



The State Bar *of California*

OPEN SESSION AGENDA ITEM 709 JULY 2022

DATE: July 21, 2022

TO: Members, Board of Trustees

FROM: Leah Wilson, Executive Director

SUBJECT: Proposed Amendment to Rule 2.11 (Due Date and Form of Payment, Licensee Fees): Return from Public Comment and Request for Approval

EXECUTIVE SUMMARY

At its May 2022 meeting, the Finance Committee directed staff to issue proposed amendments to State Bar Rules 2.11 and 2.13 for a 45-day public comment period. Together these amendments provide the State Bar with new tools to incentive the submission of conforming annual licensing payments, and, conversely, penalize nonconforming payments.

This item requests approval of amendments to State Bar Rules rule 2.11. Due to an error in finalizing the posted agenda for the Board of Trustees' July 21, 2022, meeting, rule 2.13 was not included in the noticed agenda. As a result, the Board is asked to approve amended rule 2.11 today, with amended rule 2.13 to be considered by the Board at its September meeting. This bifurcated approach, while not optimal, will provide clear direction for staff and licensees well in advance of the billing cycle (proposed amended rule 2.11). Penalties for noncompliance (proposed amended rule 2.13) would not be relevant until 2023, thus there is less urgency around implementing this particular rule revision at the July meeting.

The State Bar received three public comments in opposition to the proposed amendments.

BACKGROUND

The State Bar collects licensing fees from approximately 190,000 active and 75,000 inactive attorneys annually.

A host of changes were made to the licensee billing process in the years 2016 and 2017 to encourage online payment and reduce reliance on physical processes including establishing a platform for law firms (agencies) to make payments for multiple attorneys, the transition to electronic versus mailed fee statements, and the introduction of bar cards “print-on-demand” as opposed to strictly physical bar cards. These changes served to make the payment process easier for licensees, and reduce the environmental impact caused by hard mail, check processing, and physical bar card production. In addition, significant cost savings were realized by the State Bar resulting from the transition away from manual and physical billing processes. These cost savings have been used in part to support internal resource reallocations within the State Bar, namely, to augment to the budget of the Office of the Chief Trial Counsel.

Although online payment modalities are available and preferred, payment by check continues to be an option. When paying my check individual attorneys should calculate fees online through My State Bar Profile and pay by electronic check through the bank portal, or print the resulting coded invoice and mail along with a physical check. Agencies, paying for significant numbers of attorneys, are asked to use the agency billing platform, where they can list the bar numbers of all of those attorneys whose fees should be paid, and then pay the calculated amount online, or print the generated invoice and mail along with a physical check.

These outlined processes for payment by check are not being followed by all individual and agency payors, resulting in significant fiscal and operational burdens on the organization.

At its May 2022 meeting, staff presented proposed amendments to rule 2.11, the rule outlining the requirements for payment submission, to the Finance Committee, as provided in Attachment A (redline) and B (clean copy). The proposed amendments expressly authorize the State Bar to require the form and format of payment and to allow for delayed processing, or rejection, of nonconforming payments. Based on Finance Committee feedback, additional amendments were identified to allow for the imposition of a noncompliance fee on applicable payors; these amendments were captured in rule 2.13.

The Finance Committee authorized a 45-day public comment period for amended [rules 2.11 and 2.13](#).

DISCUSSION

Three comments were received pursuant to the public comment period, as presented in Attachment C; all commentors disagree with the proposed amendments. One commenter expressed a belief that the amendments would result in licensees being required to use the online payment system. The rule amendments do not in fact impose such a requirement. Instead, pursuant to the revised rule, all licensees would be required to submit payments in accordance with prescribed payment submission guidelines, irrespective of the payment modality (online or check).

Another commentor noted that if the State Bar lowered or eliminated the fee levied on credit card payments, more licensees would take advantage of this payment option and in doing so

reduce the incidence of noncompliance. State Bar staff agree that it is likely time to reconsider credit card processing fees; however, any future revisions to the fee structure, and resulting increase in credit card payments, is purely speculative. In the immediate term, staff needs new tools to incentivize compliant payments.

Staff does not recommend any additional revisions to rule 2.11 based on the public comment received.

FISCAL/PERSONNEL IMPACT

Implementation of this rule change is estimated to result in savings equivalent to .25 FTE (approximately \$50,000 in salary and benefit costs) annually. Additional late fee assessments generated by application of the new rule may result in increased revenue for the State Bar.

AMENDMENTS TO RULES OF THE STATE BAR OF CALIFORNIA

Title 2, Division 2, Rule 2.11

AMENDMENTS TO BOARD OF TRUSTEES POLICY MANUAL

None

STRATEGIC PLAN GOALS & IMPLEMENTATION STEPS

Updates are being made to this section of the agenda item template to reflect the 2022–2027 Strategic Plan.

RECOMMENDATIONS

Should the Board of Trustees concur in the proposed action, passage of the following resolution is recommended:

RESOLVED, the Board of Trustees, hereby approves and adopts amendments to rule 2.11 of the State Bar Rules, provided as Attachment A, effective July 22, 2022.

ATTACHMENTS LIST

- A. Proposed Amendments Redline
- B. Proposed Amendments Clean
- C. Public Comments Received

TITLE 2. RIGHTS AND RESPONSIBILITIES OF LICENSEES

Adopted July 2007

DIVISION 2. ANNUAL LICENSE FEES AND PENALTIES

Rule 2.10 Definitions

- (A) “Annual license fees” are those fees that any licensee must pay to maintain active or inactive status in a calendar year. These fees may include additional assessments and costs prescribed by law.¹
- (B) “Penalties” are the surcharges assessed any licensee who fails to pay annual license fees on time.

Rule 2.10 adopted effective June 17, 2006; amended effective January 25, 2019.

Rule 2.11 Due date; Form of payment

- (A) A licensee must pay the annual license fees set forth in the Schedule of Charges and Deadlines each calendar year no later than February 1.
- (B) The State Bar is authorized to prescribe acceptable methods for the payment of annual license fees. Any attempted payment that does not conform to a method prescribed by the State Bar may be rejected. If a licensee does not cure a nonconforming payment, the State Bar may nevertheless process the nonconforming payment before or after the February 1 deadline. Nonconforming payments that are not cured by the licensee or processed by the State Bar by the February 1 deadline subject the licensee to the penalties set forth in rule 2.13 or suspension in accordance with rule 2.33.

Rule 2.11 adopted effective June 17, 2006; amended effective January 25, 2019.

Rule 2.12 New licensees

A new licensee must be enrolled as active and pay initial fees within forty-five days of the invoice date for the fees as follows:

- (A) full annual license fees if admitted between January 1 and May 31;
- (B) half the annual license fees if admitted between June 1 and November 30;
- (C) the administrative fee for admission set forth in the Schedule of Charges and Deadlines if admitted in December.

¹ Business & Professions Code §§ 6140.5, 6140.7.

Rule 2.12 adopted effective June 17, 2006; amended effective July 20, 2007; amended effective January 25, 2019.

Rule 2.13 Late and **non-conforming** payment penalties

Late **or non-conforming** payment of annual license fees ~~is~~ **are** subject to the penalties set forth in the Schedule of Charges and Deadlines.

Rule 2.13 adopted effective June 17, 2006; amended effective January 25, 2019.

Rule 2.14 No refund

Unless these rules provide otherwise, a licensee is not entitled to a refund of annual license fees because of death, resignation, disbarment, transfer to inactive status, entering judicial office, or for any other reason.

Rule 2.14 adopted effective June 17, 2006; amended effective January 25, 2019.

Rule 2.15 Scaling

- (A) An active licensee who has a total gross annual individual income from all sources of less than \$60,478.35 may request a 25% reduction of annual licensee fees. The request must be submitted by the date set forth in the Schedule of Charges and Deadlines and include
- (1) the Active Licensee Fee Scaling Declaration signed under penalty of perjury; and
 - (2) payment of the reduced fee.

New licensees admitted after May 31 do not qualify for scaling.

- (B) An employer that receives State Bar Legal Services Trust Fund grants and is a qualified legal services project or qualified support center as defined by statute² may request a reduction of annual license fees by 25% for an active licensee employed on a continuous full-time basis or an active licensee employed on at least a half-time basis who has no income from other employment related to the practice of law. The request must be submitted by the date set forth in the Schedule of Charges and of Deadlines and include
- (1) the Qualified Employer Fee Scaling Declaration signed under penalty of perjury that the employer is qualified and pays annual license fees on the licensee's behalf; and
 - (2) payment of the reduced fee.

² Business & Professions Code § 6210 et seq.

- (C) Licensees who scale are subject to audit and upon request must provide the State Bar with past federal and state income tax returns or other acceptable documentation of financial condition.
- (D) If the State Bar determines that a licensee is ineligible to scale, the licensee must pay full annual license fees and any late payment penalties.

Rule 2.15 adopted effective June 17, 2006; amended effective July 20, 2007; amended effective November 15, 2013; amended effective January 25, 2019; amended effective January 1, 2020.

Rule 2.16 Waivers

- (A) In this rule, “annual license fees” and “penalties” are construed narrowly and do not include
 - (1) disciplinary costs³ or monetary sanctions,⁴
 - (2) Client Security Fund disbursements and costs,⁵
 - (3) mandatory fee arbitration award penalties and costs,⁶
 - (4) Minimum Continuing Legal Education (“MCLE”) noncompliance or reinstatement penalties, or
 - (5) any other charges that may be added to annual license fees for failure to comply with obligations imposed by court order, statute, or rule.
- (B) To be considered for the current year, a request must be submitted by February 1. Requests submitted after February 1 must be accompanied by full payment of any outstanding charges, which will be refunded if the request is granted.
- (C) The Secretary may waive up to \$1,000 in annual license fees and related penalties for the year in which they are due, provided that the request is
 - (1) in writing;
 - (2) supported by satisfactory documentation; and
 - (3) for any of the following reasons:
 - (a) the licensee serves full-time as a magistrate, commissioner, or referee for a state or federal court of record;

³ Business and Professions Code § 6086.10.

⁴ Business and Professions Code § 6086.13.

⁵ Business and Professions Code § 6140.5.

⁶ Business and Professions Code § 6203(d)(3).

- (b) the licensee is a retired judge who accepts assignments from the Chief Justice of California to act in a judicial capacity at least 90% of the calendar year; or
 - (c) the licensee has a total gross annual household income from all sources of \$20,000 or less, in which case the waiver is 50% of annual license fees.
- (D) The Secretary may waive annual license fees and related penalties for a licensee serving in the Army National Guard, the Army Reserve, the Naval Reserve, the Marine Corps Reserve, the Air National Guard of the United States, the Air Force Reserve, or the Coast Guard Reserve provided that
 - (1) the licensee has been ordered to report to full-time active duty for more than thirty days;
 - (2) a request for waiver is submitted in writing by the licensee, licensee's spouse, relative, law partner or associate, or legal representative and accompanied by:
 - (a) a copy of the order to report for active duty, or
 - (b) a copy of the order to report for active duty and a certified declaration by a JAG officer that the licensee has served on active duty for more than thirty days.

A licensee granted a waiver under this rule must notify the State Bar within thirty days upon termination of the assignment to active duty.
- (E) Annual license fees are waived for the year in which a judicial officer leaves office and returns to active or inactive status in the State Bar.
- (F) Annual license fees are waived for licensees on inactive status who are 70 years of age on February 1.
- (G) Annual license fees may be waived for a licensee who is enrolled in the Pro Bono Practice Program.⁷
- (H) The board reserves the right for good cause
 - (1) to grant requests for waivers denied by the Secretary; and
 - (2) to consider all other requests for waivers.
- (I) A waiver granted under this rule does not remove a court-ordered suspension for nonpayment of fees or penalties.

⁷ See Rules 3.325-3.330

Rule 2.16 adopted effective June 17, 2006; amended effective July 20, 2007; amended effective July 17, 2009; amended effective July 22, 2011; amended effective March 2, 2012; amended effective July 20, 2012; amended effective January 25, 2019; amended effective November 14, 2019.

Rule 2.17 Keller deductions and challenges

- (A) *Keller v. State Bar of California* (1990) 496 U.S. 1 prohibits the State Bar from charging licensees for State Bar expenses for lobbying and certain other activities deemed political and ideological and unrelated to the Bar's permissible goals. California law authorizes licensees to take a deduction for lobbying activities.⁸ The Board of Trustees may also identify each year additional deductions that it deems to be outside the scope of Keller. The State Bar restricts its spending on lobbying and other activities it deems outside the scope of Keller to fees paid voluntarily by licensees not taking the deductions. The deductions and the Bar's most recent audited expenses charged to mandatory license fees are published as a Statement of Expenditures of Mandatory License Fees on the State Bar Web site when the State Bar mails invoices for annual license fees. Notice is also provided in the California Bar Journal and licensees may request a copy of the statement by mail.
- (B) Licensees who believe that the annual Statement of Expenditures of Mandatory License Fees inappropriately includes an expenditure disallowed by Keller may object to the expenditure. The objection must be filed using the Challenge to Mandatory License Fees. The board may allow the objection or promptly refer it to arbitration. Filing an objection does not relieve a licensee of the obligation of paying the invoiced annual mandatory license fees on time.
- (C) For purposes of this rule, "arbitration" means that the State Bar will refer the challenge to an arbitrator selected by the American Arbitration Association. The State Bar may consolidate multiple challenges. The arbitration procedure is specified in the instructions to the Challenge to Mandatory License Fees.
- (D) If an arbitrator determines that a challenged expense is outside the scope of Keller and is allowable as a deduction, the State Bar will refund the amount of the deduction to any public agency that has paid the amount on behalf of a licensee.

Rule 2.17 adopted effective July 20, 2007; amended effective January 1, 2012; amended effective January 25, 2019.

Rule 2.18 Payment by credit card, debit card, or electronic funds transfer

The State Bar is authorized to charge licensees who choose to pay annual license fees by credit card, debit card, or electronic funds transfer an additional fee to defray the costs incurred by that election. The State Bar's Executive Director or his or her

⁸ Business and Professions Code § 6140.05.

designee is authorized to set the amount of any additional fee the State Bar is authorized to charge licensees under this rule.

Rule 2.18 adopted effective December 6, 2016; amended effective January 25, 2019.

TITLE 2. RIGHTS AND RESPONSIBILITIES OF LICENSEES

Adopted July 2007

DIVISION 2. ANNUAL LICENSE FEES AND PENALTIES

Rule 2.10 Definitions

- (C) “Annual license fees” are those fees that any licensee must pay to maintain active or inactive status in a calendar year. These fees may include additional assessments and costs prescribed by law.⁹
- (D) “Penalties” are the surcharges assessed any licensee who fails to pay annual license fees on time.

Rule 2.10 adopted effective June 17, 2006; amended effective January 25, 2019.

Rule 2.11 Due date; Form of payment

- (A) A licensee must pay the annual license fees set forth in the Schedule of Charges and Deadlines each calendar year no later than February 1.
- (B) The State Bar is authorized to prescribe acceptable methods for the payment of annual license fees. Any attempted payment that does not conform to a method prescribed by the State Bar may be rejected. If a licensee does not cure a nonconforming payment, the State Bar may nevertheless process the nonconforming payment before or after the February 1 deadline. Nonconforming payments that are not cured by the licensee or processed by the State Bar by the February 1 deadline subject the licensee to the penalties set forth in rule 2.13 or suspension in accordance with rule 2.33.

Rule 2.11 adopted effective June 17, 2006; amended effective January 25, 2019.

Rule 2.12 New licensees

A new licensee must be enrolled as active and pay initial fees within forty-five days of the invoice date for the fees as follows:

- (D) full annual license fees if admitted between January 1 and May 31;
- (E) half the annual license fees if admitted between June 1 and November 30;
- (F) the administrative fee for admission set forth in the Schedule of Charges and Deadlines if admitted in December.

⁹ Business & Professions Code §§ 6140.5, 6140.7.

Rule 2.12 adopted effective June 17, 2006; amended effective July 20, 2007; amended effective January 25, 2019.

Rule 2.13 Late and non-conforming payment penalties

Late or non-conforming payment of annual license fees are subject to the penalties set forth in the Schedule of Charges and Deadlines.

Rule 2.13 adopted effective June 17, 2006; amended effective January 25, 2019.

Rule 2.14 No refund

Unless these rules provide otherwise, a licensee is not entitled to a refund of annual license fees because of death, resignation, disbarment, transfer to inactive status, entering judicial office, or for any other reason.

Rule 2.14 adopted effective June 17, 2006; amended effective January 25, 2019.

Rule 2.15 Scaling

(E) An active licensee who has a total gross annual individual income from all sources of less than \$60,478.35 may request a 25% reduction of annual licensee fees. The request must be submitted by the date set forth in the Schedule of Charges and Deadlines and include

- (1) the Active Licensee Fee Scaling Declaration signed under penalty of perjury; and
- (2) payment of the reduced fee.

New licensees admitted after May 31 do not qualify for scaling.

(F) An employer that receives State Bar Legal Services Trust Fund grants and is a qualified legal services project or qualified support center as defined by statute¹⁰ may request a reduction of annual license fees by 25% for an active licensee employed on a continuous full-time basis or an active licensee employed on at least a half-time basis who has no income from other employment related to the practice of law. The request must be submitted by the date set forth in the Schedule of Charges and of Deadlines and include

- (1) the Qualified Employer Fee Scaling Declaration signed under penalty of perjury that the employer is qualified and pays annual license fees on the licensee's behalf; and
- (2) payment of the reduced fee.

¹⁰ Business & Professions Code § 6210 et seq.

- (G) Licensees who scale are subject to audit and upon request must provide the State Bar with past federal and state income tax returns or other acceptable documentation of financial condition.
- (H) If the State Bar determines that a licensee is ineligible to scale, the licensee must pay full annual license fees and any late payment penalties.

Rule 2.15 adopted effective June 17, 2006; amended effective July 20, 2007; amended effective November 15, 2013; amended effective January 25, 2019; amended effective January 1, 2020.

Rule 2.16 Waivers

- (J) In this rule, “annual license fees” and “penalties” are construed narrowly and do not include
 - (1) disciplinary costs¹¹ or monetary sanctions,¹²
 - (2) Client Security Fund disbursements and costs,¹³
 - (3) mandatory fee arbitration award penalties and costs,¹⁴
 - (4) Minimum Continuing Legal Education (“MCLE”) noncompliance or reinstatement penalties, or
 - (5) any other charges that may be added to annual license fees for failure to comply with obligations imposed by court order, statute, or rule.
- (K) To be considered for the current year, a request must be submitted by February 1. Requests submitted after February 1 must be accompanied by full payment of any outstanding charges, which will be refunded if the request is granted.
- (L) The Secretary may waive up to \$1,000 in annual license fees and related penalties for the year in which they are due, provided that the request is
 - (1) in writing;
 - (2) supported by satisfactory documentation; and
 - (3) for any of the following reasons:
 - (a) the licensee serves full-time as a magistrate, commissioner, or referee for a state or federal court of record;

¹¹ Business and Professions Code § 6086.10.

¹² Business and Professions Code § 6086.13.

¹³ Business and Professions Code § 6140.5.

¹⁴ Business and Professions Code § 6203(d)(3).

- (b) the licensee is a retired judge who accepts assignments from the Chief Justice of California to act in a judicial capacity at least 90% of the calendar year; or
 - (c) the licensee has a total gross annual household income from all sources of \$20,000 or less, in which case the waiver is 50% of annual license fees.
- (M) The Secretary may waive annual license fees and related penalties for a licensee serving in the Army National Guard, the Army Reserve, the Naval Reserve, the Marine Corps Reserve, the Air National Guard of the United States, the Air Force Reserve, or the Coast Guard Reserve provided that
 - (1) the licensee has been ordered to report to full-time active duty for more than thirty days;
 - (2) a request for waiver is submitted in writing by the licensee, licensee's spouse, relative, law partner or associate, or legal representative and accompanied by:
 - (a) a copy of the order to report for active duty, or
 - (b) a copy of the order to report for active duty and a certified declaration by a JAG officer that the licensee has served on active duty for more than thirty days.

A licensee granted a waiver under this rule must notify the State Bar within thirty days upon termination of the assignment to active duty.
- (N) Annual license fees are waived for the year in which a judicial officer leaves office and returns to active or inactive status in the State Bar.
- (O) Annual license fees are waived for licensees on inactive status who are 70 years of age on February 1.
- (P) Annual license fees may be waived for a licensee who is enrolled in the Pro Bono Practice Program.¹⁵
- (Q) The board reserves the right for good cause
 - (1) to grant requests for waivers denied by the Secretary; and
 - (2) to consider all other requests for waivers.
- (R) A waiver granted under this rule does not remove a court-ordered suspension for nonpayment of fees or penalties.

¹⁵ See Rules 3.325-3.330

Rule 2.16 adopted effective June 17, 2006; amended effective July 20, 2007; amended effective July 17, 2009; amended effective July 22, 2011; amended effective March 2, 2012; amended effective July 20, 2012; amended effective January 25, 2019; amended effective November 14, 2019.

Rule 2.17 Keller deductions and challenges

- (E) *Keller v. State Bar of California* (1990) 496 U.S. 1 prohibits the State Bar from charging licensees for State Bar expenses for lobbying and certain other activities deemed political and ideological and unrelated to the Bar's permissible goals. California law authorizes licensees to take a deduction for lobbying activities.¹⁶ The Board of Trustees may also identify each year additional deductions that it deems to be outside the scope of Keller. The State Bar restricts its spending on lobbying and other activities it deems outside the scope of Keller to fees paid voluntarily by licensees not taking the deductions. The deductions and the Bar's most recent audited expenses charged to mandatory license fees are published as a Statement of Expenditures of Mandatory License Fees on the State Bar Web site when the State Bar mails invoices for annual license fees. Notice is also provided in the California Bar Journal and licensees may request a copy of the statement by mail.
- (F) Licensees who believe that the annual Statement of Expenditures of Mandatory License Fees inappropriately includes an expenditure disallowed by Keller may object to the expenditure. The objection must be filed using the Challenge to Mandatory License Fees. The board may allow the objection or promptly refer it to arbitration. Filing an objection does not relieve a licensee of the obligation of paying the invoiced annual mandatory license fees on time.
- (G) For purposes of this rule, "arbitration" means that the State Bar will refer the challenge to an arbitrator selected by the American Arbitration Association. The State Bar may consolidate multiple challenges. The arbitration procedure is specified in the instructions to the Challenge to Mandatory License Fees.
- (H) If an arbitrator determines that a challenged expense is outside the scope of Keller and is allowable as a deduction, the State Bar will refund the amount of the deduction to any public agency that has paid the amount on behalf of a licensee.

Rule 2.17 adopted effective July 20, 2007; amended effective January 1, 2012; amended effective January 25, 2019.

Rule 2.18 Payment by credit card, debit card, or electronic funds transfer

The State Bar is authorized to charge licensees who choose to pay annual license fees by credit card, debit card, or electronic funds transfer an additional fee to defray the costs incurred by that election. The State Bar's Executive Director or his or her

¹⁶ Business and Professions Code § 6140.05.

designee is authorized to set the amount of any additional fee the State Bar is authorized to charge licensees under this rule.

Rule 2.18 adopted effective December 6, 2016; amended effective January 25, 2019.

Public Comments Received Regarding Proposed Amendments to Rule 2.11

Name	Commenting on behalf of an organization	Agree or disagree with proposed amendments	Comments
Martha Kendell Winnacker	No	Disagree with the proposed Rule	<p>The current payment methods are out of step with best practices in the nonprofit universe as well as among some public agencies. The Bar member must choose between paying by direct bank transfer of funds, check accompanied by a printed version of the online form, or by credit card with a substantial "convenience fee." If the credit card fee were eliminated or reduced to a nominal level below \$5, I imagine that many members would use that method. However, instead of modernizing the Bar's payment procedures, the proposal would penalize those who do not have direct transfer mechanisms established with their banks and who inadvertently make an error on their forms or are impacted by mail delays.</p> <p>The Bar's savings in processing credit card payments would be similar to those in processing direct transfer payments and would more than cover the fees the Bar pays to credit card companies.</p>
Anonymous	No answer	Disagree with the proposed Rule	No answer
David Jones	No answer	Disagree with the proposed Rule	<p>Nobody should be forced to use the online system. This is a government entity. To limit the ability of people to access that government entity (through one forced method of interacting) is ridiculous. You would not support a plan whereby people could only vote online or could only vote in person, so why support a plan to force lawyers to pay fees online? This is not the same as a private company saying that they will only accept online payments through a website for goods or services. There, the consumer can go elsewhere for the goods or services. Here, the lawyer is forced to comply with the government entity's edict or be prevented from the practicing the profession the lawyer went to school to learn and spent years honing. It sucks for you that so many lawyers cannot adequately fill out the forms and their payments get rejected. That's on them. If they choose to continue paying that way, they either have to learn to fill out the forms correctly or pay late fees and risk be suspended. They should not be forced to use the online system to pay, though. That will only limit access to government services, something a government entity should never do.</p>