



The State Bar *of California*

OPEN SESSION AGENDA ITEM NOVEMBER 2022 FINANCE COMMITTEE IV.A

DATE: November 17, 2022

TO: Members, Finance Committee

FROM: Aracely Montoya-Chico, Chief Financial Officer

SUBJECT: Request to Approve Selected Administrative Fee Increases and to Distribute Other Proposed Administrative Fee Increases to Impacted Stakeholders for Comment

EXECUTIVE SUMMARY

Pursuant to a policy adopted in 2017, the State Bar is required to assess the fees it charges for services every five years. A fee assessment began earlier this spring, starting with the Office of Admissions. The results of the Office of Admissions fee review were first presented to the Finance committee at its May 2022 meeting, with a similar review of the programs in the Office of Attorney Regulation & Consumer Resources (ARCR) and the Office of Professional Competence (OPC) presented in July 2022¹.

The Finance Committee directed staff to assess the viability of a progressive fee structure for admissions fees, whereby certain applicants for admissions would pay more than others to promote the goal of a diverse and inclusive legal profession. Staff from the Offices of Admission, Finance, and General Counsel are working to develop such a proposal.

This item provides the Finance Committee with revised recommendations relating to fees for services provided by ARCR and OPC. The Finance Committee is asked to review staff's final recommendations for fee adjustments for selected ARCR programs, and to discuss staff's preliminary recommendations for other ARCR, as well as OPC, fees. Note that although the

¹ [Five-Year Fee Review: Results for Attorney Regulation & Consumer Resources and Professional Competence \(JUL2022 III.A\)](#)

published agenda title indicates that the Finance Committee will be asked to *approve* certain fees, no such formal action is being requested at this time.

Table 1 below is a summary of the fees presented for ARCR and OPC in July 2022, and the proposed recommendations presented in this agenda item.

Table 1. Summary of Programs Presented

Office	Program	Recommendation
ARCR	MCLE Compliance	Finance Committee to review staff's final recommendation, November 2022
	Certificates of Standing	Finance Committee to review staff's final recommendation, November 2022
	Law Corporations	Finance Committee to review staff's final recommendation, November 2022
	Limited Liability Partnerships	Out for comment: impacted stakeholders
OPC	Lawyers Referral Service	No fee changes recommended
	Mandatory Fee Arbitration	No fee changes recommended
	MCLE Provider Certification	Out for comment: impacted stakeholders

The Office of General Counsel (OGC) performed an in-depth legal analysis of program fees to determine the State Bar's authority to authorize fee adjustments. OGC has determined that the State Bar has authority to self-execute adjustments for some fees while others likely require Supreme Court approval.

The goal is to bring a comprehensive and final set of recommendations for fee adjustments, reflecting committee feedback and stakeholder input and comment, to the committee's May 2023 meeting. Both the committee and the Board of Trustees will be asked to approve fee adjustments in May. This timing will allow for both a meaningful comment process and the conclusion of the California State Auditor's audit of the use of mandatory licensing fees that is currently underway. The audit may inform both staff's fee recommendations and the committee's deliberative process.

Board adopted fee adjustments requiring Supreme Court approval will be submitted to the Supreme Court following the May 2023 meeting.

BACKGROUND

The fee review methodology includes several elements including: (1) an analysis of program revenues versus costs; (2) an identification of any needed enhancements to program

performance or functionality; and (3) an analysis of costs charged by other jurisdictions for similar functions.

Based on this methodology, fee increase proposals have been developed for the following programs:

- Law Corporations
- Limited Liability Partnerships
- Mandatory Continuing Legal Education (MCLE) Compliance
- Certificates of Standing
- MCLE Provider Certification

The Law Corporations program (LC) and the Limited Liability Partnerships program (LLP) were not included in the fee update presented at the July 2022 Finance Committee; conversely, the Mandatory Fee Arbitration (MFA) and Lawyer Referral Services (LRS) programs were included in the July, but not in the present, agenda item. This agenda item reflects the universe of General Fund fees (ARCR and OPC fees) that staff recommends adjusting at this time. Detailed calculations supporting the summary information provided in the body of this memorandum are provided as Attachment A. Information gathered regarding fees charged by other states for the programs addressed in this agenda item is presented in Attachment B.

Specific fee proposals included in this item attempt to address equity and fairness questions that have been previously posed by the Finance Committee including:

1. Can we assess different fees to different individual or entity types based on ability to pay (for example for-profit vs. nonprofit organizations? Or attorney versus nonattorney applicants for admission)?
2. Can more-profitable programs subsidize less profitable ones?
3. Is the goal of every discrete fee-for-service program to be self-funding, or do some programs exist for public protection purposes, regardless of the cost to provide the services?
4. Are there other mechanisms we can employ to both generate new fees and increase efficiencies?

OFFICE OF GENERAL COUNSEL FEE ANALYSIS

OGC is performing a comprehensive legal analysis of each program fee to determine if the State Bar has the authority to authorize fee adjustments or if additional authorizations are needed from the California Supreme Court or Legislature. The table below summarizes the initial results of OGC's analysis.

Table 2. Approval Needed of Program Fees

Program	Approval by California Supreme Court Likely Necessary?
MCLE Provider Certification	No
Certificates Standing	No
MCLE Compliance	No
Law Corp	Yes
LLP	Yes

DISCUSSION

STAFF'S FINAL FEE ADJUSTMENT RECOMMENDATIONS

Law Corporations (ARCR)

Fee Type	Current	Proposed
Application	\$200	\$250
Renewal	\$75	\$100
Late	\$110	\$150

The State Bar's Law Corporations Program certifies professional corporations that wish to practice law in accordance with applicable statutes and court rules. A law corporation must annually renew its authorization to practice law by submitting an Annual Report and Renewal. While most states offer a Limited Liability Company registration status (LLC), the State Bar's Law Corporations program is unique.

Although this program is not currently operating at a structural deficit the fees assessed for this function are unchanged since the 1990s. Not surprisingly then, little investment has been made to streamline the registration and annual reporting process, which is still almost entirely paper-based, or to increase public access to information about LC registration; there is no online directory of registered California LC's.

Given the need to make investment in the regulatory infrastructure for this program, staff conducted a review of parallel fees in other states to inform suggested LC fee adjustments. Corporations filing under LLC programs average \$153 for initial filing, with \$64 in annual reporting fees. The top five states across *both* fee categories are Connecticut, Pennsylvania, Nevada, Arizona, Texas, District of Columbia, Maryland, Delaware, and Illinois. These states have an average initial filing fee of \$389 and annual reporting fee of \$261. While no LC programs are operated by respective State Bars per se, LLC fees assessed in other states provide appropriate comparators for State Bar LC fee determination purposes.

With these considerations in mind, staff recommends an increase in application fees from \$200 to \$250 (25 percent), annual reporting fees from \$75 to \$100 (33 percent), and late fees from \$110 to \$150 (36 percent). The proposed changes are anticipated to generate \$331,000 in new General Fund revenue annually. This funding would be used to make investments in the LC application and renewal processes and online access to LC registration information, as well as to support other regulatory functions.

MCLE Compliance (ARCR)

Fee Type	Current	Proposed
Late Penalty	\$200	\$250
E-Mod	\$75	\$100
Reinstatement	\$200	\$300
Credit Request	\$25	\$100

MCLE compliance involves the auditing of attorneys' continuing education requirements, which can generate fees for attorneys that do not report completion of 25 hours of MCLE in subject areas including legal ethics, competence, and elimination of bias. Attorneys who are late reporting are generally subject to a MCLE Late Penalty, and/or MCLE Reinstatement fee if they are administratively suspended. There are also special handling fees to request MCLE credit from providers not on the approved jurisdictions list (MCLE Credit Request) and to request an educational modification (MCLE E-mod) where the attorney is prevented from completing their MCLE requirements due to a physical or mental condition, natural disaster, family emergency, financial hardship, or other good cause approved by the State Bar. The structural deficit for this function is \$525,000.

Most attorneys are compliant with MCLE requirements and no unique costs are associated with that compliance. However, fee increases are recommended in relation to late reporting, requests to accept nonqualifying credit, and reinstatement. Specifically, increases from \$75 to \$100 (33 percent) are recommended for MCLE Late Penalty and MCLE E-Mod fees, and from \$200 to \$300 (50 percent) for the MCLE Reinstatement fee. Staff also recommends the MCLE Credit Requests fee be increased from \$25 to \$100 (300 percent), as these requests require a considerable amount of staff processing.

Even with the recommended fee increases, this program will be in a deficit position of approximately \$439,000 annually.

Certificate of Standing (ARCR)

Fee Type	Current	Proposed
Certificate of Standing	\$25	\$40

The State Bar can, at a licensee's request, issue a single-page Certificate of Standing to verify an attorney's name, bar number, admission date, current status, any name or status changes and any public discipline to date, for a fee of \$25, an amount which has not changed in over 20 years. The structural deficit for providing this optional service is currently \$104,000. Staff recommends increasing the certificates of standing fee from \$25 to \$40 (60 percent) and generating an estimated \$150,000 of new general fund revenue.

DISCUSSION: STAFF'S PRELIMINARY FEE ADJUSTMENT MODIFICATIONS

Outlined below are proposed fee modifications for LLP and MCLE Provider Certification. Because the proposals reflect significant changes in the fee amounts and structures for these functions, staff intends to solicit feedback from impacted entities prior to generating a final recommendation for Finance Committee consideration.

Limited Liability Partnerships (ARCR)

Application Fees

Fee Type	Current	Proposed Option 1	Proposed Option 2
First 2 Partners	\$100	\$100	\$110
Per Partner Thereafter	\$50	\$50	\$55
Cap	\$2,500	None	None

Renewal Fees

	Current	Proposed Option 1	Proposed Option 2
First 2 Partners	\$75	\$75	\$85
Per Partner Thereafter	\$25	\$25	\$30
Cap	\$2,500	None	None

The Limited Liability Partnership program certifies professional partnerships to allow partners to limit their liability for the tortious acts of their partners and employees in accordance with statutes and the State Bar's LLP Rules and Regulations. Many states offer Limited Liability Partnerships for attorneys, with most set at a single fixed-fee per group. California is one of the few states whose fees are determined by the number of individual partners (up to a cap); other states that assess per partner fees include Pennsylvania, Texas, and Tennessee. Currently, both California and Tennessee have renewal caps set at a maximum of \$2,500, while Pennsylvania and Texas have per partner fees with no caps.

Fees for this program have not changed in at least 10 years. As with Law Corporations, investments are needed to improve LLP regulation, including development of a modern registration and annual renewal process as well as establishment of an online, searchable, LLP directory. Further, the current fee structure is regressive, in that firms with 1,000 lawyers pay the same amount as firms with 100 participants. This approach runs counter to the equity and fairness considerations articulated by the Finance Committee.

With these considerations in mind, staff has developed two options for LLP registration fee adjustment:

OPTION A: No fee increase, no cap – leave fees at the same rates but remove the current per LLP cap of \$2,500. There are currently 99 LLPs who benefit from the current cap structure.

Under Option A, LLP application and renewal fees would remain unchanged, however the per LLP cap would be eliminated. Elimination of the cap would generate \$499,000 in additional General Fund revenue.

OPTION B: Fee increase, no cap – raise application and renewal fees 10–20 percent (in the respective fee category) and eliminate the per LLP cap. This option would generate additional General Fund revenue of \$714,000 annually.

See Attachment C for additional detail regarding these options. Attachment C also identifies impacted law firms, along with those firms' corresponding 2021 gross revenue, information which is provided to facilitate an assessment of the fiscal impact of the options presented.

Staff plans to survey existing LLP registrants to solicit feedback regarding proposed changes to the LLP the structure. Staff will bring survey results, as well as a final recommendation for LLP fee modification, to the Finance Committee at its May 2023 meeting.

Minimum Continuing Legal Education Provider Certification (OPC)

Existing Fees

Fee Type	Current	Proposed (for-profit)	Proposed (nonprofit)
Legal Specialization SAP Fee	\$22/specialty area add-on	None	None
Legal Specialization MAP fee	\$90/add-on	None	None
SAP Applications	\$90	\$150	\$115
MAP Applications	\$360	\$600	\$460
MAP Renewals	\$360	\$600	\$460

New Fees

Fee Type	Proposed (for-profit)	Proposed (nonprofit)
SAP Late (1-30 days)	\$90	\$90
SAP Late (31 days –2 years)	\$210	\$210
MAP Late Renewals (1-30 days)	\$300	\$300
MAP Late Renewals (31 days –2 years)	\$750	\$750
MAP Reinstatement	\$50	\$50

Providers of legal education need to be approved by the State Bar in order for that education to satisfy attorney MCLE requirements. There are two different types of MCLE providers: single activity providers (SAP) and multiple activity providers (MAP). SAP is an entity approved to hold and grant credit for a single MCLE activity during a two-year period. A MAP is an approved provider that is given authority to offer and grant credit for any MCLE activity that complies with the terms of the MAP agreement, without seeking separate approvals for each program offered. The current MAP renewal cycle is three years. A separate fee is assessed to providers of MCLE that satisfies Legal Specialization (LS) requirements.

The MCLE provider program structural deficit was originally reported in the July 2022 fee presentation as \$775,000, which included costs associated with two additional FTEs needed to reduce the existing SAP and MAP processing backlog; the backlog can be up to 8 months and is the source of repeated provider complaints. For discussion today, staff is recommending the addition of only one FTE at this time, with the second added only when the new Provider Information Management System (PIMS) software is launched. PIMS will result in a number of changes to MCLE provider certification processes some of which may mitigate the need for additional FTE. Restating the FTE count with only one new position reduces the current structural deficit to \$529,000.

Proposed fee adjustments include the following:

- Elimination of a distinct LS fee
- Reduction in the MAP renewal cycle from three to two years
- An increase in SAP and MAP fees
- Addition of SAP and MAP late fees
- Addition of a MAP reinstatement fee

The fee modifications recommended for this program draw heavily from structures in place in other jurisdictions. Refer to Attachment D for an overview of other states' parallel fees.

Concerns were raised as to whether some smaller nonprofit providers could absorb these fee increases. Although MCLE provider nonprofit status is not currently tracked, staff estimates that approximately 47 percent of providers might qualify as nonprofit entities. Staff recommends offering a 25 percent discount on all applications and renewals for those entities who provide the necessary documentation supporting their nonprofit status.

Considering all the above fees changes, the projected program balance is estimated to have a deficit of \$240,000. Future fee modifications will account for the new PIMS system and may include a per credit assessment akin to that charged by many other jurisdictions.

Staff plans to survey existing MCLE providers to solicit feedback regarding proposed changes to the fee structure. Staff will bring survey results, as well as a final recommendation for MCLE provider fee modification, to the Finance Committee at its May 2023 meeting.

SUMMARY

The Finance Committee is asked to review staff's final recommendations for fee increases for Law Corporations, MCLE Compliance, and Certificates of Standing, and to give feedback on staff's preliminary recommendations for fee increases for MCLE provider and LLP fees.

A comprehensive final set of recommendations for fee adjustments, reflecting committee feedback and stakeholder input and comment, to the committee's May 2023 meeting, will be provided to complete action. Both the committee and the Board of Trustees will be asked to approve fee adjustments in May. This timing will allow for both a meaningful comment process and the conclusion of the California State Auditor's audit of the use of mandatory licensing fees that is currently underway. The audit may inform both staff's fee recommendations and the committee's deliberative process.

Board adopted fee adjustments requiring Supreme Court approval will be submitted to the Supreme Court following the May 2023 meeting.

FISCAL/PERSONNEL IMPACT

None

AMENDMENTS TO RULES

None

AMENDMENTS TO BOARD OF TRUSTEES POLICY MANUAL

None

STRATEGIC PLAN GOALS & IMPLEMENTATION STEPS

Goal: None – core business operations

RECOMMENDATIONS

None

ATTACHMENTS LIST

- A.** Fee Summary Review
- B.** State Data
- C.** CA Limited Liability Partnerships Benefiting from Cap Structure
- D.** MCLE Jurisdiction Comparisons

Fee Summary Review

Program		Category	2022 Count	Current Fee	Revenue	July Rec	% Change	Comm Date	Revenue	Nov Rec	% Change	Revenue	Fee Status
	SAP Applications		1,383	\$ 90	\$ 124,470	\$ 225	150%	7/21	\$ 311,175	Current: see below for options			Out for Comment
	MAP Applications		124	\$ 360	\$ 44,460	\$ 540	50%	7/21	\$ 66,690				
	MAP Renewals** @3 yrs		389	\$ 360	\$ 140,040	\$ 540	50%	7/21	\$ 210,060				
MCLE (Provider)	SAP Applications (for profit)		733	\$ 90	\$ 65,969	\$ 225	150%	7/21	\$ 164,923	\$ 150	67%	\$ 109,949	
	SAP Applications (non-profit)		650	new		new			\$ 115	28%	\$ 74,751		
	MAP Applications (for profit)		65	\$ 360	\$ 23,564	\$ 540	50%	7/21	\$ 35,346	\$ 600	67%	\$ 39,273	
	MAP Applications (non-profit)		58	new		new			\$ 460	28%	\$ 26,701		
	MAP Renewals** (for profit)		206	\$ 360	\$ 74,221	\$ 540	50%	7/21	\$ 111,332	\$ 600	67%	\$ 185,553	
	MAP Renewals** (non-profit)		183	new		new			\$ 460	28%	\$ 126,153		
	SAP Late: 1-30 days		346	new		new			\$ 90	n/a	\$ 31,118		
	SAP Late: 31 days-2yrs		346	new		new			\$ 210	n/a	\$ 72,608		
	MAP Late Renewal: 1-30 days		39	new		new			\$ 300	n/a	\$ 11,670		
	MAP Late Renewal: 31 days-2yrs		39	new		new			\$ 750	n/a	\$ 29,175		
	MAP Reinstatement		78	new		new			\$ 50	n/a	\$ 3,890		
	Projected Program Revenues:					\$ 308,970			\$ 587,925			\$ 710,839	
	Current Program Cost:			\$ 817,876	Balances:	\$ (775,494)	w/+2 FTE:		\$ (496,539)	w/+1 FTE:		\$ (240,331)	
Projected Cost MCLEPC (+1 FTE)			\$ 951,170										
MFA	Arbitration Filing (4-year avg revenue)			5%	\$ 79,393	7%	40%	7/21	\$ 129,430	none		\$ 79,393	no change
	Filing Minimum		\$ 50	\$ -	\$ 100	100%		7/21	\$ -	none		\$ -	
	Filing Cap <\$250K		\$ 5,000	\$ -	\$ 7,500	50%		7/21	\$ -	none		\$ -	
	Filing Cap >\$250K		\$ 5,000	\$ -	\$ 15,000	200%		7/21	\$ -	none		\$ -	
	Projected Program Revenues:					\$ 79,393			\$ 129,430			\$ 79,393	
Projected Program Cost:			\$ 310,409	Balances:	\$ (231,016)			\$ (180,979)			\$ (231,016)		
LRS	LRS Recertification (4-year avg revenue)			1%	\$ 95,968	2%	100%	7/21	\$ 191,935	none		\$ 95,968	no change
	Projected Program Revenues:					\$ 95,968			\$ 191,935			\$ 95,968	
	Projected Program Cost:			\$ 353,400	Balances:	\$ (257,432)			\$ (161,465)			\$ (257,432)	
MCLE (Atty)	MCLE Late (effective 1/1/2024)		2,394	\$ 75	\$ 179,550	\$ 100	33%	7/21	\$ 239,400	\$ 100	33%	\$ 239,400	FC Review
	MCLE Reinstatement (effective 1/1/2024)		114	\$ 200	\$ 22,700	\$ 300	50%	7/21	\$ 34,050	\$ 300	50%	\$ 34,050	
	MCLE Credit Requests		200	\$ 25	\$ 5,000	\$ 100	300%	7/21	\$ 20,000	\$ 100	300%	\$ 20,000	
	MCLE E-mods		40	\$ 75	\$ 3,000	\$ 100	33%	7/21	\$ 4,000	\$ 100	33%	\$ 4,000	
	Projected Program Revenues:					\$ 210,250			\$ 297,450			\$ 297,450	
Projected Program Cost:			\$ 736,097	Balances:	\$ (525,847)			\$ (438,647)			\$ (438,647)		
CT	Certificate of Standing		10,000	\$ 25	\$ 250,000	\$ 30	20%	7/21	\$ 300,000	\$ 40	60%	\$ 400,000	FC Review
	Projected Program Revenues:					\$ 250,000			\$ 300,000			\$ 400,000	
	Projected Program Cost:			\$ 354,477	Balances:	\$ (104,477)			\$ (54,477)			\$ 45,523	

LC	LC Fee Applications	803	\$	200	\$	160,500	\$	200	0%	7/21	\$	160,500	\$	250	25%	\$	200,625											
	LC Renewal	9,903	\$	75	\$	742,725	\$	75	0%	7/21	\$	742,725	\$	100	33%	\$	990,300											
	LC Late Fees	1,100	\$	110	\$	121,000	\$	110	0%	7/21	\$	121,000	\$	150	36%	\$	165,000											
	Projected Program Revenues:						\$	1,024,225								\$	1,024,225								\$	1,355,925		
Projected Program Cost:		\$	357,984				Balances:		\$	666,241						\$	666,241						\$	997,941				

FC Review

LLP (Cap) current	LLP Applicant (first 2 partners)	175	\$	100	\$	17,500	Current: see below for options
	LLP Applicant (each + partner)	164	\$	50	\$	8,200	
	LLP Applicant Cap	3	\$	2,500	\$	7,500	
	LLP Renewal (first 2 partners)	2,422	\$	75	\$	181,650	
	LLP Renewal (each + partner)	8,998	\$	25	\$	224,940	
	LLP Renewal Cap	90	\$	2,500	\$	225,000	
	Projected Program Revenues:				\$	664,790	
Projected Program Cost: \$		354,244	Balances: \$		310,546		

LLP (Opt A) no fee increase no cap	LLP Applicant (first 2 partners)	175	\$	100	Option A: see above for current	\$	100	0%	\$	17,500			
	LLP Applicant (each + partner)	944	\$	50		\$	50	0%	\$	47,200			
	LLP Renewal (first 2 partners)	2,422	\$	75		\$	75	0%	\$	181,650			
	LLP Renewal (each + partner)	36,737	\$	25		\$	25	0%	\$	918,415			
	Projected Program Revenues:									\$	1,164,765		
Projected Program Cost: \$											354,244	\$	810,521

Out for
Comment

LLP (Opt B) fee increase no cap	LLP Applicant (first 2 partners)	175	\$	100	Option B: see above for current	\$	110	10%	\$	19,250	
	LLP Applicant (each + partner)	944	\$	50		\$	55	10%	\$	51,920	
	LLP Renewal (first 2 partners)	2,422	\$	75		\$	85	13%	\$	205,870	
	LLP Renewal (each + partner)	36,737	\$	25		\$	30	20%	\$	1,102,098	
	Projected Program Revenues:										\$
Projected Program Cost: \$ 354,244										\$	1,024,894

State Data

Sorted by total expense for each program category

Certificates of Standing			Limited Liability Partnerships									
Rank	State	Certificates of Standing	Rank	State	LLP Reg flat	LLP Reg per attorney	LLP Reg Cap	Rank	State	LLP Annual Rpt flat	LLP Annual Rpt /atty	LLP Annual Rpt Max
1	Minnesota	\$ 50.00	1	Texas		\$ 200.00		1	Pennsylvania		\$ 340.00	
2	Tennessee	\$ 50.00	2	Florida	\$ 1,000.00			2	Texas		\$ 200.00	
3	California NEW	\$ - 40.00	3	Alabama	\$ 200.00			3	California NEW	\$ 85.00	\$ 30.00	\$ -
4	California	\$ 25.00	4	Massachusetts	\$ 200.00			4	New York	\$ 2,262.50		
5	Kentucky	\$ 25.00	5	New York	\$ 200.00			5	Tennessee	\$ 250.00	\$ 50.00	\$ 2,500.00
6	Maine	\$ 25.00	6	Alaska	\$ 150.00			6	California	\$ 75.00	\$ 25.00	\$ 2,500.00
7	Nevada	\$ 25.00	7	Maryland	\$ 140.00			7	Florida	\$ 500.00		
8	South Carolina	\$ 25.00	8	North Carolina	\$ 125.00			8	Massachusetts	\$ 500.00		
9	Texas	\$ 25.00	9	Pennsylvania	\$ 125.00			9	Nevada	\$ 350.00		
10	Utah	\$ 25.00	10	California NEW	\$ 110.00	\$ 55.00	\$ -	10	Delaware	\$ 300.00		
11	Louisiana	\$ 20.00	11	California	\$ 100.00	\$ 50.00	\$ 2,500.00	11	Maryland	\$ 300.00		
12	New Jersey	\$ 20.00	12	Virginia	\$ 100.00			12	Wasghinton DC	\$ 300.00		
13	Oklahoma	\$ 20.00	13	Missouri	\$ 80.00			13	West Virginia	\$ 250.00		
14	Arizona	\$ 17.00	14	Tennessee	\$ 37.50			14	North Carolina	\$ 200.00		
15	Alabama	\$ 15.00		Arizona				15	Minnesota	\$ 135.00		
16	Illinois	\$ 15.00		Arkansas				16	Louisiana	\$ 125.00		
17	Massachusetts	\$ 15.00		Colorado				17	Missouri	\$ 105.00		
18	Rhode Island	\$ 15.00		Connecticut				18	Alaska	\$ 100.00		
19	Virginia	\$ 15.00		Delaware				19	Illinois	\$ 100.00		
20	Colorado	\$ 10.00		Georgia				20	Michigan	\$ 100.00		
21	Connecticut	\$ 10.00		Hawaii				21	New Hampshire	\$ 100.00	\$ 50.00	\$ 205.00
22	Delaware	\$ 10.00		Idaho				22	Oregon	\$ 100.00		
23	Georgia	\$ 10.00		Illinois				23	South Carolina	\$ 100.00		
24	Idaho	\$ 10.00		Indiana				24	Maine	\$ 85.00		
25	Iowa	\$ 10.00		Iowa				25	Connecticut	\$ 80.00		
26	Michigan	\$ 10.00		Kansas				26	New Jersey	\$ 75.00		
27	Mississippi	\$ 10.00		Kentucky				27	Washington	\$ 60.00		
28	New Hampshire	\$ 10.00		Louisiana				28	Wyoming	\$ 60.00		
29	New York	\$ 10.00		Maine				29	South Dakota	\$ 57.50		
30	Wisconsin	\$ 10.00		Michigan				30	Kansas	\$ 52.50		
31	Florida	\$ 7.00		Minnesota				31	Rhode Island	\$ 50.00		
32	Maryland	\$ 7.00		Mississippi				32	Virginia	\$ 50.00		
33	Hawaii	\$ 5.00		Montana				33	Indiana	\$ 41.00		
34	Missouri	\$ 5.00		Nebraska				34	Nebraska	\$ 30.00		
35	Montana	\$ 5.00		Nevada				35	Utah	\$ 27.00		
36	Nebraska	\$ 5.00		New Hampshire				36	Ohio	\$ 25.00		
37	North Carolina	\$ 5.00		New Jersey				37	Wisconsin	\$ 25.00		
38	Washington	\$ 5.00		New Mexico				38	Hawaii	\$ 15.00		
39	Vermont	\$ 3.00		North Dakota				39	Kentucky	\$ 15.00		
40	West Virginia	\$ 3.00		Ohio				40	Vermont	\$ 15.00		
41	Indiana	\$ 2.00		Oklahoma				41	Colorado	\$ 10.00		
42	New Mexico	\$ 1.00		Oregon				42	Arizona	\$ 3.00		
43	Alaska	\$ -		Rhode Island				43	Arkansas	\$ -		
44	Arkansas	\$ -		South Carolina				44	Idaho	\$ -		
45	Kansas	\$ -		South Dakota					Montana			
46	North Dakota	\$ -		Utah					New Mexico			
47	Ohio	\$ -		Vermont					North Dakota			
48	Oregon	\$ -		Washington					Oklahoma			
	Pennsylvania			Wasghinton DC					Alabama	n/a		
	South Dakota			West Virginia					Georgia	n/a		
	Washington DC			Wisconsin					Iowa	n/a		
	Wyoming			Wyoming					Mississippi	n/a		

Source: ca3.uscourts.gov 2021

Source: misc web 2022

Source: misc web 2022

Limited Liability Companies*									LLC (Corporations)*					
Rank	State	LLC Filing	LLC Initial Rpt	LLC Pub	LLC TOTAL	Rank	State	LLC Annual Rpt	Rank	State	Incorp Filing	Corp Initial Rpt	Corp Pub/Sig	Corp TOTAL
	CA State Bar	n/a			n/a		CA State Bar	n/a	1	Connecticut	\$ 455.00			\$ 455.00
1	New York	\$ 210.00		\$ 812.50	\$ 1,022.50	1	Texas (on gross rev)	?	2	Pennsylvania	\$ 125.00		\$ 299.00	\$ 424.00
2	Massachusetts	\$ 520.00			\$ 520.00	2	Massachusetts	\$ 520.00	3	Nevada	\$ 75.00	\$ 325.00		\$ 400.00
3	Illinois	\$ 500.00			\$ 500.00	3	Nevada	\$ 325.00	4	Arizona	\$ 60.00		\$ 299.00	\$ 359.00
4	Nevada	\$ 75.00	\$ 325.00		\$ 400.00	4	Tennessee	\$ 310.00	5	Texas	\$ 310.00			\$ 310.00
5	Arizona	\$ 50.00		\$ 299.00	\$ 349.00	5	Illinois	\$ 305.00	6	Georgia	\$ 100.00	\$ 50.00	\$ 150.00	\$ 300.00
6	Tennessee	\$ 325.00			\$ 325.00	6	Washington DC	\$ 300.00	7	Massachusetts	\$ 295.00			\$ 295.00
7	Texas	\$ 310.00			\$ 310.00	7	Delaware	\$ 300.00	8	Alaska	\$ 250.00	\$ -		\$ 250.00
8	Nebraska	\$ 120.00		\$ 150.00	\$ 270.00	8	Maryland	\$ 300.00	9	CA Law Corp NEW	\$ 250.00			\$ 250.00
9	Alaska	\$ 250.00	\$ -		\$ 250.00	9	North Carolina	\$ 202.00	10	South Carolina	\$ 135.00		\$ 100.00	\$ 235.00
10	Washington DC	\$ 220.00			\$ 220.00	10	Arkansas	\$ 150.00	11	Rhode Island	\$ 230.00			\$ 230.00
11	Washington	\$ 200.00	\$ 10.00		\$ 210.00	11	Florida	\$ 138.75	12	Washington DC	\$ 220.00			\$ 220.00
12	Connecticut	\$ 175.00			\$ 175.00	12	Alaska	\$ 100.00	13	Nebraska	\$ 65.00		\$ 150.00	\$ 215.00
13	Maine	\$ 175.00			\$ 175.00	13	New Hampshire	\$ 100.00	14	Washington	\$ 200.00	\$ 10.00		\$ 210.00
14	Alabama	\$ 165.00			\$ 165.00	14	Oregon	\$ 100.00	15	Illinois	\$ 175.00			\$ 175.00
15	Kansas	\$ 160.00			\$ 160.00	15	Maine	\$ 85.00	16	Alabama	\$ 165.00			\$ 165.00
16	Minnesota	\$ 160.00			\$ 160.00	16	Washington	\$ 73.00	17	Minnesota	\$ 160.00			\$ 160.00
17	Florida	\$ 155.00			\$ 155.00	17	Kansas	\$ 55.00	18	Maryland	\$ 155.00			\$ 155.00
18	Maryland	\$ 155.00			\$ 155.00	18	Wyoming	\$ 52.00	19	South Dakota	\$ 150.00			\$ 150.00
19	Rhode Island	\$ 150.00			\$ 150.00	19	Georgia	\$ 50.00	20	Maine	\$ 145.00			\$ 145.00
20	South Dakota	\$ 150.00			\$ 150.00	20	New Jersey	\$ 50.00	21	New York	\$ 145.00			\$ 145.00
21	Delaware	\$ 140.00			\$ 140.00	21	North Dakota	\$ 50.00	22	Delaware	\$ 140.00			\$ 140.00
22	North Dakota	\$ 135.00			\$ 135.00	22	Rhode Island	\$ 50.00	23	California	\$ 105.00	\$ 25.00		\$ 130.00
23	West Virginia	\$ 132.00			\$ 132.00	23	South Dakota	\$ 50.00	24	New Jersey	\$ 125.00			\$ 125.00
24	Wisconsin	\$ 130.00			\$ 130.00	24	Virginia	\$ 50.00	25	New Mexico	\$ 100.00	\$ 25.00		\$ 125.00
25	New Jersey	\$ 125.00			\$ 125.00	25	Iowa	\$ 45.00	26	North Carolina	\$ 125.00			\$ 125.00
26	North Carolina	\$ 125.00			\$ 125.00	26	Indiana	\$ 30.00	27	Ohio	\$ 125.00			\$ 125.00
27	Ohio	\$ 125.00			\$ 125.00	27	Louisiana	\$ 30.00	28	Tennessee	\$ 125.00			\$ 125.00
28	Pennsylvania	\$ 125.00			\$ 125.00	28	Nebraska	\$ 26.00	29	Vermont	\$ 125.00			\$ 125.00
29	Vermont	\$ 125.00			\$ 125.00	29	Michigan	\$ 25.00	30	Missouri	\$ 58.00	\$ 45.00		\$ 103.00
30	South Carolina	\$ 110.00			\$ 110.00	30	Mississippi	\$ 25.00	31	Wyoming	\$ 103.00			\$ 103.00
31	Oklahoma	\$ 104.00			\$ 104.00	31	Oklahoma	\$ 25.00	32	Idaho	\$ 101.00			\$ 101.00
32	Virginia	\$ 104.00			\$ 104.00	32	Vermont	\$ 25.00	33	Louisiana	\$ 100.00			\$ 100.00
33	Wyoming	\$ 103.00			\$ 103.00	33	West Virginia	\$ 25.00	34	New Hampshire	\$ 100.00			\$ 100.00
34	Georgia	\$ 100.00			\$ 100.00	34	Wisconsin	\$ 25.00	35	North Dakota	\$ 100.00			\$ 100.00
35	Idaho	\$ 100.00			\$ 100.00	35	California	\$ 20.00	36	Oregon	\$ 100.00			\$ 100.00
36	Louisiana	\$ 100.00			\$ 100.00	36	Connecticut	\$ 20.00	37	Wisconsin	\$ 100.00			\$ 100.00
37	New Hampshire	\$ 100.00			\$ 100.00	37	Hawaii	\$ 15.00	38	Indiana	\$ 90.00			\$ 90.00
38	Oregon	\$ 100.00			\$ 100.00	38	Kentucky	\$ 15.00	39	Kansas	\$ 90.00			\$ 90.00
39	California	\$ 75.00	\$ 20.00		\$ 95.00	39	Montana	\$ 15.00	40	West Virginia	\$ 82.00			\$ 82.00
40	Indiana	\$ 90.00			\$ 90.00	40	Utah	\$ 15.00	41	Virginia	\$ 79.00			\$ 79.00
41	Utah	\$ 72.00			\$ 72.00	41	Colorado	\$ 10.00	42	Florida	\$ 78.75			\$ 78.75
42	Montana	\$ 70.00			\$ 70.00	42	New York	\$ 9.00	43	Utah	\$ 72.00			\$ 72.00
43	Kentucky	\$ 55.00			\$ 55.00	43	Alabama	\$ -	44	Montana	\$ 70.00			\$ 70.00
44	Arkansas	\$ 50.00			\$ 50.00	44	Arizona	\$ -	45	Michigan	\$ 60.00			\$ 60.00
45	Colorado	\$ 50.00			\$ 50.00	45	Idaho	\$ -	46	Kentucky	\$ 55.00			\$ 55.00
46	Hawaii	\$ 50.00			\$ 50.00	46	Minnesota	\$ -	47	Oklahoma	\$ 52.00			\$ 52.00
47	Iowa	\$ 50.00			\$ 50.00	47	Missouri	\$ -	48	Arkansas	\$ 50.00			\$ 50.00
48	Michigan	\$ 50.00			\$ 50.00	48	New Mexico	\$ -	49	Colorado	\$ 50.00			\$ 50.00
49	Mississippi	\$ 50.00			\$ 50.00	49	Ohio	\$ -	50	Hawaii	\$ 50.00			\$ 50.00
50	Missouri	\$ 50.00			\$ 50.00	50	Pennsylvania	\$ -	51	Iowa	\$ 50.00			\$ 50.00
51	New Mexico	\$ 50.00			\$ 50.00	51	South Carolina	\$ -	52	Mississippi	\$ 50.00			\$ 50.00

Source: [upcounsel.com/annual-llc-fees-by-state 2022](https://upcounsel.com/annual-llc-fees-by-state-2022)

Source: [upcounsel.com/annual-llc-fees-by-state 2022](https://upcounsel.com/annual-llc-fees-by-state-2022)

* not State Bar run programs in other states

See Attachment D: MCLE Jurisdiction Comparison for details

			MCLE Providers				
Rank	State	Corp Annual Rpt	Rank	State	SAP low	SAP high	Blended
1	Texas (on gross rev)	?	1	Hawaii	\$ 10.00	\$ 500.00	\$ 255.00
2	Nevada	\$ 325.00	2	California NEW	\$ 150.00		\$ 150.00
3	Washington DC	\$ 300.00	3	California NEW NP	\$ 115.00		\$ 115.00
4	Maryland	\$ 300.00	4	Virginia	\$ 75.00	\$ 150.00	\$ 112.50
5	Delaware	\$ 225.00	5	Texas	\$ 50.00	\$ 150.00	\$ 100.00
6	Illinois	\$ 155.00	6	Washington	\$ 100.00		\$ 100.00
7	Arkansas	\$ 150.00	7	Florida	\$ 45.00	\$ 150.00	\$ 97.50
8	Florida	\$ 150.00	8	California	\$ 90.00		\$ 90.00
9	Massachusetts	\$ 135.00	9	Delaware	\$ 50.00	\$ 100.00	\$ 75.00
10	Alaska	\$ 100.00	10	Oregon	\$ 25.00	\$ 125.00	\$ 75.00
11	Connecticut	\$ 100.00	11	South Carolina	\$ 75.00		\$ 75.00
12	Oregon	\$ 100.00	12	West Virginia	\$ 50.00	\$ 100.00	\$ 75.00
13	CA Law Corp NEW	\$ 100.00	13	Kansas	\$ 25.00	\$ 100.00	\$ 62.50
14	Virginia	\$ 100.00	14	Louisiana	\$ 50.00	\$ 75.00	\$ 62.50
15	Maine	\$ 85.00	15	Maine	\$ 60.00		\$ 60.00
16	Washington	\$ 73.00	16	Montana	\$ 60.00		\$ 60.00
17	Iowa	\$ 55.00	17	Iowa	\$ 50.00	\$ 65.00	\$ 57.50
18	Kansas	\$ 55.00	18	Nevada	\$ 30.00	\$ 75.00	\$ 52.50
19	Wyoming	\$ 52.00	19	Alabama	\$ 50.00		\$ 50.00
20	Georgia	\$ 50.00	20	Alaska	\$ 50.00		\$ 50.00
21	New Jersey	\$ 50.00	21	Illinois	\$ 50.00		\$ 50.00
22	Rhode Island	\$ 50.00	22	Nebraska	\$ 50.00		\$ 50.00
23	South Dakota	\$ 50.00	23	New Mexico	\$ 50.00		\$ 50.00
24	Arizona	\$ 45.00	24	Oklahoma	\$ 50.00		\$ 50.00
25	Missouri	\$ 45.00	25	Wyoming	\$ 50.00		\$ 50.00
26	Wisconsin	\$ 40.00	26	Rhode Island	\$ 45.00		\$ 45.00
27	Vermont	\$ 35.00	27	Colorado	\$ 25.00	\$ 50.00	\$ 37.50
28	Indiana	\$ 30.00	28	Kentucky	\$ 20.00	\$ 50.00	\$ 35.00
29	Louisiana	\$ 30.00	29	Idaho	\$ 20.00	\$ 40.00	\$ 30.00
30	Nebraska	\$ 26.00	30	Minnesota	\$ 20.00	\$ 35.00	\$ 27.50
31	California	\$ 25.00	31	Indiana	\$ 25.00		\$ 25.00
32	Michigan	\$ 25.00	32	Ohio	\$ 25.00		\$ 25.00
33	Mississippi	\$ 25.00	33	Pennsylvania	\$ 25.00		\$ 25.00
34	New Mexico	\$ 25.00	34	Utah	\$ 25.00		\$ 25.00
35	North Dakota	\$ 25.00		Arizona			
36	West Virginia	\$ 25.00		Arkansas			
37	North Carolina	\$ 20.00		Connecticut			
38	Tennessee	\$ 20.00		Georgia			
39	Hawaii	\$ 15.00		Maryland			
40	Kentucky	\$ 15.00		Massachusetts			
41	Montana	\$ 15.00		Michigan			
42	Utah	\$ 15.00		Mississippi			
43	Colorado	\$ 10.00		Missouri			
44	New York	\$ 9.00		New Hampshire			
45	Alabama	\$ -		New Jersey			
46	Idaho	\$ -		New York			
47	Minnesota	\$ -		North Carolina			
48	Ohio	\$ -		North Dakota			
49	Oklahoma	\$ -		South Dakota			
50	Pennsylvania	\$ -		Tennessee			
51	South Carolina	\$ -		Vermont			
52	New Hampshire			Washington DC			
				Wisconsin			

MCLE Sources: jurisdictions rules/regulations/applications +

Rank	State	MAP Application low	MAP Application high	Blended	Rank	State	MAP Renewal	Years	Effective Annual	Rank	State	Late Attendance Reporting
1	Illinois	\$ 300.00	\$ 3,000.00	\$ 1,650.00		Maine	?		?		California	n/a
2	California NEW	\$ 600.00		\$ 600.00		Illinois	?	1	?		Alabama	?
3	Hawaii	\$ 500.00		\$ 500.00		New York	?	3	?		Florida	?
4	Nevada	\$ 500.00		\$ 500.00		Alabama	?	1	?		Maine	?
5	West Virginia	\$ 500.00		\$ 500.00		Nebraska	*		?		Nebraska	?
6	California NEW NP	\$ 460.00		\$ 460.00		Virginia	*	1	?		New Mexico	?
7	California	\$ 360.00		\$ 360.00		Utah	?	1	?		Pennsylvania	?
8	Alabama	\$ 350.00		\$ 350.00		Washington	?	1	?		South Carolina	?
9	Oklahoma	\$ 300.00		\$ 300.00	1	Colorado	\$ 2,500.00	1	\$ 2,500.00		West Virginia	?
10	Colorado	\$ 250.00		\$ 250.00	2	Hawaii	\$ 500.00	1	\$ 500.00	1	Louisiana	\$ 325.00
11	Delaware	\$ 250.00		\$ 250.00	3	Nevada	\$ 500.00	1	\$ 500.00	2	Texas	\$ 200.00
12	New Mexico	\$ 250.00		\$ 250.00	4	West Virginia	\$ 500.00	1	\$ 500.00	3	Ohio	\$ 100.00
13	Pennsylvania	\$ 250.00		\$ 250.00	5	California NEW	\$ 600.00	2	\$ 300.00	4	Utah	\$ 100.00
14	Ohio	\$ 25.00	\$ 400.00	\$ 212.50	6	Oklahoma	\$ 300.00	1	\$ 300.00	5	California NEW	\$ 75.00
15	Nebraska	\$ 200.00		\$ 200.00	7	Delaware	\$ 250.00	1	\$ 250.00	6	Kansas	\$ 75.00
16	South Carolina	\$ 200.00		\$ 200.00	8	New Mexico	\$ 250.00	1	\$ 250.00	7	Hawaii	\$ 50.00
17	Texas	\$ 200.00		\$ 200.00	9	California NEW NP	\$ 460.00	2	\$ 230.00	8	Nevada	\$ 50.00
18	Rhode Island	\$ 75.00	\$ 250.00	\$ 162.50	10	Ohio	\$ 212.50	1	\$ 212.50	9	Washington	\$ 50.00
19	Louisiana	\$ 100.00		\$ 100.00	11	South Carolina	\$ 200.00	1	\$ 200.00	10	Indiana	\$ 37.50
20	Maine	\$ 50.00		\$ 50.00	12	Texas	\$ 200.00	1	\$ 200.00	11	Rhode Island	\$ 30.00
21	Indiana	\$ -		\$ -	13	California	\$ 360.00	3	\$ 120.00	12	Illinois	\$ 5.00
	Alaska				14	Louisiana	\$ 100.00	1	\$ 100.00	13	Delaware	\$ -
	Arizona				15	Pennsylvania	\$ 175.00	2	\$ 87.50	14	Kentucky	\$ -
	Arkansas				16	Rhode Island	\$ 87.50	1	\$ 87.50		Alaska	
	Connecticut				17	Indiana	\$ -				Arizona	
	Florida					Alaska					Arkansas	
	Georgia					Arizona					Colorado	
	Idaho					Arkansas					Connecticut	
	Iowa					Connecticut					Georgia	
	Kansas					Florida					Idaho	
	Kentucky					Georgia					Iowa	
	Maryland					Idaho					Maryland	
	Massachusetts					Iowa					Massachusetts	
	Michigan					Kansas					Michigan	
	Minnesota					Kentucky					Minnesota	
	Mississippi					Maryland					Mississippi	
	Missouri					Massachusetts					Missouri	
	Montana					Michigan					Montana	
	New Hampshire					Minnesota					New Hampshire	
	New Jersey					Mississippi					New Jersey	
	New York					Missouri					New York	
	North Carolina					Montana					North Carolina	
	North Dakota					New Hampshire					North Dakota	
	Oregon					New Jersey					Oklahoma	
	South Dakota					North Carolina					Oregon	
	Tennessee					North Dakota					South Dakota	
	Utah					Oregon					Tennessee	
	Vermont					South Dakota					Vermont	
	Virginia	*				Tennessee					Virginia	
	Washington					Vermont					Washington DC	
	Washington DC					Washington DC					Wisconsin	
	Wisconsin					Wisconsin					Wyoming	
	Wyoming					Wyoming						

* alternate fee method

CA Limited Liability Partnerships Benefiting from Cap Structure

<i>sort by revenue</i>		Partners			Current			Option A	Option B		
Firm	Revenue (2021)	Total	Bs	Addl	Base	Addl	Renew	Renew No Cap	New Base	New Addl	New Renew
Kirkland & Ellis LLP	\$ 4,830,000,000	835	1	833	\$ 75	\$ 25	\$ 2,500	\$ 20,900	\$ 85	\$ 30	\$ 25,075
Latham & Watkins	\$ 4,333,763,000	541	1	539	\$ 75	\$ 25	\$ 2,500	\$ 13,550	\$ 85	\$ 30	\$ 16,255
DLA Piper US LLP	\$ 3,133,829,000	628	1	626	\$ 75	\$ 25	\$ 2,500	\$ 15,725	\$ 85	\$ 30	\$ 18,865
Skadden, Arps, Slate, Meagher & Flom LLP	\$ 2,662,890,000	378	1	376	\$ 75	\$ 25	\$ 2,500	\$ 9,475	\$ 85	\$ 30	\$ 11,365
Morgan, Lewis & Bockius	\$ 2,446,000,000	710	1	708	\$ 75	\$ 25	\$ 2,500	\$ 17,775	\$ 85	\$ 30	\$ 21,325
White & Case	\$ 2,387,800,000	471	1	469	\$ 75	\$ 25	\$ 2,500	\$ 11,800	\$ 85	\$ 30	\$ 14,155
ALLEN & OVERY	\$ 2,323,000,000	424	1	422	\$ 75	\$ 25	\$ 2,500	\$ 10,625	\$ 85	\$ 30	\$ 12,745
Hogan Lovells US LLP	\$ 2,308,401,000	373	1	371	\$ 75	\$ 25	\$ 2,500	\$ 9,350	\$ 85	\$ 30	\$ 11,215
Ropes & Gray LLP	\$ 2,192,810,000	294	1	292	\$ 75	\$ 25	\$ 2,500	\$ 7,375	\$ 85	\$ 30	\$ 8,845
Gibson, Dunn & Crutcher LLP	\$ 2,160,542,000	484	1	482	\$ 75	\$ 25	\$ 2,500	\$ 12,125	\$ 85	\$ 30	\$ 14,545
Norton Rose Fulbright US LLP	\$ 1,877,933,000	304	1	302	\$ 75	\$ 25	\$ 2,500	\$ 7,625	\$ 85	\$ 30	\$ 9,145
Davis Polk & Wardwell	\$ 1,770,000,000	171	1	169	\$ 75	\$ 25	\$ 2,500	\$ 4,300	\$ 85	\$ 30	\$ 5,155
Weil, Gotshal & Manges LLP	\$ 1,657,603,000	173	1	171	\$ 75	\$ 25	\$ 2,500	\$ 4,350	\$ 85	\$ 30	\$ 5,215
Sullivan & Cromwell LLP	\$ 1,555,441,000	178	1	176	\$ 75	\$ 25	\$ 2,500	\$ 4,475	\$ 85	\$ 30	\$ 5,365
Cooley LLP	\$ 1,552,149,000	369	1	367	\$ 75	\$ 25	\$ 2,500	\$ 9,250	\$ 85	\$ 30	\$ 11,095
Mayer Brown	\$ 1,517,100,000	340	1	338	\$ 75	\$ 25	\$ 2,500	\$ 8,525	\$ 85	\$ 30	\$ 10,225
Goodwin Procter LLP	\$ 1,486,263,000	561	1	559	\$ 75	\$ 25	\$ 2,500	\$ 14,050	\$ 85	\$ 30	\$ 16,855
McDermott Will & Emery	\$ 1,381,814,000	480	1	478	\$ 75	\$ 25	\$ 2,500	\$ 12,025	\$ 85	\$ 30	\$ 14,425
Reed Smith	\$ 1,310,596,000	257	1	255	\$ 75	\$ 25	\$ 2,500	\$ 6,450	\$ 85	\$ 30	\$ 7,735
Paul Hastings	\$ 1,310,126,000	318	1	316	\$ 75	\$ 25	\$ 2,500	\$ 7,975	\$ 85	\$ 30	\$ 9,565
Quinn Emanuel Urquhart & Sullivan, Milbank	\$ 1,301,077,000	285	1	283	\$ 75	\$ 25	\$ 2,500	\$ 7,150	\$ 85	\$ 30	\$ 8,575
Debevoise & Plimpton	\$ 1,224,942,000	153	1	151	\$ 75	\$ 25	\$ 2,500	\$ 3,850	\$ 85	\$ 30	\$ 4,615
Cleary Gottlieb Steen & Hamilton	\$ 1,223,119,000	180	1	178	\$ 75	\$ 25	\$ 2,500	\$ 4,525	\$ 85	\$ 30	\$ 5,425
Akin, Gump, Strauss, Hauer & Feld	\$ 1,208,738,000	328	1	326	\$ 75	\$ 25	\$ 2,500	\$ 8,225	\$ 85	\$ 30	\$ 9,865
Morrison & Foerster LLP	\$ 1,165,000,000	286	1	284	\$ 75	\$ 25	\$ 2,500	\$ 7,175	\$ 85	\$ 30	\$ 8,605
Orrick, Herrington & Sutcliffe	\$ 1,152,850,000	370	1	368	\$ 75	\$ 25	\$ 2,500	\$ 9,275	\$ 85	\$ 30	\$ 11,125
Holland & Knight LLP	\$ 1,044,337,000	742	1	740	\$ 75	\$ 25	\$ 2,500	\$ 18,575	\$ 85	\$ 30	\$ 22,285
Squire Patton Boggs (US) LLP	\$ 1,042,000,000	306	1	304	\$ 75	\$ 25	\$ 2,500	\$ 7,675	\$ 85	\$ 30	\$ 9,205
K&L Gates LLP	\$ 1,019,674,000	427	1	425	\$ 75	\$ 25	\$ 2,500	\$ 10,700	\$ 85	\$ 30	\$ 12,835
Proskauer Rose LLP	\$ 989,981,000	320	1	318	\$ 75	\$ 25	\$ 2,500	\$ 8,025	\$ 85	\$ 30	\$ 9,625
Willkie Farr & Gallagher	\$ 986,000,000	241	1	239	\$ 75	\$ 25	\$ 2,500	\$ 6,050	\$ 85	\$ 30	\$ 7,255
Winston & Strawn LLP	\$ 981,223,000	355	1	353	\$ 75	\$ 25	\$ 2,500	\$ 8,900	\$ 85	\$ 30	\$ 10,675
Ashurst, LLP	\$ 978,122,700	223	1	221	\$ 75	\$ 25	\$ 2,500	\$ 5,600	\$ 85	\$ 30	\$ 6,715
Arnold & Porter Kaye Scholer LLP	\$ 961,900,000	303	1	301	\$ 75	\$ 25	\$ 2,500	\$ 7,600	\$ 85	\$ 30	\$ 9,115
Faegre Drinker Biddle & Reath	\$ 937,037,000	566	1	564	\$ 75	\$ 25	\$ 2,500	\$ 14,175	\$ 85	\$ 30	\$ 17,005
Foley & Lardner LLP	\$ 922,354,000	478	1	476	\$ 75	\$ 25	\$ 2,500	\$ 11,975	\$ 85	\$ 30	\$ 14,365
Troutman Pepper Hamilton Sanders	\$ 918,010,000	262	1	260	\$ 75	\$ 25	\$ 2,500	\$ 6,575	\$ 85	\$ 30	\$ 7,885
Sheppard, Mullin, Richter & Hampton LLP	\$ 867,416,000	392	1	390	\$ 75	\$ 25	\$ 2,500	\$ 9,825	\$ 85	\$ 30	\$ 11,785
Shearman & Sterling LLP	\$ 861,026,000	275	1	273	\$ 75	\$ 25	\$ 2,500	\$ 6,900	\$ 85	\$ 30	\$ 8,275
Bryan Cave, LP	\$ 860,083,000	368	1	366	\$ 75	\$ 25	\$ 2,500	\$ 9,225	\$ 85	\$ 30	\$ 11,065
Alston & Bird, LLP	\$ 851,601,000	338	1	336	\$ 75	\$ 25	\$ 2,500	\$ 8,475	\$ 85	\$ 30	\$ 10,165
McGuire Woods LLP	\$ 831,051,000	406	1	404	\$ 75	\$ 25	\$ 2,500	\$ 10,175	\$ 85	\$ 30	\$ 12,205
Baker & Hostetler LLP	\$ 789,429,000	490	1	488	\$ 75	\$ 25	\$ 2,500	\$ 12,275	\$ 85	\$ 30	\$ 14,725
Fragomen, Del Rey, Bernsen & Loewy	\$ 787,305,000	100	1	98	\$ 75	\$ 25	\$ 2,500	\$ 2,525	\$ 85	\$ 30	\$ 3,025
Vinson & Elkins	\$ 782,352,000	191	1	189	\$ 75	\$ 25	\$ 2,500	\$ 4,800	\$ 85	\$ 30	\$ 5,755
Hunton Andrews Kurth	\$ 743,100,000	246	1	244	\$ 75	\$ 25	\$ 2,500	\$ 6,175	\$ 85	\$ 30	\$ 7,405
O'Melveny & Myers LLP	\$ 725,000,000	239	1	237	\$ 75	\$ 25	\$ 2,500	\$ 6,000	\$ 85	\$ 30	\$ 7,195
Pillsbury Winthrop Shaw Pittman	\$ 723,452,000	317	1	315	\$ 75	\$ 25	\$ 2,500	\$ 7,950	\$ 85	\$ 30	\$ 9,535
Seyfarth Shaw LLP	\$ 717,032,000	432	1	430	\$ 75	\$ 25	\$ 2,500	\$ 10,825	\$ 85	\$ 30	\$ 12,985
Venable	\$ 681,864,000	360	1	358	\$ 75	\$ 25	\$ 2,500	\$ 9,025	\$ 85	\$ 30	\$ 10,825
Lewis Brisbois Bisgaard & Smith	\$ 676,823,000	864	1	862	\$ 75	\$ 25	\$ 2,500	\$ 21,625	\$ 85	\$ 30	\$ 25,945
Katten Muchin Rosenman LLP	\$ 646,601,000	320	1	318	\$ 75	\$ 25	\$ 2,500	\$ 8,025	\$ 85	\$ 30	\$ 9,625

Fox Rothschild	\$ 584,000,000	413	1	411	\$ 75	\$ 25	\$ 2,500	\$ 10,350	\$ 85	\$ 30	\$ 12,415
Fenwick & West LLP	\$ 543,079,000	128	1	126	\$ 75	\$ 25	\$ 2,500	\$ 3,225	\$ 85	\$ 30	\$ 3,865
Duane Morris LLP	\$ 526,230,000	443	1	441	\$ 75	\$ 25	\$ 2,500	\$ 11,100	\$ 85	\$ 30	\$ 13,315
Crowell & Moring	\$ 514,391,000	258	1	256	\$ 75	\$ 25	\$ 2,500	\$ 6,475	\$ 85	\$ 30	\$ 7,765
Barnes & Thornburg	\$ 506,189,000	354	1	352	\$ 75	\$ 25	\$ 2,500	\$ 8,875	\$ 85	\$ 30	\$ 10,645
Kilpatrick Townsend & Stockton	\$ 497,936,000	267	1	265	\$ 75	\$ 25	\$ 2,500	\$ 6,700	\$ 85	\$ 30	\$ 8,035
Nixon Peabody	\$ 488,753,000	285	1	283	\$ 75	\$ 25	\$ 2,500	\$ 7,150	\$ 85	\$ 30	\$ 8,575
Blank Rome LLP	\$ 483,370,000	338	1	336	\$ 75	\$ 25	\$ 2,500	\$ 8,475	\$ 85	\$ 30	\$ 10,165
Locke Lord	\$ 482,096,000	317	1	315	\$ 75	\$ 25	\$ 2,500	\$ 7,950	\$ 85	\$ 30	\$ 9,535
Womble Bond Dickinson (US)	\$ 476,192,000	182	1	180	\$ 75	\$ 25	\$ 2,500	\$ 4,575	\$ 85	\$ 30	\$ 5,485
Akerman LLP	\$ 451,682,000	468	1	466	\$ 75	\$ 25	\$ 2,500	\$ 11,725	\$ 85	\$ 30	\$ 14,065
Jenner & Block LLP	\$ 446,295,000	220	1	218	\$ 75	\$ 25	\$ 2,500	\$ 5,525	\$ 85	\$ 30	\$ 6,625
Gordon Rees Scully Mansukhani,	\$ 442,256,000	513	1	511	\$ 75	\$ 25	\$ 2,500	\$ 12,850	\$ 85	\$ 30	\$ 15,415
Haynes and Boone	\$ 430,200,000	219	1	217	\$ 75	\$ 25	\$ 2,500	\$ 5,500	\$ 85	\$ 30	\$ 6,595
Husch Blackwell LLP	\$ 417,056,000	337	1	335	\$ 75	\$ 25	\$ 2,500	\$ 8,450	\$ 85	\$ 30	\$ 10,135
Shook, Hardy & Bacon LLP	\$ 414,914,000	257	1	255	\$ 75	\$ 25	\$ 2,500	\$ 6,450	\$ 85	\$ 30	\$ 7,735
Dorsey & Whitney LLP	\$ 414,096,000	357	1	355	\$ 75	\$ 25	\$ 2,500	\$ 8,950	\$ 85	\$ 30	\$ 10,735
Steptoe & Johnson LLP	\$ 393,914,000	189	1	187	\$ 75	\$ 25	\$ 2,500	\$ 4,750	\$ 85	\$ 30	\$ 5,695
Lowenstein Sandler LLP	\$ 392,080,000	125	1	123	\$ 75	\$ 25	\$ 2,500	\$ 3,150	\$ 85	\$ 30	\$ 3,775
Kramer Levin Naftalis & Frankel	\$ 390,000,000	119	1	117	\$ 75	\$ 25	\$ 2,500	\$ 3,000	\$ 85	\$ 30	\$ 3,595
Loeb & Loeb LLP	\$ 385,271,000	220	1	218	\$ 75	\$ 25	\$ 2,500	\$ 5,525	\$ 85	\$ 30	\$ 6,625
Wilson, Elser, Moskowitz, Edelman&Dicker	\$ 368,980,000	294	1	292	\$ 75	\$ 25	\$ 2,500	\$ 7,375	\$ 85	\$ 30	\$ 8,845
FinneganHendersonFarabowGarrett & Dunne	\$ 349,205,000	107	1	105	\$ 75	\$ 25	\$ 2,500	\$ 2,700	\$ 85	\$ 30	\$ 3,235
Arent Fox LLP	\$ 345,100,000	189	1	187	\$ 75	\$ 25	\$ 2,500	\$ 4,750	\$ 85	\$ 30	\$ 5,695
Snell & Wilmer L.L.P.	\$ 318,087,000	282	1	280	\$ 75	\$ 25	\$ 2,500	\$ 7,075	\$ 85	\$ 30	\$ 8,485
Manatt, Phelps & Phillips,	\$ 316,900,000	158	1	156	\$ 75	\$ 25	\$ 2,500	\$ 3,975	\$ 85	\$ 30	\$ 4,765
Buchanan Ingersoll & Rooney LLP	\$ 300,000,000	181	1	179	\$ 75	\$ 25	\$ 2,500	\$ 4,550	\$ 85	\$ 30	\$ 5,455
Kutak Rock LLP	\$ 293,051,000	346	1	344	\$ 75	\$ 25	\$ 2,500	\$ 8,675	\$ 85	\$ 30	\$ 10,405
Fisher & Phillips LLP	\$ 277,222,000	191	1	189	\$ 75	\$ 25	\$ 2,500	\$ 4,800	\$ 85	\$ 30	\$ 5,755
Stoel Rives LLP	\$ 270,164,000	207	1	205	\$ 75	\$ 25	\$ 2,500	\$ 5,200	\$ 85	\$ 30	\$ 6,235
Chapman and Cutler	\$ 262,025,000	123	1	121	\$ 75	\$ 25	\$ 2,500	\$ 3,100	\$ 85	\$ 30	\$ 3,715
Knobbe, Martens, Olson & Bear, LLP	\$ 243,000,000	165	1	163	\$ 75	\$ 25	\$ 2,500	\$ 4,150	\$ 85	\$ 30	\$ 4,975
Thompson Coburn	\$ 234,102,000	298	1	296	\$ 75	\$ 25	\$ 2,500	\$ 7,475	\$ 85	\$ 30	\$ 8,965
Kelley Drye & Warren LLP	\$ 233,852,000	135	1	133	\$ 75	\$ 25	\$ 2,500	\$ 3,400	\$ 85	\$ 30	\$ 4,075
Dinsmore & Shohl LLP	\$ 210,000,000	273	1	271	\$ 75	\$ 25	\$ 2,500	\$ 6,850	\$ 85	\$ 30	\$ 8,215
Allen Matkins Leck Gamble Mallory & Nats	\$ 193,939,000	114	1	112	\$ 75	\$ 25	\$ 2,500	\$ 2,875	\$ 85	\$ 30	\$ 3,445
Hinshaw & Culbertson LLP	\$ 191,788,000	279	1	277	\$ 75	\$ 25	\$ 2,500	\$ 7,000	\$ 85	\$ 30	\$ 8,395
Vorys, Sater, Seymour and Pease	\$ 182,000,000	176	1	174	\$ 75	\$ 25	\$ 2,500	\$ 4,425	\$ 85	\$ 30	\$ 5,305
Lewis Roca Rothgerber Christie LLP	\$ 155,774,000	139	1	137	\$ 75	\$ 25	\$ 2,500	\$ 3,500	\$ 85	\$ 30	\$ 4,195
Litchfield Cavo	\$ 150,900,000	118	1	116	\$ 75	\$ 25	\$ 2,500	\$ 2,975	\$ 85	\$ 30	\$ 3,565
Greenspoon Marder LLP	\$ 150,703,000	116	1	114	\$ 75	\$ 25	\$ 2,500	\$ 2,925	\$ 85	\$ 30	\$ 3,505
Tucker Ellis	\$ 131,000,000	105	1	103	\$ 75	\$ 25	\$ 2,500	\$ 2,650	\$ 85	\$ 30	\$ 3,175
Hanson Bridgett	\$ 129,219,000	109	1	107	\$ 75	\$ 25	\$ 2,500	\$ 2,750	\$ 85	\$ 30	\$ 3,295
Lathrop GPM	\$ 127,335,000	163	1	161	\$ 75	\$ 25	\$ 2,500	\$ 4,100	\$ 85	\$ 30	\$ 4,915
Burke, Williams & Sorensen, LLP*	\$ 77,500,000	120	1	118	\$ 75	\$ 25	\$ 2,500	\$ 3,025	\$ 85	\$ 30	\$ 3,625
Best Best & Krieger LLP*	\$ 63,800,000	106	1	104	\$ 75	\$ 25	\$ 2,500	\$ 2,675	\$ 85	\$ 30	\$ 3,205

Source: law.com/americanlawyer/2021

* alternate sources

MCLE Jurisdiction Comparisons

	SAP Fee	SAP Activity Approval Period*	SAP App Comparison (higher/lower than CA)	MAP Fee	MAP Renewal Fee	MAP Renewal Period	Annual App Fee comparison (higher/lower than CA)	App Late Fee	Attend Reporting Late Fee	Per Credit Hour Fee
California (proposed)	\$150	Unlimited times for up to 2 yrs		\$600	\$600	Every 2 yrs		Yes	Yes	Yes
California (non-profit)	\$115	Unlimited times for up to 2 yrs		\$460	\$460	Every 2 yrs		Yes	Yes	Yes
Alabama	\$50	1 date & time	Higher	\$350	\$350	Annual	Higher			
Alaska	\$50	1 date & time	Higher	\$250	\$250	Annual				
Colorado	\$50	1 date & time	Higher	\$250	\$2,500	Annual	Higher	Yes		
Delaware		Unlimited times for up to 1 yr		\$250	\$250	Annual				
Florida	\$150	1 date & time	Higher	N/A	N/A	N/A				
Hawaii	\$100/credit hr fee + \$5/attendee fee	1 date & time	Higher	500 + \$10/attendee fee	500 + \$10/attendee fee	Annual	Higher	Yes		Yes
Idaho	\$40	1 date & time	Higher	N/A	N/A	N/A		Yes		No
Illinois	\$50	1 date & time	Higher	\$2,000 or \$3,000	\$2,000 or \$3,000	Annual	Higher	Yes	Yes	Yes
Indiana	\$25	1 date & time						Yes	Yes	No
Iowa	\$65	1 date & time	Higher	N/A	N/A	N/A				
Kansas	\$25	1 date & time		N/A	N/A	N/A				No
Kentucky	\$50	1 date & time	Higher	N/A	N/A	N/A		Yes	No	No
Louisiana	\$75	1 date & time	Higher	\$100	\$100	Annual		Yes	Yes	No
Maine	\$60	Unlimited times for up to 1 yr	Higher	\$50		Annual		Yes	Yes	No
Minnesota	\$35	1 date & time		N/A	N/A	N/A		No	No	No
Montana	\$60	1 date & time	Higher							
Nebraska	\$50	1 date & time		\$200	\$25/activity					
Nevada		Up to 3 times & dates in 1 calendar yr		\$500	\$500	Annual	Higher	Yes	Yes	Yes
New Mexico	\$50	1 date & time	Higher	\$250	\$250	Annual			Yes	Yes
New York										
North Dakota										
Ohio	\$25			\$400	\$400	Annual	Higher	Yes		
Oklahoma	\$50		Higher	\$300 + \$50/on-demand course	\$300 + \$50/on-demand course	Annual	Same/Higher			No
Oregon		1 date & time		N/A	N/A	N/A		Yes		Yes
Pennsylvania	\$25	1 date & time		\$250	\$100 online; \$250 paper	Every 2 yrs				Yes
Puerto Rico	\$3/credit hr	Unlimited times for up to 1 yr		N/A	N/A	N/A				Yes
Rhode Island	\$45	1 date & time	Higher	\$250	\$250	Annual		Yes	Yes	No
South Carolina	\$75		Higher	\$200	\$200	Annual				
Tennessee	N/A	N/A		N/A	N/A	N/A		No	No	Yes (\$2/credit hr)
Texas				\$200 + tiered credit hr fee	\$200 + tiered credit hr fee	Annual	Higher	Yes		
Utah	\$25	1 date & time				Annual		Yes	Yes	Yes
Virginia				\$ based on # of courses applied for in previous CLE cycle	\$ based on # of courses applied for in previous CLE cycle	Annual	Potentially Higher	Yes		
Washington	\$100	Unlimited times for up to 1 yr	Higher	Tiered fee structure based on # of activities held in previous yr (min. \$500; max \$6,000)	Tiered fee structure based on # of activities held in previous yr (min. \$500; max \$6,000)	Annual	Higher	Yes	Yes	
West Virginia	\$50 for regular; \$100 for on-demand		Higher	\$500	\$500	Annual	Higher	Yes		
Wyoming	\$50	Unlimited times for up to 1 yr	Higher	N/A	N/A	N/A		No	No	No

* 1 date & time: states require fee be paid each time class is taught; unlimited times: states allow the same class to be offered for time period shown for a single fee

MCLE Sources: OPC survey of jurisdictions rules/regulations/applications