

From: Mandatory Continuing Legal Education Board
To: Washington State Licensed Legal Professionals & Community Members
Date: January 9, 2026
**RE: REPORT AND RECOMMENDATION OF THE MCLE BOARD
COMITY WITH COLORADO**

Mandatory Continuing Legal Education Board

The Mandatory Continuing Legal Education Board (“MCLE Board”) consists of seven members: Darryl Colman (Chair), Katharine Denmark, Nicole Meyer, Efreem Krisher, Henry Phillips, Brendon Taga, and Justin Durueke.

Suggested Amendment

The MCLE Board recommends an amendment to Admission and Practice Rule (APR) 11 that would allow for licensed legal professionals to submit a comity certificate from Colorado to satisfy their Washington MCLE requirements.

The MCLE Board recommends the following suggested amendment to APR 11(c)(6):

Comity. The education requirements in Oregon, Idaho, Colorado, and Utah substantially meet Washington’s education requirements for lawyers. These states are designated as comity states. A lawyer may certify compliance with these rules in lieu of meeting the education requirement by paying a comity fee and filing a Comity Certificate of MCLE Compliance from a comity state certifying to the lawyer’s subjection to and compliance with that state’s MCLE requirements during the lawyer’s most recent reporting period.

Background

The MCLE Board decided to research potential comity states after receiving feedback during the 2024 annual meeting with the Court. After conducting research into MCLE requirements in other states the MCLE Board is exploring the prospect of suggesting an amendment that would treat Colorado as a comity jurisdiction given the proximity of their CLE requirements to our own. Satisfying MCLE requirements in Washington through comity lessens the administrative burden on lawyers who are dually licensed in Colorado and Washington state. Although the current number of lawyers who hold a license in both Colorado and Washington is unknown, as of August 2025 there were 458 lawyers who cited they were licensed in Colorado at the time of their admission to the Washington state bar.

Colorado Comity Requirements



Comparable to Washington, Colorado also has a 3-year reporting period, requires 45 credits to be earned within that period, and has established an equity, diversity, and inclusivity credit requirement that is similar to Washington’s Ethics-Equity credit in substance and intent. Given these compatibilities, the Board expressed interest in the possibility of recognizing Colorado as a comity jurisdiction.

Colorado Rule 250 and attendant rules and regulations have an all-inclusive comity policy, where attorneys who are complaint in their home jurisdictions and meet certain conditions can use comity from any state to satisfy Colorado requirements.

Colorado Supreme Court and Judicial Education Committee’s Regulation 102(3) states that in order to comply via comity, an attorney must (1) have an active license issued by another state that has continuing legal education requirements and is the state of primary residence; (2) that attorney’s primary residence and business address in the other state have been on file with the Colorado Office of Attorney Registration for a minimum of 45 days before the end of the attorney’s CLE compliance period; (3) the attorney must complete credits in order to comply with their resident state’s requirements; and (4) the attorney provides a certificate of good standing establishing CLE compliance in the resident state along with a copy of their CLE transcript that reflects the activities undertaken during their Colorado compliance period.

Given these criteria, a Washington LLP who primarily lives in Washington, has their Washington address on file with Colorado Office of Attorney registration for the minimum time period, completes and complies with Washington requirements, and provides a certificate of good standing and Washington MCLE transcript as proof of that compliance, could attain Colorado compliance via Washington comity. The above proposed suggested amendment would allow those who reside in Colorado to submit comity certificates from Colorado to Washington to meet their CLE requirements in Washington.

Current MCLE Comity Fees

Comity Submission fee	\$25
Comity Certificate from WA	\$25



Attachments

1. [Admission and Practice Rule \(APR\) 11](#)
2. Draft APR 11 Redline
3. [Colorado Rule 250. Mandatory Continuing Legal and Judicial Education](#)
4. Colorado [Continuing Legal and Judicial Education Regulations](#) # amended by the Court, 6/18/2025, effective 1/1/2026



SUGGESTED AMENDMENTS TO THE APR 11 (Redline)

1 **TITLE**

2 **ADMISSION AND PRACTICE RULES (APR)**

3 **RULE 11. MANDATORY CONTINUING LEGAL EDUCATION (MCLE)**

4 **(a) – (c)(5) No Changes.**

5 **(6)** Comity. The education requirements in Oregon, Idaho, Colorado, and Utah substantially
6 meet Washington’s education requirements for lawyers. These states are designated as comity
7 states. A lawyer may certify compliance with these rules in lieu of meeting the education
8 requirement by paying a comity fee and filing a Comity Certificate of MCLE Compliance from
9 a comity state certifying to the lawyer’s subjection to and compliance with that state’s MCLE
10 requirements during the lawyer’s most recent reporting period.

11 **(c)(7) - (k) No Changes.**

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