



PREPROPOSAL STATEMENT OF INQUIRY

CR-101 (October 2017)
(Implements RCW 34.05.310)

Do **NOT** use for expedited rule making

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STATE OF WASHINGTON
FILED

DATE: July 23, 2025

TIME: 10:11 AM

WSR 25-15-155

Agency: Department of Licensing

Subject of possible rule making: Review of WAC 308-101 and newly enacted WAC 308-111 to create new rules which define expectations for attorneys appearing in administrative hearings before the Department of Licensing.

Statutes authorizing the agency to adopt rules on this subject: RCW 18.235.030 Disciplinary authority – Powers; Chapter 34.05 RCW Administrative Procedure Act; RCW 46.01.110 Rule-making authority; and RCW 46.20.245 Mandatory revocation – Persons subject to suspension, revocation, or denial who are eligible for certain full credit – Notice – Administrative, judicial review – Rules – Application

Reasons why rules on this subject may be needed and what they might accomplish: DOL does not currently have any rules that govern the professional conduct of attorneys appearing before the agency. These rules would provide clarity on what DOL considers prohibited attorney conduct during administrative proceedings.

Identify other federal and state agencies that regulate this subject and the process coordinating the rule with these agencies: N/A

Process for developing new rule (check all that apply):

- ☒ Negotiated rule making
- ☐ Pilot rule making
- ☐ Agency study
- ☐ Other (describe)

Interested parties can participate in the decision to adopt the new rule and formulation of the proposed rule before publication by contacting:

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Additional comments:

Date: July 23, 2025

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Title: Rules and Policy Manager

Signature: