

IMPACT STATEMENT: PROPOSED AMENDMENTS TO RULE 31

I. OVERVIEW OF IMPACT

The Petitioner submits this Impact Statement to analyze the effects of the proposed recognition of Qualified Administrative Representatives (QARs) and Qualified Regulatory Prosecutors (QRPs) on Arizona's legal landscape. This amendment is designed to modernize administrative advocacy by shifting from a rigid, degree-based licensing model to one centered on specialized competency, ethical accountability, and public accessibility.

II. ANALYSIS OF STAKEHOLDER IMPACT

The proposed amendments are anticipated to have the following impacts:

A. Impact on the Public and Vulnerable Populations: The primary impact will be a significant expansion of access to justice. By enabling qualified, non-lawyer professionals to represent parties in administrative hearings, the proposal reduces the prohibitive costs associated with traditional legal representation, specifically for individuals dealing with serious mental illness, disability services, and public benefits.

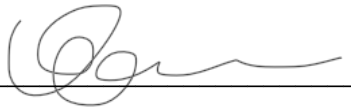
B. Impact on Administrative Agencies and Tribunals: Agencies and the Arizona Office of Administrative Hearings (OAH) will benefit from a more consistent and technically proficient class of practitioners. By requiring regulatory immersion and specialized training, the framework ensures that representatives are intimately familiar with agency-specific rules, thereby streamlining the adjudication process and reducing delays caused by procedural errors.

C. Impact on the Legal Profession: The proposal integrates the existing bar by mandating supervisory and compliance attorney roles. Far from displacing licensed attorneys, the framework establishes a collaborative model where non-lawyer experts handle specialized administrative matters under the critical oversight of the legal profession, ensuring that constitutional rights and ethical standards are consistently upheld.

III. CONCLUSION

The proposed amendments will create a more equitable, efficient, and accountable administrative justice system. The impact on the state's regulatory environment will be overwhelmingly positive, fostering greater trust in agency processes while ensuring that justice is not limited by the availability of traditional legal resources.

Respectfully submitted,

A handwritten signature in black ink, consisting of a large, stylized 'C' followed by a series of loops and a long horizontal stroke.

Petitioner