the requirements to be optional. It would also be helpful if the Bar could offer free CLE's on (2) equity ethics; (3) technology security ethics and (4) mental health ethics throughout the year.
Rebecca S. Stith	Licensed legal professional (Lawyer, LLLT, LPO)	I favor adding a mental-health ethics requirement. I am unclear as to what the technology-security ethics content would potentially be. Thank you.
Suzanne L MAGER	Licensed legal professional (Lawyer, LLLT, LPO)	I favor the amendments if the bar will make CLE credits readily available at no charge, preferably as online or recorded webinar CLEs that we can complete on our own schedules.
michael goldenkranz	Licensed legal professional (Lawyer, LLLT, LPO)	Ideally make all those ethics credits free, and if possible have some of them rolled into portions of substantive legal CLE's , so it's on stop shopping.
Katherine Krueger	Licensed legal professional (Lawyer, LLLT, LPO)	I suggest you modify it to say that those are not in practice advising clients but are simply maintaining their license as retirees (I waffle on this every year) do not have to take these. My only role now is to help some committees and nonprofits, of which I am on their board and have insurance through these, with bylaws and some contract review. Really minor. But I like the honor of being an attorney. I worked forit! Dont' want to drop the license. I am borderline income now and if you make these new one-hour classes among the free lunchbox ones, I can live with it. If I have to pay \$100 or such for this one hour on each, I will be unhappy. Do your best. You get my point...
Larry Ward	Licensed legal professional (Lawyer, LLLT, LPO)	I support the amendment as to the technology security ethics component. I do not support the amendment as to mental health ethics - there is no need to remove that from the general ethics category.
Carey Campbell	Licensed legal professional (Lawyer, LLLT, LPO)	I believe that increasing information relating specifically to technology security and mental health is highly important but am worried about the implementation of the mental health ethics aspect. There is a connection from mental health and competence of practitioners but a tenuous one. While mental health information is highly important and the discussions need to occur relating it to an ethics requirement seems a little far afield from the underlying goal. The goal should not be talking about mental health only to the level of maintaining competence which is a relatively low standard. If the goal is to have more open and honest conversations regarding the mental health of practitioners including substance abuse then the a requirement can be that simple rather than trying to tie it to ethics credits.
Thomas Yamamoto	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of categories. Not in favor of increasing total credit requirements.

Christine Chin	Licensed legal professional (Lawyer, LLLT, LPO)	The credits should be included in the current amount of ethics credits required per reporting period.
Karen Schweigert	Licensed legal professional (Lawyer, LLLT, LPO)	I support the technology security ethics proposal as a requirement, but not the rest. Those CLEs absolutely should be offered, and offering them for free would entice people to take them and take them seriously.
Victoria Thomas	Licensed legal professional (Lawyer, LLLT, LPO)	Suggesting less than 8 hours.
Lisa Keeler	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I'm in favor of more clear guidelines for ethics credits. I am not supportive of adding additional ethics credit requirements (increased number) as requiring 2 credits per year (6 per 3 year cycle) is both reasonable in providing education/guidance to lawyers and doable for lawyers. I'm not opposed to having very specific subject matter ethics credit requirements, but the requirements should be more explicitly clear, e.g.: required each 3 year reporting period to complete: 1 equity ethics credit, 1 technology security ethics credit, 1 mental health ethics credits, and 3 general ethics and professional responsibility credits.</p> <p>Also, it seems absurd to require ethics credits for "mental health ethics" as defined without actually meaningfully addressing why our system - the courts, the profession, the practice, etc. - is structured in such a way that continues to be, and is increasingly, detrimental to the health of professionals and without taking real steps to correct the same.</p>
Meredith Lehr	Licensed legal professional (Lawyer, LLLT, LPO)	General ethics requirements are fine. "Equity" ethics are a bit of a reach, but okay. Has less to do with legal ethics and more to do with politics. Technology security ethics seems useful, given the changes in how information flows. Mental health ethics seems a real stretch. Is that really something we need to require attorneys to know?
Irina Anta	Licensed legal professional (Lawyer, LLLT, LPO)	I would be in favor of this amendment if WSBA provided ample opportunity to earn these credits for free during the 3 year CLE periods.
Sandi Shelton	Licensed legal professional (Lawyer, LLLT, LPO)	I am in favor of adding the subject areas as requirements, but NOT in favor of increasing the overall number of credits required.
Karen Duncan	Licensed legal professional (Lawyer, LLLT, LPO)	
PAUL PETRY	Licensed legal professional (Lawyer, LLLT, LPO)	I am in favor ONLY if it does not require the total of required credits to increase above the current 45. Perhaps the new categories could be substituted for "equity" credits.
Kaylynn WHat	Licensed legal professional (Lawyer, LLLT, LPO)	Regarding the technology credit - we have lots of internal training around IT security already, and I'd like that to count to fulfilling this requirement if adopted. Love adding mental health requirements.
Patrick D. Moore	Licensed legal professional (Lawyer, LLLT, LPO)	Should be two credits rather than one.

Susan Skelton	Licensed legal professional (Lawyer, LLLT, LPO)	I think I would want more information about the "mental health ethics" portion. I feel like there are already so many requirements on attorneys.
Cynthia Cannon	Licensed legal professional (Lawyer, LLLT, LPO)	I understand the push for ethics CLE on tech security and mental health. My only objection is requiring more and specific ethics credits where there's a dearth of general ethics credits on offer. This requirement would add the burden of finding (and paying for) CLE seminars/courses for tech security and mental health.
Juliet Laycoe	Licensed legal professional (Lawyer, LLLT, LPO)	I am supportive of ethics credits that are focused on a particular topic or issue but not in favor of increasing the number of ethic credits required each reporting period to 8.
Vanessa D Morgan	Licensed legal professional (Lawyer, LLLT, LPO)	Does this increase the total number of CLE's required or adjust the allocation of total credits? Regarding equity ethics, the education classes to be made available need to address all inequality, whether based on sex, sexual orientation, ethnicity, heritage, etc. As an example, a "white" person may legally qualify as a minority due to ethnicity, the color of one's skin or a family name does not tell the full story, which also needs to be addressed in equity. I believe cost also needs to be examined. For many LLLT's and LPO's courses can be cost prohibitive when cut backs occur and it may be necessary to put a license on inactive and then re-activate. Thank you for your time.
Morgan Adams	Licensed legal professional (Lawyer, LLLT, LPO)	I certainly think a one time CLE requirement is helpful, even beneficial. I don't think it should be annual. Much of this appears to be specialized and isn't something that all lawyers will need for each reporting period. There are costs in time as money as well. Once a lawyer is alerted to the resources, the lawyer should then be sufficient to explore further or dust off the books and update. Of course some will never get it and some already know it.
Laura Johnson	Licensed legal professional (Lawyer, LLLT, LPO)	If these are the same requirements as a Lawyer? Then I would say yes. We see more attorneys who do not follow secure and safe procedures under technology security efforts. The Escrow industry is constantly updating their training on these issues.
Charity Atchison	Licensed legal professional (Lawyer, LLLT, LPO)	I support this if the credits are provided free through the bar association. I have concerns about a mental health ethics credit. Lawyers working for the government should be allowed to substitute the mandatory technology training for technology requirements.
Alejandro Monarrez	Licensed legal professional (Lawyer, LLLT, LPO)	If we want to add the two proposed ethics credits, then eliminate two previously required ethics credits. We should not be increasing CLEs but rather finding ways to reduce where possible on the basis of value.
Melissa	Licensed legal professional (Lawyer, LLLT, LPO)	Not in favor of the Technology segment. It doesn't make sense for In-House attorneys, of which there are many in Seattle. I am in favor of the Mental health section because that affects all attorneys.

Martin Sinclair	Licensed legal professional (Lawyer, LLLT, LPO)	I am neutral regarding the amendment, provided it does not increase the overall CLE requirement above the current 45/3yrs - the transmission email was unclear.
Charles Matthew Andersen	Licensed legal professional (Lawyer, LLLT, LPO)	The concept seems worthy and well intended. The difficulty will be implantation. It is very difficult to obtain ethics credits with CLE's. Making the ethic credits specialized will impose an almost impossible burden on a practitioner to obtain these credits. It is not easy to weave the new ethic topics into more discrete CLE's that most seasoned practitioners attend to refresh in their practice area versus more generalized cover the waterfront CLEs. If this proposal is to be pursued, it would be incumbent that the WSBA sponsors at a minimal, or no cost, and available by zoom attendance/taped each of these specialities on a very regular basis. A jumbo program with all of the required specialities should be offered once a quarter to meet the obligation would seem to be necessary.
Stephen Fredrickson	Licensed legal professional (Lawyer, LLLT, LPO)	I'm not opposed to adding these two new ethics requirements. However, I think required ethics credits should be maintained at six. Practitioners are obviously free to exceed six if they wish.
Katherine Matos	Licensed legal professional (Lawyer, LLLT, LPO)	I appreciate the intent behind the suggested amendment, but disagree with the structure. Most jurisdictions require an average 12 credits per year; increasing the total credit requirements would make Washington a further outlier. Most jurisdictions have two categories (ethics and other); creating five distinct categorical requirements is difficult to both track and find quality CLE options.
Dale Steinbach	Licensed legal professional (Lawyer, LLLT, LPO)	I am in favor of any expansion concerning mental health within the profession, both with respect to ourselves in the practice or legal community for our non-practicing members, such as myself, and with our obligations to be aware of mental health concerns in representation and advocacy. I do not feel it is necessary to add a special category of technology ethics. To the current continuing legal education requirements as current ethics credit structures under the six credit model provide an adequate number of technology and communication related subtopics. That I think I already serve the profession adequately.
Leland L. Bull, Jr.	Licensed legal professional (Lawyer, LLLT, LPO)	Having read the MCLE Board's report, I find that the proposal may unnecessarily complicate the acquisition of the required ethics hours, and I wonder where and how members will be able to acquire these individual required credits, unless the programs are permanently posted on and available from the MCLE programs for downloading. If these programs ARE INDIVIDUALLY AVAILABLE for downloading from the MCLE menu without cost to the membership, I would have no objection to the proposal.



M. Reinhardt	Licensed legal professional (Lawyer, LLLT, LPO)	Both topics are important. Since I have completed my required CLE hours for this reporting period, I believe any new requirement should only be implemented for future reporting periods.
Michele Moore	Licensed legal professional (Lawyer, LLLT, LPO)	I think the new categories are all wonderful topics to include as part of our continuing education. However, it is already difficult to obtain the category-specific credits, and I anticipate that two new categories will make it even more so. Is there any way to make them a rotating requirement? For example, two categories in one reporting period and two in the next or allowing attorneys to choose two (or even three) of the four categories? In general, I think it would be a good idea to require even more credit hours in the ethics category, maybe 10 instead of what is now required.
Jennifer Anderson	Licensed legal professional (Lawyer, LLLT, LPO)	Getting enough ethics credits is already difficult. I wouldn't object to new areas of emphasis and think technology ethics is especially relevant, but I think increasing the required number of ethics credits is a bad idea.
douglas tufts	Licensed legal professional (Lawyer, LLLT, LPO)	Have to provide those subjects often and make them readily available. They are all important. Thank you doug
Joshua Rosen	Licensed legal professional (Lawyer, LLLT, LPO)	

		<p>I am barred in 10 states so I may have a different perspective than many. I am curious how this will affect Oregon and Idaho MCLE comity.</p> <p>Several other states have added mental health requirements but generally fall within their own categories, distinct from ethics. Ethics &amp; Professional Responsibilities in every state have similar specific requirements to distinguish them from general courses. But that doesn't mean all specific courses must be ethics courses. Creating sub categories under ethics complicates course classification for persons barred in multiple states.</p>
David Shirk	Licensed legal professional (Lawyer, LLLT, LPO)	<p>New and additional requirements are not a problem and having knowledge of tech security may be an ethical requirement of all lawyers but I see no value in declaring Tech Security and Mental Health to be Ethics courses. Every individual and business should learn about tech security and there are many excellent Tech Security courses that don't have a legal ethics element. But many are likely more valuable to an attorney than any MCLE course I have ever taken.</p> <p>Washington should allow attorneys to get credit for taking quality classes on data security without requiring the course to include attorney ethics because learning about data security fulfills those ethics. Let existing ethics courses cover that aspect. Otherwise attorneys with an extensive tech background will be wasting time in elementary courses and average attorneys will be discouraged from really learning about data security because they have to take one dumbed down to satisfy attorney ethics elements.</p>
Alex Bezu	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of Technology Security Ethics credit only.
Yasmeen Abdullah	Licensed legal professional (Lawyer, LLLT, LPO)	CLE are already very expensive and it is difficult to find ones in specific areas that are not cost prohibitive, especially for those of us providing sliding fees and pro bono work. I am in favor of the amendment only if the WSBA provides annual technology security ethics; and mental health ethics CLEs free of charge to legal professionals.
Karen Nelson	Licensed legal professional (Lawyer, LLLT, LPO)	Most of my CLE comes from national (multistate) conferences on health law, and these new requirements would be quite state-specific and hard to fulfill. I would not expect a national ethics speaker to cover them. Unless WSBA is planning to offer many opportunities to take qualifying CLE sessions at a low cost to members, it could create a substantial duplication of effort and expense.

Lesley Morgan	Licensed legal professional (Lawyer, LLLT, LPO)	I would only be in favor of this suggested amendment if WSBA provides this kind of ethics CLE during its Legal Lunchbox series annually. If that is assured to happen, I would be fine with this change.
Alan Singer	Licensed legal professional (Lawyer, LLLT, LPO)	As to the mental health CLE, it should only be free if required, and WSBA should probably take the lead. It is well financed by member dollars, aware of the issue, and offers good quality CLEs, so would probably be best situated to offer a required mental health CLE.
Jennifer Dold	Licensed legal professional (Lawyer, LLLT, LPO)	I support the additional topics, but do not increase the required amount to 8 per reporting period. Include them in the required 6. Thank you.
Pamela Visco	Licensed legal professional (Lawyer, LLLT, LPO)	I think it is a lot of ethics. I think computer security should not be an ethics credit. But it should be required. I also think equity and mental health are not ethics credit. But they should be required CLE materials for attorneys. As a public defender, I take a ton of equity and mental health CLEs and educational opportunities. But I do not see how they are ethics related but more a general education credit that could be added to requirement.
Elizabeth R Devine	Licensed legal professional (Lawyer, LLLT, LPO)	Lawyers with dual licensure, such as medical professionals and social workers, should be able to use ethics credits from those professions to meet the WSBA requirements.
Christy Newman	Licensed legal professional (Lawyer, LLLT, LPO)	I think you should simply require that of the 6 you already owe that 1 shall be for technology security and one for mental health.
John McCrady	Licensed legal professional (Lawyer, LLLT, LPO)	I am in opposition to the idea that the WSBA, an organization that I am required to belong to, is requiring me to also subject myself to presentations on equity ethics, which is a subject matter fraught with political, philosophical, and even religious implications. The material is never taught from a neutral viewpoint, never as a matter for debate, but is always taught with the implicit expectation that we all concede the truth of the material presented and agree to comply with every dictate set forth.
Aaron Paker	Licensed legal professional (Lawyer, LLLT, LPO)	Good ethics CLEs are hard to find (defined as relevant to my practice and presented in a way that does more than let me check the box). If this change happens, there has to be better offerings available or I need someone to show me where the good ones are. I love the addition of the mental health ethics, one of my pet areas of concern, but I have been really disappointed in the offerings so far.

Robert Cumbow	Licensed legal professional (Lawyer, LLLT, LPO)	The change does not look especially burdensome but it does place increasing responsibility on the shoulders of licensed professionals to make sure they are satisfying each of these requirements. The longer the list gets, the more likely that someone acting diligently and in good faith will still overlook one of the required credits, or assume it's been satisfied when it hasn't. Can the change be accompanied by increased diligence on the part of WSBA-MCLE to monitor and warn professionals if they have not satisfied one of the new ethical category requirements as they near the end of a reporting period?
Amber Leaders	Licensed legal professional (Lawyer, LLLT, LPO)	I am generally supportive, particularly on mental health ethics. But I do worry about the availability of these credits to the entire bar. Both are highly specialized and will have a limited number of trainers available to do these programs well and accurately. What will WSBA be doing to ensure there are sufficient quality trainings available to meet these requirements?
Caroline Campbell	Licensed legal professional (Lawyer, LLLT, LPO)	Add suggested CLEs, but do not increase the total CLE credit requirement.
Angela Mercedes Escobar Minj	Licensed legal professional (Lawyer, LLLT, LPO)	While I see the benefit of adding credits in these areas, CLE obligations are already comparatively higher in WA versus other states (e.g., NY) and there's already enough splicing of different credit categories. That said, I do believe both areas are important for legal professionals' development, so my preference would be that these be made optional and recommended credit areas, with programming facilitated by WSBA at a reduced cost and evaluation of compliance to be assessed by WSBA in subsequent years. Thank you for considering.
Rajeev Majumdar	Licensed legal professional (Lawyer, LLLT, LPO)	I would be in complete favor of this IF the WSBA was producing and providing to its members a free on demand CLE course on each topic each year. That way we are creating mandates that can be achieved and ensuring an avenue any member can use to fulfill and be educated. Thus would ultimately benefit the profession and the public.
Erin Egan	Licensed legal professional (Lawyer, LLLT, LPO)	My concern is the availability and affordability of classes to meet these requirements.
Declined to provide	Licensed legal professional (Lawyer, LLLT, LPO)	I appreciate the importance of mental health, but I don't think it's appropriate to include as a professional licensing requirement.
Dean Prather	Licensed legal professional (Lawyer, LLLT, LPO)	We already have enough CLE credit requirements. If we have to add more subjects, then trim from others to keep the credit requirement the same.
Eriko Iwasaki Baxter	Licensed legal professional (Lawyer, LLLT, LPO)	If the proposed changes are made, I would like to request the WSBA to provide free CLEs (both live and recorded CLEs) relevant to these topics for all WA lawyers.
Sarah Hudson	Licensed legal professional (Lawyer, LLLT, LPO)	

Elliott Johnson	Licensed legal professional (Lawyer, LLLT, LPO)	Requiring specific areas of Ethics CLE isn't objectionable. Adding to the overall number of Ethics hours (from 6 to 8) is objectionable. Have you done an overall cost/time analysis? How much extra \$ will this cost the entirety of the legal populace who must add two hours to their CLEs? Just keep the number of hours at 6 Ethics hours.
James McGuire	Licensed legal professional (Lawyer, LLLT, LPO)	Design CLEs to always include all categories of ethics requirements; this will make compliance and tracking easier
Alissa Baier	Licensed legal professional (Lawyer, LLLT, LPO)	Only in favor of this amendment if enough free CLEs will be offered to provide options for professionals to meet these requirements.
Christine Camper	Licensed legal professional (Lawyer, LLLT, LPO)	I don't disagree with having some requirements for the additional specified ethics, however I do not agree with the amount for each. I have concerns about the availability of CLE's that would provide sufficient ability to meet the requirements that are not largely repetitive and/or take away from other education. I would request to reduce both technology security and mental health to 2 each.
Amanda Ullrich	Licensed legal professional (Lawyer, LLLT, LPO)	To be honest, a lot of the MCLEs are pointless. We are all over worked and often struggle to keep up. I absolutely think technology and mental health need to be part of our continuing education. It should or could actually be a larger part of the MCLEs as could DEI education. I would make those topics a larger part of the requirements and reduce other areas.
Samuel Terpstra	Licensed legal professional (Lawyer, LLLT, LPO)	I honestly don't care what changes you want to make. Make 100 categories if you think it will make better lawyers. All I request is that you spend some of my annual fees to provide 100% free access to CLE credits. Take a survey - I'd be willing to bet 90% of Washington lawyers like me get nothing from our bar membership besides access to practice, yet we have some of the highest fees in the country.
Damian NoOneElse	Licensed legal professional (Lawyer, LLLT, LPO)	I support the addition of Technology Security Ethics MCLE requirements. I do not, however, support the "Mental Health Ethics" requirement because I think a single ethics credit requirement is a shallow, ineffective, and performative gesture for an issue that should be taken more seriously. I would support a more thoughtful and robust requirements for both "Equity Ethics" and "Mental Health Ethics."

Lee Thorson	Licensed legal professional (Lawyer, LLLT, LPO)	I don't have a problem with adding the proposed specialized ethics topics, but I don't believe that any of the enumerated specialty topics areas are changing with such rapidity that they justify a required (and likely redundant) program each credit period. If the Board feels that they have to be mandated rather than simply offered as options, then I suggest that the general ethics and professional continue to be required annually, but mandate only that each Bar member must also take a program in each of the three specialty ethics areas at least once during each five year period.
Richard J. Gregorek	Licensed legal professional (Lawyer, LLLT, LPO)	I am in favor of adding the requirement for the two areas, however I see no need to increase the number of CE credits needed. These can just be required within the existing CE credits. For instance for Ethics requirements the credits must include the new topic courses available. The financial well being of small law firms is always tenuous and the additional cost and time away from the practice is not warranted.
Dan Bridges	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The "Technology Security Ethics" part seems fine given the state of tech. However, I am very opposed to a "Mental health ethics" requirement. Particularly as you don't even have the proposal on the web site. Really? Come on guys. I went there to read it, and you do not even have what you are proposing. all it does is link us to the more recent CLE on telling us all we are implicitly racist. How can you send an email out to all of the members to comment on a proposed rule, give us a link to go look at the proposed rule, and not even have the proposed rule there. :-)</p> <p>Assuming you are wanting me to take ethics on my mental health or somebody else's, that has nothing to do with the practice of law any more than requiring us to pay more taxes as a part of our license to pay for better roads. Does having good mental health make you a better lawyer? Yes. Does having better roads make it easier to get to the courthouse and therefore make justice more accessible. Yes. Is there a point where the linkage between licensing lawyers to every possible thing that affects lawyers or the justice system go outside of the scope of regulating lawyers. Yes. Please folks. I love you and our mission please stop legislating morality via ethics cles.</p> <p>thanks folks. Take care, Dan</p>

Molly Masich	Licensed legal professional (Lawyer, LLLT, LPO)	If the proposed ethics category CLE requirements are approved, WSBA should provide *FREE* CLEs to specifically target these new required ethics categories. They are highly specific and will be hard to complete without CLEs specifically targeted toward them. We pay A LOT for our annual WSBA membership, which is mandatory to practice. The WSBA should provide FREE CLEs that fulfill the increasingly compartmentalized ethics categories.
Michael J. Bond	Licensed legal professional (Lawyer, LLLT, LPO)	<p>I object to this proposed amendment: ...</p> <p>(8) Equity ethics, defined as subjects relating to equity, inclusion, and the mitigation of both implicit and explicit bias in the legal profession and the practice of law;</p> <p>This amendment advances the false claims that our profession works in a systemically racist environment, that notions of merit based achievements are white supremacist, that one is either oppressor or oppressed, that anti-racism is the antidote, and that those who dissent are unfit.</p>
Cat Zavis	Licensed legal professional (Lawyer, LLLT, LPO)	I am in support of the ethics requirement for Mental Health and opposed to the one for technology security. For some legal professionals, that is not as relevant as for others and it just adds another burden and hoop for people to jump through. If people need that information to ensure the security of their practices, they will take such courses. On the other hand, many people do not consider and/or not aware of the importance of mental health issues in their practice so I do think that should be required.
Ronald Lau	Licensed legal professional (Lawyer, LLLT, LPO)	I'm licensed in other states (CA and NY) which require these courses already. My only ask is to make CLEs flexible such that lawyers who are admitted in other states can take 1 CLE that will satisfy the same requirement with other states. Otherwise, this proposal will add more requirements and hours for attorneys.
Rachel	Licensed legal professional (Lawyer, LLLT, LPO)	I agree that the proposed new subject matters are timely and important. Respectfully, however, I don't like the superimposition of two additional credit hours. I would more likely be in favor of this suggested amendment if these courses were offered in lieu of two credits of another, current ethics requirement.
Julie Anne Brown	Licensed legal professional (Lawyer, LLLT, LPO)	I think the ethics credit requirement should remain the same. Lawyers should be given the choice of the four categories but only required to take ethics course in at least two (2) categories per reporting period (not all four). I think requiring all four is too much and does not allow lawyers to focus on the areas upon which they believe they need training. I am not in favor of increasing the number of credits required past 45 per three (3) year reporting period.

Ruth Harper	Licensed legal professional (Lawyer, LLLT, LPO)	I like the idea of Technology Security Ethics and Mental Health Ethics but do not think that these credits should be added in addition to the rest of the MCLE credits required. This places too heavy a burden on small and solo practitioners, who are already trying to run a business, manage client matters, etc. Technology Security Ethics and/or Mental Health Ethics CLEs should be added as options of categories that count toward the overall CLE credit requirement.
Alison DeGregorio	Licensed legal professional (Lawyer, LLLT, LPO)	
Todd Maiden	Licensed legal professional (Lawyer, LLLT, LPO)	I am not opposed to periodically requiring practitioners to receive CLE training in technology security and / or mental health - both are important subjects. However, I do not think the total number of CLE hours should be raised. Thank you.
Stephanie Caballero	Licensed legal professional (Lawyer, LLLT, LPO)	As long as it remains free of cost I have no objections to the change and it may be a great learning opportunity.
		I support the technology security credit requirement. Technological security has major implications for confidentiality, and lawyers should be more aware of these issues.
Cassandra Baker	Licensed legal professional (Lawyer, LLLT, LPO)	I do not support the mental health credit requirement. While I appreciate that WSBA is concerned with lawyers' mental health, I do not think a CLE credit requirement is the right way to address the issue. First, I believe health management and health education should be between an individual and their medical providers. Second, I do not believe requiring CLE credits will improve lawyers' mental health. I believe overwork is the main source of work-related mental health issues for lawyers, and a CLE requirement will not address that. To the extent that other mental health conditions such as depression and schizophrenia (to name two listed in the proposed amendment) affect a lawyer's work performance, those conditions should be managed by the lawyer and their medical providers. I think it would be more productive for WSBA to make resources available but optional, and to advocate for a change in the culture of the profession to promote sustainable workweeks that give lawyers time to attend to their mental and physical health and have a life outside of work.



Victoria Barr	Licensed legal professional (Lawyer, LLLT, LPO)	<p>The carryover provisions are confusing, but the section quoted below must be edited for clarity. I would be happy to wrestle with it if asked to do so:</p> <p>(10) Mental health ethics, defined as subjects that educate and inform lawyers, LLLTs, or LPOs about their ethical obligations and professional responsibilities under the rules of professional conduct regarding mental health issues. This includes education concerning the ethical risks to the practice of law associated with, but not treatment for, substance abuse, addictive behaviors, stress management, work-life balance, anxiety disorders, depression, bipolar disorder, suicide prevention, schizophrenia, and other mental health issues.</p>
Kari Petrusek	Licensed legal professional (Lawyer, LLLT, LPO)	I do not believe it's necessary to have a mental health ethics requirement. I do not support this suggestion.
Michael Cherry	Licensed legal professional (Lawyer, LLLT, LPO)	I believe instead of Technology Security Ethics, the title should be broader such as Technology Compliance and Ethics, as Security is but one aspect--ethics attaches to technology as security, privacy, data retention and usage policies, government regulations (including Foreign Corrupt Practices Act), etc. and therefore, the title and the potential coverage should be broader.
Barbara Prowant	Member of the public	In favor of Technology Security Ethics. Not in favor of Mental Health Ethics.
Gerald F Roach	Licensed legal professional (Lawyer, LLLT, LPO)	
Tom Brotherton	Licensed legal professional (Lawyer, LLLT, LPO)	I agree that improving the lawyer's understanding of the changing information technology environment is important. I disagree that the rest of the suggestions are needed or useful.
Chris Morgan-Riess	Licensed legal professional (Lawyer, LLLT, LPO)	More would need to be done to ensure that classes meeting these requirements are available outside the state for those of us not in WA.
Rebecca Lynne Bernard	Licensed legal professional (Lawyer, LLLT, LPO)	I question the wisdom of making ethics increasingly complex. Perhaps the WSBA should give out to attorneys an explanation for why this amendment has become necessary.
Soheila F Sarrafan	Licensed legal professional (Lawyer, LLLT, LPO)	Technology Security Ethics is something that can be taught and understood. It is unclear what "Mental Health Ethics" actually means and how it would contribute to a more ethical practice of law; so not in favor of Mental Health Ethics requirement.
Craig McDonald	Licensed legal professional (Lawyer, LLLT, LPO)	The amendments are great ideas but keeping track of it all gets complicated for me

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## Those in Favor the MCLE Board's Preliminary Suggested Amendments

Your Name	Your relationship to WSBA	Comments and Feedback
Alexandra Kory	Licensed legal professional (Lawyer, LLLT, LPO)	
Shelly Buchanan	Licensed legal professional (Lawyer, LLLT, LPO)	
Dianna Caley	Licensed legal professional (Lawyer, LLLT, LPO)	
Thomas Butcher	Licensed legal professional (Lawyer, LLLT, LPO)	Mental health should definitely be a requirement and I would support 2-5 credit requirements for this portion. With regard to technology requirement -- 1-3 credits seems appropriate.
Heather Shepherd	Licensed legal professional (Lawyer, LLLT, LPO)	I think technology security and mental health would be great to add to the requirements. I believe there are a lot of practicing attorneys that lack in both of these areas.
Bella Maslyak	Licensed legal professional (Lawyer, LLLT, LPO)	
Jonathan James	Licensed legal professional (Lawyer, LLLT, LPO)	
Jeff Grinnell	Licensed legal professional (Lawyer, LLLT, LPO)	The more content that pertains to all lawyers the better.
Michael Hallas	Licensed legal professional (Lawyer, LLLT, LPO)	Technology security is essential to practice of law and protecting client confidential information, attorney client communications and work product. Too many lawyers, including myself at times, don't think enough about it.
Kait Schilling	Licensed legal professional (Lawyer, LLLT, LPO)	
Suzanne Long	Licensed legal professional (Lawyer, LLLT, LPO)	
Maria Manza	Licensed legal professional (Lawyer, LLLT, LPO)	
Joan Pradhan	Licensed legal professional (Lawyer, LLLT, LPO)	
Adam Tabor	Licensed legal professional (Lawyer, LLLT, LPO)	
Jerica Wilson	Licensed legal professional (Lawyer, LLLT, LPO)	I think with advancing technology and hacking of private information this is very important to learn. As well, mental health is something that should be nurtured. This is a great amendment.
Julie Mayer	Licensed legal professional (Lawyer, LLLT, LPO)	
Wendy S. Neal	Licensed legal professional (Lawyer, LLLT, LPO)	
Danny Reidy	Attorney	Mental health issues in the legal profession should not be ignored. Lawyers would benefit from this training.
Synova M. L. Edwards	Licensed legal professional (Lawyer, LLLT, LPO)	I think it's great to ensure that legal professionals get well rounded continuing education.
Shauny L Jaine	Licensed legal professional (Lawyer, LLLT, LPO)	This is a welcome change. Thank you; I hope it is approved.
Kelsey Endres	Licensed legal professional (Lawyer, LLLT, LPO)	I am 100% for training in mental health and technology security!!
Laura Blair-Gano	Licensed legal professional (Lawyer, LLLT, LPO)	
Marguerite Friedlander	Licensed legal professional (Lawyer, LLLT, LPO)	I think the Mental Health ethics component is long overdue and (in my opinion) a very important addition to the ethical compendia. The state employees who are also bar members already have to fulfill annual technical security ethics. Would this qualify for the bar requirement?
Anthony Menke	Licensed legal professional (Lawyer, LLLT, LPO)	I think this is an excellent amendment and will serve our profession very well !!!
Elisa Wood	Licensed legal professional (Lawyer, LLLT, LPO)	

Chris Mammen	Licensed legal professional (Lawyer, LLLT, LPO)	Under the model rules, it's a lawyer's obligation to keep abreast of the benefits and risks of technology.
Rhena Brinkmann	Licensed legal professional (Lawyer, LLLT, LPO)	
John Keenan Osborne IV	Licensed legal professional (Lawyer, LLLT, LPO)	
Zeshan Q. Khan	Licensed legal professional (Lawyer, LLLT, LPO)	
Dawna Swenson	Licensed legal professional (Lawyer, LLLT, LPO)	I would be fine with 2 additional credit requirements, per reporting period. It would be interesting to listen to speakers on both topics
Charles Dold	Licensed legal professional (Lawyer, LLLT, LPO)	This was a good idea when it was first proposed, remains a good idea now and I am surprised it took so long to get this done. As past chair of the CLE committee we considered this to be a valuable addition to the list of materials enabling our members to retain the support of the communities they serve.
Carla Reyes	Licensed legal professional (Lawyer, LLLT, LPO)	
David Upshaw	Licensed legal professional (Lawyer, LLLT, LPO)	
Joshua Grissom	Licensed legal professional (Lawyer, LLLT, LPO)	
Cindy Gaddis	Licensed legal professional (Lawyer, LLLT, LPO)	I like the list of ethics topics under Education Requirements.
Elizabeth Thompson-Lagerberg	Licensed legal professional (Lawyer, LLLT, LPO)	Excellent proposal. The new areas are critical areas for legal professionals to be aware of and practice.
Sylvia A Miller	Licensed legal professional (Lawyer, LLLT, LPO)	
Anne Mullen	Licensed legal professional (Lawyer, LLLT, LPO)	These are good things to be responsible to learn.
Karolyn Klohe	Licensed legal professional (Lawyer, LLLT, LPO)	
Christy Peters	Licensed legal professional (Lawyer, LLLT, LPO)	
Kirsten Gregory	Licensed legal professional (Lawyer, LLLT, LPO)	
Michael Swick	Licensed legal professional (Lawyer, LLLT, LPO)	
Matthew Crane	Licensed legal professional (Lawyer, LLLT, LPO)	Seems like a reasonable approach for dealing with the issues outlined.
Jayne Marsh Gilbert	Attorney	Sounds good to me.
Dale schofield	Licensed legal professional (Lawyer, LLLT, LPO)	
Ben Dietz	Licensed legal professional (Lawyer, LLLT, LPO)	The two new categories are critical to the competent practice of law.
michael rubin	Licensed legal professional (Lawyer, LLLT, LPO)	it's a good idea
John Newcome	Licensed legal professional (Lawyer, LLLT, LPO)	Direct action in addressing mental health issues and substance abuse among attorneys has been needed for years. I applaud these initial steps taken to address mental health and substance abuse through education. I hope this will encourage law firms and employers to grant affected attorneys extended leave to seek treatment as a benefit to the traditional vacation/sick leave.
Katie Archer Jolma	Licensed legal professional (Lawyer, LLLT, LPO)	If these additional credits are adopted, then I would suggest these credits be offered as free "Lunch and Learn" sessions or as on-demand videos.
Anne-Marie Marra	Licensed legal professional (Lawyer, LLLT, LPO)	
Greg Stadter	Licensed legal professional (Lawyer, LLLT, LPO)	Seems practical and useful as stated.
Colleen Ottoson	Licensed legal professional (Lawyer, LLLT, LPO)	
William Doyle	Licensed legal professional (Lawyer, LLLT, LPO)	

Genissa Richardson	Licensed legal professional (Lawyer, LLLT, LPO)	Requiring technology and mental health CLEs is a good idea and an appropriate change to the current CLE requirements.
Patrick Preston	Licensed legal professional (Lawyer, LLLT, LPO)	These are relevant topics for most legal professionals in their practices. Thanks.
Denise Gertis	Licensed legal professional (Lawyer, LLLT, LPO)	
Dawn M. Keller	Licensed legal professional (Lawyer, LLLT, LPO)	
James D. Senescu	Licensed legal professional (Lawyer, LLLT, LPO)	
Victoria Kesala	Licensed legal professional (Lawyer, LLLT, LPO)	I think the new requirements will help us be better practitioners and reduce inadvertent ethics breaches. I THINK IT IS THE RESPONSIBILITY OF THE WSBA TO PROVIDE EDUCATION IN THESE NEW AREAS AT NO COST. That's in all-caps because I sure don't want to be searching for something to comply and find only expensive options. I also think it is important to make the education accessible (no contact, on-demand courses).
Paula Emery	Licensed legal professional (Lawyer, LLLT, LPO)	Well done, MCLE committee! Thank you.
Kim Kremer	Licensed legal professional (Lawyer, LLLT, LPO)	I think both amendments reflect how society has changed and will strengthen the profession and enhance the public's trust in our bar.
john hoglund	Licensed legal professional (Lawyer, LLLT, LPO)	
Malena Pinkham	Licensed legal professional (Lawyer, LLLT, LPO)	
Kristi Knieps	Licensed legal professional (Lawyer, LLLT, LPO)	
Stephen R. Shelton	Licensed legal professional (Lawyer, LLLT, LPO)	
Ry Ravenholt	Licensed legal professional (Lawyer, LLLT, LPO)	
Joann Abelson	Licensed legal professional (Lawyer, LLLT, LPO)	
Richelle Little	Licensed legal professional (Lawyer, LLLT, LPO)	These topics are important, and all lawyers should be educating themselves in these areas.
Alex Reaganson	Licensed legal professional (Lawyer, LLLT, LPO)	
Michelle DeLappe	Licensed legal professional (Lawyer, LLLT, LPO)	I am particularly concerned about the lack of technology competence among certain members of the bar and the potential vulnerability of both their own clients' confidential information as well as my clients' confidential information when it is provided to them in their role as opposing counsel. For example, I have encountered opposing counsel who do not know how to use a secure file share site to download and upload documents and who misconstrue insistence on using one as unreasonable or obstructionist behavior. It is essential that all lawyers receive regular training on this ever-changing aspect of legal practice as it affects all lawyers/legal professionals and all clients ultimately.
thomas martin rasmussen	Licensed legal professional (Lawyer, LLLT, LPO)	
Martin Kreshon	Licensed legal professional (Lawyer, LLLT, LPO)	

		Good idea. Might be tough for some folks to meet and cause frustration, but if the MCLE Board provides resources on programs that will help folks meet the new requirements, and if regular programs add materials to make it easy for practitioners to satisfy, I don't see any issues. These are important issues that attorneys should be aware of regardless.
Elena Praggastis	Licensed legal professional (Lawyer, LLLT, LPO)	
Laura Mancuso	Licensed legal professional (Lawyer, LLLT, LPO)	
Leanne Bowker	Licensed legal professional (Lawyer, LLLT, LPO)	I think it is good as long as you will provide classes to meet the rules.
Cameron	Licensed legal professional (Lawyer, LLLT, LPO)	
Carol Sue Janes	Licensed legal professional (Lawyer, LLLT, LPO)	I support the additional requirement. It seems important to stay up to date about these topics.
		Mental Health is interwoven with a complex mix of increasingly easy access to military type guns, with the new Supreme Court's expansion of 2nd Amendment rights. The more we can try to understand every possible aspect of almost daily mass killings, perhaps the closer we can come to alleviating the tragedies. Equity issues have become highlighted as the concept of inclusion is being challenged by some GOP states' attempts to prohibit books, teachings and thoughts to be limited to only those acceptable to the most extreme "America First" believer. AI is fraught with dangers, technologically, as are other invasive methods attacking privacy for us and our clients. This is an important area for defensive knowledge. Good forward thinking! I approve and support on all fronts.
Glenna L. Malanca	Licensed legal professional (Lawyer, LLLT, LPO)	
Mika Ito	Licensed legal professional (Lawyer, LLLT, LPO)	
		Good idea.
		I have found while administrating aspects of IT that most lawyers are clueless of Firm recordkeeping and ethical duties related to client communications and electronic records. Text communications, communications to personal email accounts, records and correspondence saved on personal machines of Firm machines off-line, ... Should be eye-opening for at least some, and likely many.
Charles Akin BLitz	Licensed legal professional (Lawyer, LLLT, LPO)	
		I fully support all proposed amendments, particularly the mandatory mental health ethics credits. Two reasons: 1) as lawyers and judges, we are at bottom helping clients and parties resolve consequential problems. We cannot fulfill that role if we ourselves need help diagnosing, managing, and overcoming mental health issues; 2) the surveys on children and teens' mental health is devastating; we are in a crisis. Those same teens and college aged students will be joining the legal profession in as little as 3-5 years. We owe it to the next generation of lawyers to stay on top of this.
Carolina Sun-Widrow	Licensed legal professional (Lawyer, LLLT, LPO)	
Conrad Smucker	Licensed legal professional (Lawyer, LLLT, LPO)	
Ada Danelo	Licensed legal professional (Lawyer, LLLT, LPO)	

Dwight Van Winkle	Licensed legal professional (Lawyer, LLLT, LPO)	Many ethics CLEs already exist on tech and mental health, reflecting their importance and easing the burden of fulfilling the new requirements.
Leah Eccles Watson	Licensed legal professional (Lawyer, LLLT, LPO)	Poor mental health is a leading contributor to malpractice. Much of what we do subjects us to information that causes vicarious trauma. And technology awareness is essential today in the legal field and understanding the ethics of technology is vital.
Catherine Merrill	Licensed legal professional (Lawyer, LLLT, LPO)	What could possibly be wrong with this!
Martin Rollins	Licensed legal professional (Lawyer, LLLT, LPO)	Thank you for all your hard work on these issues.
Alexander E. Silverman	Licensed legal professional (Lawyer, LLLT, LPO)	Cyber security is a reality. I am consistently amazed at how many attorneys email me documents and information via unsecured email.
		As for mental health, most attorney's are assisting individual clients in some capacity. Although rewarding, helping people with their problems can feel overwhelming at times. A requirement for a mental health CLE would be a wonderful reminder to us Type A's to take care of ourselves...
Elizabeth Kandiew	Licensed legal professional (Lawyer, LLLT, LPO)	Thank you for all you do!!
Shawn Alexander	Licensed legal professional (Lawyer, LLLT, LPO)	
Catherine Pope	Licensed legal professional (Lawyer, LLLT, LPO)	
Douglas Degroot	Licensed legal professional (Lawyer, LLLT, LPO)	
Sue Stepp Tamblin	Licensed legal professional (Lawyer, LLLT, LPO)	
Margie Allen	Licensed legal professional (Lawyer, LLLT, LPO)	
Jessica Erickson	Licensed legal professional (Lawyer, LLLT, LPO)	
		These new requirements ensure that more professionals "touch" areas of impact in our society and are therefore better positioned to assist a wider range of clients with a wider range of issues helping to keep legal services relevant to more people.
Pat Lashway	Licensed legal professional (Lawyer, LLLT, LPO)	
Jessica Lewis	Licensed legal professional (Lawyer, LLLT, LPO)	
Katelynn Walters	Member of the public	
Joene Gunderson	Licensed legal professional (Lawyer, LLLT, LPO)	
Jacqueline Marrast-Simpson	Licensed legal professional (Lawyer, LLLT, LPO)	
BARBARA Reinsma	Licensed legal professional (Lawyer, LLLT, LPO)	
Joshua Treybig	Licensed legal professional (Lawyer, LLLT, LPO)	
Sarah Elerson	Licensed legal professional (Lawyer, LLLT, LPO)	

		My sole concern is that WSBA provide MULTIPLE opportunities for members to fulfill these new requirements each year at a relatively low cost. When other states where I am licensed have added a specialty CLE requirement, it has often been difficult to locate and complete an approved course. For the first year or two or more it was often ONLY that bar association that offered any approved course, and it was only available live (not as a replay, on demand). This made it quite difficult for many to fulfill the requirement in a timely manner.
Elizabeth R. Bain	Licensed legal professional (Lawyer, LLLT, LPO)	
Michelle Eacrett	Licensed legal professional (Lawyer, LLLT, LPO)	
Amy Richards	Licensed legal professional (Lawyer, LLLT, LPO)	
Amy Bonfrisco	Licensed legal professional (Lawyer, LLLT, LPO)	
Monica Rands-Preuss	Licensed legal professional (Lawyer, LLLT, LPO)	
Michele McNeill	Licensed legal professional (Lawyer, LLLT, LPO)	Long overdue I would say
Kendra Grieco	Licensed legal professional (Lawyer, LLLT, LPO)	
Ian A. Northrip	Licensed legal professional (Lawyer, LLLT, LPO)	
Michael	CLE Sponsor	
Joann Dewey	Licensed legal professional (Lawyer, LLLT, LPO)	
Tali Smith	Licensed legal professional (Lawyer, LLLT, LPO)	
Anna Endter	Licensed legal professional (Lawyer, LLLT, LPO)	
Laura Evezich	Licensed legal professional (Lawyer, LLLT, LPO)	
Lauren Novack	Licensed legal professional (Lawyer, LLLT, LPO)	
Elizabeth Tuschner	Licensed legal professional (Lawyer, LLLT, LPO)	
Faith Foote	Licensed legal professional (Lawyer, LLLT, LPO)	
		As a graduate of the law clerk program and member of the Law Clerk Board, I can attest that the educational value of being a tutor truly exceptional. Its easy to forget some of the basics with time and being a law clerk tutor provides an unbelievable refresher course.
Leone Reinbold	Licensed legal professional (Lawyer, LLLT, LPO)	
Susan Kirkpatrick	Licensed legal professional (Lawyer, LLLT, LPO)	



Erika Tremblay	CLE Sponsor	<p>Technology presents new ethical challenges for attorneys. They must navigate issues like client confidentiality in the digital age, the responsible use of social media, and the security of electronic communications and data. Attorneys need to understand the implications of emerging technologies, such as artificial intelligence, blockchain, and cloud computing, to effectively serve their clients. Incorporating technology into CLE equips attorneys with the necessary knowledge and skills to navigate these ethical dilemmas and maintain professional integrity.</p> <p>The legal profession is known for its high levels of stress, anxiety, and burnout. Attorneys often face heavy workloads, demanding clients, and emotionally challenging cases. Integrating mental health topics into CLE helps raise awareness about these issues, promoting self-care, stress management, and work-life balance among future lawyers. It also reduces the stigma associated with seeking help and encourages a supportive and empathetic legal culture.</p>
Randall R. Hall	Licensed legal professional (Lawyer, LLLT, LPO)	Although I am in favor of the proposed amendment to the MCLE Ethics Requirements, I am concerned regarding the necessity of the proposal pertaining to technological security. I am certainly in favor of training pertaining to the protection of client confidential electronic data and property.
Ann Vetter-Hansen	judicial officer	
Susan Cohodes	Licensed legal professional (Lawyer, LLLT, LPO)	I think that both a tech and mental health requirement would be very useful and would not create an added burden. Very much in favor.
John Lainhart	Licensed legal professional (Lawyer, LLLT, LPO)	

I am not sure if this would be useful, but law schools refer to a broader category of well-being rather than mental health, although the focus on mental health has long been a subject of concern for law students. <https://abaforlawstudents.com/2021/04/22/path-to-reforming-aba-standards-to-promote-law-student-well-being/> In the ABA Standards for Legal Education 2022-23 Standard 303(b)(3) requires law schools to include professional identity in our curriculum. Interpretation 303-5 states “Professional identity focuses on what it means to be a lawyer and the special obligations lawyers have to their clients and society. The development of professional identity should involve an intentional exploration of the values, guiding principles, and well-being practices considered foundational to successful legal practice. Because developing a professional identity requires reflection and growth over time, students should have frequent opportunities for such development during each year of law school and in a variety of courses and co-curricular and professional development activities.”

Well-being practices might be a more inclusive way to define the new requirement. Having a yearly requirement also recognizes that well-being, like addressing bias, is not a onetime course component, but instead a lifelong skill. In that way it can help attorneys respond to a changing set of circumstances that create real stressors with a serious impact on the effectiveness and satisfaction of attorneys in practice. Here is the reference to the standards if needed. Thanks!

[https://www.americanbar.org/content/dam/aba/administrative/legal\\_education\\_and\\_admissions\\_to\\_the\\_bar/standards/2022-2023/22-23-standard-ch3.pdf](https://www.americanbar.org/content/dam/aba/administrative/legal_education_and_admissions_to_the_bar/standards/2022-2023/22-23-standard-ch3.pdf)

Gillian Dutton	Law Professor and Licensed Lawyer	
John Murphy	CLE Sponsor	It makes sense. I congratulate you on considering this adjustment.
Russell J. Mazzola, WSBA #5440	Licensed legal professional (Lawyer, LLLT, LPO)	I support the proposed change.
		Technology is important for all lawyers to keep up with. Mental health issues impact the practice of law disproportionately and all attorneys should have minimal education for themselves or how to recognize issues with staff or other lawyers so we can work to
Michelle Fontenot	Licensed attorney and Director of Texas Lawyers' As	improve the well-being of our legal community.
Aimee Harvey	Licensed legal professional (Lawyer, LLLT, LPO)	
Michael Schmidt	Licensed legal professional (Lawyer, LLLT, LPO)	
Mehera Nori	Licensed legal professional (Lawyer, LLLT, LPO)	
Matthew Emmons	Licensed legal professional (Lawyer, LLLT, LPO)	A frequently updated safeharbor for the use of Google Drive and Microsoft OneDrive is needed.
Anna Kincaid	Licensed legal professional (Lawyer, LLLT, LPO)	I think creating categories to fulfill would be positive because it would expose people to multiple viewpoints and resources if needed.

Sarah Bove	Licensed legal professional (Lawyer, LLLT, LPO)	<p>While I support the additional of technology and mental health CLEs, I believe these should be written with more broadly to include changes in understanding around both mental health and technology.</p>
		<p>Considering what the American Bar Association recently adopted relating to AI (attached and worth reading in its entirety), it seems like CLEs examining the security and ethics of artificial intelligence would be meaningful. This recommended guideline below should give all attorneys and LLLTs pause. There was an article in the Seattle Times today whereby an attorney allegedly used Chat GT to prepare a brief that turned out to be false..</p> <p><a href="https://www.seattletimes.com/nation-world/heres-what-happens-when-your-lawyer-uses-chatgpt/?amp=1">https://www.seattletimes.com/nation-world/heres-what-happens-when-your-lawyer-uses-chatgpt/?amp=1</a></p> <p>2) Responsible individuals and organizations should be accountable for the consequences caused by their use of AI products, services, systems, and capabilities, including any legally cognizable injury or harm caused by their actions or use of AI systems or capabilities, unless they have taken reasonable measures to mitigate against that harm or injury; and</p> <p>AMERICAN BAR ASSOCIATION  CYBERSECURITY LEGAL TASK FORCE  ANTITRUST LAW SECTION  TORT, TRIAL &amp; INSURANCE PRACTICE SECTION  SCIENCE &amp; TECHNOLOGY LAW SECTION  STANDING COMMITTEE ON LAW AND NATIONAL SECURITY  REPORT TO THE HOUSE OF DELEGATES  RESOLUTION 604</p>
Phyllis Craver Lykken	Member of the public	
Simcha Dornbush, National Academy of CLE (Nacle.com)		We agree with the MCLE Board's position that the subject matter in these additional areas of ethics are crucial to the competence of every lawyer today. As a national provider of CLE we have witnessed the trend that many other states have made similar topics mandatory learning for attorneys licensed in their state.
Sharon Brinley	Licensed legal professional (Lawyer, LLLT, LPO)	
Benjamin Premack	Licensed legal professional (Lawyer, LLLT, LPO)	
Mark R. Wardrop	CLE Sponsor	

Both of the suggested areas covered by this amendment are critical to the successful, and ethical, practice of law. Failing to remain aware of technological developments (and their corresponding security needs/flaws) can lead to danger in a number of ways. It would seem appropriate to require some minimal level of competence/ongoing awareness of technological developments and their corresponding security concerns. Mental health is, arguably, a field of even deeper need for recognition within the legal practice. Each area of practice may pose different needs or challenges for each individual, and those needs/challenges may change over the years. Every person's mental health journey will look different, of course, and it would be difficult to mandate that a person take specific steps on that journey. Still, there is a direct nexus between an attorney's mental health (their ability to assess danger zones, respond to those dangers, or recover from them) and their ability to practice ethically. The health of the profession overall will be benefited, and this benefit can accrue without significant intrusion into each individual attorney's journey - a factor that may be of even more benefit to those who might struggle to independently reach out for help on whatever leg of the journey they are on. In short, the suggested amendment clarifies a couple of ethical duties that have truly always existed, but it calls upon members of the bar to take a more vigilant approach on these topics. This is an amendment that I can support unconditionally.

Ruth Ptak Licensed legal professional (Lawyer, LLLT, LPO)

Pamela Charles Licensed legal professional (Lawyer, LLLT, LPO)

Christopher Fox Licensed legal professional (Lawyer, LLLT, LPO)

A much needed topic, with a bit of persuasion to encourage attentiveness.

June 7, 2023

Dear Sir or Madam:

I am in favor of the Suggested Amendment to APR 11 and interested to learn how the new requirement is to be phased in and whether revision to the RPCs are needed to reflect this change. Thank you.

Truly yours,

Mark Von Weber

Mark Von Weber Licensed legal professional (Lawyer, LLLT, LPO)

Virginia Halden Licensed legal professional (Lawyer, LLLT, LPO)

Evangeline Stratton Licensed legal professional (Lawyer, LLLT, LPO)

Renee Cogdell Lewis Licensed legal professional (Lawyer, LLLT, LPO)

The proposed new requirements are important, and I am pleased the overall credit hours would not be increased.

# WASHINGTON STATE BAR ASSOCIATION

June 5, 2023

To: MCLE Board  
RE: Preliminary Suggested Amendment to APR 11

Dear MCLE Board,

I am submitting to you feedback regarding your proposed rule change regarding a mandatory wellness and ethics credit on behalf of the WSBA Member Wellness Program. First, we appreciate your commitment to the mission of our program by supporting the wellness of the legal profession by making this credit mandatory. Unfortunately, it will have a major impact on how presentations are delivered, our ability to furnish presentation requests, and ultimately, by tying all points to ethics, will diminish how the membership experiences our stated commitment to wellbeing in the legal profession.

When I joined WSBA in 2008, far fewer wellness presentations were delivered. One reason is that MCLE criteria required that the content tied back to how to be a better lawyer. It was challenging finding mental health professionals to deliver this content. In 2014, MCLE allowed for a Personal Development credit that allowed more freedom to deliver mental health and wellness content to the legal profession. This has led to an increase in the number of presentations delivered as well as a blossoming of trainings on sundry topics not previously offered: imposter syndrome, compassion fatigue, self-care, asking for help, and resisting stigma to name a few. Even though these presentations do not cover ethics explicitly, we believe a lawyers with a grounding in the diverse aspects of wellbeing are less likely to incur ethical problems related to the same.

Theoretically we can still provide personal development CLEs that are not attached to ethics, yet in practice almost all of our CLEs are one credit and I believe requests for our CLEs will also want to check off this box of an ethics and mental health-based credit. While 11 states, by our count, are requiring a wellness-based credit, none of these states have attached it to mental health and ethics in the same presentation. One reason is that these presentations are hard to deliver.

In 2021, I delivered a free *Ethics and Wellness* CLE to the membership. I divided it into three sections: Diligence, Competence, and Communication. Before each section I put up a slide to quote the RPC. It limited the reach of my ability to educate the membership about varied topics like self-care, compassion fatigue, stress management and sundry other topics as I was repeatedly interrupted by this requirement. It is also very hard to find mental health professionals who are familiar enough with lawyer RPCs to deliver this type of presentation.

In my conversation with the Oregon Attorneys Assistance Program which recently had a mandatory wellness-based credit added, they received requests for 38 such presentations in the last year. As a staff of two, we rely upon a speaker bureau for many of these presentations. Of these 23 names, I estimate only three presenters would be competent or interested in speaking to the RPCs. Additionally, in reviewing our last 10 Legal Lunchbox presentations that on average are viewed by 1800 online viewers, none of these would have qualified for the credit as it is being written.

Ultimately, we believe this requirement to tie wellness to the RPCs sends a message to the membership that we only care about their wellbeing as long as they are practicing responsibly and not harming the public. This qualified interest in their lives is likely to be experienced as injurious and will make our content less engaging. Additionally, this decision will have a vast and challenging impact on how our

**WASHINGTON STATE**  
**BAR ASSOCIATION**

program engages with our members. Consequently, we would earnestly suggest the MCLE Board consider expanding the definition of mental health content in the same way equity ethics are treated and require it to be applicable to the legal profession and practice of law but not specifically tied to the RPCs.

Sincerely,

A handwritten signature in black ink that reads "Dan Crystal, PsyD." The signature is written in a cursive style with a large, stylized initial 'D'.

Dan Crystal, PsyD

Program Manager, Member Wellness Program

At our meeting on June 9th, the Committee on Professional Ethics reviewed the proposed amendments to the ethics portion of the MCLE requirements. The CPE had the following observations and concerns:

1. In general, the CPE does not favor the proposed amendments. The consensus of the members is that the amendments dilute the existing requirement for general ethics training on the Rules of Professional Conduct.

2. Members of the CPE did note that, based on their experiences as volunteers in the disciplinary process, a substantial number of complaints stem from lack of familiarity with technology or issues related to the mental health of the practitioner. However, even more complaints stem from other RPC issues such as failure to maintain a compliant trust account, conflicts of interest, and failure to maintain confidentiality, and no carve out category for training in those areas has been proposed. In general, the CPE believed that the public would be better served if lawyers select continuing legal education in the areas of ethics that will be most useful to their practice or situation.

3. The CPE members expressed their view that certain RPCs which bear on technology and mental health issues are straightforward, yet general, i.e, the duty of competency (RPC 1.2) and the duty of diligence (RPC 1.3). Thus, while the issues within the profession are real, the need for specialized training seems less clear.

4. The CPE members noted that Comment 18 to RPC 1.6 (confidentiality) already contains guidance related to the use of technology. The CPE questioned whether a WSBA wide requirement for additional training on the ethical implications of this topic will be useful, given the rapidly evolving nature of technology related to legal work and the highly fact specific circumstances that arise. Practitioners who face technology issues might be better advised to consult with experts who can provide a tailored approach to technology issues. Additionally, the CPE questioned whether there would be an ample number of CLE providers who had the requisite familiarity with emerging issues in technology **and** the complexities of RPC 1.6.

4. One CPE member noted that the definitions in the proposed amendments relating to equity were much less detailed than the definitions related to technology and mental health and queried whether there was a reason for this disparity.

5. The CPE asked why these additional specific requirements are framed as ethics requirements. If the Board of Governors determines that specific requirements for training on technology and mental health issues are warranted, the CPE would recommend that they be imposed as general CLE requirements, rather than framed as ethics requirements.

Of course, these are observations by the CPE, not an official recommendation from the CPE to the Board of Governors. We appreciate the opportunity to provide input and thank you for your consideration of these points

# WASHINGTON STATE BAR ASSOCIATION

**To: Renata Garcia, Chief Regulatory Counsel / MCLE Board**

**RE: Preliminary Suggested Amendment to APR 11, Accredited Sponsor Feedback**

**Date: June 8, 2023**

**From: Shanthi Raghu, Education Programs Manager, WSBA CLE**

Thank you for the opportunity to provide feedback as an accredited sponsor on the preliminary suggested amendment to APR 11.

As an accredited sponsor, WSBA CLE develops and delivers CLEs on these topics currently. At times, these topics are accredited under “Other – Professional Development” or “Other – Office Management.” At other times, these topics fall squarely under “Ethics”. The feedback we provide about the preliminary suggested amendment centers around the language as crafted, the question about application of the preliminary proposed standards, and the potential limitation it poses to the content and what might be expected of a presenter’s professional treatment of the topics. At this time, we do not have feedback to provide about the number of ethics credits this proposal would require of members in a MCLE reporting year, nor question the importance of the topics generally, but rather have concerns with the specific narrow treatment of the subjects that the language seems to convey. Finally, as an accredited sponsor, we have questions about the communication plan to both sponsors and members and requests that one can be considered along with the timeline of application if the amendment were to come to fruition.

## Language:

With regards to the language crafted for the mental health ethics, we were concerned that it could be construed to convey that there is an innate ethical risk to the practice of law if an individual presents as having any of the listed mental health issues.

## Content Limitations, Ethics, and Professional Treatment of the Topics:

Many presenters who are versed in either technology or mental health/wellness may not have the professional experience or background to speak to the Rules of Professional Conduct specifically but may in some cases be best positioned to address these topics. Presenters with professional expertise squarely in technology and/or mental health/wellness may be able to provide important information that members of the bar may benefit from in both topics, and still support members in practicing ethically, without having a direct citation to the RPCs. Having developed several programs for the Board of Governors free ethics credits on mental health and cybersecurity, WSBA CLE has directly experienced how tying the content directly to the RPCs limits the pool of individuals we are able to invite to speak, and how they accurately present the topic.

In addition, if members are required to obtain the two additional credits as drafted, and the narrow treatment of the subjects is in practice, sessions on these topics that end up being accredited under “Other” may not be perceived as essential to ethical practice of law.



To: MCLE Board

From: Margeaux Green on behalf of the Washington State Bar Association Practice Management Assistance Program

Subject: Proposed Cybersecurity MCLE Rule Change

We are in favor of implementing a cybersecurity CLE requirement; however, we have serious concerns about the rule in its current form. It is crucial to recognize the importance of mandating cybersecurity education for attorneys. Nevertheless, we believe that certain aspects of the existing rule should be reconsidered and revised to ensure its effectiveness and practicality. We are concerned about the requirement of closely linking the CLE content to the RPCs. The proposed rule would mean that CLE presenters must give significant attention to the RPCs, which may detract from addressing crucial best practices like secure cloud adoption, considerations for data management, and cybersecurity threats involving devices other than computers (such as IoT devices like Alexa). The existing scope of cybersecurity topics provides ample material to cover without burdening presenters with an extensive discussion of the RPCs. This requirement not only imposes significant content limitations for presenters but also narrows down the pool of qualified individuals who may serve as faculty. Many cybersecurity experts who are well-suited and interested in presenting on this topic, but who are not experts in the lawyer Rules of Professional Conduct, would be excluded from participating as presenters. Our suggestion would be to expand the definition of the content that falls into the ethics requirement for Cybersecurity in the same way that was done for the Equity Ethics credit. It is our understanding that so long as the content discusses diversity, equity and inclusion in the legal profession it is creditable as an ethics credit (without specifically discussing RPCs). We believe the cybersecurity credit is analogous to the DEI credit because learning about effective means of mitigating cybersecurity risks in a law practice will promote ethical practice without specifically quoting RPCs.

While we have reservations about the current proposed form of the rule, we strongly support the implementation of a cybersecurity CLE requirement. The prevalence of data protection and

cybersecurity issues poses significant challenges to businesses. Cyberattacks targeting law firms can have devastating consequences, such as the exposure of confidential client communications, sensitive data, and attorney work product. Regrettably, effective cybersecurity management is challenging for lawyers when managing a law firm and practicing law. Mandating lawyers to stay updated on cybersecurity issues will keep cybersecurity issues top of mind and provide helpful information that lawyers can integrate into their practices. It is crucial for attorneys to continuously educate themselves on protecting client and firm data from cybersecurity threats. The potential risks to client and firm data are too substantial to ignore.

I have reviewed the report of the Mandatory Continuing Legal Education Board Workgroup dated April 25, 2023. I am writing in opposition to the two proposed amendments to the APR 11 ethics requirement: technology security and mental health.

First, these topics do not involve ethics. Ethics suggests moral issues such as veracity and honesty. Technology security refers to office management, not ethics. Mental health issues do not constitute ethics either. Mental health is a private medical matter between a patient and his/her doctor. The WSBA should refrain from bootstrapping these two topics into ethics because they do not fit that category.

Second, technology security is a vast area and cannot be addressed by a one-hour credit every 3 years.\* Lawyers are already highly motivated, without a mandated CLE, to seek knowledge in this area. Technology security should remain as an elective CLE.

Third the WSBA does not qualify to mandate topics in the mental health field. The WSBA is a trade association rather than a medical association. Mental health is a private personal matter and should remain as an elective CLE.

If the WSBA truly cared about the stress levels of Washington attorneys, it would simplify the CLE process rather than enlarge it, stay out of politics and social engineering, eliminate some of its programs, reduce its staff and lower its dues. In other words, the WSBA is part of the problem regarding the mental health levels of attorneys.

Being forced to join an organization in order to practice law violates the First Amendment right to freedom of association. It also creates a monopoly by the WSBA which is a bad thing in any republic.

The WSBA has become part of the nanny state with its constant social engineering, micro-managing and finger wagging. It is time for this to stop. Rejecting these two proposed amendments of APR 11 would be a good place to start.

\*The MCLE Workgroup Report presents quite a dire set of possibilities if lawyers continue to engulf themselves in electronic and cyber modalities. Perhaps the WSBA should recommend a return to paper (!). Conduct all law firm business via paper files, the U.S. mail and the landline telephone. Ditch electronics, cell phones, WI-FI, AI etc etc.

Patricia Michl  
WSBA # 17058  
115 West 9th Ave  
Ellensburg WA 98926

6-7-2023

## COMMENTS TO THE MANDATORY CONTINUING LEGAL EDUCATION BOARD

I AM WRITING TO OPPOSE THE NEW PROPOSED  
ADDITIONS TO THE ETHICS REQUIREMENTS OF  
TECHNOLOGY SECURITY AND MENTAL HEALTH.

NEITHER OF THESE TOPICS ARE ETHICS.

MOREOVER, COERCION IS A BAD POLICY. IF SOMETHING  
IS GOOD IT DOES NOT HAVE TO BE FORCED. PEOPLE WILL  
WANT TO DO IT ANYWAY.

USING COERCION FOR MANDATORY CONTINUING LEGAL  
EDUCATION ENCOURAGES FACTIONS TO TAKE CONTROL  
OF THE WSBA MACHINERY IN ORDER TO PROMOTE AN  
IDEOLOGICAL AGENDA BY FORCING PEOPLE INTO THE  
RE-EDUCATION CAMPS OF CONTINUING LEGAL EDUCATION.  
THE EQUITY ETHICS REQUIREMENT IS AN EXAMPLE OF THAT.

THE MANDATORY CONTINUING LEGAL EDUCATION BOARD  
SHOULD BE ABOLISHED AND LAWYERS SHOULD TAKE THE  
CONTINUING LEGAL EDUCATION THAT THEY WANT TO TAKE,  
IF ANY.

Tom Stahl

TOM STAHL BAR # 17434

115 WEST 9<sup>th</sup> AVE, ELLENSBURG, WA 98926  
509-962-9051

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## MEMORANDUM

**TO:** MCLE Board

**FROM:** Asia N. Wright

**RE:** CLE Audit Report

**COURSE SPONSOR:** Lawline

**COURSE TITLE:** Ethically Growing Your Law Firm, Part 1: Designing a Law Firm Business Plan and Preparing for Growth

**COURSE DATE(S):** Recorded Webcast October 27, 2022

**ACTIVITY ID#:** 1217547

**ACCREDITATION:** Listed as 1 Ethics Credit

**DATE OF REPORT:** March 23, 2022

### Nature of the Program

The program consisted of a presenter speaking on starting and growing a law firm.

### Location/Time

Recorded Live Webcast.

### Facilities

Not applicable.

### Presenters and Their Qualifications

Attorney Jackie Cara is a solo practitioner who also founded Elevated Strategies NY, a growth strategy firm designed to help lawyers and companies that serve lawyers.

### Written Materials

The written materials consisted of a 18-page pdf that included the presentation slides as well as a 14-page pdf that contained a transcript of the presentation.

## Attendance

At multiple times during the presentation, the presentation would pause, and a beeping countdown clock would pop up for attendees to click to confirm participation.

### **EXECUTIVE SUMMARY**

This course does not meet the definition for 1 Ethics Credits per Admission and Practice Rule 11(f)(2), but instead 11(f)(5) Office Management.

### **DISCUSSION**

The presentation ran for 1 hour, 1 minute and 7 seconds. Attendees had the option of viewing the presentation slides on a big screen with the presenter shown in the corner on a small screen or vice versa.

Although the learning objectives listed, “Highlight” the ethical dilemmas solopreneurs face when building a law firm and explore how to address them” this topic was more of a throwaway comment than the focus of the presentation. The presentation mainly focused on exploring “why” an attorney should want to be self-employed and how to maximize client satisfaction to minimize complaints.

While the title of the CLE contained the word “Ethically,” Ms. Cara spent very little time going over the Ethical Rules. Not until the 12<sup>th</sup> slide, did Ms. Cara list three applicable ABA Model Rules of Professional Conduct. The slide, which was only up for 4 minutes and 24 seconds, only listed the name of the rule and did not list out the actual text of the rule. Ms. Cara also did not discuss real life ethical cases involving those rules or formal opinions. Doing so would have justified awarding an Ethics Credit.

It was not until slide 16 that Ms. Cara showed ABA Model Rule 1.1 with its text; however, for the less than three minutes the slide was shown, Ms. Cara did not provide substantive discussion on the rule itself, but rather common-sense advice of “staying in your lane.” At one point, Ms. Cara vaguely mentioned are “a lot of rules” about when you have a retainer and there are statutes that require retainers for certain services, but then did not outline which venues or practice areas that do or do not require retainers.

The remainder of the presentation was more tips and tricks to running a business. For the depth in which Ms. Cara went into ethically running a law practice, the same coverage could have been accomplished by looking at a 3-minute read on a legal blog about pitfalls to consider when setting up a practice. In the end, the limited substantive discussion of ethics rules did not justify a full hour credit for Ethics.

### **CONCLUSION**

Unfortunately, this CLE, though filled with helpful common-sense advice, did not focus on the ethical rules a lawyer should abide by as it should have. Therefore, I would accredit the CLE with 1 “Other” (or Office Management Credit) Legal credits per Admission and Practice Rule 11(f)(5).

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**MEMORANDUM**

**TO:** MCLE Board

**FROM:** Katie Denmark

**RE:** CLE Audit Report

**COURSE SPONSOR:** National Academy of Continuing Legal Education (NACLE)

**COURSE TITLE:** Cultural Awareness, Tips, and Tools for Today's Legal Practitioner

**COURSE DATE(S):** Webcast recorded on 06/28/2021

**ACTIVITY ID#:** 1173392

**ACCREDITATION:** Currently fulfills 2.25 Law & Legal Credits; recommendation to change to 2.25 Ethics & Professional Responsibility (PR) Credits

**DATE OF REPORT:** April 3, 2023

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*Nature of the Program*

This program featured one speaker, attorney and mediator Donita M. King, who discussed cultural awareness and offered legal practitioners tips and tools to expand and apply cultural awareness as advocates and mediators.

*Faculty*

Donita M. King is the owner of Donita King Law Offices, PLC and is an Adjunct Professor, Mediation at T.C. Williams School of Law at the University of Richmond. Ms. King is an arbitrator and Virginia Supreme Court certified mediator at all levels – civil and domestic (including cross border and international parental abduction prevention mediation and Hague issues). She is a FINRA (Financial Industry Regulatory Authority) arbitrator and mediator, a Virginia agricultural mediator, and a collaborative practice attorney and trainer.

*Location/Time*

The recorded webcast was divided into two “chapters” running 1:11:46 and 1:00:05, respectively. The speaker’s video played in the upper righthand corner of a larger screen. The larger screen projected the speaker’s PowerPoint slides.

## Facilities

N/A

## List of Presenters and Their Qualifications

Ms. King was the sole presenter of this webcast.

## Written Materials

The written materials consisted of a 32-page “course notes” downloadable packet that contained Ms. King’s PowerPoint presentation slides. This packet could be useful to practitioners as a quick reference guide/checklist of questions to consider when working with clients from different backgrounds and/or cultures.

## Attendance

NACLE provides an attendance certificate after the attendee views the webcast and submits their electronic request for proof of certification. The sponsor did not provide codes, survey questions, or other prompts to track or monitor attendance.

## **SUMMARY**

This course meets the requirements of APR 11, but should be accredited for 2.25 Ethics & PR Credits per APR 11(c)(1)(ii) and APR 11(f)(2), which require licensed legal professionals to earn (at least) one ethics and professional responsibility credit in the category of equity, inclusion, and the mitigation of both implicit and explicit bias. The webcast is currently accredited for 2.25 Law & Legal Credits, but it does not provide the substantive legal content required for this category of credits and is better suited for ethics credit fulfillment.

## **DISCUSSION**

### **Chapter 1 (start until 1:11:46)**

Ms. King first introduced herself and shared details about her own Mexican/African American background and multicultural upbringing. She explained that her past experiences fostered an “intuitive awareness of cultural understanding/differences/perspectives” from an early age. She described how this understanding has helped her professionally in assisting parties to communicate and reach resolution. She then explained that, as practitioners, we all need to look at possible impediments to negotiation and collaboration – which may include a lack of cultural awareness – or else we cannot serve as effective mediators. Ms. King then addressed current and shifting demographics in the United States and how clients will continue to reflect these shifts.

Ms. King then raised a foundational question: What do we mean by the term “culture?” She explained that practitioners may have an intellectual understanding of the word but may not have a practical understanding as it relates to working with clients; it takes time and introspection. She



illustrated the point that this term is broader than people think by sharing the following anecdote: when she was training practitioners to mediate cases involving elderly clients, she gave trainees hearing tests to show them that differences in hearing, for example, can serve as one basis for conflict.

Ms. King provided additional examples of working with older generation clients versus younger in mediation matters. She highlighted potential differences in communication style (text versus phone) that can serve as impediments to communication; in order to be an effective attorney, one must be able to both communicate and help others to communicate well. Her anecdotes illustrating various situations in which people make assumptions about others based on their appearances/preconceived notions could have been more succinct. Although she was clearly laying the groundwork for later discussions applying these ideas to the practice of law, this portion of the webcast could have been condensed a bit.

Ms. King explained that one's "level of response" to a particular situation will often come from how they are raised and their own cultural background. She provided some practical examples of what different cultures might feel comfortable with in both a general setting and in a conflict resolution setting. Ms. King highlighted the importance of asking the following questions: How do I, as a practitioner, get one side to see/understand the other so that equitable resolution is possible? How can we, as practitioners, communicate this understanding to our own clients? Ms. King then shared an example of when she mediated between parties of different cultures and one party used language they did not realize could be offensive to the other. She explained how she helped communicate this misunderstanding to both parties and, eventually, helped them resolve their legal dispute. She offered other practical tips as to how a practitioner might set up their office in order to make clients feel comfortable enough to discuss their issues openly and honestly.

Ms. King shared a graphic illustrating the "cultural iceberg model," which can serve as a useful reminder of what we see (food, drink, dress, greetings, outward behavior) versus what we may not see or pay attention to (core beliefs, communication style, use of space, attention to time, emphasis on individualism); she emphasized that, without making an effort to understand things below the surface, one cannot serve as an effective advocate or mediator. The purpose of introspection, she concluded, is to be able to understand the multidimensional context of culture, family, and society and how it affects communication and dispute resolution.

## **Chapter 2 (start until 1:00:05)**

Ms. King began chapter two by presenting a long list of things that may be included in the phrase "characteristics of culture." During this portion of the webcast, Ms. King gave examples from her own experience as a mediator to better explain how these factors may arise in a dispute resolution scenario. She emphasized, for example, the importance of being aware of the physical space in which advocacy or mediation occurs – is anything potentially culturally offensive? Can the space be made to make the parties feel more comfortable? Ms. King provided many non-legal examples of explicit versus implicit cultural characteristics to highlight the idea that a

practitioner's ability to understand their own perceptions will ultimately help them help their clients understand others' perceptions.

The last portion of the webcast was devoted to what Ms. King called "a self-training guide to cultural awareness" and during which she provided practical exercises to help attendees expand this awareness. Ms. King provided a list of questions intended to help practitioners "transcend stereotypical thinking and expand cultural professionalism" and then walked through some examples comparing cultural differences between specific groups of people (i.e., cultural differences between American versus Vietnamese values, Anglo-American versus Mexican-American values). Ms. King then offered another list of questions a practitioner might consider in order to ensure they are approaching client situations with cultural awareness. She offered a list of "ten ways to know more about different cultures" as well as a list of "questions to ask yourself" before approaching a case. These webcast materials, in particular, could be very useful to practitioners as they navigate cases involving parties with which they are less culturally familiar.

Finally, Ms. King offered a useful list of questions with which a client can essentially rate "the cultural competence of an attorney, agency, or mediator," and a list of "eight of the most frequently encountered examples of culturally biased assumptions." These lists also seemed quite useful, as practitioners might use them to assess their own levels of cultural awareness both generally and when working with specific parties.

## **CONCLUSION**

My overall impression of this recorded webcast was favorable, as it provided some useful tips and tools for maintaining cultural awareness as legal practitioners. Ms. King's nuanced discussion of the term "culture" and its practical application to various advocacy/mediation situations was informative and practical. Although the first chapter of the webcast could have been condensed in order to focus more on the "tips and tools" advertised by the webcast's title, the presenter did a nice job presenting the information and then applying it to more specific examples that may be useful in practice. This course should be accredited for 2.25 Ethics & PR Credits per APR 11(c)(1)(ii) and APR 11(f)(2), as it addresses issues of equity, inclusion, and the mitigation of both implicit and explicit bias in the practice of law. It is currently accredited for 2.25 Law & Legal Credits, but it does not provide the substantive legal content required for this category of credits.

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## MEMORANDUM

**TO:** MCLE Board

**FROM:** Asia N. Wright

**RE:** CLE Audit Report

**COURSE SPONSOR:** Lawline

**COURSE TITLE:** Tax Matters in Estate Planning and Estate Administration: Don't Let the Grinch Steal Christmas

**COURSE DATE(S):** Recorded Webcast May 27, 2022

**ACTIVITY ID#:** 1204541

**ACCREDITATION:** Listed as 1 Law & Legal Credit

**DATE OF REPORT:** March 14, 2022

### Nature of the Program

The program consisted of presenter speaking on tax matters.

### Location/Time

Recorded Live Webcast.

### Facilities

Not applicable.

### Presenters and Their Qualifications

Leah Del Percio is the founder and CEO of Trustate. She has 12 plus years of experience as an estate attorney (JD & LLM) with multi-jurisdictional estate admin practice.

### Written Materials

The written materials consisted of a 17-page pdf that included the presentation slides as well as a 16-page pdf that contained a transcript of the presentation.

### Attendance

At multiple times during the presentation, the presentation would pause and a beeping countdown clock would pop for attendees to click to confirm participation.

### **EXECUTIVE SUMMARY**

This course meets the definition for 1 Law & Legal Credits per Admission and Practice Rule 11(f)(1).

### **DISCUSSION**

The presentation ran for 1 hour, 2 minutes and 6 seconds. The presentation covered substantive ground on taxes and estate law and explained the difference between the various taxes in property transfer situations. Ms. Del Percio presented the material in a very clear and understandable manner which was enhanced by the very professional and illustrative PowerPoint slides. You either saw Ms. Del Percio on the full screen or when referring to slides, the screen would change to the slides but you could still see Ms. Del Percio on a small screen in the corner. It became immediately apparent that Ms. Del Percio is an expert on tax matters because her presentation was unscripted, which helped in comprehending the material.

Ms. Del Percio covered a lot of ground on Tax law, but at a pace that was still digestible for a newbie to this area of the law. Even if the viewer found some areas of the presentation progressed too fast, they could rewind, look at the slides, or review the transcript at their leisure.

### **CONCLUSION**

Overall, this CLE is a good introduction to tax matters involving estates and I would recommend it to others wanting to learn more about this area of law. I would accredit the CLE with 1 Law and Legal credits per Admission and Practice Rule 11(f)(1).

<b>DISCUSSION:</b> <b>MCLE Updates</b>
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The MCLE Staff Liaison will provide general updates to the MCLE Board

**Discussion Topics:**

- **MCLE Certification**

On May 4<sup>th</sup> 226 licensed legal professionals were suspended for not completing their licensing and/or MCLE requirements. Out of those suspended 40 were suspended for a combination of not completing licensing and MCLE requirements, and 25 were suspended solely for not meeting their MCLE requirements.

On 6/7/2023, MCLE staff sent notice of upcoming MCLE deadlines to 10,948 licensed legal professionals in the 2022-2023 reporting period. The notice was sent in accordance with APR 11 (i)(2) "Notice. Not later than July 1 every year, the Bar shall notify all lawyers, LLLTs, and LPOs who are in the reporting period ending December 31 of that year that they are due to certify compliance."

- **MCLE Board Recruitment**

The application process for the 2023-2024 fiscal year opened on March 2, 2023. For the 2023-2024 fiscal year, two MCLE Board member's terms will expire in September of 2023. The two MCLE Board members will have finished their second term and will therefore not be eligible to reapply to the MCLE Board for the next MCLE Board year. We have received three applications with volunteers selecting the MCLE Board as their first choice, and one applicant that named the MCLE Board as their second choice.

Nominations for open positions on the MCLE Board are made by a nomination team comprising the staff liaison, BOG liaison, and chair. Supreme Court boards may also share redacted applications with and solicit feedback from their board members. MCLE Board members may serve two consecutive terms.

- **MCLE Online System**

MCLE staff continues to work with the WSBA IT department to create and implement a new MCLE online system and database. The intent of the updated system is to improve the user experience for all users, allow all licensed legal professionals online access to their MCLE records, and to track the new MCLE ethics requirement. The new MCLE system is tentatively scheduled to go live in late summer or early fall 2023.

- **Annual Supreme Court Meeting**

Please make sure to reserve time on your calendars for the MCLE Board's annual meeting with the Justices from 10:00 a.m. – 11:00 a.m. on September 6, 2023. The meeting will be a hybrid in-person and remote meeting.

- **Update on Suggested Amendment Regarding Credit for Law Clerk Tutors**

The comment period for the suggested amendment regarding MCLE credit for law clerk tutors closed on April 30, 2023. We are awaiting an order from the Court, which appears will not be forthcoming until the first week of July.

**Attachments:**

- Notice of upcoming MCLE deadlines to those in the 2022-2023 reporting period

**From:** [Connor Smith](#)  
**To:** [Executive Management Team](#); [Service Center](#); [Jennifer Olegario](#); [Colin Rigley](#); [Noel Brady](#); [Michael Kroner](#); [Gabe Moore](#); [Adelaine Shay](#)  
**Subject:** FW: [External]Important MCLE Compliance Information  
**Date:** Wednesday, June 7, 2023 1:12:25 PM  
**Attachments:** [image001.png](#)

This message was sent today at 12:51 p.m. to Lawyers due to report MCLE credits for the 2022-2023 reporting period (official)(10,715).



**Connor Smith | Communications Coordinator**

Washington State Bar Association | ☎ 206.733.5948 | [connors@wsba.org](mailto:connors@wsba.org)

Pronouns: he/him

1325 Fourth Ave., #600 | Seattle, WA 98101-2539 | [www.wsba.org](http://www.wsba.org)

The WSBA is committed to full access and participation by persons with disabilities. If you have questions about accessibility or require accommodation please contact [accommodations@wsba.org](mailto:accommodations@wsba.org).

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**From:** Washington State Bar Association <[MCLE@wsba.org](mailto:MCLE@wsba.org)>  
**Sent:** Wednesday, June 7, 2023 12:51 PM  
**To:** Connor Smith <[Connors@wsba.org](mailto:Connors@wsba.org)>  
**Subject:** [External]Important MCLE Compliance Information

WSBA Seal



**June 7, 2023**

Dear Lawyer,

This email serves as a reminder that you are due to earn and report your MCLE credits at the end of this year. By December 31, 2023, you must complete at least 45 total credits of MCLE Board-approved activities, of which at least 15 must be law and legal procedure and 6 must be ethics. You must also certify your credits by February 1, 2024, by attesting to the accuracy of your roster via the online certification process. We strongly encourage you to calendar these important dates in order to avoid a late fee.

**IMPORTANT: You are not compliant with your MCLE requirements until you have completed your credit requirements and certified your credits via the online certification**

process.

### MCLE Reporting Period: 2022 – 2023

MCLE Credits Required

**45 Total Credits** with at least  
**15 Law & Legal Procedure** and **6 Ethics Credits**

Deadline to **Earn** MCLE Credits

**December 31, 2023**

Deadline to **Certify** MCLE Credits

**February 1, 2024**

You will be able to certify your credits online starting in November 2023. In the meantime, you can verify that your credits are listed correctly, delete any duplicate listings, and add additional MCLE credits earned via the [MCLE online system](#). You may also login to your myWSBA.org account to ensure your contact information is accurate.

**Carryover from 2018-2021:** [As ordered by the Supreme Court](#), the 2018-2020 reporting period was extended by one year (2018-2021). As part of this extension, you are allowed to carry over an additional 15 credits (30 total carryover credits, up to 4 of which may be ethics) from the 2018-2021 reporting period to the 2022-2023 reporting period. Please check to ensure you have certified all credits you have earned in the 2018-2021 reporting period.

**Comity:** If you are an active member in Oregon, Idaho, or Utah and are compliant for that state, you may satisfy your Washington MCLE requirements by submitting a comity certificate from the other jurisdiction through the MCLE online system. A comity certificate must be dated no more than six months prior to the submission date and must be submitted along with the \$25 fee by the February 1, 2024, certification deadline.

**Late Fees:** A late fee will be assessed if you complete your credit requirements after December 31, 2023, or if you certify or submit a comity certificate after February 1, 2024. The MCLE late fee starts at \$150 and increases in increments of \$300 for each consecutive late reporting period.

#### Important MCLE Reporting Reminders

- You may earn a maximum of eight credits per calendar day.
- No credit will be given for an identical activity within the same reporting period.

#### Additional MCLE Information

- The new credit requirement in the category of equity, inclusion, and the mitigation of both implicit and explicit bias applies to lawyers in **the 2023-2025 and subsequent MCLE reporting periods**. For more information visit the [MCLE Equity Credit webpage](#).
- Review [Admission and Practice Rule \(APR\) 11](#).
- Learn all the ways you can [earn MCLE credit](#) in Washington.

• For more information about MCLE requirements, visit our website:  
<https://www.wsba.org/mcle>.

Please contact us at [mcle@wsba.org](mailto:mcle@wsba.org) or 206-733-5987 if you have any questions or concerns.

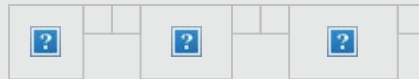
Thank you,

WSBA MCLE Team

**WASHINGTON STATE BAR  
ASSOCIATION**

1325 Fourth Ave., Suite 600  
Seattle, WA 98101-2539 | [Map](#)

Toll-free: 800-945-9722  
Local: 206-443-9722



**OFFICIAL WSBA COMMUNICATION**

All members will receive the following email, which is considered official:

- Licensing and licensing-related materials
- Information about the non-CLE work and activities of the sections to which the member belongs
- Mandatory Continuing Legal Education (MCLE) reporting-related notifications
- Election materials (Board of Governors)
- Selected Executive Director and Board of Governors communications





Liudmila Ottovna Appleby  
WSBA #58865  
Active Attorney  
**Congressional District: 2**

**Applied Committee:** Mandatory CLE Board

**Application Reason:** It seems to be an interesting field to work and become a member of the Board. I am interested to assist other attorneys with CLE. While I am a new attorney, it would be great to learn and help others in that matter.

**Employer:** U.S. Department of Housing and Urban Development

**Number of Lawyers:** No response

**Areas of Practice:** Housing<br /

**Years of Practice:** Volunteer 9 months

**Years of Membership:** 1

**Learned of Service From:** BarNews

L I U D M I L A ( M I L A ) A P P L E B Y  
Seattle, Washington 98117 | (206) 953-4753 | luda99@hotmail.com  
Member of Washington State Bar Association / WSBA License Number #58865

## **EDUCATION & LICENSE INFORMATION**

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<b>LICENSED ATTORNEY IN WA, WSBA LICENSE NUMBER #58865</b>	DEC 2021
<b>UNIVERSITY OF WASHINGTON SCHOOL OF LAW</b>   Seattle, Washington <b>MASTER of LAWS (LL.M.) &amp; Sustainable International Development (SID)</b> <i>Courses include:</i> American Legal System, Law and Development, Civil Procedures (I&II), Legal Problems of Economic Development, Constitutional Law (I&II), Graduate Legal Writing, Professional Responsibility, The Rule of Law, Secured Transactions, Immigration Law	Dec 2017
<b>SEATTLE UNIVERSITY SCHOOL OF LAW</b>   Seattle, Washington Course of Effective Legal Writing, Drafting for Global Audience	Jul 2016
<b>EDMONDS COMMUNITY COLLEGE</b>   Lynnwood, Washington Advanced Paralegal Program Certificate	Jun 2009
<b>THE FAR-EASTERN ACADEMY OF PUBLIC SERVICES</b>   Khabarovsk, Russian Federation <b>LAWYER</b> - Jurisprudence, Civil Law (Equivalent to U.S. Juris Doctor)	Jul 2004
<b>THE KHABAROVSK STATE ACADEMY OF ECONOMICS AND LAW</b>   Khabarovsk, Russian Fed. <b>ACCOUNTANT</b> - Accounting and Audit (Equivalent to U.S. Master in Economics)	Jul 1996

## **VOLUNTEERING:**

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**KCBA HOUSING JUSTICE PROJECT** | SEATTLE, WA March – Nov 2022  
**CLINIC VOLUNTEER ATTORNEY**  
**SUPERVISOR: HARRY HIGGINS, PROGRAM COORDINATOR**

### **JOB DUTIES:**

- Reviewed and analyzed documents and filled questionnaires provided by the Intake Team
- Examined cases information,
- Assessed clients' complaints and positions on the issues with the Landlord
- Interviewed clients
- Provided legal advice to clients who received pre-litigation notices
- Prepared internal attorney reports on the legal issues involve
- Explained laws and regulations to clients and how they apply to clients' cases (RLTA, other)
- Prepared Reports on potential legal issues, outcome desired by clients, and progress made
- Drafted letters, on behalf to the clients, to their landlords or landlord's attorneys, explaining tenant's position and desires, such as settlement proposals or similar

## **WORK EXPERIENCE:**

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**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT** | SEATTLE, WA DEC 2022 - PRESENT  
**SUPERVISOR: ANDREW TRAVOR, INTAKE BRANCH CHIEF**  
**INTAKE EQUAL OPPORTUNITY SPECIALIST**

### **JOB DUTIES:**

- Intake processing complaints filed by the public
- Interviewing complainants
- Conducting analysis and fact-finding of complaints about civil rights violations in housing
- Conducting analysis to determine jurisdictional aspects of complaints

L I U D M I L A ( M I L A ) A P P L E B Y  
Seattle, Washington 98117 | (206) 953-4753 | luda99@hotmail.com  
Member of Washington State Bar Association / WSBA License Number #58865

- Reviewing complex and highly sensitive allegations of discriminations related to housing
- Drafting complaints

**U.S. DEPARTMENT OF JUSTICE, EOIR** | Seattle, WA  
**SUPERVISOR: JOSEPH NEIFERT, COURT ADMINISTRATOR**  
**Legal Assistant – Federal Employee / GS-08**

May 2019 – Dec 2022

**Average hours per week: 40**

***“On the Spot” Award (June 2022)***

**JOB DUTIES:**

- Examined for sufficiency all incoming legal and administrative correspondence and filings
- Processed motions, oppositions, petitions, applications, pre-hearing statements and briefs, other legal documentation,
- Processed legal filings for ECAS and conversion Legacy ROPs to Electronic e-ROPs
- Reviewed for insufficient filings and preparing, serving Rejection Memos on the parties
- Served as a liaison between the court and the public, respondents and their attorneys, DHS trial attorneys, ICE and Border Patrol officers,
- Assisted Immigration Judges during real-time court hearings with processing motions, scheduling, consolidating and severing cases, and with other supporting administrative duties required for completion of the court hearings,
- Generated and distribution various case management reports and preparing notices to respondents, respondent’s attorneys, and other concerned parties to advise them about the status of the cases and future proceedings,

**DEPARTMENT OF JUSTICE, EOIR** | Seattle, WA  
**SUPERVISOR: RANDALL BRUNS, COURT ADMINISTRATOR**  
**Legal Assistant - Contractor (CGI Federal, Inc.) / Average hours per week: 40**

Oct 2018 – May 2019

- Conducted extensive legal research for cases to apply comprehensive legal regulations, specialized techniques, and procedures
- Assisted immigration judge in court hearings with administrative duties and date entry support and scheduling hearings
- Conducted maintenance of case files and coordination of proceedings for Master Calendar hearings
- Examined cases files for sufficiency of the documentation, obtained material documentation that is material to the cases and immigration issues
- Assisted attorneys and judges with the cases and proceedings, generated and modified computer-generated report
- Examined and processed motions, petitions, and other legal documents received by the court

**AMAZON | GIOS (GLOBAL IMMIGRATION OPERATIONS & SERVICES)** | Seattle, WA      Feb – Sep 2018  
***Paralegal I & Temp Immigration Specialist (Robert Half Legal)* / Average hours per week: 40**

- Implemented escalation management, researched, reviewed employees’ immigration matters
- Implemented Tiers 1-3 of TTs; immigration support for the U.S., Canada, South Africa
- Worked with Amazon vendor law firms on multiple projects to support employees’ immigration cases
- Corresponded, answered inquires, supported Amazon Immigration and Business-Visas Department

LIUDMILA (MILA) APPEBY  
Seattle, Washington 98117 | (206) 953-4753 | luda99@hotmail.com  
Member of Washington State Bar Association / WSBA License Number #58865

**ANU ATTORNEY PROFESSIONAL LAW FIRM, PLLC** | Seattle, WA & Fremont, CA      Apr 2013 – Oct 2017

***Immigration Paralegal / Average hours per week: 40***

- Managed immigration and family law cases, client communications, evidence provided by clients
- ***Business Immigration:*** managed from outset to close cases for Investment and Business Immigration
- ***Family Immigration:*** managed family immigration cases
- ***Affirmative Asylum and Removal Proceedings:*** prepared forms, various filings for USCIS and Immigration Courts, responses to RFE, prepared clients for asylum interviews, etc.
- ***Bond Hearings:*** prepared evidence for bond hearings and filed multiple motions

**LAW OFFICE OF REBECCA WHITE/IMMIGRATION & NATURALIZATION** | Seattle, WA      Jul 2009 – Apr 2013

***Immigration Paralegal / Average hours per week: 40***

- ***Administrative Duties:*** worked with clients, requested evidence; worked on cases
- ***Business Immigration:*** prepared H-1B, H-2B, L-1A filings; responded to RFE
- ***Family Immigration:*** worked from the start to filing the cases for Family Immigration
- ***Affirmative Asylum and Removal:*** prepared forms and filings for USCIS and Immigration Courts; prepared for hearings; filed motions; responded to RFEs; prepared client for the asylum interviews

**ATTORNEY GENERAL OF WASHINGTON** | Everett, Washington

Mar – Jul 2009

***Intern Paralegal***

- Prepared legal documents, subpoenas, witness statements, exhibit list, exhibits
- Worked with the Attorney General office's managing paralegal, provided case support
- Prepared criminal history requests and vouchers

**EDMONDS COMMUNITY COLLEGE** | Lynnwood, Washington

May 2008 – Jun 2009

***General Assistant / Average hours per week: 40***

- Supported the faculty and instructors with administrative needs, worked on instructors' projects
- Maintained and distributed college's programs information; handled equipment requisitions

**WINROCK INTERNATIONAL, FAR EASTERN OFFICE (ARKANSAS, USA)** | Khabarovsk, Russia      2001 - 2006

***Sr. Contracts Officer (\$20 Million USAID Project) / Average hours per week: 40***

- Managed contract department of the company
- Conducted negotiations with potential contractors
- Supervised company's four regional branch offices
- Developed effective policies to maintain contract system
- Maintained company's internal contracts with employees, contracts with vendors, business partners
- Managed negotiations of contracts with company's partners and vendors
- Assisted in conducting company's internal audits, audits of FOUR regional branches
- Participated in the Internal Policies training conducted at the Winrock International HQ in Little Rock, AR (2005)

## **HOBBIES**

Fitness and traveling

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Darryl Elliott Colman  
WSBA #42954  
Active Attorney  
**Congressional District:** 10

**Applied Committee:** Mandatory CLE Board

**Application Reason:** I value public service (working in house in for state agencies) and I believe in the MCLE committee's recent efforts to promote equity through rule changes. I would like to volunteer my time to support such efforts and promote access and fairness in the MCLE process. I have a variety of legal experience and skills that I think would be of use to the committee and elaborate on them in my materials attached below. Thank you for the consideration.

**Employer:** Office of Superintendent of Public Instruction

**Number of Lawyers:** No response

**Areas of Practice:** Administrative/ Regulatory, Education, Government, Insurance, Litigation<br /

**Years of Practice:** 12

**Years of Membership:** 12

**Learned of Service From:** Email from WSBA

**Darryl Colman**  
8402 160<sup>th</sup> Street Ct. E  
Puyallup, WA 98375  
(253)-278-8097  
darryl.colman@gmail.com  
WSBA #: 42954

### **Experience**

#### **Washington State Office of Superintendent of Public Instruction**

*Deputy Chief Legal Officer*, December 2022-present

- Senior level director within the Office of Legal Affairs providing legal services to various departments within OSPI, with a focus on Government Relations and Fiscal
- Provides strategic planning support and advice on emerging and ongoing legal matters that affect OSPI and K12 education statewide
- Proactive process improvement with focus on closing opportunity gaps, aligning with the agency's antiracist objectives, mitigating agency risk, and meeting or exceeding compliance requirements
- Analysis and research applying laws and regulations on statewide education
- Assists fiscal staff in drafting statutes or rules through the legislative or agency implementation process
- Provides time-sensitive bill analysis that furthers OSPI's strategic legislative goals
- Assists School Apportionment staff to provide assistance regarding fiscal allocations to school districts, tribal compact schools, and charter schools
- Assists the Public Records Office with disclosure of public records and protection of private information in accordance with state and federal laws
- Reviews contracts between OSPI and third party entities for delivery of services and goods
- Coordinates the review and processing of OSPI internal policies and procedures
- Collaborates with the Attorney General's office to manage litigation cases against OSPI

#### **Washington State Office of the Insurance Commissioner**

*Attorney Manager*, July 2018-December 2022

*Insurance Enforcement Specialist*, March 2014-July 2018

- Alternatively supervised unit of five insurance enforcement specialists (staff attorneys) or four to five paralegals and legal assistants who collectively handle all agency administrative enforcement actions, as needed by the agency. Includes significant mentorship and training of direct reports, as well as the use of data-driven performance measures.
- Additionally maintained own caseload of administrative litigation, including major administrative hearings involving complex legal questions and penalties of significant size and severity for substantial violations. Lead or sole agency representative in all cases.
- Facilitated internal meetings which formulate decisions on enforcement recommendations and strategy, as well as internal processes.
- Subject matter expert on Insurance Code and related regulations. Provides legal analysis and advice to agency stakeholders. Advice relied upon by agency leadership.
- Drafted OIC's COVID-19 emergency orders and extensions, altering insurance regulatory requirements protect consumers during the pandemic.
- Participated in all phases of rulemaking process, including drafting.

- Testified as a subject matter expert before legislative committees. Performed legislative analysis and responded to legislator questions, and has helped draft significant legislation.
- Presiding officer for small pharmacy reimbursement appeals from Sept. 2018 to Sept. 2020.
- Presented enforcement cases to internal committees to ensure that enforcement actions are fair, consistent, and defensible.
- Participates in Diversity, Equity, and Inclusion Committee
- Assists and collaborates with the Office of the Attorney General on legal questions as well as with enforcement cases that go to Superior Court.

### **Walstead Mertsching PS**

*Associate Attorney*, June 2011-December 2013

- Practiced general civil litigation, which included insurance coverage, contractual disputes, landlord-tenant relations, real property disputes, adult guardianships, and collections cases.
- Solely responsible for complex legal research and drafting of pleadings.
- Participated regularly in all aspects of motion practice.

### **University Legal Assistance**

*Rule 9 Legal Intern*, May 2009 – May 2010

- Extensive legal drafting, including and motion practice. Some supervised litigation.

### **Professor Megan Ballard, Gonzaga University School of Law**

*Research Assistant*, September 2008 – June 2009

- Researched international law sources for Prof. Ballard's "Post Conflict Property Restitution: Flawed Legal and Theoretical Foundations," 28 Berkeley Journal of Int'l Law 462 (2010).

### **Multicare Health Services, Legal Department**

*Volunteer Intern*, Summer 2008

- Complex legal research, briefing, letter writing and interviews of internal stakeholders.

## **Education**

### **Gonzaga University School of Law**

*Juris Doctor*, graduated *cum laude* May 2010; admitted to practice of law in WA November 5, 2010  
 Dean's List recipient in Fall 2008, Spring 2009, Fall 2010  
 CALI Awards for Excellence in Legal Research and Writing IV (Spring 2009), Community Property (Spring 2009), and Comparative Law (Summer 2008)

### **Western Washington University**

*B.A. History, B.A. Spanish Language and Literature, cum laude*, June 2007

Foreign Study – University of Granada, Spain, Hispanic Studies Program, August 2005-May 2006

## **Languages**

Aptitude in speaking, writing, and reading Spanish.

## **Interests**

Baseball, recreational slow-pitch softball, parent, travel, music, hiking, photography.

Darryl Colman  
8402 160<sup>th</sup> Street Ct E  
Puyallup, WA 98375  
(253)-278-8097

May 10, 2023

Dear Sir or Madam:

I am writing you because I am interested in the posted volunteer opportunity with the Washington State Bar Association (WSBA). This opportunity excites me because, if selected, I would be excited to share my legal expertise and collaborative skills to support WSBA's success.

I currently serve the Office of Superintendent of Public Instruction (OSPI) as Deputy Chief Legal Officer, starting last December. Prior to that, I served the Office of the Insurance Commissioner (OIC) as an Attorney Manager. I am a graduate of the Gonzaga University School of Law, and have practiced law in Washington for twelve years, including time in private practice at a general civil litigation law firm.

In my current role, I serve as in-house counsel for OSPI, advising agency leadership and various stakeholders how to resolve major issues in public education. This work involves in-depth statutory and regulatory interpretation, with an emphasis on government relations and fiscal questions. I often collaborate with the Office of the Attorney General on questions regarding litigation and legal questions of major policy importance.

I have experience successfully managing teams legal professionals, including significant mentorship around litigation and writing skills. I have developed many document templates that have been used by my team going forward. I have experienced litigation success in many cases of importance and complexity, especially administrative cases for the state.

My legal research, writing, and internal advice is considered fast and of high quality, relied upon by the highest levels of agency leadership. I successfully work with policy staff to respond to legislator inquiries and have testified to legislative committees as a subject matter expert. I regularly serve on rulemaking teams and have participated in groups drafting legislation.

While I mostly have been an advocate during my legal career, I do have adjudicative experience as well, such as acting presiding officer when OIC's small pharmacy reimbursement appeals unit had a vacancy, reviewing evidence and issuing dozens of initial orders in those matters. I also drafted many of the OIC's emergency orders responding to the COVID-19 pandemic.

In all my work, I take pride in collaborating effectively and positively with others. I treat my colleagues with respect and empathy, and value my ability to build relationships and trust with my collaborators throughout the agency. I know that diversity and inclusion are essential for a healthy work environment, and I strongly emphasize these values in my practice.

I already find public service very rewarding. If selected, this new challenge of assisting WSBA, with its crucial role in protecting the public and the profession, would be exciting and interesting.



Thank you very much for your time and consideration.

Sincerely,

Darryl Colman

Christine Elizabeth Hanley  
WSBA #50801  
Active Attorney  
**Congressional District:** 7N

**Applied Committee:** Mandatory CLE Board

**Application Reason:** I want to serve the Washington Bar by ensuring that the resources available to Washington attorneys to meet their ongoing CLE obligations are high-quality, engaging, and responsive to the needs of the profession and public. I am particularly interested in serving on the Mandatory CLE Board because I will have the opportunity to build multiple skill sets by developing policy, adjudicating petitions, holding hearings, and engaging with educators. I have ten years of experience as an attorney, and can bring a diverse set of skills to this position as I have worked as a litigation associate and senior associate in AM Law 500 firms and currently work in a small firm handling a mix of plaintiff and defense work. My relevant teaching experience includes earning a CALI Award for my service as a Legal Research and Writing Fellow in law school, as well as substantively reviewing the work of junior associates and mentoring them in their professional development throughout my career. Further, while at Orrick Herrington & Sutcliffe, I served on the Women's Diversity Committee.

**Employer:** Law Offices of Robert V. Cornish, Jr., P.C.

**Number of Lawyers:** 2-5 Lawyers in Firm

**Areas of Practice:** Business/ Commercial, Dispute Resolution, Legal Research and Writing, Litigation, Securities<br /

**Years of Practice:** 10

**Years of Membership:** 7

**Learned of Service From:** BarNews

# CHRISTINE HANLEY

[chanley@rcornishlaw.com](mailto:chanley@rcornishlaw.com) · [linkedin.com/in/christine-hanley-jd/](https://www.linkedin.com/in/christine-hanley-jd/)

Experienced attorney with background at AM Law 100 firms and boutique start-up firm. Adept at distilling complex legal analysis into actionable advice and empowering clients to meet business objectives while managing legal risk. Strong negotiator, writer, and researcher with proven track record of success.

## **EXPERIENCE**

### **LAW OFFICES OF ROBERT V. CORNISH, JR. PC**, Seattle, WA

*Attorney*

April 2022 – Present

- Counsels individuals, start-ups, and small businesses in disputes involving securities, cryptocurrency, trade secrets, and general business litigation, arbitration, and mediation.
  - Engagements include: (i) successfully defended start-up against allegations of breach of contract and business torts in Wyoming Chancery Court; (ii) recovered cryptocurrency losses from wallet provider in arbitration where losses were caused by fraudulent DApp transaction; (iii) successfully negotiated non-solicit clause and advised client on content of marketing communications.
- Leads business development efforts, negotiates fee structures with new clients, develops client and expert witness contacts, and represents firm at industry conventions.
- Negotiates and drafts NDAs, engagement letters, protective orders, non-compete clauses, and other professional contracts. Extensive experience reviewing and litigating arbitration clauses.

### **ORRICK, HERRINGTON & SUTCLIFFE LLP**, Seattle, WA

*Senior Associate (promoted from Managing Associate and Associate)* September 2015 – March 2022

- Litigated complex disputes involving commercial, regulatory, public policy, securities, shareholder, and financial components.
  - Engagements include: (i) successful Commerce Clause challenge to Washington Business and Occupation tax; (ii) successful defense of former Fortune 500 officer in multi-state securities and RICO litigations; (iii) successful arbitration of breach of contract claims by public company against former parent; and (iv) successful mediation of fraud claims by foreign investor in Washington company.
- Conducted internal investigations and responded to investigatory requests by federal and state agencies, including the SEC, FINRA, Washington Attorney General, Nevada Gaming Control Board, and Massachusetts Gaming Commission.
- Managed e-discovery, data collection, and review in compliance with applicable privacy laws, including Washington, California, European (GDPR), and Chinese law.
- Advised clients on public accounting regulations regarding CPA licensure, ethics, and client engagement matters; served as a rotating author of Orrick's Audit Liability Bulletin.
- Served on the Women's Diversity Committee.

**SIMPSON THACHER & BARTLETT LLP**, Palo Alto, CA

*Associate*, September 2013 – August 2015

*Summer Associate*, New York, NY, Summer 2012

- Drafted briefs and prepared witnesses for depositions in cases involving shareholder appraisal rights, take-privates, share repurchases, and director and officer liability.
- Researched federal securities actions.
- Analyzed deposition testimony.

**FREEDOM NOW**, Washington DC

*Summer Legal Intern*, May 2011 – August 2011

- Conducted research and drafted legal memoranda regarding prisoners of conscience represented by Freedom Now.
- Drafted brief to United Nations regarding client's case.

**EDUCATION**

**GEORGETOWN UNIVERSITY LAW CENTER**, Washington, DC

Juris Doctor, *cum laude*, 2013

- CALI Excellence for the Future Award in “Legal Practice: Writing/Analysis”
- Fellowships in Legal Research and Writing and Global Teaching
- Gained extensive experience editing students’ written work.

**THE GEORGE WASHINGTON UNIVERSITY**, Washington, DC

Bachelor of Arts in International Affairs with minor in History, *summa cum laude*, 2010

- Dean’s List
- Presidential Academic Scholarship
- Language immersion semester abroad at La Pontificia Universidad Católica in Santiago, Chile
- Volunteered as an English tutor at English Opens Doors in Santiago, Chile.

**PUBLICATIONS**

- Matthew Moses, Christine Hanley, *FinCEN Sends Message to the Virtual Currency Industry: The Travel Rule Applies to You, Too*, ON THE CHAIN (May 26, 2020), <https://blogs.orrick.com/blockchain/>.
- Daniel Nathan, Christine Hanley, Sunny Hwang, *They Did It for the Gram: SEC and Telegram File Dueling Expert Reports*, ON THE CHAIN (Feb. 5, 2020), <https://blogs.orrick.com/blockchain/>.
- Greg Morvillo, Christine Hanley, *Willfulness and Negligence are Mutually Exclusive Standards of Liability (Something We All Intuitively Knew Already)*, COMPLIANCE & ENFORCEMENT (June 17, 2019), [https://wp.nyu.edu/compliance\\_enforcement/](https://wp.nyu.edu/compliance_enforcement/).

**ADMISSIONS**

- Admitted to practice in California, Washington, and Wyoming.

Christine Hanley (WSBA 50801)  
Office: (307) 264-0385  
Email: [chanley@rcornishlaw.com](mailto:chanley@rcornishlaw.com)

June 2, 2023

Washington State Bar Association  
1325 Fourth Ave., Suite 600  
Seattle, WA 98101-2539

RE: Application for Appointment to Volunteer Positions

Dear Officer of the Bar:

I am applying for appointment to the Client Protection Board, Mandatory Continuing Legal Education Board, and Character and Fitness Board. I have been an active member of the WSBA since 2016 and have worked as an attorney for the past decade, first as a white collar and securities litigator in AM Law 100 firms in California and Washington and currently as a litigator in a fully-remote, boutique firm serving both plaintiffs and defendants in a wide variety of civil matters, including in the areas of securities, commercial disputes, and cryptocurrency litigation.

I am actively seeking volunteer opportunities with the Washington Bar to serve my community, build professional connections, and develop my adjudicatory skills as a member of a board. My experiences in both large and small firms representing clients of all backgrounds and economic means has given me a level of insight into the extraordinarily varied experiences of individuals that interact with the legal system in Washington, whether as attorneys, advisors, staff, or parties. My goal is to bring an empathetic and diligent approach to my work for the WSBA that furthers the ends of justice by promoting high ethical standards and professionalism within the Bar.

While I have applied to the three boards that I believe most suit my skill set and interests, I would gladly consider any other opportunities that the WSBA believes would be a good fit. If you have any questions regarding my application, please contact me at the above-listed email address or phone number.

Very truly yours,

/s/ Christine Hanley  
Christine Hanley

Mr. Brendon K Taga  
WSBA #40874  
Active Attorney  
**Congressional District: 10**

**Applied Committee:** Mandatory CLE Board

**Application Reason:** I am writing to express my interest in serving on the Mandatory Continuing Legal Education Board. As a lawyer, current board member on a legal services non-profit, and educator and leader in higher education, my experiences demonstrate my commitment to education in the profession.

My training as an educator and scholar has provided me with the knowledge and skills to support the board's agenda on continuing legal education. As the Vice President of Student Services at Olympic College, and having served as an Associate Dean at Seattle University College of Education and having led the Access Admissions Program at Seattle University School of Law, I have a strong grasp of educational systems and policies impacting preschool, K-12, graduate programs of study, and continuing professional education. As a scholar-practitioner, I continue to teach in the field, focusing on Higher Education Law, where I continue to explore issues at the intersection of higher education, disability, and the professions. I am actively involved with the Association on Higher Education and Disability (AHEAD) and the Washington Association on Postsecondary Education and Disability (WAPED), which all advance the role of the underrepresented in graduate-level institutions of higher learning. My experience leading the Access Admission Program at Seattle University School of Law gave me the opportunity to support a program that seeks to change the nature of justice by changing the face of the profession. These professional experiences always underscored the importance of education in securing opportunity and the integrity in the profession.

In order to achieve the board's goals, collaboration must extend to practitioners and other external constituents. I have developed purposeful relationships within the legal community, including the WSBA, the KCBA, and many minority bar associations. As a Vice President, I continue to advance this strategy by strengthening my existing contacts and exploring meaningful ways for our students to engage with community members; I also oversee policy development, student conduct, and Title IX activities at a public institution, so hearings and due process requirements are routine. I continue to support survivors by serving as a board member on the Sexual Violence Law Center, which provides comprehensive legal services and advocacy.

Finally, as someone who identifies as a gay, mixed-race man, I hope to bring an additional perspective to the board that can inform how continuing education can strengthen our profession and ability to serve our communities. This, combined with my work at a community college, within professional programs, and advocacy for survivor rights, help to demonstrate my steadfast commitment to the Bar's mission of serving our communities, championing justice, and improving the profession. I would consider it an honor to be able to work in service of the Bar. If you agree that my qualifications are worthy of consideration, I would be delighted to meet to further to discuss this opportunity with you in person. Thank you for your time and consideration.

**History of Committee Service:**

**Continuing Legal Education Committee:** 10/1/2016 - 9/30/2022

**Employer:** Olympic College

**Number of Lawyers:** No response

**Areas of Practice:** Education<br /

**Years of Practice:** 15

**Years of Membership:** 14

**Learned of Service From:** Email from WSBA

## Brendon K. Taga, Ph.D., J.D.

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### EDUCATION

<u>Degree</u>	<u>Institution</u>	<u>Program/Major</u>	<u>Date</u>
Ph.D.	University of Washington College of Education	Educational Psychology – Learning Sciences and Human Development	2016
M.A.	Seattle University College of Education	Adult Education & Training – Human Resources Development	2012
J.D.	Seattle University School of Law	Intellectual Property	2008
B.A.	The University of Pennsylvania	Intellectual History	2001

### PROFESSIONAL LICENSE

Washington State Bar, 2008 – Present

### ACADEMIC & ASSESSMENT EXPERIENCE

April 2020 – Present      Vice President of Student Services  
Olympic College

- Provides strategic vision, leadership and management for Student Development Services (Student Disability Services, Advising, Counseling, Testing Center, Opportunity Grant, and the Students in Need Program), Enrollment Services and Registration (Financial Aid, Military & Veterans Programs, Outreach & Recruitment, and Running Start), Student Leadership and Success (Student Programs & Activities, Conduct, and Student Government), Student Services (International Education and Study Aboard, Multicultural Cultural Support Services, and Residence Life), Athletics, and the Sophia Bremer Child Development Center;
- Directs and supervises approximately 250 staff and faculty and manages a \$5 million budget;
- Leads the Student Services Leadership Council and collaborates with the Executive Team to develop and implement strategic plans that focus on the creation of a holistic student experience from connection to graduation;
- Partners with the Vice President for Instruction, instructional deans, and faculty to ensure the integration of instructional and co-curricular planning, student learning, and assessment, and with the Vice President for Equity and Inclusion to ensure that equity priorities are embedded in hiring, professional development, student development and student success strategies;
- Provides college-wide support and leadership for developing Guided Pathways under the Achieving the Dream framework, and implementing effective strategies and performance measures to improve and sustain student completion results;
- Promotes a customer-focused philosophy within the student services division and creates a culture of teamwork and support; and
- Fosters strong relationships within the local community, encouraging creative partnerships to benefit our students and the community.

Jan. 2013 – Present      Adjunct Professor  
College of Education, Seattle University

- Prepares and delivers online and hybrid Higher Education Law course to graduate students on the topic of course design, facilitated classroom discussion, prepared course materials,



evaluated student work, and planned, evaluated, and revised curricula, course content, and methods of instruction.

Sept. 2014 – April 2020 Associate Dean & Clinical Assistant Professor  
Seattle University, College of Education

- Led and coordinated the delivery of essential student development and academic services, including advising and counseling, career planning and placement, registration and records, academic accommodations, student concerns and complaints, student discipline, probation and dismissal, student activities, and student advocacy;
- Developed, reviewed, and enforced student affairs and academic regulations and policies at the College level and coordinates with university policy development efforts, including administering student conduct processes;
- Oversaw continuous improvement functions in alignment with strategic planning, finance, accreditation, and assessment activities;
- Directed strategic enrollment management efforts, including those related to recruitment, admissions, retention, progression and completion, and overall achievement;
- Provided oversight and instructional support in the development and delivery of all College of Education online courses;
- Prepared and delivered traditional, hybrid, and online courses to graduate students on the topics of course design and education law; facilitated classroom discussion, prepared course materials, evaluated student work, and planned, evaluated, and revised curricula, course content, and methods of instruction;
- Oversaw partnership relationships with school districts and community-based partners and organizations, including drafting, reviewing, and approving of agreements and MOUs;
- Reviewed, interpreted, implemented, and ensured compliance with statutory, regulatory, accreditation-related, and university policies at the College level;
- Served as certification officer and verified and signed all recommendations to the educator licensing board for provisional and professional teaching and administrative certificates; and
- Hired, trained, and supervised administrative and classified staff.

Sept. 2008 – Sept. 2014 Associate Director  
Access Admissions Program, Seattle University, School of Law

- Directed, designed, and executed all aspects of program development, supervision, and assessment, from defining programmatic learning outcomes, goals, and objectives to developing key learning assessments;
- Designed and developed curricula, learning supports, educational policies and supports, and courseware standards;
- Collaborated with faculty and other subject matter experts and conducted other research to develop instructional content;
- Prepared and delivered lectures to graduate students on topics such as legal analysis and learning strategies, and initiated, facilitated, and moderated classroom discussions;
- Assessed the effectiveness of instruction according to ease of instructional technology use and evidence of student learning, knowledge transfer, and satisfaction;
- Advised students on academic and career subjects;
- Supported students with visible and hidden disabilities through accommodation assistance, counseling, and instructional support; and



May 2013	“Beyond Accommodations: Instructional Methods to Support Students with Learning Disabilities” at the 2013 Association of Academic Support Educators Annual Conference, University of Nevada, Las Vegas, NV.
October 2011	“Writing Concisely” at the CLE “Legal Writing - The Foundation of Every Lawyer’s Practice,” Seattle University School of Law, Seattle, WA.
August 2011	“Managing, Maximizing & Motivating Student Leaders” at the Law School Admissions Council (LSAC) Newcomers Conference, “Helping the Helpers: ASP Basics from Orientation to the Bar,” Western State College of Law, Fullerton, CA.

## **COURSES TAUGHT**

### Higher Education Law

Graduate Level, Seattle University, College of Education – Student Development Admin.  
Instructional Design: Universal Design for Learning & Technology

Graduate Level, Seattle University, College of Education – Adult Education & Training  
Objective and Advisory Writing

Graduate Level, Seattle University, School of Law – Lawyering Skills

## **SERVICE**

### **Professional Volunteer Service**

Jan. 2017 – Present: Board Member, Board of Directors, Sexual Violence Law Center (SVLC).

July 2016 – March 2023: Member, Continuing Legal Education Committee, Washington State Bar Association (WSBA).

Aug. 2019 – March 2020: Member, Educator Preparation Data Governance Task Force, Washington State Professional Educator Standards Board (PESB).

Apr. 2019 – March 2020: Associate Director, Data Administrator Group, Washington Association of Colleges for Teacher Education (WACTE).

Jan. 2019 – March 2020: Member, Education Deans for Justice and Equity.

Dec. 2018 – March 2020: Action Committee Member, Leadership for Social Justice Committee, American Educational Research Association (AERA).

Dec. 2017– 2021: Disability Knowledge Community (Faculty Representative); 2020 National Conference Reviewer, National Association of Student Personnel Administrators (NASPA).

May 2013 – 2014: Member, Assessment Committee, Association of Academic Support Educators (AASE).

Jan. 2010 – 2014: Member, Section on Academic Support, Association of American Law Schools (AALS).

### **Other Professional / Community Service**

Sept. 2006 – 2013: Appointed Panelist, Partnership for Youth Justice.

Jan. 2009 – 2012: Citizenship Instructor, St. James ESL Program.

## **PROFESSIONAL ORGANIZATIONS MEMBERSHIPS**

May 2023 – Present. Member, Kitsap County Bar Association.

Aug. 2008 – 2020: Member, King County Bar Association (KCBA).

Dec. 2017 – Present: Member, National Association of Student Personnel Administrators (NASPA).

Aug. 2011 – Present: Member, Association on Higher Education and Disability (AHEAD).

May 2019 – Present: Member, Washington Association on Postsecondary Education and Disability (WAPED).

July 2019 – 2022: Member, Council for Exceptional Children (CEC).

May 2010 – 2015: Member, American Association for Adult and Continuing Education (AAACE).

Sept. 2011 – 2015: Member, American Evaluation Association (AEA).

July 2010 – 2014: Member, Society of American Law Teachers (SALT).

June 2008 – 2014: Member, Association of American Law Schools (AALS).

I am writing to express my interest in serving for a second term on the Continuing Legal Education Committee. As a lawyer and leader in higher education, my experiences demonstrate my commitment to education in the field of law.

My training as an educator and scholar has provided me with the knowledge and skills to support the committee's agenda on continuing legal education. As the Associate Dean of Academic Affairs at Seattle University College of Education, I have a strong grasp of educational systems and contexts ranging between preschool, K-12, graduate programs of study, and continuing professional education. I'm continuing to explore issues at the intersection of higher education, disability, and the law. Through my research, I hope to surface the experiences of students with disabilities in higher education, with the goal of creating stronger pathways to the professions for such students. I'm also interested in how disabling conditions impacts practicing attorneys. I am actively involved with the Association on Higher Education and Disability (AHEAD) and the Washington Association on Postsecondary Education and Disability (WAPED), which all advance the role of the underrepresented in graduate-level institutions of higher learning. My experience leading the Access Admission Program at Seattle University School of Law gave me the opportunity to support a program that seeks to change the nature of justice by changing the face of the profession. These professional experiences always underscored the importance of education in securing the integrity of the profession.

In order to achieve the committee's goals, collaboration must extend to practitioners and other external constituents. When I served as the leader of an access and equity-oriented program, I develop purposeful relationships within the legal community, including the WSBA, the KCBA, and many minority bar associations. Supporting these contacts and maintaining this role in the community not only promoted the values of our program, but also created important opportunities for our students. As an Associate Dean, I continue to advance this strategy by strengthening my existing contacts and exploring meaningful ways for our students to engage with community members. As a member of the committee, I would seek to continue to create productive collaborations with practitioners and organizations and create stronger systems that support effective continuing education.

As both a lawyer and a leader in the field of education, I can bring an important perspective to the committee. I believe that my work at the College of Education and with the Access Admission Program help demonstrate my steadfast commitment to the Bar's mission of serving the public, championing justice, and improving the profession. I would consider it an honor to be able to work in service of the Bar. If you agree that my qualifications are worthy of consideration, I would be delighted to meet to further to discuss this opportunity with you in person. Thank you for your time and consideration.