

## **Rural Area Flexibility Analysis (RAFA)**

### **1. Types and estimated numbers of rural areas**

The proposed regulation does not specifically apply to rural areas, nor are there anticipated impacts on rural areas. The proposed rule will allow legal interns from law schools statewide, some of which may be in rural areas, to represent parties in Board proceedings. The proposed rule does not impose any affirmative obligations or costs on localities, including rural areas.

### **2. Reporting, recordkeeping and other compliance requirements; and professional services**

Rural areas are not obligated to engage in any reporting, recordkeeping, or other compliance requirements as a result of the proposed rule, nor are they expected to require professional services. The Board and law schools will maintain all records associated with an internship program stemming from the revised regulation.

### **3. Costs**

The Board does not anticipate that rural areas will bear any costs associated with the proposed amendment to 12 NYCRR 302-1.6. Because the revised rule would only expand an existing rule that has had no impact on rural areas, the Board does not predict that rural areas will now have to bear costs associated with the proposed rule.

### **4. Minimizing adverse impact**

Board has reviewed the minimization approaches set forth in SAPA 202-bb(2) and finds them unnecessary to implement because the Board anticipates that the proposed regulation will not negatively affect rural areas. Indeed, the Board expects that the revised regulation will positively impact claimants in rural areas who have been unable to find an attorney, insofar as this proposal will likely make it easier for claimants to retain a law school intern and expeditiously resolve the dispute.

### **5. Rural area participation**

The Board will duly assess all comments received by representatives of rural areas during the public comment period.