

IN THE SUPREME COURT OF TENNESSEE  
AT NASHVILLE



ADM2025-01403

IN RE: PUBLIC COMMENTS ON POTENTIAL REGULATORY REFORMS  
TO INCREASE ACCESS TO QUALITY LEGAL REPRESENTATION

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No. ADM2025-01403 – Filed: September 16, 2025

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**RESPONSE TO INVITATION FOR PUBLIC COMMENT**

In response to the Court’s invitation to comment on proposed regulatory reforms to the education and licensure requirements for attorneys practicing in Tennessee, the Tennessee District Public Defenders Conference (“Conference”) submits the following comments. The Conference’s primary interest in these proceedings derives from its core statutory mission: providing effective legal representation to indigent persons accused of crimes. Accordingly, the Conference focuses its comments on reforms that could affect the quality and availability of that representation. The Conference has not addressed the question of non-lawyer ownership of law firms, as the Conference is a state-funded entity operating within a limited and defined scope of public services.

## I. ABA ACCREDITATION AND EDUCATIONAL STANDARDS

### A. Access and Affordability

The Conference is concerned that relaxing educational standards for attorney licensure would diminish the professionalism and competency of the Tennessee bar, ultimately to the detriment of Tennessee's citizens. A significant increase in the number of licensed attorneys does not, by itself, ensure that those attorneys will be adequately prepared to serve their clients. The Conference does not categorically oppose permitting graduates of non-ABA-accredited institutions to sit for the bar examination, provided that the substantive standards for admission remain uniform and are applied consistently regardless of the applicant's educational institution. Any such reform must prioritize the integrity of the standards, not merely the number of individuals who may seek admission.

The Conference further questions whether increasing the aggregate number of licensed attorneys statewide would meaningfully address the geographic disparities in access to legal services that appear to animate the Court's inquiry. Newly licensed attorneys, whatever their educational background or pathway to admission, retain the discretion to establish practices in the markets of their choosing. The concentration of legal professionals in urban and suburban centers likely reflects broader economic and demographic patterns, including the concentration of potential clients in those areas, rather than any barrier attributable to existing admission standards. Relaxing those standards would not alter the economic calculus that leads

attorneys to locate in densely populated markets rather than underserved rural communities.

Additionally, lowering admission standards may increase the size of the bar without reducing the cost of legal services. The fees attorneys charge to clients are driven not only by the costs of legal education, but also by the ordinary costs of operating a law practice: office space, utilities, legal research subscriptions, taxes, and professional fees, among others. These operational costs are not reduced by changing admission requirements. Accordingly, reforms that expand the pool of licensed attorneys without addressing the underlying economics of legal practice may have little impact on the affordability of legal services for the citizens the Court seeks to assist.

### **B. Indigent Representation**

The Conference is most deeply concerned about the potential impact of reduced admission standards on the quality of legal representation available to indigent Tennesseans facing criminal charges. The Conference has invested substantial resources in improving the quality of indigent defense, including the development of specialized training programs, the creation of an appellate division, and the integration of social work professionals into Public Defenders' offices. Those investments reflect a commitment to ensuring that the constitutional right to counsel is meaningful, not merely formal.

Any reform that facilitates the entry of less-qualified attorneys into the criminal defense market risks undermining these efforts. In particular, the Conference is concerned that expanding the pool of attorneys eligible to take court appointments could create a two-tiered system of representation in which well-resourced defendants retain experienced counsel while indigent defendants are served by attorneys who met lower standards of preparation and competency. Such an outcome would raise serious equal protection and due process concerns and would erode public confidence in the fairness and legitimacy of the criminal justice system itself.

At a minimum, the Conference urges the Court to ensure that any modifications to admission or licensing standards do not apply to attorneys who represent individuals accused of crimes. The Conference acknowledges that several states have explored the use of limited-license paraprofessionals, or individuals who receive specialized licensure to assist with discrete civil legal matters, such as certain family law and landlord-tenant proceedings.<sup>1</sup> The Conference does not oppose that approach in civil contexts where it has been thoughtfully implemented. However, it strongly opposes the extension of any such framework to criminal proceedings, where

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<sup>1</sup> Tara Hughes, RP, ACP, and Joyce Reichard, JD, *How States Are Using Limited License Legal Paraprofessionals to Address the Access to Justice Gap*, [www.americanbar.org](http://www.americanbar.org), Feb. 02, 2026, <https://www.americanbar.org/groups/paralegals/blog/how-states-are-using-non-lawyers-to-address-the-access-to-justice-gap/>

liberty interests are at stake and the constitutional requirements for effective assistance of counsel are well-established.<sup>2</sup>

## II. COMITY AND BAR EXAMINATION ADMINISTRATION

The Conference strongly supports efforts to promote greater interstate mobility for licensed attorneys and urges the Court to streamline the comity admission process. As the Conference has experienced directly, the current administration of that process imposes significant and unnecessary burdens on applicants and on the offices that seek to employ them.

The Conference frequently recruits attorneys who are licensed in other states to serve as assistant public defenders. Under the current system, the Board of Law Examiners routinely takes in excess of one year to process comity applications, even in cases that appear to present no ethical or disciplinary concerns. This delay creates serious operational difficulties. Because the statutory framework governing the Conference's employment of assistant public defenders requires that those attorneys be licensed in Tennessee, extended processing delays effectively prevent the Conference from fully staffing its offices with otherwise-qualified candidates.

The problem is compounded by a lack of transparency in the application process. The Conference is not permitted to inquire about the status of a pending comity application, and individual applicants are frequently unable to obtain status

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<sup>2</sup> *Id.* The Conference is aware that the above cited article notes that Arizona appears to allow some of these non-attorney groups to represent persons in very limited criminal matters (pretrial release and misdemeanors not subject to incarceration). *See* AZ ST CJA § 7-210(F)(b)(3) (2025).

updates as well. This opacity is particularly problematic because the period during which an applicant may practice law in Tennessee pending admission is limited. When the Board's processing extends beyond that period, the applicant is left in an unauthorized status, unable to represent clients and thus unable to perform the duties for which the Conference sought to hire them.

The Conference also urges the Court to direct the Board of Law Examiners to apply its procedural rules with greater proportionality. The Conference is aware of instances in which bar applicants have been rejected on the basis of technical, ministerial errors in their applications, such as submission of a document in a font size that varies from the specifications in the Board's rules. Disqualifying an otherwise-qualified applicant on such grounds, or requiring resubmission of an application because of minor technical deficiencies, serves no legitimate gatekeeping function and imposes delays that are inconsistent with the Court's stated commitment to expanding access to legal services.

In sum, the Conference observes that the current administration of both the comity process and the initial bar application process impose unnecessary friction on the entry of qualified attorneys into the Tennessee bar. Expediting the licensure of attorneys who have already demonstrated their qualifications, whether through admission in another state or through preparation to sit for the bar examination, would do more to advance the Court's access-to-justice objectives than relaxing the substantive qualifications for admission.

### III. CONCLUSION

The Conference respectfully submits that the Court's access-to-justice objectives can be meaningfully advanced without reducing the substantive standards that govern attorney licensure in Tennessee. The Conference offers two targeted recommendations.

First, the Court should advocate for a substantial increase in the compensation rates paid to attorneys appointed to represent indigent defendants in criminal proceedings. Adequate compensation would expand the number of attorneys willing to accept appointed cases, encourage legal professionals to establish practices in underserved rural communities where appointed work is more prevalent, and reduce the quality differential between retained and appointed counsel. This reform would address the access problem directly, by improving both the availability and the quality of representation for those who cannot afford private counsel.

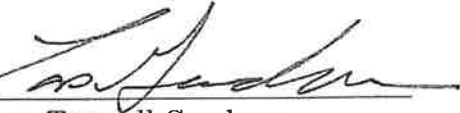
Second, the Court should direct the Board of Law Examiners to reform its procedures for processing comity applications and initial bar applications. Specifically, the Board should be directed to establish and publish processing timelines, provide applicants and sponsoring employers with access to case-status information, and exercise proportionate judgment in the application of technical filing requirements. Implementing these procedural reforms would remove artificial barriers to entry for qualified attorneys and increase the effective supply of legal

services available to Tennesseans without compromising the standards that protect the public.

The Conference urges the Court to pursue reforms that enhance the quality and efficiency of the attorney licensure system rather than dilute the standards that make licensure meaningful. The constitutional rights of the indigent accused, and the integrity of the legal system as a whole, depend on ensuring that every attorney admitted to the Tennessee bar is genuinely prepared to fulfill the obligations of the profession.

Respectfully submitted,

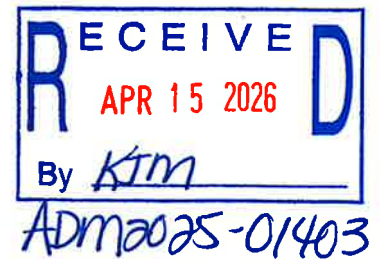
**Tennessee District Public Defenders Conference**

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April 15, 2026

Submitted via email: [appellatecourtclerk@tncourts.gov](mailto:appellatecourtclerk@tncourts.gov)

James Hivner, Clerk  
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RE: No. ADM2025-01403, In re: Public Comments on Potential Regulatory Reforms to Increase Access to Quality Legal Representation

Dear Honorable Justices of the Tennessee Supreme Court:

Frontline Justice respectfully submits this public comment in response to the Court's request regarding No. ADM2025-01403. This submission focuses solely on consideration (6): whether any legal services currently provided by lawyers could be competently performed by paraprofessionals and, if so, what qualifications, limitations, or subject-matter restrictions the Court should consider imposing. The Court has extended the deadline for written comments to April 30, 2026.

Frontline Justice is a national initiative dedicated to expanding access to legal help for everyday civil legal issues. We train, equip, and support community justice workers who assist individuals with straightforward legal matters that often go unresolved because legal help is unavailable, difficult to access, or unaffordable. Our work also includes research, policy development, and implementation support related to community justice worker programs, including technical assistance to courts, funders, legal services organizations, and community-based organizations studying or implementing these programs.

Consideration (6) refers to "paraprofessionals." In this comment, we use the term "community justice workers" to refer to a specific role: trained individuals who work within a defined scope of practice, typically under supervision, in legal services or nonprofit settings that already provide legal and other life-stabilizing assistance to the public. This area of legal innovation is undergoing active regulatory development. As of this writing, 14 states and the District of Columbia have passed or proposed rules to authorize justice worker programs, and many more are actively exploring them.

Frontline Justice likewise supports authorizing community justice workers to assist Tennessee residents in civil legal matters. We believe that, with clear guidelines and a well-defined scope,

trained community justice workers can competently deliver many legal services that, under current rules, only lawyers are generally permitted to provide, even though many Tennesseans are unable to obtain that assistance from a lawyer.

### **Community Justice Workers address a real shortage of accessible legal help.**

Many Tennesseans face civil legal problems that carry immediate consequences for daily life, including benefit denials, housing disputes, debt collection matters, family-related filings, and record-clearing relief. Many do not have a realistic path to receiving help from a lawyer. Legal aid organizations cannot meet the existing need. Due to funding constraints, LSC-funded legal aid organizations must turn away nearly half (49%) of those seeking assistance.<sup>1</sup> Many more households do not qualify for free representation, yet still cannot afford private counsel.

Economic data help explain this gap. A 2025 report from United Ways of Tennessee uses the term ALICE (Asset Limited, Income Constrained, Employed) for households earning above the federal poverty line but still not enough to cover basic costs. In 2023, 44% of Tennessee households were below the ALICE Threshold: 14% in poverty and another 30% above the poverty line but still unable to afford basic expenses.<sup>2</sup> The report also found that the annual survival budget in Tennessee was \$29,328 for a single adult and \$74,796 for a family of four.<sup>3</sup> By contrast, the Legal Services Corporation's 2024 income eligibility thresholds were \$18,825 for an individual and \$39,000 for a family of four, which reflects how many Tennessee households can be above legal aid eligibility limits and still far below the state's actual survival budget.<sup>4</sup>

These financial constraints shape how people respond to legal problems. Someone already struggling to pay for rent or a mortgage, food, transportation, child care, and health care is unlikely to be able to hire a lawyer to respond to a benefits notice, file a housing claim, answer a debt case, or complete family law paperwork. Many go without legal assistance altogether. Others miss deadlines, misread notices, submit incomplete paperwork, or abandon claims they may have been entitled to pursue. These access challenges are compounded when written materials, forms, and procedural instructions are difficult to understand.

Literacy barriers also affect a person's ability to advocate for themselves in civil legal matters. National Center for Education Statistics estimates based on PIAAC data indicate that about 22% of adults in Tennessee have literacy skills at or below Level 1, and about 38% are at Level 2.<sup>5</sup> Adults at or below Level 1 may be able to read short texts and complete a simple form, but may

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<sup>1</sup> See Legal Servs. Corp., *Tennessee State Profile*, <https://www.lsc.gov/grants/our-grantees/tennessee-state-profile> (reporting an estimated LSC-eligible population of 1,209,440 in Tennessee, representing 17.4% of the state population, and listing 2024 income eligibility thresholds of \$18,825 for an individual and \$39,000 for a family of four).

<sup>2</sup> See United For ALICE, *The State of ALICE in Tennessee: 2025 Update on Financial Hardship* (2025), <https://www.unitedforalice.org/tennessee> (reporting that 44% of Tennessee households were below the ALICE Threshold in 2023 and that the annual household survival budget was \$29,328 for a single adult and \$74,796 for a family of four).

<sup>3</sup> United For ALICE, *The State of ALICE in Tennessee*, *supra* note 2.

<sup>4</sup> See Legal Servs. Corp., *Tennessee State Profile*, <https://www.lsc.gov/grants/our-grantees/tennessee-state-profile>

<sup>5</sup> See Nat'l Ctr. for Educ. Stats., *U.S. PIAAC Skills Map: State and County Indicators of Adult Literacy and Numeracy* (NCES 2020-047), U.S. Dep't of Educ. (2020), <https://nces.ed.gov/surveys/piaac/skillsmap>.

struggle to draw inferences, combine information from multiple written sources, or locate specific information in a document.<sup>6</sup> Adults at Level 2 may be able to read print and digital texts and draw simple inferences, but may still have difficulty with more complex evaluation and text-based tasks.<sup>7</sup>

In civil legal matters, those limitations can make it difficult to understand written communications, determine what information is relevant, compare documents, complete forms correctly, and identify what must be done next and by when. In that setting, trained community justice workers can provide practical assistance by helping people understand notices, identify the legal issue, complete paperwork, gather supporting documents, and take the next procedural step before important deadlines pass.

### **The Court should use an evidence-based approach.**

Frontline Justice encourages the Court to adopt an evidence-based approach when considering this role. That process begins with identifying the problem Tennessee is trying to solve: recurring civil legal problems, high unmet need, and limited access to timely, affordable assistance. It then asks what types of help are most often needed, which tasks recur from case to case, where people already seek help, and what type of training prepares a person to perform that work accurately and safely.

Tennessee's own recent legal needs assessment provides a helpful starting point. The 2025 Tennessee Civil Legal Needs Assessment found that 36.5% of surveyed households reported healthcare-related legal issues, 30.2% reported family law issues, 24.1% reported housing and property issues, 22.8% reported employment and public benefits issues, 21.3% reported consumer and financial issues, 20.7% reported criminal justice and driver's license issues, and 18.2% reported advanced directives and estate planning needs.<sup>8</sup> The same assessment also identified low public awareness of available legal services, barriers to digital access, and particular challenges faced by rural residents and other vulnerable populations.<sup>9</sup> Those findings provide an important starting point for deciding where trained community justice workers could be deployed first and what kinds of training would be most useful.

Tennessee would not be venturing into untested territory. Several jurisdictions have already authorized community justice workers or comparable models. Their experience can provide useful guidance on scope of practice, training, supervision, organizational placement, and consumer protection. The research literature also offers useful evidence on program design, including service delivery in rural settings and evaluations of how these models perform.

That research is especially relevant in Tennessee, where many residents face access barriers tied to geography, infrastructure, and limited service availability. Recent scholarship also

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<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> See *Tenn. All. for Legal Servs., Tennessee Civil Legal Needs Assessment 2025 3 (2025)*, [http://lqs.org/wp-content/uploads/2026/02/TALS-TN\\_Civil\\_Legal\\_Needs\\_Assessment\\_2025.pdf](http://lqs.org/wp-content/uploads/2026/02/TALS-TN_Civil_Legal_Needs_Assessment_2025.pdf) (reporting that healthcare-related legal issues, family law issues, and housing and property issues were among the most commonly reported civil legal needs among surveyed households).

<sup>9</sup> *Id.*

emphasizes that lawyer-centered models are difficult to scale in low-access settings, particularly rural communities, and that effective service design depends on multiple local access points and institutions already present where people seek help. That insight is consistent with the Tennessee assessment's emphasis on community partnership expansion and stronger service capacity.<sup>10</sup>

### **Community justice workers should be placed in legal services and nonprofit service organizations.**

Frontline Justice recommends that Tennessee authorize this work through legal services organizations and nonprofit organizations that already provide direct services. That design reflects how people actually seek help. Many do not begin by contacting a lawyer, especially when they do not yet recognize that their problem has a legal dimension. They turn first to a trusted source: a food bank, shelter, domestic violence program, neighborhood nonprofit, reentry organization, public benefits site, school, health system, senior center, church, or another trusted service provider. Those are often the places where legal problems first become visible and where people ask for help understanding a notice, a deadline, a form, or the next required step.

The research supports this placement choice. The rural access brief concludes that effective service design should build on existing human and community infrastructure and specifically identifies community centers, senior centers, veterans' groups, schools, and health care systems as examples of institutions that can serve as direct access points for meaningful, problem-specific legal assistance when they receive appropriate training and support.<sup>11</sup>

Community-based organizations are also a practical place to house this work. They already serve the people most likely to face these problems, and they often encounter those problems early, before the situation becomes harder to correct. They can provide structure, supervision, and day-to-day accountability. Authorizing the role in these settings would make it easier for people to get legal help sooner and in the places where they are already seeking assistance.

### **Entry into community justice work should be low-barrier.**

Frontline Justice urges the Court to structure community justice work as a low-barrier entry model. If Tennessee requires years of schooling, high fees, broad disqualification rules, or attorney-style licensing requirements, fewer people will be able to serve in this role, and fewer already resource-constrained community-based organizations will be able to support it. The result will be fewer access points to legal help, reduced geographic reach, and less ability to respond to recurring civil legal needs in the communities where those needs arise most often. Recent research points in the same direction. In a 2026 American Bar Foundation research brief, *Analysis of the Social and Economic Impact of Delaware Qualified Tenant Advocates*

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<sup>10</sup> See Rebecca L. Sandefur, Matthew Burnett & James Teufel, *Rural Access to Justice: Key Research Learnings and Implications for Service Design and Delivery* (Am. Bar Found. Access to Just. Rsch. Initiative 2026),

<https://www.americanbarfoundation.org/wp-content/uploads/2026/02/Rural-Access-to-Justice-FIN.pdf>

f.

<sup>11</sup> *Id.*

(2022–2025), Teufel, Burnett, and Sandefur identify reduced educational and licensing barriers as one reason qualified tenant advocate roles can be sustained.<sup>12</sup> The brief notes that these roles do not require the years of higher education, licensing fees, and multiple examinations associated with becoming an attorney.

### **There should be no character and fitness process.**

Frontline Justice does not recommend a standard character and fitness process for this role. A character and fitness regime would add cost, delay, administrative burdens, and uncertainty. It would also import a feature of lawyer licensing that is disproportionate to a narrower, task-specific role. This role is limited by scope and well-suited to organization-based oversight. Tennessee can therefore protect the public through other means.

If the Court determines that some form of screening is necessary, any screening should be limited and directly tied to the role's responsibilities. Frontline Justice has previously taken the position that exclusion should be tied to conduct directly connected to safety, fraud, or misuse of the position, and that automatic exclusion rules should be avoided. Public protection can be addressed through role-specific screening, clear scope limits, complaint procedures, and removal for misconduct without adopting a broader lawyer-licensing process.

### **Training should match the approved scope of practice.**

Training should be tailored to the work Tennessee authorizes. The Court does not need a general legal education model for a role that is limited in its subject matter and tasks. Training should be tied to the actual notices, forms, deadlines, interviews, procedural steps, and referral triggers that the authorized worker will encounter. That is the training most likely to produce competent performance in the work the Court chooses to authorize.

For example, the Delaware Qualified Tenant Advocate program uses training that is directly tied to the authorized housing scope of practice. The curriculum covers landlord-tenant law, ethics, professional standards, practical exercises, mock hearings, client interviews, evidence development, and advocacy in the settings where these workers are authorized to act. The Alaska program similarly provides subject-specific training in five approved areas and supplements it with continuing support, templates, forms, guides, and ongoing access to attorneys and staff.

A scope-based training model is a better fit for this role because it prepares workers for the tasks Tennessee intends them to perform, avoids requiring broad instruction on subjects outside the approved role, and is more scalable because it can be delivered more

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<sup>12</sup> See James Teufel, Matthew Burnett & Rebecca L. Sandefur, *Analysis of the Social and Economic Impact of the Delaware Qualified Tenant Advocates Program (2022–2025)* (Am. Bar Found. Access to Just. Rsch. Initiative 2026), <https://www.americanbarfoundation.org/limited/whosewp-content/uploads/2026/02/Delaware-Qualified-Tenant.pdf>.

efficiently across defined subject areas and functions. Training could include the following areas:

- instruction on ethics, confidentiality, role boundaries, and referral rules
- subject-matter training connected to the approved area of work
- field training using the forms, notices, and workflows the worker will actually handle

### **There should be no bar examination.**

Frontline Justice does not recommend a bar examination or similar test for this role. A bar examination serves a different professional track. It tests broad legal knowledge across multiple doctrinal areas and functions within a full lawyer-licensing system. A limited, scope-defined role requires a different method of preparation and assessment.

For this role, the most effective approach is to tie training and assessment to the approved scope of work. That approach measures whether the worker can perform the authorized tasks accurately and recognize when referral to a lawyer is required. Frontline Justice has been engaged in developing training for community justice worker roles, and that work has reinforced that training is most useful when it is tied to the actual advocacy tasks the worker will be expected to handle. A scope-based model, for example, may include modular instruction tied to the approved subject area, supervised practice using the forms and procedures the worker will actually encounter, and completion of a practicum or other structured field component before independent work begins.

### **Research shows community justice worker models can produce measurable results.**

Recent research also supports the basic practicality of community justice worker models. In Delaware, qualified tenant advocates were involved in 3,755 housing matters between 2022 and 2025 and participated in more than three-quarters of one legal aid organization's housing cases.<sup>13</sup> The program was associated with preservation or recovery of approximately \$4.8 million in housing-related financial assistance, substantial case outcomes for tenants, high client satisfaction, and an estimated return on investment of approximately \$7 in benefits for every \$1 invested.<sup>14</sup>

The Alaska Community Justice Worker Program was authorized by the Alaska Supreme Court in 2022. Hosted by Alaska Legal Services Corporation, the program trained a growing community justice workforce to deliver services in five legal areas, including SNAP, wills, Indian Child Welfare Act cases, intimate partner violence, and consumer debt. By the time of the study, more than 200 community justice workers had completed at least one approved training course and passed knowledge checks. In SNAP matters alone, community justice workers handled more than 1,400 cases, helped recover \$23.6 million in food assistance for Alaskan households, and generated an estimated additional

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<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

\$14.5 million in community economic benefit.<sup>15</sup> The program also completed 180 wills and expanded legal help into rural and underserved communities, including towns and villages with no attorneys and communities off the road system.<sup>16</sup> Between 2022 and 2024, the number of cases served by community justice workers increased by 1,575%, and initial findings estimated roughly \$25 in public-benefit value for people and their communities for every \$1 invested under one federal grant.<sup>17</sup>

More broadly, evidence in the United Kingdom also shows that trained non-lawyer advisors perform as well as or better than lawyers in common civil areas such as housing, benefits, and debt, and that consumer complaints have been minimal when programs are properly supervised and embedded in trusted organizations.<sup>18</sup> Similarly, in Utah, a regulatory sandbox that includes justice workers delivered over 75,000 services between 2020 and the time data was collected in 2024. Well-designed community justice worker programs are scalable and inspire confidence among consumers.<sup>19</sup>

These examples do not answer every design question for Tennessee, but they do show that trained, scope-defined nonlawyer legal helpers can deliver substantial services and measurable results.

### **The legal system already authorizes adjudicative and representative functions outside of attorney licensure.**

Federal and state legal systems already authorize people who are not attorneys to assist in administrative proceedings, represent parties in certain matters, and decide some lower-level cases where that authority is established by rule or law. Tennessee, therefore, would not be entering unfamiliar territory by authorizing a limited, scope-defined role for trained legal helpers in civil matters. At the federal level, the Department of Justice's Legal Aid Interagency Roundtable has reported that 15 federal agencies with relevant administrative proceedings permit nonlawyers to assist in those matters.<sup>20</sup> In state systems, people without law degrees also perform some formal functions in defined judicial settings. Current legal scholarship reports

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<sup>15</sup> See Matthew Burnett, Rebecca L. Sandefur & James Teufel, *Analysis of the Social and Economic Impact of the Alaska Community Justice Worker Program (2021–2025)* (Am. Bar Found. Access to Just. Rsch. Initiative 2025),

<https://www.americanbarfoundation.org/wp-content/uploads/2025/11/ABF-Alaska-Community-Justice-Brief-FIN.pdf> (reporting that Alaska community justice workers handled more than 1,400 SNAP cases, helped recover \$23.6 million in benefits, and increased cases served by 1,575% between 2022 and 2024).

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> See Richard Moorhead, Avrom Sherr & Alan Paterson, *Contesting Professionalism: Legal Aid and Nonlawyers in England and Wales*, 37 *Law & Soc'y Rev.* 765 (2003).

<sup>19</sup> See Rebecca L. Sandefur & Matthew Burnett, *Building Successful Justice Worker Programs: Emerging Insights from Research and Practice*, 41 *Alaska L. Rev.* 24 (2024),

<https://scholarship.law.duke.edu/cgi/viewcontent.cgi?article=1662&context=alr>.

<sup>20</sup> See White House Legal Aid Interagency Roundtable, *Access to Justice in Federal Administrative Proceedings: Nonlawyer Assistance and Other Strategies* 26 (2023),

<https://www.justice.gov/archives/atj/media/1327481/dl> (reporting that agencies across the federal government permit, and sometimes fund, nonlawyers to help people navigate administrative proceedings involving areas such as housing, public benefits, immigration, civil rights, tax, food security, and worker protection).

that 32 states allow at least some low-level state court judges to adjudicate without a law degree. Tennessee itself provides one example. In at least some municipal courts, city judges may serve without a law license, subject to statutory qualifications, continuing education requirements, and limits on the matters they hear, including municipal ordinance and traffic matters.<sup>21</sup>

## **Conclusion**

Frontline Justice commends the Court's inquiry into practical ways to expand access to legal help in Tennessee. The question presented for public comment is whether any legal services currently provided by lawyers could be competently provided by paraprofessionals and, if so, what qualifications, limitations, or subject-matter restrictions the Court should consider imposing. Frontline Justice believes the answer is yes.

We recommend that Tennessee authorize Community Justice Workers to be placed in legal services organizations and nonprofit service organizations that already serve the people most likely to need this help. Entry should remain low-barrier. Training should match the approved scope of practice and the actual forms, deadlines, procedures, and other tasks workers will be expected to handle. The Court should avoid adding attorney-licensing features that do not fit this narrower role, including a character and fitness process and a bar examination.

In doing so, Tennessee would help address routine but serious civil legal problems through a model informed by experience in other jurisdictions and designed to protect the public through clear scope limits, focused training, organizational placement, supervision, and referral rules.

If the Court would find it useful, Frontline Justice would be glad to provide additional information on the design, training, and implementation of community justice worker models.

Respectfully submitted,

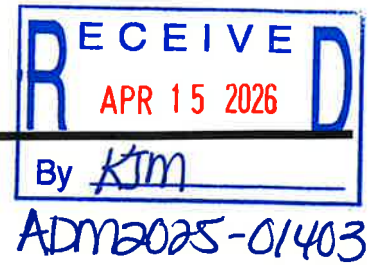
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<sup>21</sup> Sara Sternberg Greene & Kristen M. Renberg, *Judging Without a J.D.*, 122 Colum. L. Rev. 1287 (2022).

**Kim Meador**



**From:** John Watkins <Marlenjaw2018@foradvocacy.com>  
**Sent:** Wednesday, April 15, 2026 9:18 AM  
**To:** appellatecourtclerk  
**Subject:** Expand Legal Help in Tennessee: Comments on No. ADM2025-01403

**Warning: Unusual sender** <marlenjaw2018@foradvocacy.com>

You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

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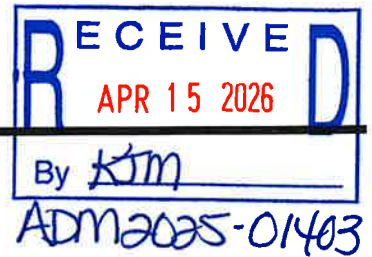
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Sincerely,

John Watkins  
Knoxville, TN

**Kim Meador**



**From:** Bethany Redwine <missb1217@forgrassroots.com>  
**Sent:** Wednesday, April 15, 2026 9:19 AM  
**To:** appellatecourtclerk  
**Subject:** Expand Legal Help in Tennessee: Comments on No. ADM2025-01403

**Warning: Unusual sender** <missb1217@forgrassroots.com>

You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

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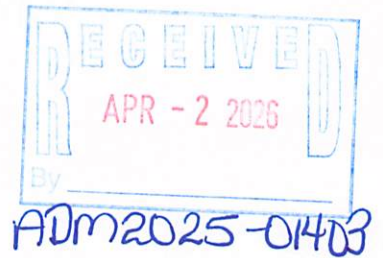
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Sincerely,

Bethany Redwine  
Rockwood, TN

**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403**

**VIA EMAIL**



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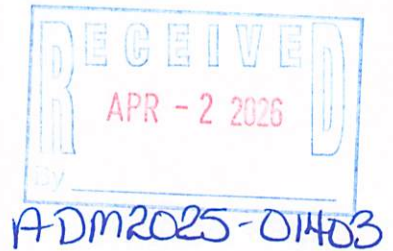
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Michael Silvers  
Michaelsilvers763@gmail.com  
Telford, TN

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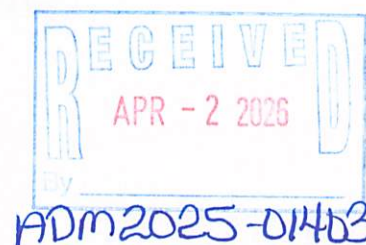
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Sincerely,

Vicky Baucom  
iljc333ktf@gmail.com  
Mt. Juliet, TN

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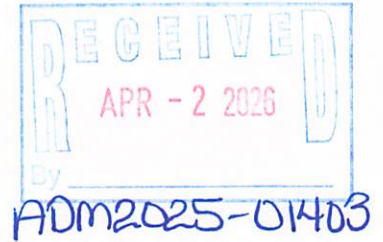
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Sincerely,

Tami Kathryn  
tlnmft@gmail.com  
Brentwood, TN

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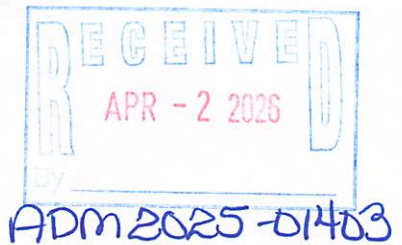
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Sincerely,

Rob Melendez  
topcat217@gmail.com  
Palmyra, TN

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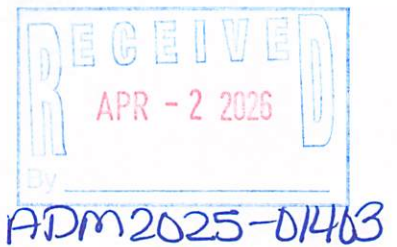
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Sincerely,

April Patterson  
fluffyfluffballs411@gmail.com  
Dresden, TN

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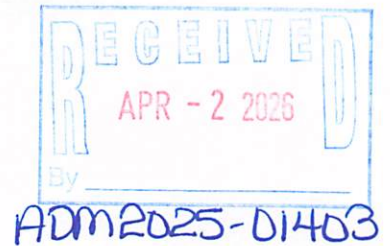
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Julian Odio  
Julian.odio03@gmail.com  
Nashville, TN

**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403**

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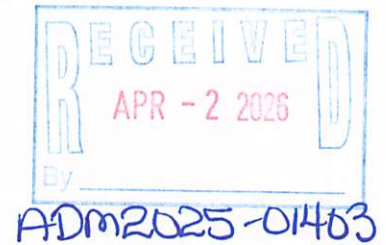
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Dakota Myers  
dakotamyers@ymail.com  
Nashville, TN

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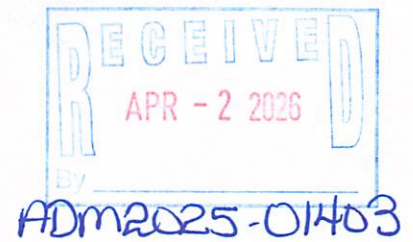
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theandrewlocke@gmail.com  
Madison, TN

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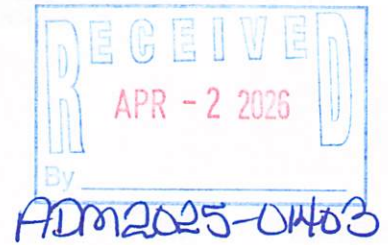
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Gregg Bowman  
firebird71266@gmail.com  
Greeneville, TN

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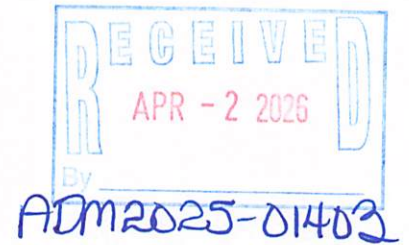
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Carolina Solla  
carolina.a.solla@gmail.com  
Knoxville, TN

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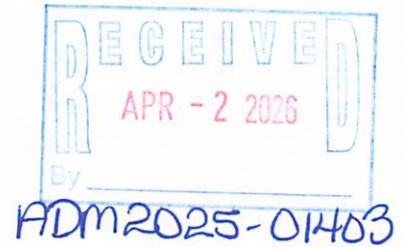
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Sandra Pulse  
msspulse56@gmail.com  
Columbia, TN

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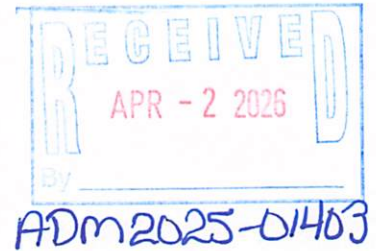
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Sincerely,

Trecia Hayes  
treciahayes@gmail.com  
Greeneville, TN

**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403**

**VIA EMAIL**



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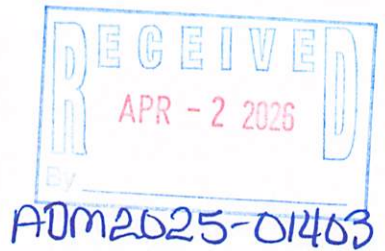
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Sincerely,

Denise Prince  
princedenise52@gmail.com  
Huntland, TN

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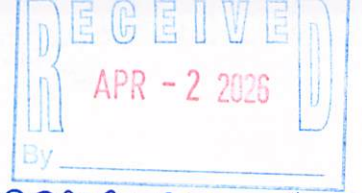
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Sincerely,

Kevin Beaty  
ygbeaty@bellsouth.net  
Rockwood, TN



**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403**

ADM2025-01403

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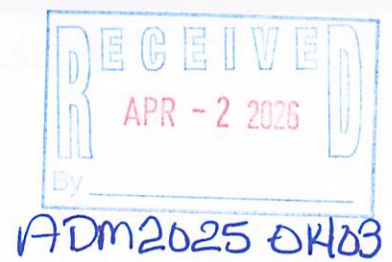
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Sincerely,

Leann Collier  
leanimal@yahoo.com  
La Vergne, TN

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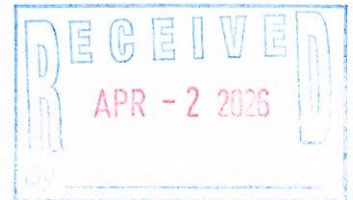
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Sincerely,

Michael Williams  
michael.e.williams@live.mercer.edu  
Berry Hill, TN

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Everyone should have legal representation.

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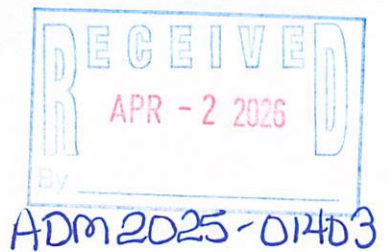
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Sincerely,

Ronald Dayley  
ronald.dayley@yahoo.com  
Clarksville, TN

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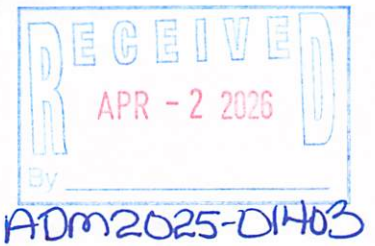
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Sincerely,

Murray Watts  
Mdwatts848@gmail.com  
Clarksville, TN

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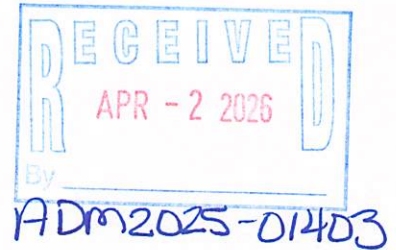
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Kathy Watts  
kathywatts@bellsouth.net  
Clarksville, TN

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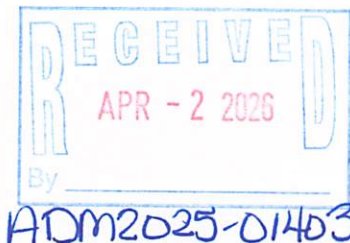
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Tiffany Norbeck  
tiffanynorbeck@yahoo.com  
Clarksville, TN

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Bridging the Gaps: Expanding Legal Help and Elevating Lived Expertise to Prevent Homelessness in Tennessee Every day, Tennesseans face civil legal issues involving housing, family law, debt, benefits, and more — yet most cannot afford a lawyer. In many communities, especially rural areas, there simply aren't enough lawyers to go around. People are left to navigate judges, attorneys, and complicated legal processes alone. The Tennessee Supreme Court has acknowledged this crisis and is asking the public for ideas to make legal help easier to access. One solution is clear: Tennessee must allow trained Peer to Peer legal helpers, especially those whom have survived these systems so brutally without law degrees to assist with basic civil legal needs. With short, accessible training, these helpers could support people with common, low-risk issues such as filling out forms, understanding court procedures, and preparing for hearings. They could offer help through trusted community spaces libraries, nonprofits, churches, and community centers bringing support closer to home instead of creating new barriers. This approach is not only practical; it is essential. Civil legal issues, especially evictions, are one of the fastest pathways into homelessness. Prevention is only possible when people have timely, affordable help. Without it, families fall through gaps that should never exist. And this is where Tennessee's homelessness response system reveals another truth: Peer-to-peer support and lived expertise are the missing capacity our state has never fully recognized or compensated. Those who have experienced homelessness firsthand carry insights that illuminate the real barriers in our systems — barriers that data alone cannot capture. As the HUD Nashville-Davidson County Continuum of Care (CoC) strategic plan emphasizes, individuals with lived experience must be fully integrated into decision-making, leadership, and system design. True progress cannot happen while structural, procedural, or cultural barriers keep them from shaping solutions. By prioritizing inclusion, equity, and direct engagement, Tennessee can build a justice and homelessness response system guided by the people who understand it best. This means: - Investing in eviction prevention through accessible legal help - Funding real Meaning accessible like criminal rights to counsel, Eviction Right to Counsel - Paying lived-expertise leaders as essential contributors and co author's - Embedding peer-to-peer support into every stage of the system - Removing procedural roadblocks that silence the voices of those most affected Homelessness in Nashville is a reality we cannot ignore, with more than 3,400 individuals families with children single male fathers currently unhoused. Rising living costs, limited affordable housing, and gaps in support systems all contribute to this crisis. But when people lose their housing because they had no legal help, no advocate because we're unpaid we exist now, and no guide that is a preventable failure. By addressing these issues with honesty and urgency, we create space for healing and real change. Through community-driven efforts, policy advocacy, and compassionate action, we can build

remedies that restore trust, dignity, and stability. The path forward is clear: Tennessee must expand access to civil legal help and elevate lived expertise as a cornerstone of homelessness prevention. These two efforts are not separate they are inseparable. Today, we call on the Tennessee Supreme Court, policymakers, service providers, and community members to take action. Let us build a system where justice is accessible, homelessness is preventable, and the people who know the system best are leading the way. Urging the Court to act. Together, we can create a more compassionate, practical, and effective system of care for all Tennesseans.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

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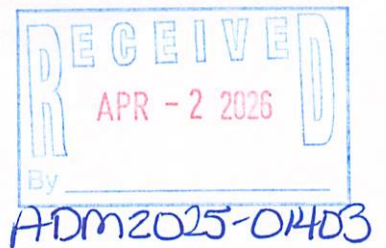
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Sincerely,

Kennetha Patterson  
visionheirsinc2011@outlook.com  
Nashville, TN

**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403**



**VIA EMAIL**

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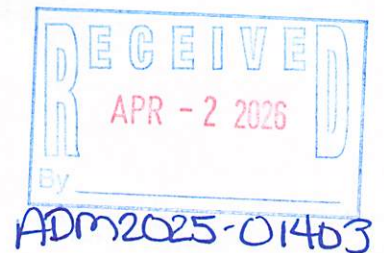
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Sincerely,

Linda Zelnik  
Benthall.zelnik@gmail.com  
Nashville, TN

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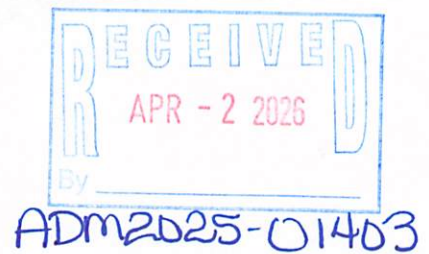
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Louanne Parker  
lparker1214@gmail.com  
Taft, TN

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Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

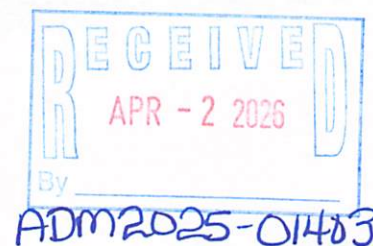
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Sincerely,

William Henry  
primethottimus217@gmail.com  
Cleveland, TN

**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403**

**VIA EMAIL**



Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. Thank you for the opportunity to weigh in on this important issue. Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

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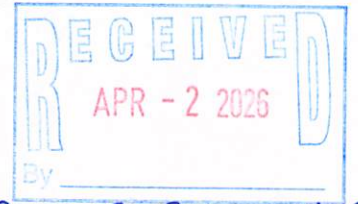
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Sincerely,

Shannon Haddon  
Smh0685@gmail.com  
Winchester, TN

**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403**

**VIA EMAIL**



ADM 12025-01403

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

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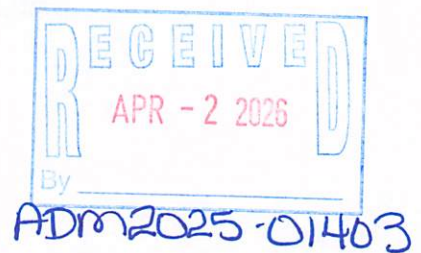
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Sincerely,

Shannon Merritt  
Smerrittmpd@yahoo.com  
Memphis, TN

**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403**

**VIA EMAIL**



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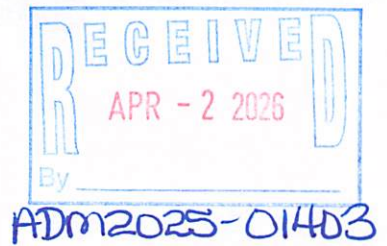
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Sincerely,

Deborah Brawner  
debbrawler@att.net  
Nashville, TN

**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403**



**VIA EMAIL**

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I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. Thank you for the opportunity to weigh in on this important issue. Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

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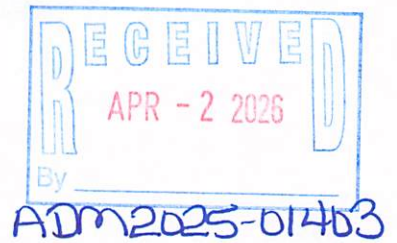
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Sincerely,

Brittany Evans  
Brittany@theshelterinc.com  
Lawrenceburg, TN

**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403**

**VIA EMAIL**



Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. Thank you for the opportunity to weigh in on this important issue. Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

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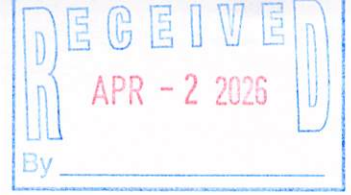
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Sincerely,

Emily Austin  
epaustin116@gmail.com  
Memphis, TN



**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403 from Nashville Resident**

ADM2025-01403

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

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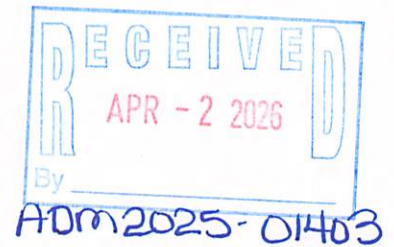
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Sincerely,

Timothy Phillip  
Nashville, TN  
timphillip.68@hotmail.com

**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403**

VIA EMAIL



Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

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I am writing to formally request the allocation of federal funding to support the establishment of salaried, non-attorney legal representative positions within the Memphis community. This request is driven by a critical gap in our local support system that prevents individuals with severe health issues from accessing the federal disability benefits they are entitled to.

#### Professional Background and Expertise

With a decade of specialized experience in Social Security Disability, I have seen firsthand the complexities of the application process. My background includes: Legal Assistant (6 years): Working within a high-volume Memphis attorneys office, managing medical record development and case files. Disability Advocate (4 years): Directly assisting individuals through every stage of the process, including Initial Claims, Reconsiderations, and Hearings. I have a proven track record of drafting comprehensive hearing briefs for Administrative Law Judges (ALJs), which frequently result in "On-the-Record" approvals, saving the government the time and expense of a formal hearing.

#### The Current Challenge

In Memphis, many individuals are involuntarily unable to work due to chronic, mental illness or severe accidents. Currently, the system for representation is flawed for the most vulnerable: Financial Barriers for Advocates: The requirement to travel to Baltimore, Maryland, for testing and the associated lodging costs are significant hurdles for non-attorney representatives.

Inconsistent Compensation: Relying on a contingency fee paid by the claimant is often unsustainable. It is difficult for low-income claimants to manage these payments, and advocates often face challenges in receiving funds even after a successful approval.

The Representation Gap: Because of these financial risks, many private firms decline cases for the very individuals who need help most, those with high barriers to stability.

Proposed Solution: The Salaried Advocate Model I am proposing that federal funds be released to a non-profit 501(c)(3) organization, specifically one aligned with workforce development and basic necessity needs, to fund a salaried Disability Advocate position. This model offers several advantages: Early Intervention: Providing expert assistance at the Initial Claim and Reconsideration

levels reduces the massive backlog at the Hearing level. Equity of Access: By providing a salaried expert, we ensure that a claimants ability to navigate the system is not dependent on their ability to pay a fee. Systemic Efficiency: Professionalizing the initial application process ensures that the Social Security Administration receives fully developed, accurate files from day one.

### Closing

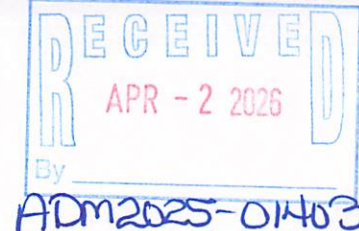
The need for this service in Memphis is severe. Transitioning disability advocacy from a fee-contingent model to a community-based, salaried model will provide the "grit" and technical expertise required to bridge the gap between medical necessity and financial stability. I would welcome the opportunity to discuss how we can implement this pilot program to better serve our community. Thank you for your time and consideration of this vital request.

Sherhunda Gentry

Zip code: 38002

sherhundagentry@gmail.com

**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403**



VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

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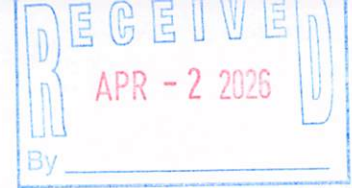
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Sincerely,

Cindy Karth  
Memphis, TN  
cindykrutzher37@gmail.com



**From Case Counselor at The Hospitality Hub: Comments on No. ADM2025-01403** ADM2025-0403

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

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I am a case counselor at The Hospitality Hub. In my community, expanding access to legal help is important because it has become unaffordable for the community, especially people experiencing homelessness. I would want legal helpers to have oversight by a nonprofit or a company, and I would want legal helpers to be able to assist with debt collection, employment and workplace law, housing, and domestic violence and protective orders.

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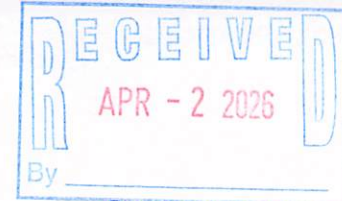
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Sincerely,

Mykala Nunley  
Memphis, TN  
mykalanunley@yahoo.com



Director of Advocacy for BLDG Memphis - Comments on No. ADM2025-01403 ADM2025-01403

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

I am the director of advocacy for BLDG Memphis. Expanding access to legal help is important because it strengthens community ownership through drafting wills, heirs property, title clearing, and small estate planning. I would want legal helpers to have oversight by a nonprofit or company, subject-matter training that can be done online in under 10 hours, and reporting standards and metrics. I would want legal helpers to be able to assist with any legal matter.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

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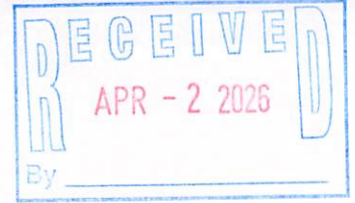
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Sincerely,

Jonathan Mosley  
Memphis, TN  
jonathan@bldgmemphis.org



**Expand Legal Help: Comments on No. ADM2025-01403 from volunteer with Memphis Shelby County Juvenile Court CASA**

ADM2025-01403

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

I am affiliated with the University of Memphis and a volunteer with the Memphis & Shelby County Juvenile Court CASA. In my community, expanding access to legal help is important because many people cannot hire an attorney to help with small legal issues. I would want legal helpers to have oversight by a nonprofit or company, and subject-matter training that can be done online in under 10 hours. I would want them to be able to assist with any civil legal matter.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

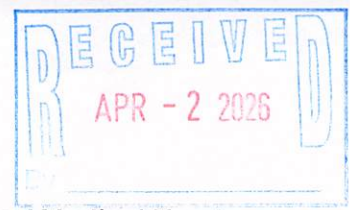
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Sincerely,

Cecilia Cox  
Memphis, TN  
clcox7@memphis.edu



**Expand Legal Help: Comments on No. ADM2025-01403 from Customized Medical Needs**

ADM2025-01403

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

I am with Customized Medical Needs/Customized Veterans Group. Expanding access to legal help is important because many of the individuals that I serve are affected by recidivism due to the fact that they can't afford legal resources. I would want legal helpers to have subject-matter training that can be done online in under 10 hours, and oversight by a nonprofit or company. I would want legal helpers to be able to assist with any civil legal matter.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

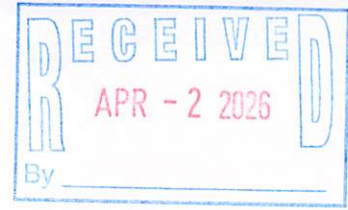
The Court should also consider clear carveouts from Unauthorized Practice of Law rules for low-risk legal assistance, like helping individuals understand court processes and filling out paperwork, which should not be treated as the practice of law. Tennesseans who would receive this help are already protected by existing consumer protection laws, negating the need for the enforcement mechanism that comes with licensure.

Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

I'm grateful that the Tennessee Supreme Court is leading this effort to reform and modernize our legal system. I encourage you to authorize the delivery of legal services by legal helpers and continue exploring ways to ensure that every Tennessean can get the legal guidance they need, when and where they need it. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

Christi Davidson  
Memphis, TN  
christi@customizedmedicalneeds.com



**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403 from GROWWTH - Univ of Memphis**  
ADM2025-01403

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis.

I am with GROWWTH (Growing Relational and Occupational Wealth in West Tennessee Households) - University of Memphis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

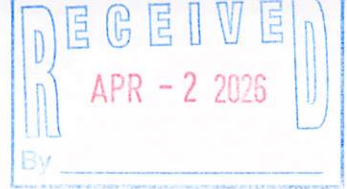
The Court should also consider clear carveouts from Unauthorized Practice of Law rules for low-risk legal assistance, like helping individuals understand court processes and filling out paperwork, which should not be treated as the practice of law. Tennesseans who would receive this help are already protected by existing consumer protection laws, negating the need for the enforcement mechanism that comes with licensure.

Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

I'm grateful that the Tennessee Supreme Court is leading this effort to reform and modernize our legal system. I encourage you to authorize the delivery of legal services by legal helpers and continue exploring ways to ensure that every Tennessean can get the legal guidance they need, when and where they need it. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

Anthony Scherrod  
Memphis, TN  
scherrod@memphis.edu



**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403 from U. of Memphis Staff**

ADM2025-01403

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

I am with the University of Memphis. I would want legal helpers to have oversight by a nonprofit or company, and subject-matter training that can be done online in under 10 hours. I would want legal helpers to be able to assist with any civil legal matter.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

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Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

I'm grateful that the Tennessee Supreme Court is leading this effort to reform and modernize our legal system. I encourage you to authorize the delivery of legal services by legal helpers and continue exploring ways to ensure that every Tennessean can get the legal guidance they need, when and where they need it. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

James Cottrell  
Memphis, TN  
jctrll1@memphis.edu



**2Unique Community Salvation Foundation Comments on No. ADM2025-01403**

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

I am with the 2Unique Community Salvation Foundation. Expanding access to legal help is important because it would provide resources at a grassroots level. I would want legal helpers to have oversight by a nonprofit or company, and subject-matter training that can be done online in under 10 hours. I would want legal helpers to be able to assist with debt collection, family law, employment and workplace law, small claims and money disputes, housing, domestic violence and protective orders, public benefits and assistance, and reentry and civil legal consequences.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

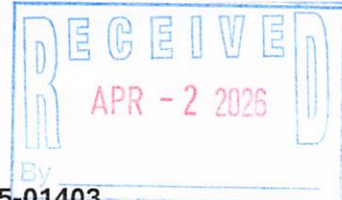
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Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

I'm grateful that the Tennessee Supreme Court is leading this effort to reform and modernize our legal system. I encourage you to authorize the delivery of legal services by legal helpers and continue exploring ways to ensure that every Tennessean can get the legal guidance they need, when and where they need it. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

Roshunda Buchanan  
Cordova, TN  
rbuchanan@2unique-csf.org



**From Black Clergy Collaborative of Memphis: Comments on No. ADM2025-01403**

ADM2025-01403

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court’s request for comments on the regulation of the legal profession and Tennessee’s access-to-justice crisis. I strongly endorse the Court’s suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

I am with the Black Clergy Collaborative of Memphis, and in my community, expanding access to legal help is important because people can't afford attorneys for evictions, clearing titles, wills, and trust. I would want legal helpers to have oversight by a nonprofit or company, and subject-matter training that can be done online in under 10 hours. I would want legal helpers to be able to assist with debt collection, employment and workplace law, small claims and money disputes, housing, domestic violence and protective orders, public benefits and assistance, and reentry and civil legal consequences.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

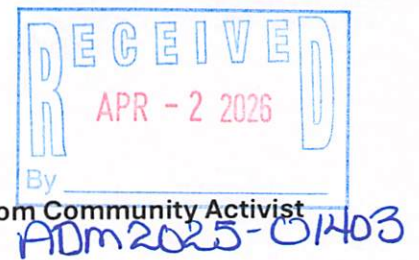
The Court should also consider clear carveouts from Unauthorized Practice of Law rules for low-risk legal assistance, like helping individuals understand court processes and filling out paperwork, which should not be treated as the practice of law. Tennesseans who would receive this help are already protected by existing consumer protection laws, negating the need for the enforcement mechanism that comes with licensure.

Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

I’m grateful that the Tennessee Supreme Court is leading this effort to reform and modernize our legal system. I encourage you to authorize the delivery of legal services by legal helpers and continue exploring ways to ensure that every Tennessean can get the legal guidance they need, when and where they need it. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

Shirley Bondon  
Memphis, TN



**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403 from Community Activist**

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

I am a community activist and concerned citizen. In my community, expanding access to legal help is important because most people without legal knowledge don't know the procedures to follow to start the case/complaint. I would want legal helpers to have any tools necessary for a successful outcome, including oversight by a nonprofit or company. I would want legal helpers to be able to assist with any civil legal matter.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

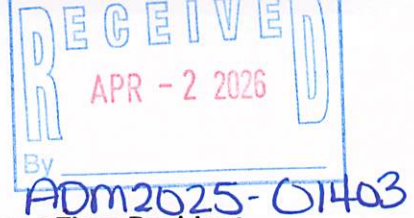
The Court should also consider clear carveouts from Unauthorized Practice of Law rules for low-risk legal assistance, like helping individuals understand court processes and filling out paperwork, which should not be treated as the practice of law. Tennesseans who would receive this help are already protected by existing consumer protection laws, negating the need for the enforcement mechanism that comes with licensure.

Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

I'm grateful that the Tennessee Supreme Court is leading this effort to reform and modernize our legal system. I encourage you to authorize the delivery of legal services by legal helpers and continue exploring ways to ensure that every Tennessean can get the legal guidance they need, when and where they need it. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

Barbara Thomas  
Memphis, TN  
barbratom48@yahoo.com



**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403 from Long-Time Resident**

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

In my community, expanding access to legal help is important because most people do not have the resources to afford all legal situations. I would want legal helpers to have an apprenticeship program, and I would want them to be able to assist with any civil legal matter.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

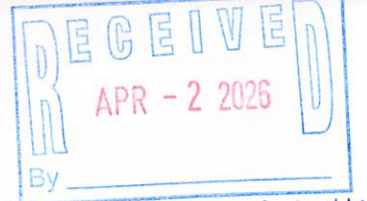
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Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

I'm grateful that the Tennessee Supreme Court is leading this effort to reform and modernize our legal system. I encourage you to authorize the delivery of legal services by legal helpers and continue exploring ways to ensure that every Tennessean can get the legal guidance they need, when and where they need it. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

Chrystal Baker  
Arlington, TN  
chrystalmbaker@gmail.com



From Tennessee Prison Outreach Ministry: Comments on No. ADM2025-01403

ADM2025-01403

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

I am with the Tennessee Prison Outreach Ministry. We need help for the residents in our transition houses. I would want legal helpers to be able to assist with any civil legal matter. Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

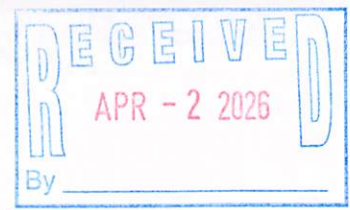
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Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

I'm grateful that the Tennessee Supreme Court is leading this effort to reform and modernize our legal system. I encourage you to authorize the delivery of legal services by legal helpers and continue exploring ways to ensure that every Tennessean can get the legal guidance they need, when and where they need it. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

Michelle Kevorkian  
Nashville, TN  
mkevorkian@tpom.org



**From Child Advocacy Center for 23rd District: Comments on No. ADM2025-01403**

*ADM2025-01403*

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

I am with the CAC 23rd District. Expanding access to legal help is important because there is not a legal aid close to any CAC in the 23rd District. I would want legal helpers to be able to assist with debt collection, family law, employment and workplace law, small claims and money disputes, housing, domestic violence and protective orders, public benefits and assistance, and reentry and civil legal consequences.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

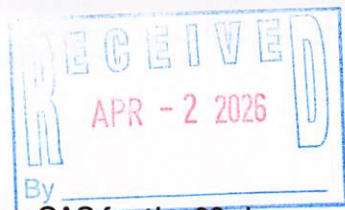
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Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

I'm grateful that the Tennessee Supreme Court is leading this effort to reform and modernize our legal system. I encourage you to authorize the delivery of legal services by legal helpers and continue exploring ways to ensure that every Tennessean can get the legal guidance they need, when and where they need it. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

Jessica Tigert  
Charlotte, TN  
jtigert@23rdCAC.org



**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403 from CAC for the 23rd District**

By  
ADM2025-01403

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

I am with the Child Advocacy Center for the 23rd Judicial District. I would want legal helpers to be able to assist with debt collection, family law, employment and workplace law, small claims and money disputes, housing, domestic violence and protective orders, public benefits and assistance, and reentry and civil legal consequences.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

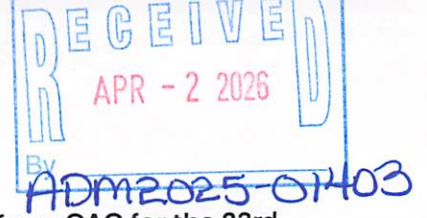
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Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

I'm grateful that the Tennessee Supreme Court is leading this effort to reform and modernize our legal system. I encourage you to authorize the delivery of legal services by legal helpers and continue exploring ways to ensure that every Tennessean can get the legal guidance they need, when and where they need it. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

Vanessa Wandel  
Charlotte, TN  
vaness@23rdcac.org



**Expand Legal Help in Tennessee: Comments on No. ADM2025-01403 from CAC for the 23rd Judicial District**

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

I am with the Child Advocacy Center for the 23rd Judicial District. Our clients face many hurdles and affording an attorney is a common barrier for them. I would want legal helpers to have oversight by a nonprofit or company, and subject-matter training that can be done online in under 10 hours. I would want legal helpers to be able to assist with any civil legal matter.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

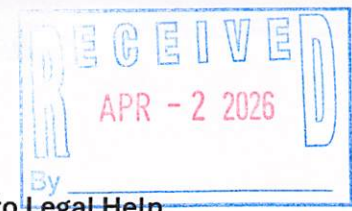
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Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

I'm grateful that the Tennessee Supreme Court is leading this effort to reform and modernize our legal system. I encourage you to authorize the delivery of legal services by legal helpers and continue exploring ways to ensure that every Tennessean can get the legal guidance they need, when and where they need it. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

Kathryn Norbeck  
knorbeck@23rdcac.org



From CAC Intern - Comments on No. ADM2025-01403 - Expand Access to Legal Help

ADM2025-01403

VIA EMAIL

Dear Clerk Hivner and Honorable Justices of the Tennessee Supreme Court,

I am writing in response to the Court's request for comments on the regulation of the legal profession and Tennessee's access-to-justice crisis. I strongly endorse the Court's suggestion that people without law degrees could deliver legal services and support authorizing legal helpers to assist with basic civil legal needs. This is a smart, compassionate, and practical way to make justice more accessible.

I am an intern with the Child Advocacy Center. In my community, expanding access to legal help is important because it helps to better serve underserved individuals. I would want legal helpers to have oversight by a nonprofit or company, and subject-matter training that can be done online in under 10 hours. I would want legal helpers to be able to assist with any civil legal matter.

Across our state, people struggle to access the legal assistance they need; lawyers are too expensive for most people, and many counties are classified as legal deserts because there just aren't enough lawyers to go around.

I urge the Court to focus on low-barrier approaches that expand access to basic help now. Authorized legal helpers could receive short, modular, and accessible subject-matter training, and work under the supervision of non-profits, libraries, community and religious centers, and legal businesses. Licensure that requires extensive training or costly credentialing risks recreating the lawyer-only bottleneck under a different name, while there are countless routine, low-risk legal needs that could be met today by a neighbor who has undergone a short online course.

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Allowing legal helpers would put help directly where people need it—in libraries, churches, and community centers—and ensure that people are not shut out of our justice system simply because of where they live or how much money they have.

I'm grateful that the Tennessee Supreme Court is leading this effort to reform and modernize our legal system. I encourage you to authorize the delivery of legal services by legal helpers and continue exploring ways to ensure that every Tennessean can get the legal guidance they need, when and where they need it. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

Emily Toler  
Bradyville, TN  
etoler@23rdcac.org