

August 19, 2022

Minnesota Supreme Court

25 Rev. Dr. Martin Luther King Jr. Blvd.

Ste 105

St. Paul, MN 55155

and

Standing Committee for the Legal Paraprofessional Pilot Project

Dear Honorable Justices of the Court and Standing Committee Members,

For a victim of domestic violence, family court actions and civil protective orders often happen at the most dangerous time in their life as abuse often escalates when an abused party attempts to leave the relationship. Domestic and sexual violence makes cases much more complex and failure to understand the dynamics in these cases can further traumatize the client or increase their physical danger. Due to this, certain organizations that serve victims and survivors of domestic abuse voiced concerns and opposition to the proposal to expand the Legal Paraprofessional Pilot Project (LPPP) to cases involving victims of domestic and sexual violence. In the Court's June 16, 2022 Order, hereinafter "Order", the pilot project was ordered to be expanded to include those case types and the Standing Committee was ordered to submit recommendations for training or experience requirements for legal paraprofessionals after consultation with the programs serving victims and survivors listed in the Order.

We, as the members named in the Order, oppose the training and experience requirements proposed by the subcommittee and note that the subcommittee's recommendations are not reflective of the training we, as those who serve victims and survivors, thought constituted an appropriate minimum baseline. We respectfully request that the Court and Standing Committee carefully consider the recommendations that we provided to the subcommittee and adopt them into the LPPP. Lastly, we also would like to express concerns about the process by which the recommendations were reached.

- I. We believe the recommendations of the subcommittee are likely to be woefully inadequate to ensure any measure of safety for victims of domestic and sexual assault.

As a group comprised of advocates and attorneys who provide direct services to victims as well as support to programs, we carefully undertook the directive of the Court. Although there was disagreement among our group, we were able to reach a very thoughtful recommendation for training requirements to make to the

FILED

August 19, 2022

**OFFICE OF
APPELLATE COURTS**

subcommittee. These recommendations were broken down into two categories—cases involving victims of domestic assault and cases involving victims of sexual assault.¹

As to cases involving allegations of domestic violence (including child abuse), we identified three core competency areas: the dynamics of domestic violence; screening for domestic violence, safety, and lethality; and the legal intersections of domestic violence. We then identified existing trainings that would address these core competencies, resulting in our recommended 20 hours of training for both the paraprofessional who will be doing the representation and the attorney who will be supervising the paraprofessional. We also recommended 3-4 credits of ongoing CLEs per year to stay current on changes to the law in the area and we recommended shadowing at least two evidentiary hearings that had a domestic abuse advocate present.

It is worth noting that these training recommendations align with those from national organizations. In a recent joint statement, the Association of Family and Conciliation Courts and the National Council of Juvenile and Family Court Judges recognized that “Family law practitioners should receive regular and ongoing training... including, but not limited to intimate partner violence, substance misuse, high conflict, denigration, parental alienating behaviors, and healthy parenting.” They also stated that practitioners should “screen for safety, conflict, and parent-child contact problems... including the severity, frequency, and impact. Practitioners should, in all cases, employ a structured and evidence-informed screening for family risk factors.”

As to cases involving allegations of sexual violence (including child sexual abuse), we recommended that these cases be excluded from representation due to their frequent intersection with other areas of the law and systems that are beyond the scope of the LPPP. If, however, representation by paraprofessional is going to occur, we recommended a minimum of 45 hours of training that cover the following specified core competencies: dynamics of sexual assault; screening for safety and lethality; and the legal intersections of sexual assault. We also identified available trainings that would address these core competencies, which included the 40-hour sexual assault training offered by MNCASA and other advocacy agencies across the state.² We also recommended 3-4 annual CLE credits to ensure that paraprofessionals can stay current with changes to the law impacting sexual violence, and we recommended shadowing a sexual assault advocate through 4 restraining order evidentiary hearings, 2 of which are for a Harassment Restraining Order and the remaining 2 for sexual assault-related Order for Protections.

Prior to the subcommittee’s third meeting, which we understood to be a discussion of our training recommendations, subcommittee members received an email containing an outline of training recommendations that was developed by two subcommittee members and presented as the basis for future subcommittee discussions. This outline disregarded our recommendations and went so far as to state that most paraprofessionals do not need to complete any training regarding domestic or

¹ Powerpoint of full recommendations by DV and SV organizations attached as Appendix 1. Recording of presentation given on 8/5/22 in possession of Standing Committee member Maren Schroeder.

² We cannot confirm the availability of training from other organizations at this time.

sexual violence in order to represent victim-survivors in family court cases. Rather, the authors unilaterally decided that professional experience providing paralegal services in family law was sufficient.

Our group sought to define the quantity and quality of that experience. We learned that the family law experience requirement, as envisioned, would not require any experience with DV or SV and there was not a quantified requirement for how much of the professional practice needed to be family law for the experience requirement to be met. So, in essence, if a firm did even one family law case per year with no DV or SV involved, the experience threshold would be met after the requisite number of years had passed. Our concerns are compounded by our research of paralegal studies educational programs in the state, which revealed that there are very few DV and family law classes available or required and no educational program offers SV classes.³

This disregard of our training recommendations was the culmination of an overall contempt for our participation and efforts. Our group feels that many of the subcommittee members took the Court's Order to consult with us literally and did just that and nothing more.

- II. We believe that the subcommittee dynamics were not conducive to a collaboration that could successfully develop reasonable training standards.

Our group was met with a lot of resistance as to why paraprofessionals should need this training with questions from the group such as, "Why do we have to do more training than attorneys do? They can just practice these cases, they don't have to do this training" and "Why would we need to more training to represent clients in these cases than we need to do to represent them under Rule 114?" While we have some specific concerns with both of those assertions, including the fact that Rule 114 neutrals should not be representing anyone or giving parties legal advice, the overall sentiment is concerning and shows a lack of understanding of how complex the dynamics can be in these cases. We heard over and over again that some representation is better than none, stating that the Court made that clear in the language of the Order that "the unmet need for legal representation, however, stands paramount." When dealing with victims' safety and the re-traumatization from inadequate representation that occurs, we do not believe that sentiment is true. It is notable that domestic abuse and sexual assault advocates, who work with victims and survivors every day, are only granted limited powers by this Court's February 5, 1991 Order in C2-87-1089 that do not extend to representing victims in Court. Nonetheless, every DV and SV organization we consulted with in putting together our recommendations require much more training for their staff attorneys and advocates than what we recommended for this pilot program.

We were also surprised by the pushback concerning the cost that training would require. At the meeting on July 28, 2022, one presenter told the representatives from

³ See Appendix 2 summarizing programs based on Minnesota Paralegal' Association's website excluding classes less to this topic such as torts although transmission of STDs and things of that nature can make torts and family law overlap.

the DV and SV organizations, “It’s a business model, not pro bono work. I already do enough pro bono work. I’m here to make money.” Despite that statement, at the next meeting when our recommendations were made and very low-cost options for existing courses⁴ to meet those training requirements were identified, the overwhelming response was that it would be cost prohibitive for private firms and legal aid organizations. This argument seems without merit if this is a business model for firms. If firms want to make money from the pilot project, it should be worth it to them to invest in competency. These trainings are also something that every member organization we polled from the DV and SV agencies have their staff do despite being non-profits with limited resources. It gives the members of this group who serve victims grave concerns if the business model underlying the expansion of this pilot project makes adequate training cost prohibitive.

During our meetings, we also heard, “Some people may not be able to afford an attorney that charged a \$5,000 retainer, but can do \$2,500.” This shows a real lack of understanding for the dynamics of power and control in abusive relationships. We have similar concerns with the Court’s Order stating, “...we limit expansion of the pilot program to OFP and HRO proceedings to representations of persons seeking the OFP or HRO” as this completely ignores the dynamic of abusers attempting to use the Court system as a control tool against victims and would allow abusers to qualify for the pilot project simply by filing for an OFP or HRO against the victim.

Our intention is not in any way to disparage paralegals. We believe with proper training and properly trained supervising attorneys, paraprofessionals can successfully expand their roles in several ways. When it comes to the dynamics of DV and SV however, the cases are more complex than the Standing Committee and Court seem to be weighing them. Each of us have stories of how participants have lost their lives while trying to leave their abusers. We do not want that for any victim and do not want that for any paraprofessional who was placed in the position of holding those victim’s lives in their hands. For those of us who do this every day, we are not being dramatic when we say this is truly a matter of life and death.

- III. We believe the process by which the recommendations were reached did not create the possibility for all concerns being heard by the Court in making informed decisions.

The subcommittee formed from the larger Standing Committee appeared to be all proponents of expanding the pilot project. While the subcommittee certainly followed the directive of the Court and met with the designated representatives of the DV and SV organizations, they made it clear that their interaction with us was perfunctory and that they would be deciding which recommendations are made to the Standing Committee and subsequently to the Court. For better clarity on the resistance the DV and SV organizations were met with, we would encourage the Standing Committee and Court to listen to the audio recording of the question and answer

⁴ Classes such as Standpoint’s New Laws if both days are taken cost \$100 total for legal aide members and \$150 for private attorneys and last year qualified for 11.25 CLE credits.

portion of the August 5, 2022 meeting in which the DV and SV agencies made recommendations to the subcommittee beginning at minute marker 48:20 of the recording referenced in Footnote 1 (the video recording does not include the last approximate 20 minutes of the meeting). We were surprised, after delivering a presentation on what resources for training currently exist and what training we would recommend, to be met with not only argument, hostility but even tears, and then the chair of the Standing Committee felt the need to “explain down” to us the feelings of the group and how the recommendations were being received. We joined the group in the spirit of cooperation and thought the process would be more about compromise and reaching a recommendation both our members and the subcommittee members could jointly recommend to the Standing Committee and ultimately the Court. We were scheduled to meet four times to develop these training recommendations, but it was declared at the conclusion of our third meeting that we would not meet further. At this final meeting on 8/12/22, when it was explained to us that the subcommittee makes the recommendation to the Standing Committee regardless of our position and they were charged by the Court with only listening to our input and then ultimately choosing to incorporate it or disregard it as they saw fit, it became clear that the process we had hoped would be happening was not going to occur. We were taken aback when, while trying to explain that as members of the DV and SV communities we could not endorse the recommendations that we were reviewing, we got responses including, “So it’s your recommendations or nothing?” and “you’re trying to put up barriers.” It seemed very much like gaslighting for us to have just been told that the subcommittee could totally disregard our input in the recommendations to the larger Standing Committee if that is ultimately what they decide to do and then to be accused of forcing our recommendations in an all or nothing approach and trying to create barriers when we were merely trying to set the paraprofessionals and, more importantly, the victims will serve up for success.

If the Standing Committee is made up solely of proponents of the Pilot Project and its expansion, it is hard to understand how the Court will make informed decisions to govern this project. The process of seeking advice from outside organizations via an input only model seems flawed in its creation if the Court truly wants recommendations that are reflective of the concerns detailed in the Order. We therefore would respectfully urge the Court to reevaluate the process created by that Order for this issue and future issues that may arise that require various opinions to be weighed by the Court.

Given our concerns about the process, if the Court were to order the Standing Committee’s subcommittee to re-convene with this group and develop joint training recommendations, it would likely continue to be ineffective. Subsequently, we respectfully ask the Court to adopt our training recommendations for the Legal Paraprofessional Pilot Program.

Sincerely,

Debra Bulluck, Representative from MSBA Family Law Section and its Domestic Abuse Committee

Maria Maier, Representative from St. Paul and Ramsey County Domestic Abuse Intervention Project

Nikki Kelly, Representative from Standpoint

Artika Roller, Representative from Minnesota Coalition Against Sexual Assault

Ashley Sturz, Representative from Minnesota Coalition Against Sexual Assault



LPPP Training

Potential Options and Proposed Recommendations




Overview

What's needed

What's offered

Proposed
Recommendations



What's Needed – Domestic Abuse

Representation in domestic abuse cases is complex.

- Cases often intersect with other legal areas (such as criminal, CHIPS, housing, and immigration).
 - ❖ **Legal paraprofessionals must know how the "primary" case impacts "secondary" cases and advise clients appropriately.**
- Safety issues are common, and legal action may increase lethality risks.
 - ❖ **Legal Paraprofessionals must know how to screen for this risk - or consult with professionals who can assist with this – and advise clients appropriately.**
- Domestic abuse is traumatic for many clients.
 - ❖ **Legal Paraprofessionals must be knowledgeable about trauma and the varied, and counter-intuitive ways that it can manifest.**

What's Needed: Domestic Abuse Training

- Dynamics of Domestic Violence
- Legal Intersections (family law, child support, etc.)
- Local System Responses (including, but not limited to):
 - Medical forensic options and responses
 - Law Enforcement policies, procedures, and practices
 - Advocacy services
 - Child protection policies, procedures, and practices
 - Housing – legal options and protections; Safe at Home program
- DV Screenings (post-separation abuse risks, lethality, suicide, etc.)
- Trauma
- Interviewing child victims and witnesses
- Intercultural effectiveness
- Vicarious Trauma, compassion fatigue, and self-care

What's Needed – Sexual Assault*

Representation in sexual assault cases is complex.

- Cases often intersect with other crimes and systems (such as medical, law enforcement, and child protection)
 - ❖ **Legal paraprofessionals must be knowledgeable of the impact of these intersections and advise clients appropriately.**
- Cases often intersect with other legal areas (such as criminal, CHIPS, housing, and immigration courts).
 - ❖ **Legal paraprofessionals must know how the "primary" case impacts "secondary" cases and advise clients appropriately.**

***It is recommended that paraprofessionals be excluded from sexual assault cases.**

What's Needed - Sexual Assault*

- Safety issues are common, and legal action may increase lethality risks.
 - ❖ **Legal Paraprofessionals must know how to screen for this risk - or consult with professionals who can assist with this – and advise clients appropriately.**
- ❖ Sexual assault is traumatic for many clients.
 - ❖ **Legal Paraprofessionals must be knowledgeable about trauma and the varied, and counter-intuitive ways that it can manifest.**

***It is recommended that paraprofessionals be excluded from sexual assault cases.**

What's Needed: Sexual Assault Training

- 40 Hour Sexual Assault Advocacy Training that includes:
 - Screenings (safety, lethality, suicide, etc.)
 - Trauma
 - Intercultural effectiveness
 - Vicarious Trauma, compassion fatigue, and self-care
 - Local System Responses (including, but not limited to):
 - Medical forensic options and responses
 - Law Enforcement policies, procedures, and practices
 - Advocacy services
 - Housing – legal options and protections; Safe at Home program
- Interviewing child victims and witnesses
- Development of a supplemental training specific to paraprofessionals (trauma-informed legal representation)



Training Summary

DOMESTIC VIOLENCE

- Dynamics of Domestic Violence
- Local System Responses
- DV Screenings (post-separation abuse risks, lethality, suicide, etc.)
- Trauma
- Interviewing child victims and witnesses
- Intercultural effectiveness

SEXUAL ASSAULT

- Sexual Assault, 40-hour training
- Local System Responses
- Screenings (safety, lethality, suicide, etc.)
- Trauma
- Interviewing child victims and witnesses
- Intercultural effectiveness
- Supplemental training – trauma-informed legal representation



What's Offered

Potential Training Opportunities*



What's Offered – Domestic Violence

DV 101, Offered by St. Paul Intervention Project (SPIP)

- **minimum 16-hour training**
- **Training topics include:**
 - Dynamics of domestic abuse, types of domestic violence, pattern of abuse, etc.
 - Increased barriers to accessing help for traditionally marginalized communities and people – LGBTQ+, BIPOC, Older and younger victims, Immigrants/refugees, non-English speaking, etc.
 - Intersectionality of domestic violence and other forms of oppression
 - Impact of Children's Exposure to Domestic Violence
 - Trauma-Informed Services
 - Risk Assessment
 - Safety Planning
 - Community Resources
 - Criminal Justice and Civil Justice Systems
 - The importance of Restraining Orders- the multi-tiered impact orders have on victims' and their children's safety and long-term well-being, as well as other critical court proceedings.
- **Training includes simulations and role-playing and has required test on content at completion.**

What's Offered – Domestic Violence

SAFeR , Offered by Battered Women's Justice Project (BWJP)

- SAFeR is an approach to decision making in IPV-related family law matters. It consists of four parts: (1) **screening** for IPV; (2) **assessing** the full nature and context of IPV; (3) **focusing on the effects** of IPV; and (4) **responding** to IPV in all recommendations, decisions, and interventions.
- Training is estimated 1-1.5 hours
- <https://www.bwjp.org/our-work/projects/safer.html>

Screen for
IPV

Assess the
Nature &
Context of
IPV

Focus on
the Effects
of IPV

Respond to
the Lived
Experience
of IPV

What's Offered – Domestic Violence

Protection Order Training, offered by BWJP's National Center on Protection Orders and Full Faith & Credit (NCPOFFC)*

- Training to individuals and jurisdictions on the following:
 - Identifying and resolving systemic problems in local procedures for issuance, service and enforcement of protection orders.
 - Interjurisdictional enforcement of protection orders.
 - Child custody provisions within protection orders.
 - Federal and state firearms prohibitions related to domestic violence.
 - Federal domestic violence and stalking crimes.
- Training duration is unknown.
- <https://www.bwjp.org/our-work/projects/protection-orders.html>
- ***Is not specific to Minnesota.**



What's Offered – Domestic Violence

Order For Protections (Beginner and Advanced Courses), offered by Ramsey County PDAS with presenters from Tubman, SPIP, SMRLS, courts and other partners

- A two-part OFP training for advocates and attorneys.
- The Beginner training is 1.5 hours covering OFP paperwork and OFP basics.
- The Advanced training is a 3-hour complete OFP mock trial. In prior sessions, a Ramsey County judicial officer presided. The training included mock evidence and objections.



What's Offered – Domestic Violence

Other training providers may include:

- Victims' Rights Law Center (VRLC)
 - <https://victimrights.org/>
- Association of Family and Conciliation Court (AFCC)
 - <https://afccmn.org/resources/>
- Office of Justice Programs (OJP)
 - <https://dps.mn.gov/divisions/ojp/training-and-communication/Pages/2011-conference-on-crime-and-victimization.aspx>
- Minnesota Alliance on Crime (MAC)
 - <https://www.mnallianceoncrime.org/events/>

What's Offered – Sexual Assault

Virtual Sexual Assault Advocacy Training, offered by MNCASA

- A 40-hour training for advocates.
- Includes both pre-recorded and live components.
- Available to non-advocates for estimate \$400.



What's Offered – Sexual Assault

SEXUAL ASSAULT ADVOCATE/COUNSELOR TRAINING, created by Office for Victims of Crime Training and Technical Assistance Center (OVC TTAC) and offered by ????

- The 2.5 day curriculum focuses on intervening with individuals in a crisis rather than long-term and group counseling.
- Target Audience: volunteers or staff at rape crisis centers, but the training also can be useful for medical and legal professionals who interact with victims
- https://www.ovcttac.gov/SAACT/module_toc.cfm
- Topics include

- | | |
|---|--|
| 1 Introductions and Overview | 2 What is Sexual Assault Advocacy/Counseling? |
| 3 Realities of Sexual Assault | 4 The Neurobiology of Trauma and Sexual Assault |
| 5 Impact of Sexual Assault | 6 Campus Sexual Assault |
| 7 Effects of Sexual Assault on Males | 8 Procedures in Common Advocacy Situations |
| 9 Recovery Education and Skills Training | 10 Compassion Fatigue and Self-Care |
| 11 Wrap-Up and Evaluation | |

What's Offered – Both Domestic Violence and Sexual Assault

New Laws, offered by Standpoint

- The single greatest source of up-to-date legal information for advocates and professionals.
- Annual 2-day training
 - The first day of New Laws provides attendees with Special Topic presentations.
 - The second day focuses on changes in statutory and case law, both in Minnesota and Federally, that have occurred in the previous year and have an impact on sexual and domestic violence.
- \$60/day, or \$100 for both days for legal aid/services, prosecutors, & volunteer attorneys.
 - \$90/day or \$150 for both days for private attorneys and general public.
- 11.25 CLE credits for attorneys in 2021.
- <https://www.standpointmn.org/new-laws>



STANDPOINT
Attorneys & advocates against domestic & sexual violence



Proposed Recommendations

Overall Recommendations

- Request a more narrowed expansion of the LPPP to both expand the program and achieve reasonable training requirements.
- Exclude Sexual Assault cases from the LPPP.
- Require both the legal paraprofessional and the supervising attorney to complete the training requirements.
- Allow legal paraprofessionals and the supervising attorneys to substitute demonstrable CLE training specific to domestic violence and/or sexual assault (in lieu of the training requirements).
 - Requires further discussion prior to implementation to fully clarify the standards.

Training Recommendations (domestic violence)

- Legal paraprofessionals must complete a minimum of 20 hours of training that covers the following core competencies prior to handling a case involving allegations of domestic violence (including child abuse):
 - Dynamics of Domestic Violence
 - Screening for domestic violence, safety, and lethality
 - Legal intersections of domestic violence
- The following trainings are recommended to satisfy this training requirement:
 - DV 101
 - SAFeR
 - OFP Beginner and Advanced trainings
- Ongoing CLEs, 3-4 per year (such as New Laws)
- ADDITIONALLY, legal paraprofessionals must shadow a domestic abuse legal advocate through at least 2 OFP evidentiary hearings.
 - Consent or other appropriate agreement will need to be obtained to preserve the client's privilege with the advocate.

Training Recommendations (sexual assault)*

*If not excluded from
LPPP.

- Legal paraprofessionals must complete a minimum of 45 hours of training that covers the following core competencies prior to handling a case involving allegations of sexual assault:
 - Dynamics of sexual assault
 - Screening for safety and lethality
 - Legal intersections of sexual assault
- The following trainings are recommended to satisfy this training requirement:
 - 40-hour Sexual Assault Training
 - SAFeR
 - OFP Beginner and Advanced trainings
- Ongoing CLEs, 3-4 per year (such as New Laws).
- ADDITIONALLY, legal paraprofessionals must shadow a sexual assault advocate through at least 2 HRO and 2 OFP evidentiary hearings.
 - Consent or other appropriate agreement will need to be obtained to preserve the client's privilege with the advocate.



Questions?

APPENDIX 2

		Ethics	Civil	Criminal	Family Law	Legal Writing	Legal Research	Witness/Client Interviewing	Evidence & Exhibit Prep	Litigation and Trial Practice	Domestic Abuse in Law	Sexual Violence in Law
	Degree											
Alexandria Technical and Community College	AAS	w/oT	w/oT	w/oT	w/oT	Y	Y	N	Y	N	*	
American National University	Cert.	N	N	Y	E	w/oT	w/oT	N	Y	N		
American National University	Assoc.	N	N	Y	Y	w/oT	w/oT	N	Y	N		
Hamline University	BA w/ Grad. Cert.	N	Y	N	N	w/oT	w/oT	Y	E	N		
Inver Hills Community College	A.S.	N	N	Y	Y	Y	Y	E	N	Y		
Inver Hills Community College	Post-Grad Cert.	N	N	Y	Y	Y	Y	E	N	Y	*	
Lake Superior College	AAS	E	Y	Y	E	Y	Y	N	N	N		
Lake Superior College	Cert.	E	Y	Y	E	Y	Y	N	N	N		
National American University	AAS	N	Y	Y	N	Y	Y	N	N	N		
National American University	BS	Y	Y	Y	Y	Y	Y	N	N	N		
North Hennepin Community College	AS	N	N	E	E	w/oT	w/oT	N	N	Y	*	
North Hennepin Community College	Cert.	N	N	E	E	w/oT	w/oT	N	N	Y	*	
Rasmussen	Cert.	Y	Y	Y	Y	Y	Y	N	N	N		
Rasmussen	A.S.	Y	Y	Y	Y	Y	Y	N	N	N		
University of Wisconsin-Superior	Cert.	Y	Y	E	E	w/oT	w/oT	N	E	N		
Winona University	Cert.	N	Y	Y	N	w/oT	w/oT	N	E	E		
Winona University	BS	N	Y	Y	N	w/oT	w/oT	N	E	E		

KEY

Y = Yes

N=No

E = Elective

w/oT = w/other topic

* = see sheet 2

	DV included in Family Law course?	Duration of DV education
<u>Alexandria Tech - LGL1603</u> https://www.alextech.edu/academics/course-descriptions-outlines	<u>Yes</u>	<u>unspecified</u>
<u>American National University</u> <u>Hamline</u>	<u>unknown</u>	<u>unknown</u>
<u>Inver Hills Family Law course</u> https://voices.inverhills.edu/paralegal/courses/pa-2201-family-law/	<u>Yes</u>	<u>1.5hr</u>
<u>Lake Superior</u> <u>National American University</u>	<u>No</u>	<u>N/A</u>
https://www.national.edu/smart-catalog/?deg=2022-2023/Catalog/	<u>unknown</u>	<u>unknown</u>
<u>North Hennepin Community College</u> chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/ https://www.nhcc.edu/sites/default/files/2022-06/ParalegalAS_NorthHennepinCommunityCollege.pdf	<u>Yes</u>	<u>unspecified</u>
<u>Rasmussen</u> https://rasmussen.dcatalog.com/v/2022---2023-Catalog/?page=140	<u>No</u>	<u>N/A</u>
<u>University of Wisconsin - Superior</u> https://www.uwsuper.edu/catalog/2022-24/undergraduate/legal-studies-programs_catalog4573016	<u>No</u>	<u>N/A</u>
<u>Winona University</u> https://catalog.winona.edu/preview_program.php?catoid=27&poid=5339&returnto=3107	<u>No</u>	<u>N/A</u>