

**From:** Jackson, Margaret  
**Sent:** Wednesday, April 16, 2014 1:23 PM  
**To:** Clark, JR  
**Subject:** Comments Opposing the Proposal to Revoke Interpretation 305-3

Hello Mr. Clark,

I write in opposition to the proposal to allow schools to offer paid externships for academic credit. Revoking the interpretation that forbids the award of academic credit for paid student work will not help students or legal education meet the challenges of today's legal market, nor will it serve the public. Many schools are currently enhancing their curricula to provide much more widely-available experiential education, which students, the ABA, and the public are increasingly demanding. Removing the restriction against paid externships will be a disincentive to these positive trends.

Among the innovations are an increased externships and so-called "hybrid clinics" that currently provide educationally-structured placements with public interest and legal aid organizations. Students in those placements learn firsthand about the value of public service legal work, while also enabling those organizations to better serve their clients. These organizations will not be able to pay their externs, if payment becomes permitted. What effect will the availability of paid work for credit have on low-income persons with legal needs and the organizations that struggle to provide legal services to them? The lack of legal assistance for low- to moderate-income persons remains a well-documented problem in our society. Allowing some students to receive varying levels of compensation from private law firm externship placements will have a negative impact on the availability of students willing to take externships that cannot offer pay.

Ultimately, the goals and objectives of paid employment and those of education are often in conflict. Among the goals of legal education are to instill the value of service to society and the obligation of lawyers to contribute. Paying law students to obtain their own education seems at odds with this principle.

Thank you,

Margaret Moore Jackson  
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