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September 7, 2006

Mr. Tom Hall
Clerk of Supreme Court
500 South Duval Street
Tallahassee, FL 32399-2300

Dear Mr. Hall:

We are writing to express our opposition to the proposed rule for establishing the Florida Registered Paralegal designation. We appreciate and agree with the Court's and the Bar's concern about the quality of paralegal education. However, we do not agree with the proposition that because there are a variety of certificate programs with differing standards, that **all** certificate programs should be disqualified. While the Bar is certainly in a position to determine the standards by which attorneys practice law, determining the quality of educational programs is unique to the accreditation agencies recognized by the U. S. Department of Education. Certificates have been long recognized as indicators of educational achievement, and are used not only by private schools, but by colleges as well. In fact, several Florida community colleges offer certificate programs. Under the current proposal, these students' paralegal education would be totally discounted.

The proposed rule does provide other ways for paralegals holding certificates to qualify for Tier II status - obtaining the CLA designation and having an undergraduate degree, for instance. However, these options alone don't address the fundamental issue of the quality of education. So many talented individuals enter the paralegal profession with earned degrees and a paralegal certificate. Adding the additional hurdle of obtaining the CLA or PACE credential, or an additional two years of experience, on top of their undergraduate degree and paralegal certificate, flies in the face of the purpose of the proposed regulation. The inequity is glaring and can be remedied by including **accredited** certificate programs under the definition of approved programs.

This remedy is based on sound, long-standing, educational practice, and it frees the Bar from becoming an arbiter of educational quality, a task that is time consuming and that would require additional expense and expertise.

Recognized accreditation agencies vouch for the quality of the institutions and programs they accredit. This includes certificate granting institutions and programs. We encourage the Bar to reconsider its position and include certificate programs approved by an agency recognized by the U.S. Department of Education as part of the educational requirements for Tier II paralegals. Accredited schools meet the high standards desired by the Florida Bar.

The Court will be remiss if it does not take every opportunity to learn and understand the role played by accreditation agencies in higher education. We encourage the Court to contact the Executive Directors

of any recognized accreditation agency to build this knowledge base prior to making its final decision.

Our accrediting agency is:
Accrediting Council for Continuing Education and Training (ACCET)
Roger Williams, Executive Director
rjwilliams@accet.org, www.accet.org
202-955-1113

Mr. Williams is also the Chair of the Council of Recognized National Accrediting Agencies (see <http://www.cnaa.org>). The current Chair of the ACCET Commission is Dr. Karen Kershenstein, who preceded John Barth (see contact below) in the Office of Postsecondary Education, Accreditation and State Liaison.

Other contacts to consider:

Mr. John W. Barth, Director
Accreditation and State Liaison
Office of Postsecondary Education
U.S. Department of Education
1990 K Street, NW, #7105
Washington, DC 20006-8509
(202) 219-7011, FAX: (202) 219-7005
E-MAIL: john.barth@ed.gov
www.ed.gov/admins/finaid/accred/index.html

Dr. Judith S. Eaton, President
Council for Higher Education Accreditation (CHEAA)
One Dupont Circle NW, Suite 510
Washington, DC 20036
(tel) 202-955-6126, (fax) 202-955-6129
chea@chea.org www.chea.org

Thank you again for your willingness to hear all sides of this very important debate. If there is any additional information that we could supply, or if it would be helpful to discuss this topic via phone conference or in person, please do not hesitate to contact me.

Very truly yours,

John S. Shaheen
Executive Vice President