



September 7, 2006

Via E-Mail and US Mail

Thomas D. Hall, Clerk  
The Supreme Court of Florida  
500 Duval Street  
Tallahassee, Florida 32399-1925

**Re: Case Number SC06-1622  
Petition to Amend the Rules Regulating the Florida Bar**

Dear Mr. Hall:

This letter will serve as a formal comment from the American Alliance of Paralegals, Inc. ("American Alliance"), regarding the proposed Florida Registered Paralegal Program ("Program").

The American Alliance supports Florida Bar Rule 20 which will establish the Florida Registered Paralegal Program. However, the American Alliance respectfully requests the inclusion of its AACP (American Alliance Certified Paralegal) designation under 20-3 ELIGIBILITY REQUIREMENTS, Certification, as an accepted certification that meets the goal of having high standards for the Florida Registered Paralegal status.

The American Alliance is a national paralegal organization whose purpose is to advance the paralegal profession by focusing on the individual paralegal. The American Alliance advocates a Bachelor's Degree that includes, or is combined with, a paralegal studies program for persons entering the profession. Members are encouraged to continue their education throughout their careers. It is recommended that members participate in no less than nine hours of continuing education annually, including at least one hour of ethics. Goals and standards of the American Alliance are to establish minimum educational criteria, adhere to ethical standards, provide networking opportunities, create a resource center, and associate with national and local organizations.

American Alliance of Paralegals, Inc.  
16815 East Shea Boulevard, Suite 110, No. 101, Fountain Hills, Arizona 85268  
[www.aapipara.org](http://www.aapipara.org)

**Advancing the Paralegal Profession by Focusing on the Individual Paralegal**

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The American Alliance established a program for the certification of paralegals consisting of, and incorporating, the following educational and experience criteria:

- (a) A Bachelor or advanced Degree in any discipline from an accredited institution; or
- (b) An Associate Degree in paralegal studies from an ABA approved paralegal program or a program which is a voting institutional member of the American Association for Paralegal Education; or
- (c) A Certificate from an ABA approved paralegal program or a program which is a voting institutional member of the American Association for Paralegal Education.

Upon meeting the above requirements, a candidate making application for certification submits (along with a verified application and a processing fee) the following items:

- (a) A certified copy of the paralegal's official transcript(s) from the educational institution(s) attended; and
- (b) An affidavit or declaration from the attorney attesting to the paralegal's substantive work experience.

Following review and approval by the Commission, a certificate is issued to the paralegal indicating certification by the American Alliance based on the above formal educational and experience criteria. Upon certification, each paralegal will be permitted to use the designation American Alliance Certified Paralegal ("ACCP").

The proposed Program recognizes a bachelor's degree, an associates' degree, and a juris doctorate degree. Not included in the proposed Program are "degrees" from certificate programs because the Florida Bar's Special Committee to Study Paralegal Regulation ("Special Committee") felt there would be difficulty in quantifying the quality of the certificate programs. With the inclusion of a certificate program as criteria for an ACCP, the Special Committee chose not to include the ACCP designation. This quality of the certificate program is assured with the ACCP designation.

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The American Alliance is the only national paralegal association that aligns with the ABA Standing Committee on Paralegals' jurisdiction through its effort to set the standard for paralegal education in that it requires the school from which a paralegal degree or certificate is earned be ABA approved or be a voting institutional member of the American Association for Paralegal Education ("AAfPE"). Voting institutional membership with AAfPE is only available to "schools offering paralegal and legal assistant education programs that are either approved by the American Bar Association or in substantial compliance with the ABA guidelines and accredited by a nationally recognized accrediting agency." As such, in order to receive a paralegal certificate, the student must first have 60 semester credit hours or an associate degree to attend the ABA paralegal certificate program. Also, in order to maintain American Alliance certification, every AACP shall renew his/her certification status every two (2) years and complete eighteen (18) hours of continuing legal education ("CLE") which includes two (2) hours of ethics. At the time of renewal, an AACP must be employed as a paralegal.

As you will note, the American Alliance has a higher standard of post-high school education requirements for certification than other propriety paralegal testing programs and is firmly committed to its belief that quality education is necessary for all paralegals.

The American Alliance requests the inclusion of the AACP designation in the proposed Florida regulation based on the criteria that paralegals holding a degree or a certificate are from schools that are either ABA approved or a voting institutional member of AAfPE. This criteria assures the quality of the certificate program.

Please do not hesitate to contact me by telephone at 703-503-9309 to discuss this request.

Very truly yours,



Deborah A. Repass, AACP, RP  
President

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