

Thank you for the opportunity to comment on the proposed changes to ACJA 7-203: Confidential Intermediary. As noted in another comment, many of the changes are clerical in nature. There are two proposed changes on which I would like to comment.

D. Administration.

53. Confidential Intermediary Board. ~~In addition to the requirements of~~ Pursuant to ACJA § 7-201(D)(5), the following requirements apply:

~~The~~ the confidential intermediary board is established, ~~comprised of the following eleven~~ consisting of 5 members

A larger number of board members makes it difficult to reach a quorum, but five is likely too few. A board consisting of seven or eight would account for members who are unable to attend or become inactive. Seven or eight would provide diversity and better representation.

A. **Renewal of Certification.** In addition to the requirements of ACJA § 7-201-(G) governing renewal of certification, the following provisions apply to confidential intermediaries:

1. Expiration Date. For confidential intermediaries certified before August 1, 2022, All certificates expire at midnight on October 31, ~~2006 and every of each even-numbered~~ year.

Requiring renewal on a yearly basis would create an undue financial burden on certificate holders as well as increase the workload of the Certification and Licensing Division. In a recent informal survey of seven confidential intermediaries attending a continuing education meeting, none have charged their clients more than \$3500.00 and all have provided services on a pro bono basis for some clients. Some confidential intermediaries work mostly on a pro bono basis and only charge clients expenses incurred in the case. In the 29-year history of this program, there have been few complaints against confidential intermediaries.

Two years is a more common professional license renewal cycle.