Juvenile Rules Task Force

Public Meeting, March 5, 2021
(All members and guests attending telephonically)

Meeting Minutes

Members attending: Hon. Rebecca Berch (Chair), Hon. Mark Armstrong, Professor Barbara Atwood, Beth Beckmann, Beth Beringhaus, Dale Cardy, Maria Christina Fuentes by her proxy Steve Selover, John Gilmore, Magdalena Jorquez by her proxy Randi Alexander, Hon. Joseph Kreamer, Donna McQuality, Eric Meaux, William Owsley, Christina Phillis, Hon. Maurice Portley, Hon. Kathleen Quigley, Beth Rosenberg, Denise Smith, Denise Avila Taylor, Hon. Patricia Trebesch, Edward Truman by his proxy Carey Turner, Kent Volkmer, Hon. Anna Young

Members absent: Kathleen Coughlin, Tina Mattison, Hon. Rick Williams

Guests: Shari Anderson Head, Elise Kulik, David Euchner

AOC staff: Caroline Lautt-Owens, Joe Kelroy, Mark Meltzer, Angela Pennington

1. Call to order; preliminary remarks; approval of meeting minutes. The Chair called the fifteenth Task Force meeting—its tenth consecutive virtual meeting—to order at 10:00 a.m. There were no workgroup or Editorial Group meetings in February. The rules were locked after the February 5 Task Force meeting to allow Ms. Pennington an opportunity to prepare the second draft of the rules without intervening text changes. Ms. Pennington completed the full second draft set (240 pages) on February 17, then posted those rules on the Task Force webpage. Each of the six Parts of the second draft set of rules was posted separately. That same day, staff emailed links to the webpage to stakeholders whose names had been previously provided by members and to others, such as COSC, COJC, and the State Bar Juvenile Law section. Staff's email invited comments from the stakeholders.

As of March 3, 2021, staff had received 14 comments. A few of the comments were from Task Force members, but most were from judicial officers, practitioners, and agencies. COA-1 and COA-2 also provided comments. Staff included these 14 comments in a pre-petition comment table, which was included the meeting packet. The first page of the table shows the rules in each of the 6 Parts that were addressed by the first 14 comments. Most of the comments in the table were cut-and-pasted from emails and were unedited. Two long comments in letter style, from Laurie Owen and David Euchner, appeared separately in the packet after the comment table. Staff received 5 comments thereafter, which, in the interests of circulating them promptly, were distributed verbatim as email attachments in lieu of adding them to the table. (The Chair noted that one of those comments, from Judge Johnson, was a draft document that was not intended for distribution; but given the timing of its receipt and the desirability of considering her comment, even as a draft, it was nonetheless circulated to the members.) Some comments

focused on just one or two rules, others addressed multiple rules or global concerns. By day's end on March 4, the Task Force had received 19 comments regarding the draft rules. (Staff received a 20th comment after the meeting, via Professor Atwood, from Judge Laurie San Angelo regarding Rule 417.) The comments were all thoughtful, and the Chair expressed her appreciation to each person who submitted one.

Before proceeding to the comments, the Chair asked members to review draft minutes of the February 5, 2021 Task Force meeting. There were no corrections.

> **Motion:** A member moved to approve the February 5, 2021 meeting minutes. The motion received a second and it passed unanimously. **JRTF 016**

2. Introduction to the second draft rules; plan for reviewing the comments. The Chair introduced the second draft set of rules by comparing it to the first draft set, which had been presented at the February 5 Task Force meeting. Unlike the first draft, which had one, two, or three-digit rule numbers, the second draft utilizes three-digit rule numbering throughout. The first of these numbers refers to the Part where the rule is located, and therefore provides the user with a cue on the rule's subject matter. (Three-digit numbering is similarly used in the Arizona Rules of Evidence.) The second draft also includes rules that had been inadvertently omitted from the first draft, or that had not been approved prior to the February 5 meeting. Rules in the first draft were not properly sequenced, but they have been in the second draft, so rules with a common subject matter are grouped together, and rules appear in the order in which events are likely to occur. The second draft also includes a table of contents for each Part.

The Chair then proposed her plan for reviewing the 19 comments. Because the time available at today's meeting is insufficient for a complete review of those comments, she prefers that members focus on the most substantive comments, or those that could have the most impact. She acknowledged that determining which comments are in those categories is not clear cut. Nonetheless, she suggested deferring to the Editorial Group comments concerning grammatical edits, which includes portions of the comments from Judge Warner, Ms. Rosenberg, and Mr. Conant. The Editorial Group would also review comments concerning Part V, which were few in number. If, before the Task Force files its petition, there is time for the workgroups to convene, the Chair would refer to them for their review and recommendations the comments, or portions of the comments, from Ms. Meiser, Ms. Jorquez, Judge Farrar, Mr. Truman, Mr. Meissen, and Judge Johnson. The Task Force would then begin the morning session of today's meeting with a review of other comments concerning Parts I, II, and VI, and continue thereafter with a review of comments concerning Parts III and IV. Members concurred with the plan of review.

3. Review of comments to Parts I, II, and VI. Comment #1, from Commissioner Bibbens, suggested that the definition of "parent" in Rule 102(r) match the definition of parent in A.R.S. § 25-401(4). After discussion, members agreed to make the

suggested change by adding the second sentence of the statutory definition to the definition in Rule 102.

In Rule 104(d)(3) ("evaluation report"), Judge Warner noted in comment #3 that beginning the provision with the words "before any dependency [etc.]" was confusing. He suggested saying instead "in any dependency." Members agreed with the suggestion. They agreed to make a similar change in Rule 104(d)(2) ("admissibility of child safety worker's report"), which also begins with the words "before any." While on the subject of Rule 104(d)(2), a member commented that current Rule 45 ("admissibility of evidence"), section (c) ("admissibility of reports") uses the word "shall [admit those reports]," which the member contended means "must admit." The draft rule, on the other hand, says "must review…and may admit." The member asked to change "may" to "must." Comment #12 from Mr. Koltunovich also proposed a change to Rule 104(d)(2). A judge member reminded members that they had extensive discussions on this section at previous meetings and asked whether today's meeting was an appropriate forum for reconsidering issues that had been previously resolved. The Chair agreed that it was not. Therefore, members did not make the suggested changes to Rule 104(d). The Chair noted that members did not have consensus on every one of the hundreds of proposed rule changes. If members believe the Task Force incorrectly resolved an issue, rather than reconsidering the issue at today's meeting, they should propose adding an explanatory note in the rule petition.

Members then turned to comment #7, a lengthy memo to the Task Force from David Euchner primarily concerning Part VI rules. For the reasons specified in the preceding paragraph of these minutes, members did not consider the portions of Mr. Euchner's comment concerning ineffective assistance of counsel or motions for new trial. Ms. Beckmann, who expressed appreciation for Mr. Euchner's comment, took the lead on addressing the remainder of his comment. One area of his comment asked whether the list of appealable final orders in Rule 103(b) was actually exhaustive, as it purports to be. His comment said, "the list includes some orders that clearly are not final, while excluding others that are arguably 'more final' than some that are on the list." Ms. Beckmann responded that the listed orders are based on case law, but with a catch-all in Rule 601(b)(2)(N) ("any other order that is final pursuant to Arizona case law") because future appellate opinions might change what is a final appealable order. Neither Ms. Beckmann nor members saw the need to change the draft rule in this regard. Mr. Euchner's comment also raised issues concerning the nature of time-extending motions and the associated tight deadlines. Ms. Beckmann will speak with her Division One counterpart on those issues.

Ms. Beckmann added a related concern regarding the 12-day deadline under Rule 317 ("altering or amending a final order"), subpart (b)(1), the second sentence of which allows the court to extend or excuse the deadline for extraordinary circumstances. (See comment #10 from COA-2.) Ms. Beckmann proposed an outer limit on when the court can do this, for example, no later than 6 months after entry of the order. Members favored

adding such a limit; they did not support the alternative or removing the second sentence of Rule 317(b)(1). Another issue in comment #10 (the portion from Mr. Truman) noted concerns with reducing the time for filing a petition for review under Rule 609 to 20 days; it is 30 days under the current rule. The members' rationale for 20 days was that most appellants don't file a petition for review, and the shorter time would allow an appellate court to issue its mandates more promptly, which would benefit many children. However, a member suggested a compromise: retain the 30-day limit for filing the petition for review but require a party who intends to file the petition to file a notice of that intent within 15 days. Judge Kreamer advised that workgroup 1 will consider this suggestion.

Rule 603 ("notice of appeal"), subpart (a)(5) allows the court for good cause to excuse an untimely notice of appeal. Mr. Euchner proposed an edit that would preclude the State or DCS from filing a delayed notice. Although members did not generally favor that change, one member supported it, and observed that the State does not have constitutional rights at stake, whereas parents do. Counsel may also have difficulty locating a parent within the time for filing a notice of appeal, whereas the State should not have a similar difficulty. The workgroup will consider Mr. Euchner's proposed amendment. [Note: Mr. Euchner subsequently spoke at the Call to the Public and commented on this issue. He said that dependency and termination appeals are not purely civil; rather, they have aspects that are quasi-criminal in nature. Parents in those proceedings typically have appointed counsel, and if their counsel did not timely file a notice of appeal, it would constitute ineffective assistance and be an error of constitutional dimension. He said that similar to the State in a criminal case, the State in these juvenile cases does not have the same constitutional rights as an individual, and accordingly, should not have a co-extensive right to file an untimely notice of appeal. Mr. Euchner said his proposed amendment is a recognition of this difference.]

Rule 604 ("the record on appeal"), section (f) ("sanctions") would allow the appellate court to impose sanctions on a party for a supplemental designation of items for the appellate record that were unnecessary. Mr. Euchner's comment contended that the proposed rule "is entirely unworkable and counterproductive" and would require the appellate court to second-guess an attorney's decision to make a supplemental designation. Although current Rule 104(G) permits sanctions for unnecessary designations, members generally concurred with Mr. Euchner's observations. They also agreed that in egregious circumstances, the appellate court would have inherent authority to impose sanctions. However, a judge member cautioned that removing the provision could open the door for attorneys using supplemental designations solely with the intent of extending time. The workgroup will also look at this issue.

A member noted an issue raised by Ms. Owen (comment #6) concerning the admission of DCS reports that contain statements from unidentified declarants. The member believed that parties should know the identities of declarants, or their statements should be stricken from the reports. Another member replied that neither case law nor

statutes contain a requirement that reports disclose a hearsay declarant's identity. One member proposed adding to the pertinent sections of Rule 104(c) ("admissibility of reports") that a timely disclosed report is admissible "with proper foundation." Because Rule 104(d)(2) says that the court "may" admit the report, the court has discretion to exclude it or to give it little weight. Workgroup 1 will discuss this issue.

Although members did not raise other issues during the morning session concerning comments to Parts I, II, and VI, Judge Kreamer noted that a number of the remaining comments raise important issues. He cited as an example portions of comment #12 regarding Part II rules. He noted that many of the comments were received just days before today's meeting, and he supported allowing the workgroups additional time to review the comments.

4. **Review of comments to Parts III and IV.** A portion of Commissioner Bibbens' comment (comment #1) overlapped with a parallel comment from the Pima LGBTQ+ Task Force (comment #4). Comment #4 proposed adding to the subjects enumerated in Rule 309 ("education requirements for a court-appointed attorney or GAL"), section (d) ("later training") "the needs of LGBTQ youth in care." Members did not oppose this amendment, but several members felt that it didn't go far enough in identifying other disproportionately affected minority youth. A workgroup will follow-up on this issue.

Judge Warner's comment (#3) observed that Rule 303(d) ("manner of appointment") requires the court to "enter an order or issue a minute entry" assigning or appointing counsel. Rule 324 ("minute entries") provides that "an unsigned minute entry is an order of the court." Accordingly, the language of Rule 303(d) – and similar language in other rules – is duplicative. The members supported a suggestion to relocate Rule 324, which is a two-sentence rule, to Rule 102 ("definitions"). But in doing so, members should assure that the new definition is consistent with Supreme Court Rule 125 and make appropriate conforming changes to other juvenile rules. A workgroup will address this. Judge Warner's comment also proposed adding this sentence to Rule 304(c) ("withdrawal"), subpart 4: "The attorney remains the person's attorney of record until a notice of withdrawal is filed." Members agreed to make that change and another change Judge Warner proposed to Rule 304(c)(1) concerning withdrawal with the client's consent.

Judge Warner also suggested a change to the wording of Rule 323 ("simultaneous dependency and legal-decision making/parenting time proceedings"). Members preferred his suggested language for section (a) ("transfer to juvenile division") to the current wording. His clearer language says, "If pending family law and dependency proceedings concern the same parties, the judge presiding over the juvenile case makes decisions concerning the children." Members requested that a workgroup also consider Professor Bennett's margin comment concerning the applicability of rules on a Rule 323 determination. (He asked whether family law rules apply when a juvenile court makes

decisions regarding parenting time.) Judge Warner requested that the juvenile rules distinguish summary adjudications from contested adjudications, and that a new rule describe "what a summary adjudication is." However, while a word search of Part III rules revealed references to summary judgment motions, there were no references to summary adjudications. Members supported Judge Warner's proposed amendment to Rule 339(b) ("time limits"), which would add to that section the words "and may accelerate the disposition to the time a dependency finding is made."

Rule 342 ("motion for return of the child"), section (b) ("time limits") would require the court ("must set"), as current Rule 59(b) requires ("shall be set), to schedule a hearing on a motion for return of the child. Judge Warner noted the possibility of recurring motions under this rule and the rule's requirement in that circumstance to set repeated hearings. He suggested that the rule should require the court to set a hearing, for example, only when a motion had not been filed in the previous six months. One member noted that the pertinent statute contains no such limitation. Another member observed that a parent might be able to rectify a situation within weeks and should not need to wait months to file the motion. Members concluded that currently there is not an actual problem with the number of Rule 59 motions that are filed, and they declined to add a limitation to Rule 342.

Professor Bennett's narrative comment raised an issue of attorneys for parents not attending DCS child and family team meetings, either because the attorneys were concerned about violating ER 4.2 ("communication with person represented by counsel") or because they were explicitly told by DCS staff that they could not attend. (Compare Rule 306(g), which requires a child's attorney to attend and provide input at a DCS staffing.) Counsel's attendance poses an ethical issue because the DCS caseworker at these meetings is a representative of an attorney-represented party in litigation. A member acknowledged that parents are occasionally excluded from these meetings. Sometimes, but not always, it is because the parent's attorney assumes an adversarial role at a staffing. But the member added that a staffing is supposed to be more open than DCS sometimes acknowledges. Those who attend should participate in good faith, and guidelines are in place to further that objective. A judge member noted that attorneys could abuse the intended purpose of a staffing, but also believed there a rule concerning a DCS staffing might be needed to assure that everyone is aware of who can participate and the nature of the engagement. A workgroup will review this issue further.

At a later point in the meeting, members considered Professor Bennett's proposed amendment to Rule 306 ("duties and responsibilities of an attorney and GAL for a child"). Professor Bennett's proposed section (h) (untitled), would exempt the child's attorney and GAL from the requirement of ER 4.2 for the limited purpose of communicating with child safety workers. His proposed text would also impose a duty on the Attorney General's office to inform the child's attorney and GAL of any scheduled staffing and inform DCS that the child's attorney and GAL "are encouraged to fully participate in child and family team meetings." A member from the Attorney General's office thought

that appropriate contact would be reasonable, but it might be problematic to give the child's attorney unlimited access to the case worker. Members distinguished contact with a case worker on routine matters from contact involving contested issues. The Chair referred the matter to the workgroup but noted that there might not be an easy fix and it might be difficult to resolve this issue in a court rule.

Professor Bennett also proposed adding a new untitled section (d) to Rule 315 ("disclosure and discovery"). This one-sentence section would provide, "If a child is moved to a new placement, the DCS must disclose full contact information to the attorney and GAL for the child within 36 hours of the move." Members generally favored the amendment but proposed both longer and shorter times for the requirement (24, 48, or 72 hours.) A member noted that pursuant to current DCS policy, DCS has up to 10 days to notify the child's attorney and GAL of a child's relocation, which most agreed was too long. Members agreed that the court-appointed attorney and GAL representing the child should know the child's whereabouts at all times, and it is the court's responsibility to assure that DCS timely provides this information. They also agreed that DCS could provide this information by telephone or email (see Rule 315(a)(2)). The workgroup will review the proposed amendment and include the necessary details.

Members also discussed Professor Bennett's comment regarding the admission of a parent's report under Rule 104. If Professor Bennett's comment was directed at the admission of an evaluation report from the parent's expert, Rule 104(d)(3) would already allow admission of the report, and his proposed amendment would be unnecessary. A related question in Professor Bennett's comment was whether a report admitted at a preliminary protective hearing remains admitted for purposes of future hearings, including a termination adjudication. Members initially disagreed on the answer to that question. While the initial response of some members was "no," others noted Rule 351 ("termination adjudication hearing"), section (g) ("social study"), permitting the admissibility of a social study as provided in Rule 104(d). They also cited Rule 340 ("motion to determine the provision of reunification services"), which allows the court to consider "documents entered into evidence at prior proceedings." Some members preferred to leave this question for trial judges. Judges can determine if, notwithstanding the admission of a report at a prior hearing, there are reasons to exclude it at a subsequent proceeding. This might also be an issue for judicial education, i.e., instruction that previous admission of a report is by itself an insufficient basis for admitting it at a subsequent hearing.

Professor Bennett proposed adding a third sentence to Rule 305 ("appointment of a guardian ad litem") that would direct the court appointing a GAL for a child or an adult to "state the reason for the appointment and the expected role of the guardian ad litem." Members had previously included similar, but not identical, language in Rule 308 ("duties and responsibilities of a guardian ad litem for a parent, guardian, or Indian custodian"). Members discussed the benefit of having language like this in those two rules as well as in Rule 306 ("duties and responsibilities of an attorney and GAL for a

child"). One proposed solution would expand the language of Rule 308 to make it applicable to a child's GAL. The workgroup will consider how to best achieve the members' objective.

Members then discussed various other comments concerning the Part III rules. Ms. Jorquez, in comment #11, wanted a participant's right to be heard under Rule 311 ("participants' rights") to be limited to matters concerning the child. Members agreed with the change and the workgroup will review her proposed modification to Rule 311(b). In his text changes to Rule 311 associated with comment #13, Mr. Conant requested the addition of an amendment regarding a participant's right to counsel. Members agreed that participants have a right to retain counsel, but not a right to court-appointed counsel, and that a participant's attorney can address the court. But members believed the proposed amendment implied that participants had a status approaching that of a party and concluded that the amendment was unnecessary. Ms. Rosenberg's comment (#9) proposed adding text regarding a guardianship subsidy to the guardianship rules; she will provide the workgroup with specific language. The comment from Ms. Owen (comment #6) proposed adding to Rule 333 ("contested review of temporary custody"), subpart (a)(2)(A), the words "to prevent abuse or neglect" (i.e., "whether removal of the child from the home was clearly necessary to prevent abuse or neglect.") Members agreed to add those words.

A member proposed that comments concerning the QRTP, including comments #5 from Ms. Jorquez, #17 from Ms. Dunn on behalf of the Children's Action Alliance, and #19 from Ms. Ronan on behalf of the Center for Law in the Public Interest, be referred to the workgroup. Judge Portley expressed the view that the new federal statute provides the essential requirements for QRTPs, i.e., that judges timely consider assessments and set subsequent review hearings. He believes that proposed Rule 335 accomplishes these objectives. He suggested that proposals contained in comments #17 and #19 exceed the basic federal requirements and add what he considers to be best practices. Although Arizona can adopt its own statutes that incorporate the FFPSA's requirements and add best practices, as other states, e.g., Washington. have done, Arizona has not yet done so. A member added that until the FFPSA is operationalized in Arizona, Arizona stakeholders might not even know which best practices would be desirable. Some members agreed with Judge Portley, but to get a better sense, the Chair called for a straw poll. By a ratio of 5:1, a majority concluded that Arizona currently needed a rule containing a basic structure required by the FFPSA, and that incorporating additional best practices should be deferred until after Arizona has implemented the program.

However, one member had a concern with comment #5. The concern was that if DCS is doing its own assessments, as the proposed amendment in comment #5 would allow after DCS obtains a waiver, then DCS might use a QRTP as a substitute for a group home when a foster family is unavailable. A DCS representative advised that DCS does not currently intend to request waivers, but it might do so in the future and wanted to preserve that option. Members declined to simply cross-reference in Rule 335 the federal

statute that contains the waiver provisions, but rather they preferred to add appropriate text to the body of the rule, as proposed by comment #5. Another comment noted that the acronym "QRTP" as it appeared in Rule 335 was sometimes erroneous and requires correction. Judge Kreamer posed the possibility that DCS might implement the QRTP sooner than October 1, 2021, and the rule petition might need to request an even earlier effective date for Rule 335. He will keep the Task Force advised of any news on this point.

Members then turned to comments on the Part IV rules.

Rule 411 ("service of the petition to adopt and notice of hearing") requires the petitioner to serve, among others, "any person who has initiated a paternity action." Ms. Meiser (comment #2) suggested adding the words "within the time required by A.R.S. § 8-106." Members agreed and added "(J)" to the statutory reference. Ms. Meiser also had a concern with Rule 408 ("certification to adopt"). The concern was that a prospective adoptive parent who anticipated an unfavorable determination from an agency might withdraw the application and reapply through a different agency. She suggested that there be a record of withdrawn applications, such as requiring that the subsequent application provide the details of a prior application. During their discussion, members noted that a prospective adoptive parent might be dissatisfied with an agency for legitimate reasons, and withdraw their application accordingly, and there shouldn't be a negative inference from the withdrawal of a previous application. In addition, if this is actually a widespread problem, it should be addressed by statute. Members also considered but declined to make a change to the ICWA provisions in Rule 416 ("hearing to finalize adoption"), as comment #2 proposed.

Members then reviewed another portion of comment #11, from Ms. Jorquez, concerning Rule 417 ("setting aside an adoption"). Her comment indicated that the timing in Rule 417(a) ("motion to set aside"), which required the court to hold a hearing within 10 days of filing, was inconsistent with the time in Rule 417(c) ("initial hearing"), which requires the court to set an initial hearing no later than 15 days after filing. Members agreed that the contradiction could be remedied by deleting the first sentence of section (c). However, during the ensuing discussion, members noted two other anomalies. First, although Rule 317 ("altering or amending order") includes a 12-day time limit, Rule 407(f), which can also be a time extending motion under Rule 603(a)(3), contains no similar procedure. Second, Rule 407(f) and Rule 417(a) address the same subject: a motion to set aside an adoption judgment. On the second item, a member proposed relocating the substance of Rule 407(f) to Rule 417(a). The workgroup will address these issues.

Mr. Conant's comment (#13) included a few additional matters. Professor Atwood will discuss his comment in Rule 408 ("certification to adopt") regarding the ICPC with a subject matter expert. (The ICPC is a defined term in Rule 102(l).) Members declined his proposed amendment to Rule 404 ("appointment, appearance, and withdrawal of counsel") because it would tend to elevate a prospective adoptive parent to near-party

status and lead to a situation that could be detrimental to the actual parties, especially if the goal of an ongoing dependency proceeding is family reunification. The workgroup will discuss Mr. Conant's proposed amendment to Rule 410 ("petition to adopt").

A member proposed adding a definition of "agency," because sometimes this word refers to an adoption agency and other times it refers to DCS. The member also suggested that the term "DCS" be used wherever the rules now mention "division" or "department."

5. Draft rule petition. The Chair advised that staff initially drafted the rule petition, and she reviewed and edited the document. The draft in the meeting packet includes some of her comments concerning text that might be deleted to reduce the length of the petition. She asked members to advise of any items that should be added to the petition, or that were not adequately discussed in the draft. She noted the oddity of including a proposed amendment to Civil Rule 81.1, but no one objected to the inclusion. The draft requests an early effective date for Rule 335 on the QRTP, which would be provisionally numbered Rule 52.1 until the remaining rules become effective on July 1, 2022, as proposed. However, she also raised the possibility of filing a separate petition concerning this rule.

The petition proposes that the Court consider the petition in December rather than August. The proposed July 1, 2022 effective date would allow 6 months for judicial and stakeholder training on the new set of juvenile rules following their anticipated adoption in December. Members still need to consider forms, and whether forms should continue to be part of the rules or alternatively, that forms be made available elsewhere, such as on the Arizona Judicial Branch website. Members concurred in the three-digit rule numbering and thought it would be helpful.

6. Roadmap. The Chair requested workgroups to set meetings and review their respective items as noted and discussed at today's meeting. The petition filing deadline is currently March 31, 2021. The Chair advised that she will ask the Chief Justice about the possibility of extending that date one month, until the end of April. Even if it appears that the Court might look favorably upon the request, members should still proceed apace. If the Court approves the request, the Chair would like to set another Task Force meeting at the beginning of April, after the round of workgroup meetings.

7. Call to the public; adjourn. Mr. Euchner responded to a Call to the Public. His comments concerning Rule 603 are noted in section 3 of these minutes (at page 4). Mr. Euchner added that he appreciates the three-digit rule numbering. The Chair concluded the meeting by thanking members for their work and time, for their attention to detail, and for their thoughtfulness and diligence.

The meeting adjourned at 3:35 p.m.