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The Washington State Limited License Legal Technician Program: Enhancing Access to Justice and Ensuring the Integrity of the Legal Profession

Stephen R. Crossland

Paula C. Littlewood

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**THE WASHINGTON STATE LIMITED LICENSE LEGAL TECHNICIAN PROGRAM:
ENHANCING ACCESS TO JUSTICE AND ENSURING THE
INTEGRITY OF THE LEGAL PROFESSION**

Stephen R. Crossland* & Paula C. Littlewood**

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I. INTRODUCTION

In June of 2012, the Supreme Court of the State of Washington adopted Admission and Practice Rule (APR) 28—the Limited Practice Rule for Limited License Legal Technicians.¹ The Supreme Court voted 6–3 to approve APR 28, which allows individuals who meet certain education, training, and certification requirements to provide technical help and advice on legal matters—such as selecting and completing court forms, informing clients of procedures and timelines, explaining pleadings, and identifying additional documents that may be needed in a court proceeding.² Although limited license legal technicians (LLLTs) will not be allowed to represent clients in court or to contact and

* Chair, Washington Limited License Legal Technician (LLLT) Board.

** Executive Director, Washington State Bar Association. The Authors would like to thank Professor Terry Price of the University of Washington School of Law for his contribution that describes the online teaching format of the first LLLT family law practice area course.

1. WASH. ADMISSION TO PRACTICE R. 28 (2014); Hon. Barbara Madsen & Stephen Crossland, *The Limited License Legal Technician: Making Justice More Accessible*, NWLAWYER, Apr.–May 2013, at 23, 23, available at <http://nwlawyer.wsba.org/nwlawyer/201304?pg=25#pg1>.

2. WASH. ADMISSION TO PRACTICE R. 28(A), (F)(3), (F)(6), (F)(8); Madsen & Crossland, *supra* note 1.

negotiate with an opposing party on a client's behalf, they will be able to give legal advice within a defined scope of authority.³

As the first licensed, independent paraprofessionals in the legal profession, it is not surprising that the licensing requirements for LLLTs are not unlike those of lawyers.⁴ The legal technicians will need to pass an examination, engage in continuing education, adhere to rules of professional conduct, and show proof of financial responsibility—among other stringent requirements.⁵ Such requirements serve to protect the public.⁶

II. HISTORY OF THE RULE

While adoption of the rule was a single monumental moment for the legal profession and consumers in the state of Washington, the path to its adoption involved twelve years of study and heated debate.⁷ The court gave considerable thought to the rule before approving it—as evidenced by the number of years that went into drafting the proposed rule—presenting the rule statewide, accepting public input, debating the need for the rule and its potential impact, and seeking other solutions, all against a backdrop of continued growth in *pro se* problems.⁸ The impetus for the rule came from two sources: (1) a need to address the staggering unmet civil legal needs of the public in Washington; and (2) a desire to curb, if not eliminate, the burgeoning prevalence of people providing purported legal services without any requisite training or regulatory oversight.⁹

The original rule was drafted in 2005, but the history actually begins with the WSBA [Washington State Bar Association] committees established in the late 1980s and early 1990s that addressed the unauthorized practice of law and domestic relations. These committees were formed, in part, because of the growing number of people unable to afford professional legal help. This [gap] was dramatically true in family law cases where courts in the 1970s began reporting large increases in family law cases involving at least one party not represented

3. Madsen & Crossland, *supra* note 1; see WASH. ADMISSION TO PRACTICE R. 28(G)(4), (H)(5)–(6).

4. See WASH. ADMISSION TO PRACTICE R. 28(D), (E).

5. *Id.* R. 28(E)(1), (E)(4), (H)(9), (I).

6. See *id.* R. 28(A).

7. See LLLT BOARD, HISTORICAL SUMMARY OF THE LIMITED LICENSE LEGAL TECHNICIAN RULE 1, available at http://bog11.homestead.com/legaltechtf/july27/wsba/wsba_intro_materials.pdf.

8. See *In the Matter of the Adoption of New APR 28—Limited Practice Rule for Limited License Legal Technicians*, No. 27500-A-1005, at 1, 12 (Wash. 2012) [hereinafter *Order Adopting LLLT Rule*], available at <http://www.courts.wa.gov/content/publicUpload/Press%20Releases/25700-A-1005.pdf>.

9. LLLT BOARD, *supra* note 7; see *Order Adopting LLLT Rule*, *supra* note 8, at 2.

by an attorney. This trend led to a proliferation of non-attorneys offering help with legal documents, a problem that has only grown larger with the advent of the Internet.¹⁰

To begin addressing the unauthorized practice of law, a specific definition was needed; thus, in 1998, the WSBA formed the Committee to Define the Practice of Law: “This committee’s work led to General Court Rules (GR) 24 and 25, which define the practice of law and establish the Practice of Law Board (POLB).”¹¹ One of the supreme court’s mandates to the POLB for GR 25 was “to address access-to-justice issues for those who cannot afford attorneys” by recommending ways to authorize nonlawyers to engage in certain defined activities that would otherwise constitute the practice of law as defined in GR 24.¹²

The 2003 Civil Legal Needs Study commissioned by the Washington Supreme Court revealed that more than 85% of the poor and working poor did not have access to legal services to assist in addressing their civil legal needs.¹³ In 2005, the POLB crafted a rule to create and regulate a new legal professional to meet those needs: the legal technician.¹⁴

A. Learning from the Medical Profession

Although the LLLT “proposal was controversial in the legal world—the WSBA Board of Governors overwhelmingly opposed it” both times the proposed rule was presented for its consideration—the concept of having additional professional service providers is not a new one.¹⁵ The medical profession has had a similar model in place for decades with the positions of nurse practitioners and physician assistants.¹⁶ In fact, “[i]t was this model in the medical field that impressed some members of the [Washington] Supreme Court

10. Madsen & Crossland, *supra* note 1.

11. *Id.*; see WASH. GEN. R. 24 (2001); *id.* R. 25 (2006); see also *Practice of Law Board*, WASH. STATE BAR ASS’N, <http://www.wsba.org/Legal-Community/Committees-Boards-and-Other-Groups/Practice-of-Law-Board> (last visited May 13, 2014) (noting that the Practice of Law Board was created “to investigate unauthorized practice of law complaints, issue advisory opinions, and recommend to the Supreme Court ways nonlawyers can improve access to law-related services”).

12. Madsen & Crossland, *supra* note 1; see WASH. GEN. R. 25.

13. Madsen & Crossland, *supra* note 1, at 24; TASK FORCE ON CIVIL EQUAL JUSTICE FUNDING, WASH. STATE SUPREME COURT, THE WASHINGTON STATE CIVIL LEGAL NEEDS STUDY 8 (2003), available at http://www.wsba.org/~media/Files/Legal%20Community/Committees_Boards_Panels/ATJ%20Board/Washington%20State%20Civil%20Legal%20Needs%20Study%20Executive%20Summary%20-2003.ashx.

14. Madsen & Crossland, *supra* note 1.

15. *Id.*; see also Brooks Holland, *The Washington State Limited License Legal Technician Practice Rule: A National First in Access to Justice*, 82 MISS. L.J. SUPRA 75, 90 (2013), http://mississippilawjournal.org/wp-content/uploads/2013/02/3_Holland_Final.pdf (discussing the Board of Governors’ initial opposition to the proposed legal technician rule).

16. Madsen & Crossland, *supra* note 1.

and others in the judicial branch, and prompted thoughts of an independent paraprofessional in the legal profession.”¹⁷

Unfortunately, nurse practitioners and physician assistants were not included under the regulatory umbrella of the medical profession. In Washington, however, we have felt it crucial and optimal to have LLLTs be under the control of the supreme court, which is constitutionally authorized to regulate the practice of law. To do otherwise would create separation of powers issues that would pit the supreme court against the legislature or the executive branch, depending on which branch is charged with authorizing and regulating the LLLTs.

In addition to these considerations, Washington officials examined the existing court programs:

Also of interest was the effectiveness of Washington’s courthouse facilitator position. Courthouse facilitators provide basic information to pro se persons in family law cases, and have been helpful and highly-sought. However, facilitators are court employees subject to budget reductions and are greatly restricted by the definition of practicing law.¹⁸

In other words, these court facilitators are not authorized to practice law in helping clients in the same way the LLLT will be. Accordingly, “[t]hey do not have the latitude to provide the kind of critical services needed.”¹⁹

Similar to the turning point for the medical profession several decades ago, “the legal profession in Washington and across the U.S. is facing alarming trends indicating vast numbers of Americans are not accessing critical legal help, while large numbers of attorneys are struggling to make a living.”²⁰ Several events and trends led the supreme court to adopt the LLLT Rule, including the groundbreaking 2003 Civil Legal Needs Study released by the Washington Supreme Court Task Force on Civil Legal Justice.²¹ The study found that 85% of the state’s low-income population had serious civil legal problems involving basic needs—such as housing, employment, and family stability—but only 15% were receiving any kind of assistance.²²

Additionally, growth in the number of pro se litigants coming to court unprepared and bewildered indicated a need for better access to legal assistance.²³ According to court surveys, unprepared pro se litigants slow down court functions and, most critically, contribute to questionable justice

17. *Id.*

18. *Id.*

19. *Id.* at 23–24.

20. *Id.* at 24.

21. See generally TASK FORCE ON CIVIL EQUAL JUSTICE FUNDING, *supra* note 13, at 5–10 (introducing the impetus for conducting the study and key findings).

22. Madsen & Crossland, *supra* note 1, at 24.

23. See HON. BARBARA A. MADSEN, WASH. COURTS, 2014 STATE OF THE JUDICIARY 5 (2014) available at <http://www.courts.wa.gov/newsinfo/content/stateOfJudiciary/january2014.pdf>.

outcomes.²⁴ As one judge commented, “We have many more middle class persons who have been caught up in the recession and are unable to pay their rent or mortgage or bills They come to court, embarrassed and distraught, and the only thing I can tell them is that I cannot do anything.”²⁵

Furthermore, “Significant increases in the cost of law school [have] result[ed] in growing barriers for many interested in the legal profession”²⁶ The average cost of public law school has nearly tripled since 2001, and law school enrollment for 2013 dropped to its lowest level since 1977.²⁷ Finally, “[t]he proliferation of persons [or] online businesses engaging in the unauthorized practice of law”²⁸ exploited a huge public need that the legal profession was not adequately addressing.²⁹

B. The Need Is Too Great

Seven years elapsed between the first proposal of the LLLT Rule in 2005 and its adoption in 2012.³⁰ During that period, members of the POLB spent their time making presentations statewide to bar associations, access to justice organizations, and anyone who would be interested or affected by the rule.³¹ The POLB listened to concerns carefully and weighed various options. Although the board also conducted a survey of other states in hopes of discovering another program or idea that could help reach unserved populations in an effective manner, the research turned up no results. As in Washington, pro bono clinics, court facilitators—as well as legal document preparers in some states—and underfunded legal aid providers could not handle all of the cases, and unlicensed persons continued to inappropriately fill that need.³²

III. THE RULE

As previously mentioned, APR 28 allows persons authorized by the state supreme court who meet certain education, training, and certification

24. *See id.* at 5.

25. *Id.* (quoting a superior court judge).

26. *Id.*

27. *See* Ethan Bronner, *Law Schools' Applications Fall As Costs Rise and Jobs Are Cut*, N.Y. TIMES, Jan. 31, 2013, at A1 (quoting Brian Z. Tamanaha of Washington University Law School), available at http://www.nytimes.com/2013/01/31/education/law-schools-applications-fall-as-costs-rise-and-jobs-are-cut.html?_r=1&.

28. *See* MADSEN, *supra* note 23.

29. LLLT BOARD, *supra* note 7.

30. *Id.* at 1–2.

31. *Id.* at 1.

32. *See generally id.* (stating that “the impetus behind defining the practice of law was to . . . protect the public from the unauthorized practice of law”).

requirements to provide technical help on legal matters.³³ The rule also created a thirteen-member LLLT Board comprised of attorneys, four nonattorney members, and at least one legal educator.³⁴ The purpose of the board is to pick practice areas to which the rule should be applied, define the scope of practice in those practice areas, design a program to educate LLLTs on the scope of practice authorized, create rules of professional conduct, create an examination, create a continuing education program, and create a discipline system.³⁵

In its first official act, the board recommended family law as the area to which the rule should be first applied because it is one of the areas of highest need in the civil law arena.³⁶ The supreme court approved that recommendation in March 2013.³⁷ From there, the board undertook the significant work of defining the scope of practice authorized in the family law arena.³⁸ The work involved members of the LLLT Board, as well as expert family law practitioners, who first outlined the universe of family law issues and then carefully outlined the authorized practice areas for LLLTs.³⁹

The scope of practice is codified in Regulation 2 in the appendix to APR 28.⁴⁰ Subject to some limitations, the scope of practice generally includes the following areas: child support modification actions, dissolution and legal separation actions, domestic violence actions, committed intimate relationship actions, parenting and support actions, major parenting plan modifications, paternity actions, and relocation actions.⁴¹

IV. THE EDUCATION

One of the most critical aspects of planning the LLLT program was delineating the educational requirements for LLLT candidates to complete. Training the LLLTs in what they are allowed to do—consistent with the scope outlined in Regulation 2—was, of course, the starting point for the training.⁴²

33. WASH. ADMISSION TO PRACTICE R. 28(B)(4) (2014); *see also* MADSEN, *supra* note 23 (noting that the LLLT Rule allows trained nonattorneys to help in “filling out and filing the correct paperwork, answering questions and so on”).

34. WASH. ADMISSION TO PRACTICE R. 28(C)(1).

35. *See id.* R. 28(C)(2)–(3).

36. Minutes of Limited License Technician Board ¶ VI (January 30, 2013) [hereinafter 01/30/13 LLLT Board Minutes] *available at* http://www.wsba.org/~media/Files/Legal%20Community/Committees_Boards_Panels/LLLT%20Board/Minutes/20130130%20Meeting%20Minutes.ashx; *see also* LLLT BOARD, *supra* note 7, at 26 (indicating that family matters are more likely to receive an attorney’s attention than other issues).

37. *Limited License Legal Technician Board*, WASH. STATE BAR ASS’N, <http://www.wsba.org/Legal-Community/Committees-Boards-and-Other-Groups/Limited-License-Legal-Technician-Board> (last visited May 13, 2014).

38. *See* 01/30/13 LLLT Board Minutes, *supra* note 36.

39. *See id.*

40. WASH. ADMISSION TO PRACTICE R. 28, Regulation 2 (2013).

41. *Id.* R. 28, Regulation 2(B)(1).

42. *See generally id.* R. 28, Regulation 1–2 (indicating the scope of practice by LLLTs).

But exposing the LLLTs to areas beyond their scope of authority is just as important—this way, they understand when they tread into these areas and know when they need to refer clients to a lawyer.⁴³

The education component has two main parts: (1) a core education component to be completed at the community college level and (2) a practice area component for each area of law in which the LLLT would like to have a license.⁴⁴ The minimum level of education required for an LLLT is an associate-level degree,⁴⁵ and it is envisioned that half of the associate-level education will be comprised of the core education requirements. The core education requires forty-five quarter credits, including the following: introduction to law and legal process; civil procedure; legal research, writing, and analysis; contracts; professional responsibility or ethics; law office procedures and technology; interviewing and investigation techniques; and legal studies electives.⁴⁶ Currently, candidates must take these courses at an ABA-approved paralegal program;⁴⁷ however, representatives from the Washington community college system and the board are working together to define criteria for certifying other paralegal programs in the state to increase accessibility to the education for students.

The second component of the education requirement, the practice area education, must be completed in a curriculum developed by an ABA-approved law school.⁴⁸ Interestingly, all three ABA-approved law schools in Washington—University of Washington, Seattle University, and Gonzaga University—came to the table and volunteered to work together in developing the curriculum.⁴⁹ The resulting requirement calls for fifteen family law credits: five credits in basic family law and ten credits in advanced and Washington law-specific topics.⁵⁰ The original vision was for the curriculum to be taught at the local community colleges by a law professor, practitioner, or community college instructor, but at the close of developing the curriculum, the law schools asked to deliver the practice area education.

Both a law professor and a practitioner teach the classes, and the classes are currently sited at the University of Washington, with professors from all three law schools involved at various points.⁵¹ The classes are streamed so that

43. See generally *id.* R. 28, Regulation 2(B)(3) (listing the prohibited acts of LLLTs).

44. *Id.* R. 28, Regulation 3(A)–(B).

45. *Id.* R. 28(D)(3)(a).

46. *Id.* R. 28, Regulation 3(A).

47. *Id.*

48. *Id.* R. 28(D)(3)(c).

49. See *Practice Areas Courses Frequently Asked Questions*, WASH. STATE BAR ASS'N, <http://wsba.org/Licensing-and-Lawyer-Conduct/Limited-Licenses/Legal-Technicians/Practice-Area-Courses#> (last visited May 13, 2014).

50. *Id.*

51. See Paula Littlewood, *Rethinking Legal Education in a Changing Legal Profession*, WASH. ST. BAR ASS'N, at 4, available at http://www.wsba.org/~media/Files/Licensing_Lawyer

students can access the classes from anywhere.⁵² Some of the students in the class have entered the program through a limited time waiver process, through which certain paralegals who have passed an advanced national certifying paralegal exam and have ten years of substantive law-related experience supervised by a licensed lawyer can enroll in the practice area education, without needing to complete the associate level degree and core education requirements.⁵³ The first class of LLLTs will thus be qualified and experienced practitioners with the knowledge and preparation necessary to practice independently of an attorney.⁵⁴

A. Online Teaching for LLLT Students

The University of Washington School of Law (UWSL) began teaching the first family law course for LLLT students in January 2014.⁵⁵ Because of the geographical spread of the students—only half were in the Seattle–King County area where the law school is located—and fewer enrollments than expected, the UWSL faculty determined that an in-class course would not be practical. Necessity being the mother of invention, the faculty concluded that an online, live-streaming course format was best.⁵⁶

The university licenses an online webchat program called Adobe Connect.⁵⁷ Students can access the program for free.⁵⁸ Once in the program, the screen layout has essentially two formats.⁵⁹ In the first format, called “Discussion,” the screen is divided into five boxes: an attendance box with the list of students; the webcam box, in which the students can see the instructor; the chat box for the students to comment on the material; a polling box for in-class questions to the students; and a notes box where the daily outline is displayed.⁶⁰

%20Conduct/MCLE/Rethinking%20Legal%20Education%20in%20a%20Changing%20Legal%20Profession%20%20October%202013.ashx.

52. See *Practice Areas Courses Frequently Asked Questions*, *supra* note 49.

53. WASH. ADMISSION TO PRACTICE R. 28, Regulation 4(B).

54. See *id.*

55. See *Limited License Legal Technician Program in Family Law*, UNIV. OF WASH. SCH. OF LAW, <http://www.law.washington.edu/LLLT/Default.aspx> (last visited May 13, 2014).

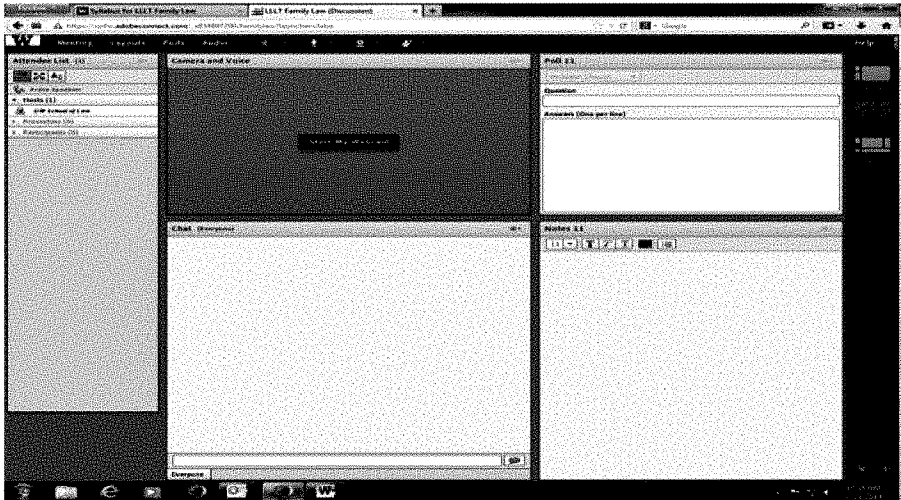
56. See generally *id.* (indicating that the program is designed to be easily accessible).

57. See *id.*

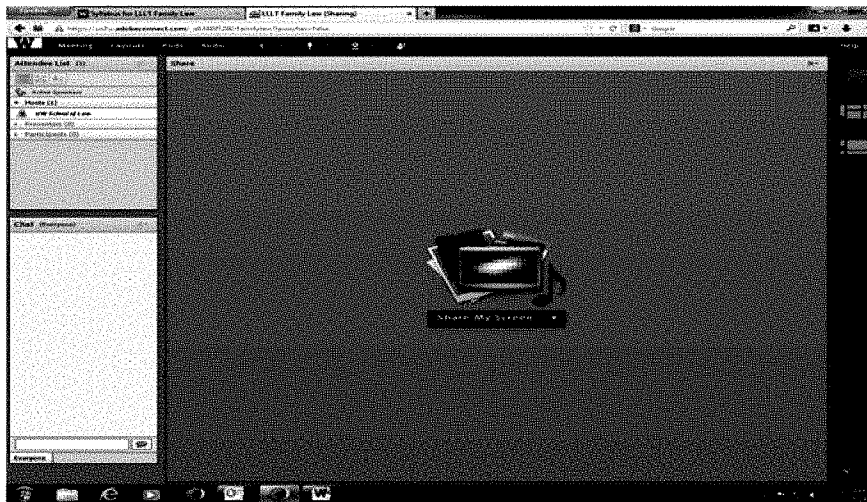
58. See *id.*

59. Using *Adobe Connect* 8, ADOBE, at 10–11, available at http://help.adobe.com/en_US/connect/8.0/using/connect_8_help.pdf (last updated May 14, 2013).

60. See *id.* at 11 fig.B.



In the second format, called “Sharing,” the screen is divided into three boxes: the attendance box, the chat box, and a larger box covering two-thirds of the screen where the instructor can share documents, PowerPoint presentations, or other websites with the students.⁶¹



In the “Sharing” format, the students can hear the instructor but cannot see him.⁶² The program has limited capability for the students to speak—depending

61. See *id.* at 10–11, 11 fig.A.

62. See *id.* at 11 fig.A.

on their home computers and bandwidth—and their input is limited to written comments in the chat box.⁶³

The core of the class interaction occurs in the chat box.⁶⁴ While the students have the ability to raise their hands through a screen icon, too long of a time period would pass if the instructor used the in-class format by calling on students and then waiting for them to write questions or comments.⁶⁵ Hence, the family law instructor created a new rule for this online class: the students write comments while he is speaking, and then at an appropriate pause in the material, he goes back over the comments and answers the questions.⁶⁶ Many times some of the other students have answered the questions and the instructor has nothing left he needs to respond to. Sometimes the comments are tangential and do not need a response. But frequently, the class has enough material left to create the conversation and dialogue about the material.

The class has also benefitted from the participation of a practicing family law attorney once a week for every other class. This structure permits the instructor to cover the family law material in a more theoretical way, while the practicing attorney can cover the actual practice and the nuts and bolts. The students benefit from both perspectives.

The Authors asked the instructor whether it is lonely teaching in this online method; he stated that it is not. The students are highly motivated. They realize that they are the first LLLT students in the country and, hence, pioneers in this field.⁶⁷ They are also not new to the legal profession, as many J.D. students are. Thus, they fill the chat box with excellent insights and examples about the material, while stretching their own professional boundaries in the process. It has actually been extremely rewarding for the instructor and the students.

B. The Examination and Experience

The primary purpose of APR 28 is the protection of and service to the public.⁶⁸ The rule assures that applicants will be qualified.⁶⁹ Like lawyers, they must take a “bar exam.”⁷⁰ However, LLLTs must take two bar exams.⁷¹ All

63. See *Adobe Connect Help/Adobe Connect Bandwidth*, ADOBE, <http://helpx.adobe.com/adobe-connect/kb/connect-bandwidth-calculation.html> (last visited May 13, 2014).

64. See *Chat in Meetings*, ADOBE, http://help.adobe.com/en_US/connect/8.0/using/WSBDD43665-8F3B-4aa5-849A-027CAD12D460.html (last visited May 13, 2014).

65. See *Ask and Accept Attendee Questions*, ADOBE, http://help.adobe.com/en_US/connect/8.0/using/WS2A51E705-02C9-4b6a-80F5-8FD2AAD135A3.html (last visited May 13, 2014).

66. See *Chat in Meetings*, *supra* note 64.

67. See *Limited License Legal Technician Program in Family Law*, *supra* note 55.

68. WASH. ADMISSION TO PRACTICE R. 28(A) (2014).

69. See *id.*

70. See *id.* R. 28(E)(1).

71. See *id.* (requiring examinations of core competencies and substantive law issues related to their practice areas).

LLLTs must pass a core competency examination that covers the required general core education subjects and additional legal studies electives.⁷² LLLTs must also pass an examination in each practice area in which they elect to be licensed.⁷³ Although the form of the examination has not yet been determined, a subcommittee is studying this issue.⁷⁴ The subcommittee will make recommendations to the board who will, in turn, make recommendations to the supreme court for final approval.⁷⁵

The Rule also provides that each LLLT applicant will have at least 3,000 hours of substantive legal experience under the supervision and guidance of a licensed lawyer.⁷⁶ The LLLTs can complete these hours concurrently while taking the required coursework and then finish after taking the exams if necessary.⁷⁷ In this way, the pathway to the LLLT license does not become protracted.⁷⁸ Members of the legal profession have frequently suggested that an apprenticeship or mentorship would be helpful in the training of lawyers to help make them “practice ready” to serve the public.⁷⁹ This provision serves to incorporate this concept.⁸⁰

V. THE RULES OF PROFESSIONAL CONDUCT

APR 28 provides that LLLTs will be subject to the same standard of care and ethical standards as lawyers.⁸¹ A subcommittee of the board is preparing recommendations to the supreme court that will create a set of Rules of Professional Conduct (RPC) for LLLTs.⁸² The process has involved taking the same RPCs for lawyers and adapting them for LLLTs.⁸³ APR 28 contemplates

72. *See id.*

73. *See id.*

74. Minutes of Limited License Technician Board ¶ VI (Aug. 15, 2013) [hereinafter 08/15/13 LLLT Board Minutes] available at http://www.wsba.org/~media/Files/Legal%20Community/Committees_Boards_Panels/LLLT%20Board/Minutes/20130815%20Meeting%20Minutes.ashx.

75. *See* WASH. ADMISSION TO PRACTICE R. 28(C)(3).

76. *See id.* R. 28(E)(2).

77. *See id.*

78. *See id.*

79. Over sixty-five years ago, Judge Frank pleaded for a return to legal apprenticeship in the *Yale Law Journal*. *See generally* Jerome Frank, *A Plea for Lawyer-Schools*, 56 *YALE L.J.* 1303 (1947) (recommending that professors have practical experience and schools move away from case method teaching to more practical application, urging more law student observation of practitioners, and recommending utilization of free clinics as teaching tools based on the medical school model). For a modern take on the importance of clinical education, see Katherine R. Kruse, *Getting Real About Legal Realism, New Legal Realism, and Clinical Legal Education*, 56 *N.Y.L. SCH. L. REV.* 659, 660 (2011–2012).

80. *See* WASH. ADMISSION TO PRACTICE R. 28(A), (E)(2).

81. *See id.* R. 28(K)(1).

82. 08/15/13 LLLT Board Minutes, *supra* note 74, at ¶¶ VII–VIII.

83. *See id.*

that its provisions will protect and serve the public.⁸⁴ While this task has been arduous, it will pay large dividends in terms of serving and protecting the public.

VI. CONCLUSION

Pioneering the first program of its kind in the nation is both exciting and daunting. However, the needs of the consuming public for access to justice continue to grow, and the current model of delivery of legal services by attorneys increasingly fails to meet those needs. A quote from the state supreme court order adopting APR 28 captures the court's sentiment in adopting the rule: "We have a duty to ensure the public can access affordable legal and law related services, and that they are not left to fall prey to the perils of the unregulated market place."⁸⁵ It is this interplay between need, duty, and ingenuity that makes the Limited License Legal Technician Program both promising and rewarding to advent.

84. See WASH. ADMISSION TO PRACTICE R. 28(A).

85. Order Adopting LLLT Rule, *supra* note 8, at 5–6.