



The State Bar *of California*

**OPEN SESSION
AGENDA ITEM
APRIL 2020
COMMITTEE OF BAR EXAMINERS ITEM O-404**

DATE: April 24, 2020

TO: Members, Committee of Bar Examiners

FROM: Natalie Leonard, Principal Program Analyst

SUBJECT: Action on Application for Provisional Accreditation – St. Francis Law School

BACKGROUND

St. Francis Law School is a registered, unaccredited distance law school located in Newport Beach, California. The school has filed an application with the Committee of Bar Examiners (Committee) seeking provisional or full accreditation. (Attachment A).

The Committee's Rules regarding accreditation

A registered, unaccredited school applies for accreditation by submitting an application and detailed self-study demonstrating how it currently complies with the Rules for Accredited Law Schools (Rules) and Guideline for Accredited Law Schools (Guidelines) or plans to do so in the future. (Rule 4.121). The application includes a plan for program transition, including a plan for teaching-out currently enrolled law students in their current program or allowing students to apply to the accredited program, with all students being given a reasonable opportunity to complete their J.D. degrees. (Guideline 1.1(D)(1)).

When the Committee reviews an application for provisional accreditation under Rule 4.123, it will take one of the following actions:

- (A) notify the law school within thirty days of considering the application that it does not appear to substantially comply with these [Accredited] rules and, for reasons stated in the notice, advise the law school to withdraw its application
- (B) require an inspection within sixty days of the Committee's consideration of the application for provisional accreditation
 - (1) upon determining that the law school appears to substantially comply with the standards; or

- (2) if the law school refuses to withdraw its application in spite of the Committee's advice that it do so
- (C) request further information, allowing a reasonable time for review
- (D) deny the application

Before being granted provisional or full accreditation, the State Bar must conduct an inspection in order "to verify the information submitted by the law school and determine the extent of the law school's compliance with these [Accredited] rules." (Rule 4.124). If the Committee grants provisional accreditation, the provisionally accredited law school is subject to annual inspection and its students remain subject to the First-Year Law Students' Examination requirement until such time as full accreditation is achieved. (Rule 4.120).

Key operational factors for accredited schools

All accredited law schools must comply with rules divided into sixteen subject matter areas. (Rule 4.160). The following key provisions unique to the substance of the accredited J.D. curriculum will be summarized in this memorandum: Educational Program including Transition Plan; Competency and Practical Skills Training; Scholastic Standards; Minimum, Cumulative Bar Passage Rate Requirements; Admissions; Physical Resources/Infrastructure; Library; Financial Resources; and Dean and Faculty. (Rule 4.160 (D-H), (J-L), (N)). The school describes additional administrative compliance in its application as to the remaining areas: Lawful Operation; Integrity; Governance; Multiple Locations; Records; Constitutional Compliance; and Compliance with Committee Requirements. (Rule 4.160 (A-C), (I), (M), (O-P)).

DISCUSSION

St Francis Law School has been registered as an unaccredited distance law school for eight years. Its JD program is taught completely online. The school is a division of Baker College, a not-for-profit educational institution. Baker College and St Francis Law School hold tax exempt status. According to its 2019 Annual Report, a total of 54 students are currently enrolled in St Francis's JD program. The school operates a part-time JD program, as only accredited schools are permitted to operate full-time programs. St Francis Law School does not have plans to add a full-time JD program if it should become an accredited law school.

The law school was last inspected in 2016, and would normally next be inspected in 2021. If the Committee advances this application today by requesting an inspection, that inspection will serve both as the periodic inspection of St Francis Law School as a registered school and also as the evaluation of the school's readiness to earn provisional or full accreditation.

St Francis Law School's proposed accredited JD program

If ultimately accredited, St Francis Law School plans to continue its current online JD curriculum consisting of 130 quarter credit units to be completed in four years. St Francis will continue to offer the same required courses, with the exception of the First Year Law Students' Examination Preparation class. Because one quarter credit is equal to two-thirds of a semester credit, the school's 130 quarter credit program translates to approximately eighty-six credit hours. The

school estimates that this represents 3900 hours of engagement with at least 1200 hours in verified academic engagement.

The school plans to retain its current curriculum and quarter calendar, though it might make slight calendar modifications. The school's curriculum is detailed at length in the application.

The school's teachout plan indicates that students in the unaccredited program will generally qualify to transfer to the accredited program since the admissions program is already more selective than the rules and guidelines would require. The school remaining willing to teach out students in the unaccredited program if they cannot or do not wish to transfer.

Summary of the Law School's Plan for Compliance with the Accredited Rules

St Francis Law School's application for accreditation was clear, detailed and complete. It appears that the school is at or near full compliance and its examination outcomes are well above average, though sample size is small. The school represents that it is ready to proceed to an inspection to verify its substantial or full compliance in all areas.

Dean and Faculty

The law school "must have at each campus . . . a competent dean, a qualified administrator, an adequate administrative staff and a competent faculty that devote adequate time to administration, instruction and student counseling." (Rule 4.160(D)). St Francis Law School's Dean is an experienced educator who graduated from an ABA law school and is licensed to practice in Illinois and Colorado. He has served as professor and dean at two other California, and he is active in both teaching and distance education structural design initiatives. The school has one full-time faculty member and a range of part-time faculty members sufficient to keep a very low student-faculty ratio.

A Sound Program of Legal Education Compliant with Scholastic Standards

Under Division 6 Academic Program Guidelines, a law school "must maintain a qualitatively and quantitatively sound program of legal education" that includes at least twelve hundred hours of verified academic engagement. (Guidelines 6.1, 6.5(A)). This translates to eighty credits, with fifteen hours of verified academic engagement plus thirty estimated hours of preparation per credit. (4.160 (E), Guidelines 6.5 (A-B)). Students' time spent in untracked preparation or homework would be in addition to this amount. The school's combination of six hundred hours of live classes plus tracked time in discussions, writing, skills assignments, quizzes and examinations total over 3,000 hours.

Under Division 7's Scholastic Standards, verification of at least twelve hundred hours of academic engagement must be conducted via reliable means. (Guideline 7.11) St Francis uses its technology platform to track engagement, including attendance at live classes twice per week, and measurement of time spent online for other assignments. Other hours of engagement are tracked using industry benchmarks and validated on a frequent basis, as allowed under the Guidelines.

Competency and Practical Skills Training

As part of the curriculum, “[a] law school must provide the opportunity for students in the JD degree program to complete a minimum of fifteen (15) units of practice-based skills and competency training. (Rule 4.160(F), Guideline 6.9(A)(1)).

The school will meet this requirement by offering a combination of six credits of practical skills integrated into the curriculum plus a Legal Externship program.

The school measures its nine quarters of practical skills integrated into the doctrinal courses in a conservative manner, identifying the fraction of a course devoted to practical skills. Examples include arguing for the state or defendant in a mock sentencing hearing in first year LAW 722 Criminal Law II, or planning the voir dire of a police officer based on a police report involving domestic violence, in LAW801 Evidence I.

Legal externships at the school are designed and monitored in compliance with the Guidelines, requiring pre-approval, monitoring, assessment, validation, and credit within allowable limits.

Minimum, Cumulative Bar Examination Passage Rate

An accredited law school must maintain an MPR of forty percent or more. (Rule 4.160 (N), Guideline 12.1). St Francis Law School’s 2019 MPR is 63.6 percent. While based on a small sample size of ten graduates who took the Bar Examination between July 2016 and July 2019, it greatly exceeds the minimum requirement.

Should the school become fully accredited, its students will establish exemption from the First Year Law Students’ requirement, but the school will still need to fairly assess students’ capacity to succeed in law school and to assist the school in maintaining an MPR of forty percent or more. St Francis feels that its current policy will allow it to appropriately admit students under accredited status. Notably, the school requires applicants to have earned a bachelor’s degree, which exceeds what the Accredited Law School Rules require, and the school has a comprehensive and selective admissions process. The school’s students have had strong performance on both the First Year Law Students’ Examination (FYLSX) and the California Bar Examination (CBX).

The school’s July 2019 CBX Pass Rate was fifty percent, or two out of four applicants, all of whom happened to be first-time takers. Those results, along with the results of the February 2020 Bar Examination, will be taken into account when updating the school’s MPR in July 2020. A pass rate for an individual examination at that level is extremely likely to ensure continued compliance with the MPR requirement. With that said, the school is small, and, as a result, its pass rate could be subject to significant fluctuations up or down. The school is encouraged to pay close attention to examination preparation, as should all schools, in order to maintain compliance with this key Rule, and the school has represented that it is prepared to do so.

Admissions

The law school must “maintain a sound admissions policy . . . [and] must not admit any student who is obviously unqualified or who does not appear to have a reasonable prospect of completing the degree program.” (Rule 4.160(H)). The school will maintain its admissions policy if it becomes an accredited school. As mentioned above, the school requires applicants to possess a bachelor’s degree or other advanced degree, welcomes the inclusion of standardized tests, and carefully reviews each application.

Physical Resources, Library, and Financial Resources

The school must also have adequate infrastructure, including an appropriate library, technical infrastructure, and sufficient financial resources to implement the required changes. (Rule (4.160 (J-L), Guidelines 8-10). The law school complies with these requirements.

Division 8 Library Requirements can be fulfilled by making either physical or electronic library volumes available to the students. St Francis uses the LexisNexis Advance service to meet this requirement. The school provides a wide range of specifically described legal research orientations and learning modules designed to teach both electronic and book research, as required by Guideline 8.3.

Division 9 Physical [and Infrastructure] Resources are already in place to deliver a compliant online JD program and related academic and administrative support. The technical platform is already in use at the school. The school’s program has always been delivered completely online, with the exception of student externships at legal jobs. Therefore, while its physical office is modest, the facility is sufficient for the school’s purposes. The school’s technological infrastructure for online learning is already in place and operational, and the school can call upon the additional expertise of Baker College to continue to innovate in online legal education. Therefore, the school will not need to make changes to deliver its educational program, academic support, or student records office if it should become accredited.

Division 10 Financial Resources must be “adequate . . . to support [the school’s] programs and operations . . . including all services it claims to provide.” Here, the school will not need to invest further funds to enter an accredited status, and the infrastructure is already in place. The school is still relatively new and running at a small deficit that is sustainable in the short term through support from its parent Baker College and access to a reasonable reserve fund from the school. Financial performance continues to improve and the school believes that its financial opportunities will increase upon accreditation.

Other Administrative Requirements

The school already demonstrates compliance with additional administrative rules including: Lawful Operation; Integrity; Governance; Multiple Locations; Records; Constitutional Compliance; Compliance with Committee Requirements. (Rule 4.160 (A-C), (I), (M), (O-P)). The school has a formal governance structure. Its records are fully online. The school appears to

comply with all laws and the Constitution and to operate with integrity. It has also indicated that it is willing to comply fully with the Accredited Rules and Guidelines. The Multiple Locations Rule does not apply to this school, as it has only one location.

RECOMMENDATION

It is recommended that the Committee “determine that the law school appears to substantially comply with the standards” and “require an inspection within sixty days of the Committee’s consideration of the application for provisional accreditation” or, potentially, full accreditation, understanding that the ongoing public health crisis may require that additional time is needed in order to schedule an available team. (Rule 4.123(B)). If an inspection is ordered, staff will also consider online options to speed completion of the inspection.

The results of the inspection would then be presented to the Committee to determine whether the school has established substantial compliance warranting provisional accreditation or full compliance warranting accreditation.

PROPOSED MOTION

If the Committee agrees with this recommendation, the following motion is suggested:

Move that St Francis Law School’s Application and Self-Study for Provisional Accreditation be received and filed; that the Committee determine that the law school appears to substantially comply with the Rules for Accredited Law Schools and Guidelines for Accredited Law Schools; and that staff be directed to schedule an inspection of the school within sixty days to verify whether the law school is in substantial or full compliance with the Rules for Accredited Law Schools and Guidelines for Accredited Law Schools; and that the Inspection Report be presented to the Committee to allow a final decision on this application.

Attachment A: St Francis Law School Application for Provisional Accreditation Self-Study



SELF STUDY

DECEMBER 2019

Self Study of St. Francis School of Law for the purpose of Application for Accreditation.
All contents confidential and proprietary to the fullest extent permitted by law.

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SELF-STUDY REPORT FOR LAW SCHOOLS SEEKING PROVISIONAL CALIFORNIA ACCREDITATION BY THE STATE BAR CALIFORNIA

GENERAL INSTRUCTIONS AND SELF-STUDY REPORT TEMPLATE

The Self-Study Report provides the law school with an opportunity to demonstrate its compliance with the Accredited Law School Rules (Rules) and Guidelines for Accredited Law School Rules (Guidelines). The information also helps The State Bar of California to prepare for an accreditation inspection and to make that inspection more efficient and cost effective. This Self-Study Report will be considered in conjunction with past periodic inspection reports and annual reports from the school.

When responding to the questions, please indicate whether the response represents current operations at the school, or what would be implemented if accreditation is granted.

In some cases, the questions in this Self-Study Report may have some similarity to questions asked of the school as part of its current compliance with the Unaccredited Law School Rules and Guidelines. The school is asked to answer all questions in this Self-Study Report to provide a complete, current picture of the school's intended methods and practices, discussing any changes that are expected from current practices if the school is approved to operate as a California Accredited school, and the school's intent and ability to achieve and maintain its compliance with the Rules and Guidelines for Accredited Law Schools.

Format (Self-Study Report Template and Attachments)

Please submit information using this template. In response to each section, provide a narrative that refers specifically to each Rule or Guideline cited, and addresses each specific topic listed. Each section provides directions on the required scope of the requested narrative, suggested page limits and, where applicable, a list of all required attachments as well as web links to the posting locations of relevant electronic materials. Discuss, in detail, whether the law school is compliant with all relevant portions of the Rules and Guidelines for Accredited Law Schools, including the following rules and their interpretive guidelines: Rule 4.160(B) Integrity; Rule 4.160(C) Governance; Rule 4.160(D) Dean and Faculty; Rule 4.160(E), Educational Program; Rule 4.160(F), Competency Training; Rule 4.160(G); Scholastic Standards; and Rule 4.160(H), Admissions.

Please include all "required" attachments listed. If the requested information is included in another document, such as the catalog, please clearly indicate the document and location, and copy the relevant text into the answer. If including additional attachments beyond those required, clearly mark the relevant portion of the document and reference the Rule or Guideline that it satisfies. (See instructions for citing and labeling each attachment as discussed in "Attachment Requirements," below.) If a document is required, but available only in a format

that would be used by the school in its registered status at this time, that document can be used as a base and the school can indicate the changes that would be necessary in an accredited status.

Template Requirements

Please use this form to record your responses. Be concise but complete. Follow the requirements for attachments noted below. If converting the completed document to a PDF, please make sure that text in the new document is still fully searchable.

Attachment Requirements

Please submit all required attachments and those cited in each narrative response either as bookmarked sections clearly named in the main document, or as additional documents, clearly named, and with a list of attachments in the main document. Provide only those additional attachments, beyond those required, which the law school believes necessary to support the narrative.

If a document is attached in support of a particular Rule or Guideline, please be sure to guide the reader to the correct portion of the document and state the reason that the identified portion is relevant to the rule or guideline cited.

Filing Requirements

If a school has already received a community user ID to access the Admissions Information Management System (AIMS), Self-Study Reports should be submitted through AIMS, with payment sent under separate cover. If the school has not yet received such an ID, the Self-Study Report may be saved to a thumb drive and mailed to the State Bar along with the payment.

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SECTION 1: PRIOR REQUIREMENTS AND RECOMMENDATIONS

If the law school is still working to address any mandatory or suggested actions identified in the school's most recent inspection, please identify the status and how compliance will be achieved under the Rules and Guidelines for Accredited Law Schools.

Required Attachments:

- Catalog (Item 1: provide name used by law school)
- Student Handbook (Item 2: provide name used by law school)
- Faculty Handbook (Item 3: provide name used by law school)

Suggested: 1-3 pages

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

St. Francis School of Law was last inspected by the Committee of Bar Examiners in 2016. At the time, there were several mandatory and recommended actions which were immediately addressed. To our knowledge, there are no pending or ongoing actions, either mandatory or recommended.

Evidence:

- Attachment 1-1 is the St. Francis School of Law General Catalog
- Attachment 1-3 is the St. Francis School of Law Faculty Handbook
- Attachment 1-4 is the school's response to the periodic inspection report approved by the Committee of Bar Examiners in its meeting of December 2 – 3, 2016
- Attachment 1-5 is the CBE Staff Memo to the CBE regarding approval of the SFL Inspection Report

NOTE Each Attachment in this report is included in the Attachments subfolder for the section in which it is required or listed as evidence. Each Attachment is indexed, with the section number and attachment number, and page numbers, in the Table of Attachments. Individual PDF-format versions of each attachment are included in identified folder with the electronic file of this report.)

SECTION 2: GUIDELINE WAIVERS

If the law school currently operates under a Committee-granted Guideline waiver, describe:

- the nature of each such waiver and its continuing need;
- plans to meet applicable accreditation standards without the waiver, with anticipated time frame;
- anticipated need to request future waivers on any topic under the Rules and Guidelines for Accredited Law Schools.

Required Attachments:

- Documents/Correspondence confirming waivers granted by the Committee

Suggested: up to 1 page

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

St. Francis School of Law operates in full compliance, without waivers, with the Unaccredited Law School Rules and Guidelines for Unaccredited Law School Rules.

In addition, we believe St. Francis School of Law operates in full compliance, without waivers, with the Accredited Law School Rules and Guidelines for Accredited Law School Rules.

SECTION 3: RULE 4.163 SELF-STUDY REPORT OVERVIEW

Please discuss how the law school currently operates to achieve its stated academic mission, objectives and goals. Describe the reasons that it seeks accreditation. Further summarize the school's J.D. program(s) and any changes expected under accreditation. Please note whether the school anticipates that student enrollment numbers would change and whether tuition would be expected to change. Further detail on these matters will be requested in other sections of this Self-Study Report.

Required Attachments:

- Mission statement
- Current statement of academic objectives and goals (e.g., program outcomes)

Suggested: up to 1 page

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

St. Francis School of Law (SFL) presently operates a highly successful J.D. program, 100% online, with excellent student and graduate outcomes. The mission of the school, and program outcomes of the J.D. Program, detailed in the attachments, are met by careful admissions, a curriculum which leverages the best practices of online legal education, taught by a highly qualified and dedicated faculty, and assessed by professionally-developed practice and testing assignments, integrated across the curriculum, to provide both formative and summative assessments and feedback to the learner.

The SFL program of legal education focuses on learner outcomes. Most common law school subjects are taught, and all subjects tested on the California Bar Exam (CBX) are required. Practical skills training is integrated across the curriculum in doctrinal courses (and recorded on student transcripts) while learners also gain skills in drafting, trial practice, pre-trial practice (such as motions and discovery), negotiation, oral argument, and other skills through dedicated Professional Skills elective courses. More than 25 quarter credits of practical skills training are available to students through these two mechanisms.

Regulatory exam outcomes are an important indicator of mission success for SFL. To date of application:

- 81.94 % of those taking the First Year Law Students Exam (FYLSE) one or more times have passed it. (Data from October 2012 through October 2019.)
- 60% of SFL graduates who have at any time since inception of the school taken the California Bar Exam (CBX) have passed it. (Data from July 2016 through July 2019.)

The school seeks accreditation principally to remove the stigmatizing “unaccredited” label. Further, its goals are well aligned with the mission of California Accredited Law Schools

(CALS) as a whole: providing affordable and accessible legal education to persons and regions of the State of California that are underserved by the existing network of ABA-approved law schools.

Given the success of its students and graduates, the school does not anticipate radical changes upon accreditation. Admission will continue to be selective; the term and credit system are expected to continue as they are, and both tuition and enrollment are expected to continue on their current gradual-increase trajectory. The school will move away from some of the legacy restrictions on registered schools – such as the continuous study rule – that currently drive distorted student schedules and severely impact adult learners. The SFL J.D. program plans to remain a part time program that is to be completed in four (4) academic years, maintaining the same number of currently required quarter credit units

In sum, upon accreditation, the school will continue to prioritize delivering affordable, innovative legal education of the highest possible quality to a qualified and diverse population of mainly working professionals.

Evidence:

- Attachment 3-1 is the Mission Statement of SFL from the St. Francis School of Law General Catalog, page 3. <https://stfrancislaw.com/academics/catalog/>
- Attachment 3-2 is the Program Objective and Program Goals and Outcomes from the St. Francis School of Law General Catalog, page 3. <https://stfrancislaw.com/academics/catalog/>

SECTION 4: RULE 4.105(C)-(D) GENERAL PROVISIONS. Program Transition Plan (Guideline 1.1(D))

Please describe the school's transition plan for any students currently enrolled in the registered program:

- Academic calendar
- Term structure
- Credits required or offered
- Course scheduling
- Attendance requirements
- Curricular requirements
- Teach-out for programs no longer to be offered
- Resources needed to accommodate multiple programs or growth in the student body
- Other matters necessary for students to transition to accredited program of the law school

The plan should include:

1. **CALENDARING.** What would be the changes to the school's calendar, if any? If the degree may take a longer or shorter time to complete, discuss it here. Briefly discuss the current calendar, and then fully discuss any changes.
2. **TERM STRUCTURE.** What are the differences, if any, in the term structure for the school year or for completion of the degree. Briefly discuss the current term structure, and then fully discuss any changes.
3. **CREDITS.** What are the differences, if any, in credits offered for the degree, including how they may be obtained? Briefly discuss the current credits, and then fully discuss any changes.
4. **COURSE SCHEDULING.** What are the differences, if any, in the course scheduling, in terms of actual time requirements and time required for completion of the course. Briefly discuss the current time requirements, and then fully discuss any changes.
5. **ATTENDANCE REQUIREMENTS.** Regular and punctual attendance in academic engagement is required under Guideline 6.5(C). Briefly discuss the school's current methods for measuring attendance or engagement and fully discuss how this requirement will be met under accreditation. For courses offered online, explain how attendance in engagement will be measured. If various methods are used, discuss all methods and the courses to which they apply.

6. CURRICULAR REQUIREMENTS. Please discuss any changes that will be made in the curricular requirements. Please be as specific as possible about any new requirements, or different means of fulfilling old requirements, and how grading will be determined.
7. TEACH-OUT PROGRAMS OR PROGRAMS NO LONGER TO BE OFFERED. Please discuss any teach-out for programs that will be discontinued after the transition, addressing the requirements of *Guidelines, Division 1, Section (2)*. Will all students be eligible to transition to the planned newly accredited program?
8. OTHER MATTERS. Please discuss any other changes that will be implemented as a result of the transition, including any matters necessary for students to transition to the accredited program of the law school.

In addition, make sure to discuss the effect any new programs will have on any current programs, and how the needs of the students in those current programs will be addressed. Is an increase in enrollment expected? Is an increase in tuition expected? Does the law school expect that additional resources will be needed under accreditation to ensure that students are appropriately resourced?

Required Attachments:

- Program Transition Plan

[PLEASE INSERT NARRATIVE HERE OR ATTACH A SEPARATE DOCUMENT LABELED "Program Transition Plan"]

SFL Response:

We believe SFL operates in full compliance with the Accredited Law School Rules and Guidelines for Accredited Law School Rules. SFL plans an accredited, its 130-quarter credit unit, part time, J.D. program that is to be completed in four (4) academic years, maintaining the same required courses (with one exception) and practical skills training experiences. The Program Transition Plan, consequently, reflects much of the information already provided in this report, with differences noted.

Evidence:

- Attachment 4-1 is the SFL Program Transition Plan

SECTION 5: RULE 4.160(A) - LAWFUL OPERATION. The law school must operate in compliance with all applicable federal, state, and local laws and regulations. (Guideline 1.6)

Please discuss the law school's:

- compliance with all applicable local, state and federal laws and regulations, including the Americans with Disabilities Act (ADA), Health Insurance Portability and Accountability Act (HIPAA) and Family Educational Rights and Privacy Act (FERPA)
- compliance with all relevant state or local business licensing requirements
- current status as a corporation with the California Secretary of State and, if relevant, status as tax-exempt entity; its status if not a corporation
- procedures for implementing applicable laws and regulations, including the above

Required Attachments:

- Proof of current corporate status; local business license, if required
- If the law school participates in any federally-sponsored financial aid program(s), any report regarding loan default rates of its students, the law school's plans to address the default rate and participation in such programs
- If the law school is tax exempt, its most recent IRS 501(c)(3) exemption letter
- Any alcohol or substance abuse policy or program applicable to students
- If applicable, the most recent correspondence received from WASC or any other accrediting entity confirming the current status of the law school's accreditation
- Policies and procedures related to accommodations under the ADA or FERPA

Suggested: 1-2 pages

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

Compliance with All Applicable Local, State and Federal Laws and Regulations, Including the Americans With Disabilities Act (ADA), Health Insurance Portability and Accountability Act (HIPAA) And Family Educational Rights and Privacy Act (FERPA)

SFL maintains compliance with all applicable laws through the monitoring and compliance activities of its Dean, Registrar, Disability Services Coordinator, President, Vice President of Finance, Vice President of Admissions, Director of Academic Excellence, and Librarian. These parties enforce the Standard Operating Procedures (SOPs) related to records management, privacy, security, determination of accommodations, provision of accommodations, student advising and counseling, and corporate entity registration/licensing.

ADA Compliance

During each Orientation course, each student is advised of the ADA policy for the School of Law, and required to certify that they have read the policy. At the same time, students are provided with the opportunity to indicate whether they are seeking any accommodations in connection with their study at the School of Law.

Students indicating a desire for accommodation complete the State Bar of California form(s) that pertain to that accommodation, and are asked to have the relevant type of medical or other provider certify the disability and provide supporting documentation as appropriate. The student is also referred to the State Bar of California website page with information for law students regarding testing accommodations and requested to immediately begin the process of obtaining any desired accommodations from the State Bar.

Once such information is complete and provided to the School of Law by the student and provider, it is reviewed by the Disability Services Coordinator, and any missing information, or additional information needed, is requested from the student. Once the documentation is complete, a decision is made upon temporary accommodations pending receipt of the determination of accommodations authorized by the State Bar of California. Generally speaking, temporary accommodations will be those requested by the students and/or provider, and the testing accommodation allowed by the State Bar will be mirrored in the testing accommodations put into place for the student for the remainder of the J.D. program (barring changed circumstances.)

If the accommodation involves additional testing time, the School of Law's administrative assistant adjusts learning management system settings to allow the prescribed extra time for the student. For final exams, the student may be provided with a separate test platform via RPNOW, the remote exam proctoring program, in order to maintain the privacy of the accommodation during final exams.

Information provided in connection with disability accommodation requests is maintained separate from student Education Record files and is available only to the designated school officials with a need to know (e.g., the Disability Services Coordinator.)

HIPPA Compliance

SFL does not receive or maintain student health-related records except as related to accommodations, leaves, etc. Information provided in connection with disability accommodation requests is maintained separate from student Education Record files and is available only to the designated school officials with a need to know (e.g., the Disability Services Coordinator.) Information provided in connection with leave/withdrawal requests is provided only to designated school officials with a need to know (e.g., the Director of Academic Excellence.)

FERPA Compliance

Student information is secured and protected. SFL personnel follow FERPA guidelines and regulations concerning student data. Student data regarding course registrations is included in the Canvas LMS instance dedicated to St. Francis, Jenzabar (JZ) and Oasis (two student information systems), and Google Drive, with access restricted to those authorized by login and

password. The SIS systems are protected by comprehensive security systems that are regularly tested to ensure security. Backup systems protect against loss and/or corruption of data. Certain SFL student records maintained in Jenzabar (JZ) and related student information systems, and/or Google Drive, are duplicated in paper files retained in secure, sprinklered storage.

Compliance with All Relevant State or Local Business Licensing Requirements

St. Francis School of Law is a California-based non-profit corporation. SFL is licensed by the City of Newport Beach.

Evidence:

- Attachment 5-1 is a print of the CA Secretary of State Business Entity Search results for SFL, drawn on December 29, 2019, showing Corporate Status ACTIVE, Non-Profit Status Confirmed; <https://businesssearch.sos.ca.gov/CBS/Detail>
- Attachment 5-2 is a copy of the St. Francis School of Law Corporate Statement of Information
- Attachment 5-4 is a copy of SFL's City of Newport Beach Business License

Current Status as A Corporation with The California Secretary of State And, If Relevant, Status as Tax-Exempt Entity; Its Status If Not A Corporation

St. Francis School of Law is a California-based non-profit corporation in good standing. St. Francis School of Law is owned by Baker College, a non-profit corporation. Both St Francis School of Law and Baker College have tax exempt status.

Evidence:

- Attachment 5-5 is SFL's IRS 501(c)(3) exemption letter and Franchise Tax Board Exempt Acknowledgment Letter
- Attachment 5-6 is a copy of the St. Francis School of Law Fictitious Business Name Statement
- Attachment 5-7 is a copy of SFL's Articles of Incorporation

Procedures for Implementing Applicable Laws and Regulations, Including the Above

SFL has developed, and maintains, Standard Operating Procedures (SOPs) to implement school policies and compliance with applicable law. The SOP document is maintained by the Registrar and Dean and regularly amended and updated. SOPs include, among others, the following:

- ADA Compliance
- HIPPA Compliance
- FERPA Compliance

Evidence:

- Attachment 5-8 is SFL's Alcohol and Drug Abuse Prevention Program (PDF Presentation; Adobe Acrobat required to view)
- Attachment 5-9 is SFL Campus SaVE Sexual Violence Prevention Program (PDF Presentation; Adobe Acrobat required to view)
- Attachment 5-11 is SFL ADA Rights & Procedures from the SFL General Catalog
- Attachment 5-12 is SFL FERPA Rights & Procedures from the SFL General Catalog
- Attachment 5-13 is SFL ADA Compliance SOP from the SFL SOP Manual
- Attachment 5-14 is SFL HIPPA Compliance SOP from the SFL SOP Manual
- Attachment 5-15 is SFL FERPA Compliance SOP from the SFL SOP Manual

SECTION 6: RULE 4.160 (B) - INTEGRITY. The law school must demonstrate integrity in all of its programs, operations, and other affairs. (Guidelines 2.1-2.10; Bus. & Prof. Code Section 6061.7, subdivisions (a) and (c); Guidelines 13.1-13.5)

Discuss how the law school operates in an honest and forthright manner, specifically noting all of the policies, procedures and disclosures noted in Guidelines 2.1-2.10, Bus. & Prof. Code section 6061.7(c), and, if the school offers any professional degree in addition to the Juris Doctor degree, Guidelines 13.1-13.5.

In responding to this section, please explain:

- how the law school operates with honesty and integrity from the perspective of the public, prospective students, applicants and enrolled students (Guideline 2.1)
- how the law school conducts its financial affairs in an honest and forthright manner, with specific reference to the terms of its tuition refund policy (Guideline 2.2(B))
- how the law school communicates honestly, including specific references to where it posts all mandatory disclosures (Guidelines 2.3 (A) – 2.3(E), B.&P. Code § 6061.7)
- the name and nature of any entity that owns or controls the law school and whether any compensation is paid to recruit or enroll students (Guidelines 2.4, 2.5)
- all policies and procedures governing student discipline (Guideline 2.6(B))
- the type of grading system used; when pass/fail grades are used; when students are required to or allowed to repeat a class; the definition or requirements for academic good standing; the use of anonymous grading; whether and how students are informed of all factors used to issue final grades; the standards and circumstances governing academic probation and disqualification; whether students may remain enrolled while on probation and how they may be taken off probation; the methods used to confirm the authenticity of student work; how students obtain a review of grades received; how all such requests are handled and resolved (Guideline 2.7(A) – 2.7(H))
- how privacy and confidentiality of student records are maintained (Guideline 2.8)
- how the law school maintains appropriate security and backup for its records, whether maintained in hard copy files or electronically (Guideline 2.9)
- how the law school publicly states and informs students of the services, experiences, activities, and academic counseling, as offered at each campus (Guidelines 2.10(A), 2.10(B))
- the nature of any review and preparation curriculum offered by the law school, either in-house or commercial, to help prepare students to take the First-Year Law Students Examination (FYLSX) or California Bar Examination (CBX) (Guideline 2.10)
- if the law school offers any professional degree in addition to the Juris Doctor degree, how the law school complies with the requirements of Guideline 13 and specifically, the requirements of Guidelines 13.3-13.4

Required Attachments:

- Current corporate by-laws, if any
- Copies of any advertisement, brochure or webpage used to recruit students
- Copies of all required disclosures; please identify where each appears in the law school's correspondence, publications and website, including all disclosures required by B&P Code sections 6061.7(a) and (c), Guideline 2.3(D) and, if applicable, Guideline 2.3(E) and Guidelines 13.3-13.4. Please provide a screenshot and URL address for each website page on which information appears on the law school's website, as required by B&P Code section 6061.7(a) and (c); Guideline 2.3(D); and, as applicable, Guideline 2.3(E) and Guideline 13.3.
- Current Information Report (B&P Code section 6061.7(a))
- Policies and procedures from catalog or student handbook as to:
 - tuition refunds and cancellations
 - imposition of non-academic student discipline
 - academic standards
 - examinations and grading, including grading basis and authenticity of work
 - request for grade reconsideration and grade review
 - course repetition policy
 - student confidentiality and privacy
 - admission criteria
 - transfer credit practices and policies
 - security and backup for systems and records
 - availability of student services and activities

If any of the above is not in either publication, please include a hard copy of such policies or procedures, and explain how students can access the information.

Suggested: 4-6 pages; please emphasize Guidelines 2.2, 2.3, 2.7, 13.3 and 13.4

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

How the Law School Operates with Honesty and Integrity from The Perspective of The Public, Prospective Students, Applicants and Enrolled Students (Guideline 2.1)

SFL institutional core values (Quality, Transparency, Integrity and Innovation) guide every decision and action, whether in communication with prospective students, academic decision-making, or communication with regulators and the community. Values translate into action when, for example, marketing presents the SFL program of legal education as rigorous – it is, and communicating less would not fully explain the commitment students must make to be successful. The SFL website lists detailed, exam-specific pass and fail data for every regulatory exam undertaken by any SFL student or graduate since inception of the school. Students are informed of that same information in every Enrollment Agreement that they sign (updated

yearly.) Information on cost is similarly provided accurately both on the website and in Enrollment Agreements. There are no hidden fees, in fact, as of 2019, the previous \$55 application fee was abolished after experience confirmed that the token amount was not indicating the commitment to enrollment traditionally sought by those fees. It was replaced by a one-time, \$100 enrollment fee, payable only by those who begin studies at St. Francis. When conveying unfortunate academic news, such as academic dismissal, the school endeavors to do so in the most respectful manner.

Evidence:

- Attachment 6-1 is a copy of the School of Law's By-Laws
- Attachment 6-2 contains copies of 2018-2019 reporting year advertisements, social media posts and other materials used publicly in student recruitment
- Attachment 6-3 is a screenshot of the SFL website Disclosure of Consumer Information page at: <https://stfrancislaw.com/disclosure-of-consumer-information/>
- Attachment 6-4 contains copies of other disclosures to comply with the Guidelines, in the General Catalog, SFL website, SFL Application and SFL Enrollment Agreement
- Attachment 6-5 is the Current Information Report Required by B&P Code Section 6061.7
- Attachment 6-6 is SFL General Catalog excerpts highlighting all requested policies in the order requested. (The SFL General Catalog contains all typical Student Handbook information): <https://stfrancislaw.com/academics/catalog/>
-
- SFL Core Values Statement: <https://stfrancislaw.com/about-sfl/core-values/>
- SFL Pass Rata Data: <https://stfrancislaw.com/academics/pass-rates/>
- SFL Tuition and Fee, Cancellation and Refund Information: <https://stfrancislaw.com/admissions/tuition/>
- SFL Student Requirements (and expectations): <https://stfrancislaw.com/admissions/student-requirements/>
- SFL General Catalog (containing all typical Student Handbook information): <https://stfrancislaw.com/academics/catalog/>
- SFL Disclosure of Consumer Information, including require reporting under Business and Professions Code Section 6061.7 : <https://stfrancislaw.com/disclosure-of-consumer-information/>
- SFL Non Discrimination Policy: <https://stfrancislaw.com/about-sfl/policies/>

How the Law School Conducts Its Financial Affairs in An Honest and Forthright Manner, With Specific Reference to The Terms of Its Tuition Refund Policy (Guideline 2.2(B))

Integrity in financial matter is one of SFL's most important priorities. The school reports finances accurately to regulators, including audited financial statements and auditor opinions for the entity of which it is a part. As a private non-profit, SFL does not regularly, publicly report impact or finances, but when making representations about its financial condition, it strives to be accurate and comprehensive.

In individual student financial matters, SFL provides extraordinary resources for a school of its size. Students who encounter questions or concerns about finances receive assistance and counseling directly from the Assistant Business Manager or the Vice President of Finance.

SFL also has fair financial policies and practices. SFL tuition is payable on a quarterly basis, not by semester or year, and SFL students who wish to withdraw from, or defer, a quarter may do so without financial penalty.

SFL courses are short; typically, 4 to 8 weeks. Refund timelines are, therefore, based on the timeline of these short courses. Students who withdraw from a class they begin during the first seven days of the course receive full refunds. Students who withdraw after two weeks, receive partial refunds, according to a schedule publishes on the website and in Enrollment Agreements.

SFL is also careful to counsel students about the academic impacts they will encounter, owing to State Bar and Supreme Court Rules and Guidelines, in the event of leave, deferral, withdrawal, etc. Before permitting a student to take one of those actions, counseling, or explicit waiver of counseling, is required.

Evidence:

- SFL Business Office Description and Contact Link: <https://stfrancislaw.com/admissions/student-services/>
- SFL Tuition and Fee, Cancellation and Refund Information (with counseling requirement): <https://stfrancislaw.com/admissions/tuition/>
- SFL General Catalog Contact Information Page: page 4 of the catalog included herein or that students access at: <https://stfrancislaw.com/academics/catalog/>

How the Law School Communicates Honestly, Including Specific References to Where It Posts All Mandatory Disclosures (Guidelines 2.3 (A) – 2.3(E), B.&P. Code § 6061.7)

SFL provides both required and additional disclosure in two principle locations: 1) on its website and 2) in the Disclosure Statement portion of the annual Enrollment Agreement. The main disclosure page of the website, directly linked from the main menu under “Admissions” and called “Disclosure of Consumer Information” includes all the following:

1. the State Bar’s mandatory disclosure language
2. an advisement that St. Francis may have additional requirements and a referral to the General Catalog for those additional requirements,
3. disclosure of the school’s affiliation with Baker College and its non-profit status
4. disclosure of SFL’s non-profit status, and
5. a link to the annual reporting form required by the State Bar to comply with Business and Professions Code Section 6061.7.

Evidence:

- SFL Disclosure of Consumer Information, including require reporting under Business and Professions Code Section 6061.7 : <https://stfrancislaw.com/disclosure-of-consumer-information/>

The Name and Nature of Any Entity That Owns or Controls the Law School and Whether Any Compensation Is Paid to Recruit or Enroll Students (Guidelines 2.4, 2.5)

SFL is wholly owned and controlled by Baker College, a private not-for-profit educational system located in Michigan. This fact is disclosed on the Disclosure of Consumer Information page, as described above.

SFL recruiting and enrollment is supervised by SFL’s Vice President of Admissions (Chuck Gurden) and conducted, principally, by SFL’s full time Admissions Representative (Brett Ripley.) Mr. Gurden and Mr. Ripley receive only ordinary employee compensation (salary). Contract marketing, contact center, customer relations management software, and other non-employee specialty service providers are engaged for specific activities related to recruitment and admissions. None of these contracts entail per-student compensation structures.

Evidence:

- SFL Disclosure of Consumer Information, including require reporting under Business and Professions Code Section 6061.7 : <https://stfrancislaw.com/disclosure-of-consumer-information/>
- SFL Leadership page (with photos of Mr. Gurden and Mr. Ripley): <https://stfrancislaw.com/about-sfl/leadership/>

All Policies and Procedures Governing Student Discipline (Guideline 2.6(B))

The SFL General Catalog describes Student Discipline Procedures (page 24), used for academic conduct (the Honor Code), violations of Personal and Professional Conduct policies, Acceptable Use policies, Student Identity Verification policies, and other student behavioral responsibilities. The procedure entail due regard for notice to students of any allegation and an opportunity for students to engage with the Dean or others in resolution before formal discipline is imposed, as well as educationally-appropriate opportunities for students to participate in any formal proceedings undertaken if informal resolution does not address the situation completely.

For example, in the case of an alleged violation of the Honor Code, the Dean confers with the student about the alleged violation, both to educate the student about the expectations of the Honor Code and in an effort to understand and effectively respond to the circumstances. (Alleged violations are sometimes found to have been simple misunderstandings that can be remedied informally.) If the informal process fails or is incomplete, the Dean is authorized to appoint an Ad Hoc Honor Code Committee, which may include fellow students, to review the

allegations and make a recommendation both on findings of fact and an ultimate resolution. The Committee considers both the allegation and the student's written response to the allegation. The Dean may accept, reject, or modify the Ad Hoc Honor Code Committee recommendations, but typically gives them deference.

Other processes, such as for violation of Personal and Professional Conduct policies regarding student-to-student interaction, would be conducted similarly, though rarely, in practice, proceed beyond informal resolution or to appointment of a committee.

Evidence:

- SFL Student Discipline Procedure; SFL General Catalog, page 24:
<https://stfrancislaw.com/academics/catalog/>

The Type Of Grading System Used; When Pass/Fail Grades Are Used; When Students Are Required To Or Allowed To Repeat A Class; The Definition Or Requirements For Academic Good Standing; The Use Of Anonymous Grading; Whether And How Students Are Informed Of All Factors Used To Issue Final Grades; The Standards And Circumstances Governing Academic Probation And Disqualification; Whether Students May Remain Enrolled While On Probation And How They May Be Taken Off Probation; The Methods Used To Confirm The Authenticity Of Student Work; How Students Obtain A Review Of Grades Received; How All Such Requests Are Handles And Resolved (Guideline 2.7(A) – 2.7(H)

The Type of Grading System Used

The grading system used and the procedures for ensuring integrity of grades, including grade review, are detailed in the SFL General Catalog. In addition, Standard Operating Procedures (SOPs) provide the leadership and staff specific guidance on how to process and apply these procedures in specific cases, such as where a student requests modification of grades or transcripts. Several sections of the catalog provide policies in this area:

- Credit Assessment, Grading and Advancement Policies, beginning on page 16
- Academic Standing and GPA beginning on page 13
- Authenticating Student Identity on page 29
- Participation and Study Verification on page 29

The grading system used is a typical 4-point scale, where A is the highest grade possible and F the lowest. Each course syllabus contains a variety of assignments and assessment for which students earn points and for which a grading scale is provided. A typical course grading scale might be:

A	100-95%	4.0
A-	94-90%	3.7
B+	89-88%	3.3
B	87-82%	3.0
B-	81-80%	2.7
C+	79-78%	2.3
C	77-72%	2.0
F	71 and below	0

Each type of possible grade, including W (Withdraw), I (Incomplete), AU (Auditor) and others, is described in the General Catalog. For example:

GPA is not computed for the following grades:

CR = Credit (as set forth in the syllabus)

AU = Audit (must be established at registration)

I = Incomplete

NC = No credit

W = Withdrawal

Students accrue honor points for grade accumulated in courses toward calculation of the Grade Point Average (GPA) recorded for their studies, which drives academic decisions about advancement, probation, and dismissal: To compute the GPA, the school first calculates the honor points for each course completed (grade points multiplied by credit hours; for example, an A or 4.0 grade in a four-credit hour class yields 16 honor points). Then, the school adds all honor points earned, and divides by the total GPA credit hours attempted for all quarters at SFL. (Grades of I, CR, NC, W, and AU are not attempted GPA credit hours, and are not included in the calculation of GPA)

See: Basis for Final Grade, SFL General Catalog, page 17, Basis for GPA, SFL General Catalog, page 18, and Grade Definitions, SFL General Catalog, page 18.

When Pass/Fail Grades Are Used

Credit/No Credit grading is used in place of Pass/Fail in certain courses as described in the SFL General Catalog. Credit/No Credit gradings is used, for example, for FYLSE and CBX preparation courses, Independent Study, and Legal Externship.

See: Credit/No Credit Courses, SFL General Catalog, page 18, and Curriculum, SFL General Catalog, page 35 – 41.

When Students Are Required to Or Allowed to Repeat A Class

SFL students are not permitted to repeat a course or an examination for the purpose of raising the grade received on such course or examination. SFL students are permitted to repeat a required class when a failing grade is issued for that class under limited conditions, including:

- A student who fails a required course must repeat the course at a time specified by the school.
- A student failing a required course is not guaranteed an opportunity to retake the course within their normal four (4) years of study, and may have to take an addition year or half year of study to complete degree requirements and graduate.
- A student failing an elective course is not guaranteed an opportunity to retake the course.
- Students may never receive duplicate credit for repeating a course.
- Students who pass a course but lose credit for the course owing to an interruption of continuous study will not be permitted to repeat the course for credit.
- A student repeating a course must pay additional tuition and fees for the repeated course.

Students who fail a course and are otherwise qualified to stay enrolled in SFL may continue their studies but must repeat courses as needed in order to earn all required units in the increments required. Any course in which the student received a grade below a “C” must be repeated under the Repeating Courses policy. Students are permitted to make up at most 1 year of law study. Students who fail a second year of law study will be automatically dismissed.

See: Repeating Courses, SFL General Catalog, page 13 and Upper Division Advancement, SFL General Catalog, page 21

The Definition or Requirements for Academic Good Standing

All students must have a cumulative GPA of at least 3.0 and be in good standing to graduate from the SFL J.D. program. “Good Standing” requires compliance with all policies of the school in addition to maintaining the GPA required for good academic standing, advancement and/or graduation.

SFL computes a cumulative grade point average (GPA) for each student at the end of each quarter. Students in good academic standing are eligible to advance to the next quarter. Students not in good academic standing may not be eligible to advance to the next quarter and may be dismissed.

For students to remain in good academic standing and qualify for advancement, the following GPAs must be earned at the indicated stages of study:

GPA Credits Attempted	Minimum GPA
1-8	2.0
9-16	2.75
17-32	2.87
33-graduation	3.0

Classes graded on a Credit/No Credit basis do not impact the student GPA.

See: Academic Standing and GPA, SFL General Catalog, page 13 and Retention and Advancement Step Scale, SFL General Catalog, page 14

The Use of Anonymous Grading

Anonymous grading is generally not used. Classes are kept small – generally 8 to 15 students – and professors directly engage with students on the development of their specific knowledge and skill. Professors also give tailored feedback even on final exams, so anonymous grading would decrease the utility of this feedback in student development.

See: Basis for Final Grade, SFL General Catalog, page 17.

Whether and How Students Are Informed of All Factors Used to Issue Final Grades

Each student will be provided with a written statement of the basis of final grades in the course included in the syllabus distributed to each student at the beginning of each class. Such syllabus will also set forth the expected composition of the final exam (i.e., format and applicable weighting).

Course grading guidelines will be determined by each professor for each course and will be posted in the syllabus for the course.

See: Basis for Final Grade, SFL General Catalog, page 17.

The Standards and Circumstances Governing Academic Probation and Disqualification

If a student's cumulative GPA falls below the appropriate minimum GPA required to remain in good academic standing according to the step scale, and the student has completed at least eight (8) quarter credits in the J.D. program, the student will be placed on academic probation. The student will be counseled to improve performance. When a student is placed on academic probation it is noted on the student's transcript and is not removable.

If a student on academic probation attains a satisfactory GPA according to the step scale in the probationary quarter, but his/her cumulative GPA is still below that required by the step scale for good academic standing, the student will remain on probation for the next quarter. Students who continue to earn term GPAs that meet the step scale requirement will be continued on academic probation.

Students on academic probation must participate in counseling and/or remediation required by the school. Failure to do so may result in dismissal.

Students are academically dismissed based on any of the following:

1. A student fails his/her first quarter.
2. A student on academic probation earns a GPA at the end of the second or later probationary quarter lower than that required by the step scale for good academic standing.
3. A student fails a course or receives no credit for a course in the probationary quarter and it is not possible to meet the GPA required under the step scale for that quarter.

See: *Basis for Final Grade*, SFL General Catalog, page 17, *Academic Standing and GPA*, SFL General Catalog, page 13, *Retention and Advancement Step Scale*, SFL General Catalog, page 14, *Academic Probation Policy*, SFL General Catalog, page 14, *Removal from Academic Probation* SFL General Catalog, page 14 and *Academic Dismissal*, SFL General Catalog, page 14.

The Methods Used to Confirm the Authenticity of Student Work

Each student is provided with a unique login to St. Francis' technology platforms, and in accordance with technology manuals, is encouraged to change their password on a regular basis. Final exams are proctored live and students will be required to show photo ID to take such exams. Exam instructions are circulated in advance of each exam. In addition:

1. Students are required to participate in all scheduled courses. Each student's participation is graded by the professors.
2. SFL's technology platforms track student participation.
3. Students are required to verify pursuant to the Honor Code that they have spent the appropriate amount of time per term engaged in curricular activities.

4. Students complete study logs at the end of each course describing in detail the time and nature of academic engagement activities undertaken during the course by each student.
5. Each term, students report their study time and certify that they spent the required time for study.
6. Assignment submission, discussion board participation, quiz and exam completion, and other learning activities completed on or uploaded to Canvas are verified by the professor and learning management system.
7. Class attendance and participation for each scheduled session is marked by the professor.
8. Staff reviews study time and attendance data generated from these sources to confirm overall compliance.

See: *Authenticating Student Identity*, SFL General Catalog, page 29 and *Participation and Study Verification*, SFL General Catalog, page 29.

How Students Obtain A Review of Grades Received; How All Such Requests Are Handled and Resolved (Guideline 2.7(A) – 2.7(H))

SFL students with concerns about the grading of any exam must follow the Academic Appeal Process. If a student believes that the final course grade is based on a clerical or calculation error, capriciousness, arbitrariness, or is not in alignment with established grading criteria outlined in the course syllabus, the student may file an appeal. The appeal must indicate the basis for review, from among those listed in this paragraph, and must offer evidence to support the claim.

To ensure prompt resolution of the student concern, the appeal process has deadlines for each stage. If the student does not file the Academic Appeal form and related required paperwork within 6 weeks of the end of the course in which the concern occurred, the student cannot appeal. All deadlines for the process must be met; otherwise, the appeal ends, and the student has no further recourse.

Step 1

The student will discuss the concern in dispute with the instructor.

Step 2

If the concern is not resolved with the instructor, and the student wishes to pursue the concern, the student will submit an Academic Appeal form, including a comprehensive, written summary of the facts and data from the student's point of view. Upon receipt of the appeal, the Faculty Academic Committee, sitting as the school's Grade Review Committee, will submit the appeal to the instructor.

The instructor will review the appeal and submit a written response to the Faculty Academic Committee regarding the student's concern within 5 business days. The

Faculty Academic Committee will share the response with the student. The Faculty Academic Committee will have ten business days to render a decision and advise the student.

Step 3

If the student chooses to pursue the concern further, the student shall notify the Faculty Academic Committee within 5 business days of receipt of the decision that the student wishes to have the matter reviewed by the Dean. The Faculty Academic Committee will contact the Dean and will forward all documentation. The Dean will review the matter within ten business days of receipt of the appeal to resolve the concern.

The decision of the Dean is final. The student and the instructor may respond in writing and these responses will be placed in the student's academic file. No further appeal will be permitted.

See: Guidelines for Review of Graded Exams, SFL General Catalog, page 19 and Academic Appeal Process, SFL General Catalog, page 19.

Whether Students May Remain Enrolled While on Probation and How They May Be Taken Off Probation

If a student on academic probation attains a satisfactory GPA according to the step scale in the probationary quarter, but his/her cumulative GPA is still below that required by the step scale for good academic standing, the student will remain on probation for the next quarter. Students who continue to earn term GPAs that meet the step scale requirement will be continued on academic probation.

However, students on academic probations will not remain enrolled when, 1) a student on academic probation earns a GPA at the end of the second or later probationary quarter lower than that required by the step scale for good academic standing, or 2) a student fails a course or receives no credit for a course in the probationary quarter and it is not possible to meet the GPA required under the step scale for that quarter.

A student will be removed from academic probation at the end of the quarter in which his/her cumulative GPA equals or exceeds the level required by the step scale for good academic standing.

See: Basis for Final Grade, SFL General Catalog, page 17, Academic Standing and GPA, SFL General Catalog, page 13, Retention and Advancement Step Scale, SFL General Catalog, page 14, Academic Probation Policy, SFL General Catalog, page 14, and Removal from Academic Probation SFL General Catalog, page 14.

How Privacy and Confidentiality of Student Records Are Maintained (Guideline 2.8)

Student information is secured and protected. SFL personnel follow FERPA guidelines and regulations concerning student data. SFL policies detail the obligations of various parties (students, staff, faculty, and administrators) respecting privacy of student records and information. Students are advised of both the protections and the limitations of protections afforded personal or academic information. The Disclosure of Student Records policy (SFL General Catalog page 27 – 28) for example, specifies the following instances where student records may be disclosed, as exceptions to FERPA:

- To other St. Francis officials, including teachers, within St. Francis whom St. Francis has determined to have legitimate educational interests. This includes contractors, consultants, volunteers, or other parties to whom St. Francis has outsourced institutional services or functions, provided that the conditions listed in §99.31(a)(1)(i)(B)(1) (a)(1)(i)(B)(2) are met. (§99.31(a)(1))
- To officials of another College where the student seeks or intends to enroll, or where the student is already enrolled, if the disclosure is for purposes related to the student's enrollment or transfer, subject to the requirements of §99.34. (§99.31(a)(2))
- To authorized representatives of the U. S. Comptroller General, the U. S. Attorney General, the U.S. Secretary of Education, or state and local educational authorities, such as a state postsecondary authority that is responsible for supervising St. Francis's educational programs. Disclosures under this provision may be made, subject to the requirements of §99.35, in connection with an audit or evaluation of federal- or state-supported educational programs, or for the enforcement of, or compliance with, federal legal requirements that relate to those programs. These entities may make further disclosures of PII to outside entities that are designated by them as their authorized representatives to conduct any audit, evaluation, enforcement, or compliance activity on their behalf. (§§99.31(a)(3) and 99.35)
- In connection with financial aid for which the student has applied, or which the student has received, if the information is necessary to determine eligibility for the aid, determine the amount of the aid, determine the conditions of the aid, or enforce the terms and conditions of the aid. (§99.31(a)(4))
- To organizations conducting studies for, or on behalf of, St. Francis, in order to: (a) develop, validate, or administer predictive tests; (b) administer student aid programs; or (c) improve instruction. (§99.31(a)(6))
- To accrediting organizations to carry out their accrediting functions. (§99.31(a)(7))
- To parents of an eligible student if the student is a dependent for IRS tax purposes. (§99.31(a)(8))
- To comply with a judicial order or lawfully issued subpoena. (§99.31(a)(9))
- To appropriate officials in connection with a health or safety emergency, subject to §99.36. (§99.31(a)(10))
- Information St. Francis has designated as "directory information" under §99.37. (§99.31(a)(11))
- To a victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense, subject to the requirements of §99.39. The disclosure may only include the final results of the disciplinary proceeding with respect to that alleged crime or offense, regardless of the finding. (§99.31(a)(13))
- To the general public, the final results of a disciplinary proceeding, subject to the

requirements of §99.39, if St. Francis determines the student is an alleged perpetrator of a crime of violence or non-forcible sex offense and the student has committed a violation of St. Francis' rules or policies with respect to the allegation made against him or her. (§99.31(a)(14))

- To parents of a student regarding the student's violation of any federal, state, or local law, or of any rule or policy of St. Francis, governing the use or possession of alcohol or a controlled substance if St. Francis determines the student committed a disciplinary violation and the student is under the age of 21. (§99.31(a)(15))
- To the National Student Clearinghouse or similar organization for enrollment and degree verification purposes for interested parties (www.degreeverify.org).

In sum, confidentiality of student records is assured through care in placing and storing information initially, secure systems, periodic review of access, and limiting ongoing access to authorized personnel. Directory Information, not subject to FERPA protection is defined. Student Roster participation, beyond identity, is optional in the LMS. Education records are defined, and students are notified annual, by revisions of the SFL General Catalog, of any changes in Education Record-related policies. Students and the public may not access either secure electronic systems containing non-directory information or duplicate paper files.

Evidence:

- SFL General Catalog Policies as follows: <https://stfrancislaw.com/academics/catalog/>
 - *Annual Notification* on page 28
 - *Directory Information* on page 28
 - *Acceptable Use Policy for St. Francis Information Technology Resources* beginning on page 30
 - *Inappropriate Usage* on page 31
 - *Participation and Study Verification* on page 29
 - *Email and Electronic Communication* on page 32
 - *Privacy* on page 32
 - *Operational Security* on page 32

How the Law School Maintains Appropriate Security and Backup for Its Records, Whether Maintained in Hard Copy Files or Electronically (Guideline 2.9)

Student data regarding course registrations is included in the Canvas LMS instance dedicated to St. Francis, Jenzabar and Oasis (two student information systems), and Google Drive, with access restricted to those authorized by login and password. The SIS systems are protected by comprehensive security systems that are regularly tested to ensure security. Backup systems protect against loss and/or corruption of data. Certain SFL student records maintained in Jenzabar (JZ) and related student information systems, and/or Google Drive, are duplicated in paper files retained in secure, sprinklered storage.

Evidence:

Acceptable Use Policy for St. Francis Information Technology Resources, SFL General Catalog, page 30

How the Law School Publicly States and Informs Students of The Services, Experiences, Activities, And Academic Counseling, As Offered at Each Campus (Guidelines 2.10(A), 2.10(B))

SFL maintains a single, worldwide, online campus. Students are informed of available services through the SFL General Catalog, through syllabi, through SF501 the New Student Orientation, through periodic Town Halls or community communications from the Dean and staff, and through individual interactions with the Student Services Coordinator, Director of Academic Excellence, Dean, and others. In addition, the school maintains a blog of matters of interest, including law related topics and school-related events.

Evidence:

- SFL Blog: <https://stfrancislaw.com/blog/>
- Attachment 6-7 is a sample of the SF 501 New Student Orientation Syllabus
- SFL General Catalog Contact Information (page 4): <https://stfrancislaw.com/academics/catalog/>
- SFL General Catalog Student Service (page 16): <https://stfrancislaw.com/academics/catalog/>

The Nature of Any Review and Preparation Curriculum Offered by The Law School, Either In-House or Commercial, To Help Prepare Students to Take the First-Year Law Students Examination (FYLSX) Or California Bar Examination (CBX) (Guideline 2.10)

Exam Review Courses

SFL offers LAW 815, FYLSE Prep (a 10-week course), and LAW 990 and LAW 991, GBX Prep I and II, (two six-week courses). All courses are offered for credit, on a Credit/No Credit grading basis.

FYLSE

LAW 815 includes review of contracts, torts and criminal law doctrine, approximately 39 proctored and timed one-hour practice essay exams with feedback and grading by the professors, and several hundred multiple choice questions. The course includes three proctored and timed mock exams. Students who practice these test-taking skills – including the ability of students to type at a high speed – are better prepared to be successful on the exam. Some of the answers published by the bar as passing answers are 10-plus typewritten pages long. A recent criminal law exam question featured 16 crimes to be completed in one hour. The course is designed to assist students in preparing to type the essay exam in proper IRAC format under strict timed conditions, at the appropriate level of detail, by providing extensive practice and feedback.

The course incorporates one week of review of each of the three subjects tested on the FYLSE, essay writing assignments in live class workshop sessions, and a proctored and timed mock FYLSE (with three FYLSE-type essays -- one essay in each subject) and 100 multiple choice questions to be completed in six hours. Certification of students for the FYLSE is based on their performance on this first segment of the course.

The faculty member teaching the course personally coaches students on their progress throughout the course, with the input of the Dean, where appropriate. SFL does not encourage students to take the FYLSE if their performance demonstrates that they are unprepared for the exam. Sometimes students find that career related events (e.g., travel, new job, moving to a new location, promotion) interfere with their ability to focus on the required preparation for the exam.

LAW811 is presently taught by Professor Karen Travis. In the past, Dean Carole Buckner, Professor Noel Woodward, Professor Miho Murai, and Professor Ryann Jorban have also participated in teaching portions of the course

General Bar Exam

SFL requires two six-week general bar review courses, LAW990 and LAW991. These are for-credit courses offered to graduating students on a Credit/No Credit grading basis.

The courses include all subjects covered by the General Bar Exam, with approximately one subject covered per week, with Criminal Law and Criminal Procedure combined. The Performance Exam is also covered, with several practice performance exams included in the course. Multiple choice exams and essay exams are provided weekly, along with recorded reviews done by professors who have taught the subject matter in each of the substantive courses.

LAW990 and LAW991 are team taught, with Dean Greg Brandes and Professor Karen Travis coordinating and leading the courses. Many faculty and former faculty have taught individual subjects or contributed materially to the course, including: Professor Karen Travis (Torts, Contracts, Evidence, Professional Responsibility), Dean Greg Brandes (Evidence, Real Property, Remedies, Trusts, Wills and Estates, Criminal Law and Procedure, Contracts, Performances Exam, Business Associations, Constitutional Law, Community Property, and Professional Responsibility), Dean Carole Buckner (Contracts, Torts, Criminal Law, Criminal Procedure, Evidence, Real Property, Civil Procedure, Professional Responsibility and the Performance Exam), Professor Ray Chao (Criminal Law and Procedure and Evidence), Professor Roger Cusick (Civil Procedure and Constitutional Law), Professor Dixon Gardner (Business Associations), Professor David Graubert (Constitutional Law), Professor Terry Roberts (Community Property and Professional Responsibility), Professor Jonathan Watson (Real Property), Professor Michael White (Community Property) and Professor James Woodruff (Trusts, Wills and Estates).

Optional Additional Learning Experiences

A variety of additional optional skills and content workshops are offered throughout the year. For example, Students have been given the option to begin early preparation for the FYLSE by participating in voluntary multiple choice or essay writing workshops conducted 4-5 weeks prior to the start of the required preparation class. The workshops include focused review of contracts, torts and criminal law doctrine followed by writing and discussing an actual essay question that has appeared on the California FYLSE. Individual feedback on student essays is provided by the professor, and tutorial guidance on approach strategies for multiple choice questions are offered.

Evidence:

- Curriculum, SFL General Catalog, page 35 – 41:
<https://stfrancislaw.com/academics/catalog/>

If the Law School Offers Any Professional Degree in Addition to The Juris Doctor Degree, How the Law School Complies with The Requirements of Guideline 13 And Specifically, The Requirements of Guidelines 13.3-13.4

SFL does not offer any professional degree, nor any degree of any kind, other than the J.D.

SECTION 7: RULE 4.160 (C) - GOVERNANCE. The law school must be governed, organized, and administered so as to provide a sound educational program. (Guidelines 3.1-3.3; 4.1-4.2)

Describe the law school's governance and organization; identify all members of any board governing the law school; identify and provide the credentials of everyone responsible for its administration and generally describe their respective responsibilities by referring to each requirement of Guidelines 3.1-3.3; Guidelines 4.1(A)-4.1(C); and Guideline 4.2.

In responding to each of the Guidelines cited, please discuss:

- the role of the dean and each associate or assistant dean of the law school; if not the dean, please specify and identify each full-time or part-time administrator at each campus, including each branch or satellite campus; the registrar and any faculty members involved in governance, operations or academic policy-making processes
- if the law school is part of a larger institution or entity, the relationship between the law school and that larger organization, with respect to its governance and decision- and policy-making regarding the law school
- For law schools with more than one campus, please address and describe the manner or form of the law school's governance of each campus

Required Attachments:

- Organizational chart for the law school, by campus, showing names and titles of each dean, administrator, registrar and all administrative staff, and whether employed on a full- or part-time basis
- A resume and job description of each person identified in the organizational chart
- A list of the members of the law school's governing board(s) and board of visitors/advisors, if any, including name, contact information, academic and professional degrees, and present occupation of each member

Suggested: 2-3 pages

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

The Role Of The Dean And Each Associate Or Assistant Dean Of The Law School; If Not The Dean, Please Specify And Identify Each Full-Time Or Part-Time Administrator At Each Campus, Including Each Branch Or Satellite Campus; The Registrar And Any Faculty Members Involved In Governance, Operations Or Academic Policy-Making Processes

Role of the President

The President, Dr. Jill Langen, is the President of the non-profit entity St. Francis School of Law, and chief administrative and executive officer of the school. Dr. Langen is widely

experience in higher education, having served for many years as Vice President of Baker College's Center of Graduate and Professional Studies

Role of the Dean

The Dean is head of the faculty, face and leader of the school, and its chief operations manager. The Dean bears final responsibility for academic, discipline, policy, and personnel decisions related to SFL students and faculty. The Dean is the principle compliance officer for compliance with State Bar regulations and reporting. The Dean provides leadership to the faculty in the development of curriculum, policies, grading standards, assessments, courses, and the curriculum as a whole. The Dean is also responsible for interface with Baker College, by which entity SFL is wholly owned.

Dean Greg Brandes was appointed in September 2017. Dean Brandes is an innovator in legal education, having been a Professor of Law and dean at two other California Accredited or California Registered law schools, including Concord Law School and San Francisco Law School. He is a widely known expert on law school teaching and learning, particularly related to assessment and distance education. Along with other founding administrators, he developed the teaching and learning for Concord Law School, including innovative online courses, online classrooms, and assessment models that are today widely recognized as best practices. He has taught Contracts, Criminal Law, Torts, Evidence, Criminal Procedure and first year skills in law school, and, Corporations, Agency and Partnership, Contracts, Sales and Remedies, Family Law, Creditor's Rights, Civil Procedure, Ethics, and Essay Skills Workshops in bar review. In his consulting and training work, he has lectured extensively on law school teaching and learning, curriculum and assessment, regulation of law schools, and developing faculty cultures, as well as his other areas of expertise in negotiation, management, personal and institutional development, and organizational leadership.

He recently co-edited Working Group on Distance Learning in Legal Education: Collected and Recommended Practices, the 2015 edition of the Working Group on Distance Learning in Legal Education's guide to distance learning in law schools. He served on Phase II of California's Task Force on Admissions Regulation Reform, which prepared implementing regulations to increase competence of new lawyers in California. He also served on the California Committee of Bar Examiners' Rules Working Groups I and II, which proposed new regulations for state accredited and registered schools, including regulations that would expand distance education in those schools. He also served on the Committee of Bar Examiner's Rules Advisory Committee (RAC), including as its chair. He presently serves on the Committee of State Bar Accredited and Registered Schools, another advisory body to the California Committee of Bar Examiners and the State Bar of California. His policy work was instrumental in bringing into effect Rules and Guidelines for California Accredited Law Schools (CALs) that permit wholly online J.D. programs to become state accredited.

Dean Brandes received his J.D. from Loyola University Chicago School of Law and a B.A. from Marycrest College. He is a member of the state bars of Colorado and Illinois, and is admitted to the bar of the United States Supreme Court.

Role of the Registrar

Tammy Carr is the Registrar of SFL, with principal responsibility for the collection, recordation, maintenance, and accuracy of student academic and non-academic records. Ms. Carr was appointed as Registrar in 2016. Prior to appointment as Registrar, she worked in the program in 2014 as an academic advisor.

Ms. Carr works closely with the Dean, the Director of Academic Excellence, and the Student Services Coordinator to ensure the timely and accurate collection of student records and the maintenance of SFL policies and SOPs. Ms. Carr responds to requests for grade information and transcripts, consults on cumulative GPA attained in pre-legal education where needed, and interfaces with technology resources engaged in maintaining SFL's secure online student information system.

Role of Faculty

The faculty is involved in many aspects of the academic operations of the School of Law, directly and through the Faculty Academic Committee (FAC):

- **Admissions Decisions:** Faculty members established the admissions criteria and provide feedback to the Dean and admissions office regarding changes to criteria for admission to the program when they are considered. The Admissions Representative gathers information for review by faculty from applicants, and presents the information to faculty along with a recommendation. Two faculty members review each applicant's admissions file and vote on whether to grant or deny admission. In some cases, faculty request further information regarding the candidate.
- **Setting and Administering Academic Policy:** Faculty members are consulted on setting and revising academic policy. Policies are revised upon recommendation of management, recommendation of the Dean, and recommendation of faculty representatives.
- **Courses:** Faculty members with substantive legal expertise select casebooks and design courses for SFL. Faculty members teaching the courses provide feedback on changes to courses, including changes to assignments, based on their experience teaching the course.
- **Curriculum:** Faculty members recommend new courses. In addition, the Advisory Council for the School of Law also reviews and discusses the curriculum and recommends new courses. Faculty members update existing courses when a new edition of a book comes out, or as needed due to new developments in the law.
- **Grading & Academic Disqualification:** Faculty members perform grading based on a standardized rubric for each assignment, and provide additional feedback by commenting on student work. These grades are reported to the Registrar, who applies SFL's grading policies to determine whether a student is placed on academic probation or is academically disqualified from the program.
- **Faculty meetings:** Faculty meetings typically occur one to four times per year, with an agenda published in advance. Minutes of meetings are maintained. All meetings are recorded so that those faculty members who could not attend are able to view the meeting at their convenience. The recordings are posted for faculty to view.

Board of Trustees

The Board of Trustees for the School of Law meets annually. The President, with input from the Dean of SFL, develops a report for the Board's meeting and the President presents information to the Board of Trustees at the annual meeting.

Board of Advisors

The School of Law has an Advisory Council including practicing attorneys from Northern and Southern California, with a diverse range of practical experience. The Advisory Council typically meets once per year to discuss the program, and provides specific input on a variety of topics, including the scope of the curriculum, new courses, program goals, and the overall performance of the program. Currently the Advisory Council includes:

- *Howard Klein, J.D. the founding partner of a boutique intellectual property law firm in Orange County, California.*
- *Mary McCaffrey, J.D., a St. Francis School of Law alumnus from Northern California.*
- *Teresa Schmid, J.D., Ph.D., former chief executive for the State Bar of Arizona and the State Bar of Oregon, and director of professional services for the Los Angeles County Bar Association.*
- *Tod Zuckerman, J.D., a sole practitioner from Daly City, CA, with experience in insurance law, complex litigation and extensive teaching experience at the university and law school levels.*

Evidence:

- Attachment 7-1 is SFL Organizational Chart
- Attachment 7-2 contains CVs or Resumes of Key Personnel in the Organizational Chart
- Attachment 7-4 is a List of the Members of the Law School's Governing Board

If the Law School Is Part of a Larger Institution or Entity, The Relationship Between the Law School and That Larger Organization, With Respect to Its Governance and Decision-Making Regarding the Law School

SFL is governed by a dedicated and independent Board of Trustees, its officers, and to an appropriate degree, its faculty. The SFL Board of Trustees is led by Dr. F. James Cummins, an educator with more than 40 years' experience leading private non-profit schools and colleges. Among its members, it counts Dr. Bart Daig, President of Baker College and its Chief Executive Office. Dr. Jill Langen, is President of SFL and also Provost of Baker College. These leaders, along with the other officers of SFL and its Dean closely coordinate policies and decision making for the benefit of SFL and its students.

Evidence:

- SFL Leadership page (with photos of Dr. Cummins, Dr. Daig, and Dr. Langen):
<https://stfrancislaw.com/about-sfl/leadership/>

For Law Schools with More Than One Campus, Please Address and Describe the Manner or Form of The Law School's Governance of Each Campus

SFL maintains a single, worldwide, online campus only

SECTION 8: RULE 4.160 (D) – DEAN AND FACULTY. The law school must have a competent dean and a competent faculty that devotes adequate time to administration, instruction, and student counseling. (Guidelines 4.1-4.9)

Discuss how the law school’s faculty is compliant and devotes adequate time to provide students both sound instruction and adequate counseling; please refer to all requirements noted in Guidelines 4.3-4.9.

In responding to each the Guideline noted, please discuss in particular:

- the role of individual faculty members or faculty committees in student discipline, grade review, and any academic and non-academic policy-making (Guideline 4.2)
- current student-faculty ratios, by campus, for multi-campus schools (Guideline 4.3)
- current faculty course loads (Guideline 4.4)
- policies and practices to ensure reasonable office hours are provided (Guideline 4.4)
- current faculty credentials (Guideline 4.5)
- how faculty members are recruited and hired and what the law school does to promote and offer means for faculty to improve their teaching skills (4.6)
- the process, timing and procedures used to evaluate faculty (Guidelines 4.7, 4.8)
- the law school’s policy regarding academic freedom (Guideline 4.9)

Required Attachments:

- Faculty evaluation policy and procedures
- Faculty retention and promotion policy, if any
- List of faculty committees, if any, with description by function and membership roster
- Academic Freedom policy
- Faculty orientation and training materials, if any

Suggested: 4-6 pages

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

SFL faculty members are highly qualified and experienced lawyers with both academic and practice experience. Many of them have taught at St. Francis for many years, or at other institutions. Faculty are required to spend live class time teaching, grading time giving feedback, including the use of rubrics for particularized evaluation of skills and knowledge aspects of the assignment, time devoted to answering individual questions, and time devoted to meetings and/or office hours on request. Almost 100% of the faculty are licensed in one or more jurisdictions.

Evidence:

- Attachment 8-1 is the Faculty Evaluation Policy and Standards

- Attachment 8-3 is the SFL List of Faculty Committees
- Attachment 8-4 is the SFL Academic Freedom Policy
- Attachment 8-5 is the Materials used for Training and Orienting Faculty
- Attachment 8-6 is the Fall 2019 SFL Enrollment Agreement containing, in the Disclosure Statement, biographical information on the faculty (highlighted).

The Role of Individual Faculty Members or Faculty Committees in Student Discipline, Grade Review, And Any Academic and Non-Academic Policymaking (Guideline 4.2)

SFL faculty members, as noted in Section 7, participate in the review, formulation, and modification of academic policies, sometimes directly and sometimes through the Faculty Academic Committee (FAC). The FAC, appointed by the Dean, has the primary role in reviewing Academic Appeals, and is frequently consulted by the Dean on matters of academic policy, on new courses being considered for inclusion within the curriculum, on the application of academic policy, and other matters.

Evidence:

- *Academic Appeal Process*, SFL General Catalog (page 19):
<https://stfrancislaw.com/academics/catalog/>

Current Student-Faculty Ratios, By Campus, For Multi-Campus Schools (Guideline 4.3)

SFL reports five-year historic student faculty ratios to student each year in its Disclosure Statement attachment to the Enrollment Agreement. The Fall 2019 Disclosure Statements lists the following student-faculty ratios for SFL's single online campus:

For the past five years, the ratio of teaching faculty members to enrolled students, as of September 15, has been as follows: 2018: 1 faculty member to 1.69 students; 2017: 1 faculty member to 1.81 students; 2016: 1 faculty member for 1.5 students; 2015: 1 faculty member for 2.32 students; 2014: 1 faculty member to 3.35 students; for 2013.

The student faculty ratio which will be included in the Winter 2020 Enrollment Agreement when that document is prepared is 1 faculty member to 2.0 students. It is anticipated that the student faculty ratio will remain stable within a range of better than 1 faculty member to 3 students for the 2019 – 2020 academic year.

Evidence:

- Attachment 8-6 is the Fall 2019 SFL Enrollment Agreement containing, in the Disclosure Statement, information on student/faculty ratios (highlighted).

Current Faculty Course Loads (Guideline 4.4)

SFL has one full time faculty member who teaches year-round, vacations and holidays excepted. All other teaching faculty members are adjuncts who teach from one to six courses per year. Each course entails approximately 18 work hours for each unit of study, and courses are typically 2 to 5 quarter units of credit over 2 to 8 weeks.

Evidence:

- Attachments 8-7 Faculty Staffing Plan 2019, showing course loads of individual faculty members for the past year.

Policies and Practices to Ensure Reasonable Office Hours Are Provided (Guideline 4.4)

Faculty are expected to be accessible and responsive to students. Professors are accessible to students before and after class, by phone and email, and make themselves available outside of class during office hours or upon request. Faculty members typically respond to email questions within 24 – 48 hours and make appointments with students for individual counseling rather than holding scheduled office hours.

Evidence:

- *Faculty Office Hours / Accessibility*, SFL Faculty Handbook page 13
- *Professor's Office Hours*, SFL General Catalog (page 16):
<https://stfrancislaw.com/academics/catalog/>

Current Faculty Credentials (Guideline 4.5)

SFL teaching faculty are required to have a J.D. from a law school approved by the ABA or accredited or registered by the State Bar of California Committee of Bar Examiners. In addition, faculty members teaching in doctrinal courses have academic or practice experience in the selected topical field, and faculty teaching in practical skills classes have practice experience in the skills area being taught.

Evidence:

- *Faculty*, SFL General Catalog (pages 42 - 44):
<https://stfrancislaw.com/academics/catalog/>
- Attachment 8-6 is the Fall 2019 SFL Enrollment Agreement containing, in the Disclosure Statement, biographical information on the faculty (highlighted).

How Faculty Members Are Recruited and Hired and What the Law School Does to Promote and Offer Means for Faculty to Improve Their Teaching Skills (4.6)

Faculty members are identified and engaged through a variety of means, including inquiries received by the school, contacts with deans and faculty at other schools, the Dean's extensive professional legal education network, and other sources.

New faculty members are subject to background checking and credential verification. They complete an application and other common hiring documents (such as the Employment Eligibility Verification), consent to the background check, and provide a current resume or CV. The Payroll/HR department engages a vendor to complete background checks on all new employees and prospective faculty must successfully pass that screening. The Dean independently verifies state bar membership and license status at the time of hiring,

New faculty receive training in school systems (e.g., WebEx and Canvas), policies and procedures, grading and the grading scale, and how to conduct online classes (if needed.) Faculty training is conducted by the Faculty Developer (Julia Keider), who serves as the instructional effectiveness support staff for the school. Faculty members are enrolled in an online course covering all aspects of instruction including use of SFL's technology, instructional techniques, course set up, grading and feedback requirements to students including use of rubrics, grade submission, and grade changes. Ms. Keider also conducts periodic presentations at SFL faculty meetings and coordinates requests for additional faculty development in targeted areas.

Faculty members have a responsibility to develop and maintain competency in the areas they teach, in addition to continuing development of teaching skills and knowledge of teaching and learning.

Evidence:

- *Faculty Development*, SFL Faculty Handbook, pages 14 - 17
- New Faculty Orientation Course Syllabus

The Process, Timing and Procedures Used to Evaluate Faculty (Guidelines 4.7, 4.8)

Faculty evaluations consider two main sources of information: 1) feedback received from students during Course Evaluations, where available, completed at the conclusion of each course, and 2) direct observation of faculty performance by the Dean, Faculty Developer, or others, considering both in-class and outside-of-class faculty work.

SFL's Faculty Growth and Evaluation Process (FGEP) includes reviewing faculty classrooms and student evaluations and developing a Professional Growth Plan (PGP) for each faculty member. FGEP promotes continuous improvement of quality teaching and learning. Multiple sources of data assist faculty with providing effective learning experiences for students and identify how to use best practices to improve student outcomes, and to use the evaluation process to identify areas of growth.

The areas of focus during the observation and evaluation process are:

- Planning & Preparation
- Professional Expertise
- Learning Facilitation
- Learning Environment

Faculty members receive an overall rating of Meets Expectations, Does Not Meet Expectations, or Exceeds Expectations in each area. Ratings are determined by evidence gathered from faculty reflections, observations (class recordings and other LMS details), and student evaluation results.

The Faculty Developer will prepare the evaluation with input from the Dean. Existing faculty members are observed by an assigned Faculty Developer as often as once per year, and it is expected that every faculty member be evaluated once every three (3) years, depending on the Dean's determinations.

The faculty review process includes feedback from the Dean and may include feedback from the Faculty Developer (a specialist who supports faculty and works on professional growth plans or items identified in the evaluation.) The Dean of St. Francis School of Law and the Faculty Developer are responsible to follow up on the evaluation with the faculty member to ensure it is related to the faculty member's Professional Growth Plan (PGP). Additionally, peer observations are encouraged as a means of broadening the evaluation process and enhancing teaching within the departments.

New faculty are reviewed within their first year of teaching. Continuing faculty are reviewed less frequently, but the expectation is that all continuing faculty will be reviewed as needed or at least once every three years, whichever is earlier.

Evidence:

- *Faculty Development, Faculty Growth and Evaluation Process*, SFL Faculty Handbook, pages 16 - 17
- For a full description of the categories, evidence, and ratings, refer to *Faculty Growth and Evaluation Category and Rating Definitions*, Appendix F, SFL Faculty Handbook, pages 40 - 41

The Law School's Policy Regarding Academic Freedom (Guideline 4.9)

SFL believes that academic freedom encompasses the freedom of faculty members to discuss all relevant matters in the classroom, to explore all avenues of scholarship, research and creative expression and to speak or write as a public citizen without institutional discipline or restraint. Academic freedom also includes the duty of faithful performance of academic duties and obligations, the recognition of the demands of the scholarly enterprise, and the candor to make it clear that the individual is not speaking for the institution in matters of public interest.

SFL accepts the following *statement of principles* from the American Association of University Professors regarding academic freedom as it applies to faculty.

Faculty members are entitled to freedom in the classroom in discussing their subject but must avoid persistently interjecting material which has no relation to their subject.

- Faculty are entitled to full freedom in research and in the publication of the results, subject to the adequate performance of their other academic duties; but all research must be based upon an understanding with the authorities of the institution.
- As members of their community, Faculty have the rights and obligations of other citizens. Faculty measure the urgency of these obligations in the light of their responsibilities to their subject, to their students, to their profession, and to their institution. When they speak or write as citizens, they avoid creating the impression of speaking or acting for their law school or university. As citizens engaged in a profession that depends upon freedom for its health and integrity, professors have a particular obligation to promote conditions of free inquiry and to further public understanding of academic freedom.

<http://www.aaup.org/AAUP/pubsres/policydocs/contents/1940statement.htm>

Evidence:

- *Academic Freedom*, SFL General Catalog, page 21:
<https://stfrancislaw.com/academics/catalog/>
- *Academic Freedom Statement*, SFL Faculty Handbook, page 5

SECTION 9: RULE 4.160 - (E) EDUCATIONAL PROGRAM. The law school must maintain a sound program of legal education. (Guidelines 1.8, 6.1-6.14)

Demonstrate how the law school maintains a sound academic program that is qualitatively and quantitatively compliant, with reference to all subsections of Guidelines 6.1-6.10, with specific reference to each subsection of Guidelines 6.2. and 6.5, and a thorough discussion of all the ways that “academic engagement” as defined in Guideline 6.5(B) will be achieved and measured in the law school’s educational program, including noting how a student’s work will be authenticated.

In responding to the Guidelines, discuss in particular:

- the current curriculum, providing a detailed discussion relating to the total units and required courses needed to earn a J.D. degree; all elective classes, and the law school’s efforts to expand or improve the curriculum since its last inspection
- all policies and procedures, if any, for granting exceptions to the required curriculum, and how often and under what circumstances exceptions are made
- methods of instruction used (*e.g.*, lecture, performance, etc.) and alternative teaching platforms used (*e.g.*, in class, distance-learning) and what changes, if any, are currently contemplated to improve and expand the curriculum
- whether the number of hours of instruction for the J.D. degree that are academic engagement are or will be verified in accordance with the requirements of Guideline 6.5(B), including a discussion of the minimum 45-hour requirement for each semester unit and how the school will ensure that a minimum of 15 hours of each semester unit will be taken through academic engagement
- the school’s published or planned policy requiring regular and punctual attendance in verifiable academic engagement, per the standards set forth in Guideline 6.5(C)
- the school’s published or planned policy specifying the requirements to verify student participation in an approved experiential or clinical program, and to monitor that (Guideline 6.5(C))
- if the school requires student attendance in a physical classroom, whether the school is using either semester or quarter terms of study (Guideline 6.5(D)(1))
- if the school has a summer session, discussion of how that is defined (five weeks for a semester-based law school, three weeks for a quarter-based law school, or other), including the credit offered. Focus the discussion on Guideline 6.5(D)(1) and Guideline 7.3(C)
- for a law school offering a summer session and requiring student attendance in a physical classroom or its equivalent, demonstration that the summer session is within the scope of Guideline 6.5(D)(1) and Guideline 7.3(C)
- for a law school in which students earn credit for academic engagement through participation in an approved synchronous or asynchronous curriculum taught through distance-learning technology or by participation in an experiential or clinical program approved under Guideline 6.6, or a combination thereof, discuss how credits are earned as authorized by Guideline 6.5(A). (See Guideline 6.5(D)(2))

- the law school's published policy discussing the verified academic engagement for a full-time student as defined in Guideline 6.5(E) or a part-time student as defined in 6.5(F)
- for students that have completed a portion of their legal studies at a registered, unaccredited law school and subsequently graduate from an accredited law school, the policies in place to ensure that they meet the Guideline 6.5(A) requirements concerning 1,200 hours of study in aggregate (Guideline 6.5(H))
- the policies, procedures and controls used to grant credit for internships, externships or other non-classroom activities; please discuss their utility and effectiveness
- the relationship between graduates' final grade point averages to CBX results and all efforts undertaken to improve academic performance and CBX results

Required Attachments:

- Most recent Annual Compliance Plan submitted to the Committee, if any
- List of courses offered; include units of credit given, whether graded or pass/fail, any necessary prerequisites or sequencing requirements and whether exceptions are made, whether course is required or elective
- Policies and procedures, if any, for making exceptions to required curriculum
- A typical student program
- Book list, syllabi template and syllabi for all required courses taught within the last two years
- Policies, procedures and controls relating to attendance in verified academic engagement, and the number of hours of academic engagement required for a student to receive the J.D. degree and sit for the CBX
- Policies concerning participation and credit for summer sessions, if any
- Policies, procedures and controls as to all credit given for internships, externships or legal work performed outside the classroom, or for participation in approved synchronous or asynchronous curriculum
- A five-year comparison of average class size, with any reasonable projections of whether average class size is expected to increase or decrease

Additional Attachments:

- Any additional studies or statistics internally prepared which measure or correlate academic performance and eventual success on the CBX

Suggested: 8-12 pages

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

The Current Curriculum, Providing A Detailed Discussion Relating to The Total Units and Required Courses Needed to Earn a J.D. Degree; All Elective Classes, And the Law School's Efforts to Expand or Improve the Curriculum Since Its Last Inspection

Overview of Curriculum

SFL J.D. program graduates complete a rigorous, practical legal education that includes over 600 hours of live classroom instruction (36,000 minutes) and about 3,300 hours of other academic engagement with the faculty and curriculum, and preparation.

The St. Francis J.D. program is a 130-quarter unit, four-year program delivered using a robust online platform in which students attend live classes, take exams, and engage in other academic activities fully online. Operating presently under the standards for unaccredited, registered law schools, students are required to successfully complete 24 to 26 weeks of study for one half year of credit or 48 to 52 consecutive weeks of study for a full year of credit. Students beginning law study after January 1, 2018, are required to complete 9 quarter units of training in practical skills.

In compliance with Guidelines for Accredited Law School Rules Guideline 6.9, SFL offers 6 designated Professional Skills courses totaling 9 quarter units of credit (e.g., LAW736 Professional Skills IV – Drafting Motions), and 13 others courses, totaling 40 quarter units, that fully or largely concentrate on skills development (e.g., Advanced Legal Writing.) In addition to courses focused on skills, students complete extensive practical training exercises embedded in doctrinal courses (e.g., arguing for the state or defendant in a mock sentencing hearing in first year LAW 722 Criminal Law II, or planning the voir dire of a police officer based on a police report involving domestic violence, in LAW801 Evidence I.) Units of credit for these embedded skills development exercises are also recorded on student transcripts in increments according to the time devoted to them, in accord with the guidelines in Guideline 6.9.

St. Francis awards credit in quarter, not semester, units. (For reference, the student work represented by one quarter unit of credit generally equates to two thirds of the student work required for a semester unit of credit.) Each quarter unit is designed to represent approximately 30 hours of student work, so SFL students completing the 130-quarter-unit J.D. program have engaged with the subjects, faculty, and curriculum for at least 3,900 hours in 4 years. (130 times 30 is 3,900.)

SFL course designs conform to the Department of Education credit hour regulations. Roughly one third of this 30 hours of student work per quarter unit is live classes and other forms of academic engagement of the sort that might be conducted in a classroom (e.g., timed quizzes, exams, and writing assignments) permitted by Guideline 7.11, and two thirds are academic engagement of other kinds, and preparation. For example, a typical course is 4 quarter units taken over 6 weeks. Student meet for live classes every Tuesday and Thursday for those six weeks (12 classes) for 90 minutes each (1080 minutes, equal to 21.6 hours of live class, measured by the standard in Guideline 6.5(D)(3). Outside of class, they complete Discussions (argument, discussion, research, writing, and skills exercises, typically two per week, on which the student and the course community – including the professor – comment, peer review, and critique and

debate), writing assignments (timed essays), skills assignments (untimed drafting and other skills assessments), quizzes (timed multiple-choice and/or short answer assessments) and exams (times, proctored essay and multiple choice exams), in addition to their reading assignments, case briefing, outlining, course reviews, and other preparation tasks.

SFL requires each student to spend approximately 960 to 1020 hours each year devoted to academic engagement and preparation. (That is, each year typically comprises at least 32 - 34 quarter units of courses, which equates to 960 to 1020 hours of student work.) These hours include many learning activities of academic engagement with the school faculty and its curriculum, including lectures, discussions, quizzes, essays, skills writing assignments, drafting assignments. At present, under the Guidelines for Unaccredited law school rules, at least 135 hours of these 960 to 1020 hours comprise interactive classes. Students are required to confirm the number of hours they spent preparing for each class and engaging with the faculty, curriculum, and courses. Routinely, most confirm spending more than the requisite time.

The first year is comprised of 8 classes of 4 quarter units each for a total of 32 quarter units. Students complete a similar number of units in years 2 through 4 as described in the following tables:

First Year

Currently, the School of Law’s First Year curriculum includes the following:

Course	Credits	Curriculum	Grading System	Prerequisites
LAW731 Torts I	4	Required	Graded	None
LAW 732 Torts II	4	Required	Graded	LAW731 Torts I
LAW733 Torts III	4	Required	Graded	LAW731 Torts I LAW 732 Torts II
LAW 721 Crim I	4	Required	Graded	None
LAW722 Crim II	4	Required	Graded	LAW 721 Crim I
LAW711 Contracts I	4	Required	Graded	None
LAW 712 Contracts II	4	Required	Graded	LAW711 Contracts I
LAW713 Contracts III	4	Required	Graded	LAW711 Contracts I LAW712 Contracts II

Second Year

Students starting their Second Year take the following courses, in order:

Course	Credits	Curriculum	Grading System	Prerequisites
LAW815 FYLSE Preparation	6	Required	Credit/No Credit	Completion of all Torts, Contracts and Criminal Law Courses
LAW741 – Legal Research and Writing	4	Required	Graded	None

Second Through Fourth Year

The balance of the second year and the remaining two years (the “Upper Level”) include required classes that run in a periodic cycle. All of these classes must be taken to graduate. The sequence of the classes for each student varies somewhat, depending on when students complete their first year of the program, when students take and pass the FYLSE, and whether they choose to take a leave of absence and re-enter the program. However, the most common schedule prioritizes Real Property I and II, Criminal Procedure, Constitutional Law, and other typical second year courses in the second year, Evidence, Business Associations, Advanced Legal Writing, and Professional Responsibility in the third year. And Community Property, Remedies, and General Bar Prep I and II in the fourth year. Required courses in the cycle are:

Course	Credits	Curriculum	Grading System	Prerequisites
LAW751 Business Associations I	4	Required	Graded	None
LAW752 Business Associations II	4	Required	Graded	LAW751 Business Associations I
LAW761 Civil Procedure I	4	Required	Graded	None
LAW762 Civil	4	Required	Graded	LAW 761 Civil

Procedure II				Procedure I
LAW791 Criminal Procedure	4	Required	Graded	None
LAW860 Trusts Wills & Estates	5	Required	Graded	None
LAW851 Remedies	5	Required	Graded	None
LAW841 Real Property I	4	Required	Graded	None
LAW842 Real Property II	4	Required	Graded	LAW841 Real Property I
LAW801 Evidence I	4	Required	Graded	None
LAW802 Evidence II	4	Required	Graded	LAW801 Evidence I
LAW770 Community Property	5	Required	Graded	None
LAW781 Constitutional Law I	4	Required	Graded	None

LAW782 Constitutional Law II	4	Required	Graded	LAW781 Constitutional Law I
LAW830 Professional Responsibility	5	Required	Graded	None
LAW990 General Bar Prep I	4	Required	Credit / No Credit	None
LAW991 General Bar Prep II	4	Required	Credit / No Credit	None

During this Upper Level period, students will also take the following required skills course:

Course	Credits	Curriculum	Grading System	Prerequisites
LAW871 Advanced Legal Writing	4	Required	Graded	LAW741 – Legal Research and Writing

During the Upper Level period, students will typically take three to five electives. Length and timing of the electives varies. The following electives have been offered since the school's last inspection:

Course	Credits	Curriculum	Grading System	Prerequisites
LAW821 Intellectual Property I	4	Elective	Graded	None
LAW822 Intellectual Property II	4	Elective	Graded	LAW 821 – Intellectual Property I

LAW931 Bankruptcy	4	Elective	Graded	None
LAW935 Compliance	4	Elective	Graded	Recommended: LAW751 Business Associations I & LAW752 Business Associations II
LAW970 Alternative Dispute Resolution	4	Elective	Graded	None
LAW960 Administrative Law	4	Elective	Graded	LAW 761 Civil Procedure I; LAW 762 Civil Procedure II; LAW 781 Constitutional Law I; LAW 782 Constitutional Law II
LAW980 Children and the Law	4	Elective	Graded	None
LAW910 Employment Law	4	Elective	Graded	None
LAW902 Criminal Trial Advocacy	4	Elective	Graded	LAW 801 Evidence I & LAW 802 Evidence II; LAW 791 Criminal Procedure
LAW765 Law Practice Management	4	Elective	Graded	None
LAW 734 Professional Skills I -- Drafting Pleadings	1	Elective	Graded	LAW731 Torts I; LAW732 Torts II; LAW 733 Torts III
LAW 714A Professional Skills II - - Introduction to Contract Drafting	2	Elective	Graded	LAW711 Contracts I; LAW712 Contracts II; LAW713 Contracts III

LAW735 Professional Skills III – Drafting Discovery	2	Elective	Graded	LAW731 Torts I; LAW732 Torts II; LAW 733 Torts III
LAW736 Professional Skills IV – Drafting Motions	2	Elective	Graded	LAW 761 Civil Procedure I & LAW 762 Civil Procedure II
LAW737 Professional Skills IV – Drafting Legal Correspondence	1	Elective	Graded	None
LAW739 Professional Skills VI – Legal Negotiation	1	Elective	Graded	None

The following elective courses are available for students and expect to be offered within the next three years, with professors available to teach them, in the event students elect to take these courses:

Course	Credits	Curriculum	Grading System	Prerequisites
LAW901 – Civil Trial Advocacy	4	Elective	Graded	LAW 801 Evidence I & LAW 802 Evidence II; LAW 761 Civil Procedure I & LAW 762 Civil Procedure II
LAW940 – Federal Income Taxation	4	Elective	Graded	None
LAW881 Clinical Experience I	2	Elective	Graded	None
LAW881 Clinical Experience I	2	Elective	Graded	LAW881 Clinical Experience I
LAW932 Accounting and Finance for Lawyers	1	Elective	Graded	None
LAW933 Introduction to	1	Elective	Graded	None

Business Planning				
LAW997 Performance Simulation Seminar	1	Elective	Graded	None

In addition, the following are available to 4L students (and 3L students with approval of the Dean) in appropriate cases of advanced academic qualification:

Course	Credits	Curriculum	Grading System	Prerequisites
LAW950 Legal Externship	3-4	Elective	Credit / No Credit	LAW 801 Evidence I & LAW 802 Evidence II; LAW 761 Civil Procedure I & LAW 762 Civil Procedure II; LAW791 Criminal Procedure. Open to students in their 4L year, and 3L year with approval by the dean, in good academic standing
LAW920 Independent Study	4	Elective	Credit / No Credit	Open to students in their 4L year, and 3L year with approval by the dean, in good academic standing

Professional Skills Curriculum

In addition to the professional skills courses noted as electives above, practical skills exercises and credits are included in doctrinal courses. These embedded practical exercises allow students to apply the doctrine in real-world settings, get feedback, and improve their skills, all while learning and reinforcing the substance of the course. Examples of exercises that may be used:

Course	Professional Skills Exercises
Business Associations I	<p>Client counseling exercise</p> <p>Draft a partnership agreement</p> <p>Draft corporate articles, minutes & statement of information</p> <p>Prepare for negotiation of a buy sell agreement</p> <p>Revise draft of buy sell agreement to meet client objectives</p> <p>Draft a motion to dismiss a claim based on breach of fiduciary duty</p> <p>Evaluate a proposed transaction involving an interested director</p> <p>Draft a demand letter on behalf of shareholders regarding a shareholders' derivative claim</p>
Business Associations II	<p>Draft an indemnification agreement</p> <p>Draft agreements for a dual class of common stock, a single class of common stock and multiple classes of common stock</p> <p>Draft a shareholder agreement</p> <p>Draft an agreement to buy minority shares</p> <p>Draft a merger agreement and related certificates for the approval of the merger</p>
Civil Procedure I	<p>Motion to dismiss for lack of personal jurisdiction</p> <p>Counseling client regarding removal of a case</p> <p>Memorandum to client re selection of proper forum for case based on subject matter jurisdiction</p>
Civil Procedure II	<p>Drafting questions for a client interview</p> <p>Drafting a complaint</p> <p>Outlining a motion to dismiss a complaint</p> <p>Assessing ethical issues in filing a motion to dismiss</p> <p>Drafting a discovery plan</p> <p>Drafting document requests</p> <p>Drafting interrogatories</p> <p>Drafting a statement of undisputed facts in support of a motion for summary judgment</p>

	Drafting an email to a client addressing post-trial motions
<i>Evidence I</i>	<p>Draft an outline preparing for a witness interview</p> <p>Respond to a hearsay objection during witness questioning</p> <p>Respond to a motion in limine based on relevance</p> <p>Analyze the application of the Confrontation Clause to a 911 call</p> <p>Plan the voir dire of a police officer based on a police report involving domestic violence</p> <p>Develop a response for admissibility of deposition testimony based on the former testimony exception</p> <p>Answer questions from the court regarding admissibility of character evidence</p> <p>Develop an evidentiary foundation for a witness to testify to habit and custom</p>
<i>Evidence II</i>	<p>Analyze elements of the attorney client privilege and the ethical obligations in reference to an inadvertently disclosed letter</p> <p>Prepare for cross-examination and impeachment of a police officer based on a prior inconsistent statement</p> <p>Review a rap sheet and determine the admissibility of prior convictions</p> <p>Prepare for voir dire of an expert witness</p> <p>Prepare for argument to the court barring expert witness testimony</p> <p>Analyze whether to call an opposing expert witness</p> <p>Evaluate a deposition transcript to authenticate an email and plan further investigation</p> <p>Evaluate a possible best evidence objection to an email</p>
<i>Intellectual Property I</i>	<p>Complete copyright registration</p> <p>Complete trademark registration</p> <p>Draft an appellate opinion on copyright infringement</p>

	<p>Draft a legal memorandum on a possible copyright infringement</p> <p>Client letter explaining trademark priority and loss of trademark rights</p> <p>Analyze benefits of federal trademark registration for a potential client</p> <p>Draft a letter analyzing domain names and cybersquatting</p>
<i>Intellectual Property II</i>	<p>Client letter advising of rights and remedies under trade secret law</p> <p>Outline of points to cover in exit interview with departing employee going to a competitor</p> <p>Memorandum to client re patentability of an enzyme and methods of manufacturing an enzyme</p> <p>Client letter addressing obviousness in reference to a patent infringement</p> <p>Analyze options following a Final Office Action</p> <p>Prepare for a client meeting regarding a potential patentable</p> <p>Memorandum to general counsel re: potential claims and relief in connection with misappropriation claim</p>
<i>Professional Responsibility I</i>	<p>Draft a motion to withdraw from representation</p> <p>Draft a fee agreement</p> <p>Draft a complaint for legal malpractice</p> <p>Draft a stipulation and protective order with a claw-back provision</p> <p>Draft a conflict of interest disclosure and waiver</p>
<i>Professional Responsibility II</i>	<p>Draft a motion to disqualify counsel</p> <p>Examine website for ethics rule violations and appropriate disclaimers</p> <p>Draft a legal research memorandum re contacts with represented party and perjured testimony</p> <p>Draft a memorandum pertaining to the attorneys' duties when terminated and pursuing litigation</p>

Professional Skills I	<p>Review client file and draft and revise a federal court complaint</p> <p>Review memorandum from counsel and draft and revise an answer to a complaint</p>
Real Property I	<p>Review a deed and draft a memorandum analyzing the interests of the parties</p> <p>Draft a client letter advising a concurrent owner of his rights and obligations</p> <p>Negotiate and document a settlement of a dispute between concurrent owners</p> <p>Draft a client letter advising a landlord regarding accommodation of a disability involving a pet</p>
Real Property II	<p>Conduct a title search in a county records office</p> <p>Apply statutes concerning record title to a factual scenario</p> <p>Prepare a memorandum summarizing a client interview</p> <p>Evaluate photographs depicting express or implied easements</p> <p>Access tax documents for property and determine property value</p> <p>Analyze documents pertaining to a right of way</p> <p>Analyze documents pertaining to express and implied easements</p> <p>Analyze a deed, bylaws, photos and deed restrictions to determine possible covenants</p> <p>Draft letters to clients addressing a variety of issues related to real property</p> <p>Draft memos discussing a variety of legal issues related to real property</p>
Remedies	<p>Draft a letter to a client regarding mitigation of damages</p> <p>Draft a memorandum analyzing potential recovery</p> <p>Draft a memorandum in support of a request for preliminary injunction</p> <p>Draft an injunction</p>

Trusts, Wills & Estates	Draft a memorandum regarding the execution of a will. Draft a will. Draft a client letter regarding the client’s will. Draft a client letter regarding a will contest. Participate in a mock negotiation regarding a will contest. Draft a durable power of attorney. Prepare a checklist for a client meeting. Prepare for and conduct a mediation involving fiduciary responsibilities.
Alternative Dispute Resolution	Conduct a negotiation in a sexual harassment case (role playing exercise) Complete a negotiation in a personal injury case (role playing exercise) Conduct a mediation of a dispute involving defamation and wrongful termination (role playing exercise) Conduct a mediation of a real property dispute (role playing exercise) Conduct an arbitration in a car accident case (role playing exercise) Conduct an arbitration in a construction case (role playing exercise)

The Law School’s Efforts to Expand or Improve the Curriculum Since Its Last Inspection

Curriculum improvement is a high priority and ongoing process at SFL. First year courses receive constant attention, and all courses have been revised multiple times since the last inspection, in an effort to improve teaching of particular topics (e.g. strict products liability), replace outdated teaching materials, and update the exams and examples used in the course.

Since July 2018, the school has, in fact, reviewed every single one of its courses, as these courses were converted to the school’s new learning management system, Canvas. These reviews entailed re-considering the learning objectives, reviewing and if necessary, revising, the learning activities, including the formative assessments, and checking, and if needed, revising, the learning support materials (e.g., Instructor resources and slides used in class.) Updates to the first-year courses are most frequent, to respond to developments in testing of these subjects on the FYLSE, and to improve the learning design to address areas of particular difficulty for new students. For example, Criminal Law I and II underwent complete re-writes in Fall 2019, and many courses have been updated to reflect new books, or new editions of books. 49 courses were “touched” and most revised in various ways, during this comprehensive review and transition process.

New courses have also been added. Since 2016, SFL has increased the number of elective course offerings by 100%. In its 2016 study, the school reported that 5 electives had been offered and 4 more were expected in the next year (2017). Since 2016, in fact, the school has offered 18 elective courses, some multiple times, including all of those planned and previously offered.

SFL continues to research and adopt best practice for online legal education. The Dean hosted, in conjunction with University of Denver Sturm College of Law and AccessLex, a conference, in fall 2019, entitled, *Online & Hybrid Learning Pedagogy: Toward Defining Best Practices in Legal Education*, (<https://www.law.du.edu/online-learning-conference/conference-schedule>)

which attracted over 150 faculty and deans from all across legal education. The school is just now beginning the process of incorporating practices developed at the conference in its new course offerings, but expects to continually improve delivery of learning outcomes through application of research-based best practices to course and learning design decisions.

Evidence

- Attachment 9-2 is SFL's List of Courses Offered, with required information about grading, prerequisites, etc. This list is the same as them embedded in the Study text, just without the explanatory text accompanying each section.
- *Program Overview*, SFL General Catalog (page 37-43): <https://stfrancislaw.com/academics/catalog/>
- *Curriculum*, SFL General Catalog (page 37-43): <https://stfrancislaw.com/academics/catalog/>

All Policies and Procedures, If Any, For Granting Exceptions to The Required Curriculum, And How Often and Under What Circumstances Exceptions Are Made

SFL students may petition the dean for an exception to a course or curriculum requirement. The Dean will consider the petition and evidence, the student's academic record and arguments, and the needs of the school in deciding the petition.

Petitions for exceptions to the requirement to complete a course required by the curriculum are exceptionally rare. None have been received since at least September 2017.

Petitions for an exception to a course requirement – for example a prerequisite requirement – occur occasionally, approximately twice per year. Exceptions to a prerequisite requirement can be granted when the student academic record demonstrates the ability to handle extra content that may need to be absorbed to successfully complete the course.

Other petitions concern course sequence requirements. For example, a student seeking a Legal Externship petitioned for a waiver of the requirement that Legal Externship students be in their fourth year, arguing that she had completed all but one of her third year classes and had completed all prerequisite courses for Legal Externship. The requirement that the student be in the fourth year was waived and the Legal Externship completed extremely successfully.

SFL has developed, and maintains, Standard Operating Procedures (SOPs) to implement school policies and compliance with applicable law and State Bar requirements. The SOP document is maintained by the Registrar and Dean and regularly amended and updated. SOPs include, among others, the following:

Evidence:

- Attachment 9-3 is the SFL Petition Process SOP

Methods of Instruction Used (E.G., Lecture, Performance, Etc.) And Alternative Teaching Platforms Used (E.G., In Class, Distance-Learning) And What Changes, If Any, Are Currently Contemplated to Improve and Expand the Curriculum

Instructional Methodology

SFL delivers a practical, rich law school curriculum and experience online, using WebEx for its live class sessions and the Canvas learning management system (LMS). For a fuller description, and view, of these platforms, please see section 15.

SFL uses a hybrid learning methodology in which live online classes (synchronous) combine with real-time assessment and practices (timed quizzes, writing assignments, and exams), near-real-time learning experiences (graded discussions) and asynchronous learning activities – all supported by instructor and peer feedback -- to deliver a rich, blended, practical, and carefully assessed learning experience for the students. The table below lists the key synchronous and asynchronous components of the courses:

Key Synchronous Components	Key Asynchronous Components
<ul style="list-style-type: none"> • Live face-to-face, voice-to-voice for all students and professor (video participation is required) • Socratic method questioning and discussion (students are called on) • Live classes attendance and participation tracking and grading for credit • PowerPoint and document display • Application sharing (e.g., Lexis) • Simultaneous text communication between students and the professor, class-wide or privately • Multiple views (slides, application, whiteboard, chat, roster, professor, student, class) • Hand raising signals professor that students have a question • Live classes are recorded and available for review 	<ul style="list-style-type: none"> • Discussions by the course community, guided by the professor • Weekly graded timed writing practice • Weekly graded multiple-choice quizzes • Graded practical skills assignments for students in the upper level • Proctored and timed exams • Feedback from professors on all assignments via rubrics/comments • Immediate feedback on quizzes; feedback in a few days on other assignments • Projects and practical learning experiences embedded in many doctrinal courses • Dedicated skills training courses • Course improvement via learning outcomes analysis and feedback from students via end-of-course surveys

Learning on SFL platforms can have significant advantages over learning in live, physical classrooms. In SFL courses, students get a very specific and orderly schedule for all study and assessment tasks. (Like many of these things, this can be done in the physical classroom, but tragically often is not). Students know exactly what is expected of them, for example on what to prepare for class or how to meet expectations on an assignment (because assessment rubrics are standardized and published in advance.) Students are accountable for weekly learning – there is no chance to slack off for the entire course and then catch up at the end – though they can move through assignments at a pace and order that fits their learning style, because they have multiple learning activities on the topics in each seminar weekly. They can store and retrieve all their work (from anywhere, via mobile applications of Canvas and WebEx), setup and use course calendars and planning tools to keep their studies on track, and reach out and receive timely answers from their professor, all in one central place. They get prompt or even immediate feedback on many types of practice exercises (including some peer feedback in Discussions.) Perhaps most importantly, they can always know “where they stand” in terms of both learning and grades, because courses are built to provide multiple frequent, low-stakes assessments, graded promptly, with developmental feedback. Well-designed courses, delivered on modern learning management systems, remove most of the guesswork and frustration that confounds law students in many less-organized law school courses. Research suggests this method of learning is at least as efficacious, if not more so, than traditional law school courses.

In WebEx live classes, all students can see and hear the professor and each other, interact live in real time, and contribute to whiteboard work, presentations, chat discussions, and other activities. Professors use Socratic method to call on students. Class sizes are limited to 15 students to assure regular and substantive contribution by all students. Class recording makes it easy for students to review class activities, lectures, and materials as desired. Students and the professor can communicate in text contemporaneously with the lecture or other class activity, as when the professor wants to get an answer to a question from *all* students. Professor can conduct live polls using third party tools that they link through application sharing. Professors (or students) can show videos, share drafting and other work product, work in groups, and in general, replicate almost all experiences of live physical classroom settings, if desired (all from an inexpensive laptop computer in the comfort and privacy of home.) Students with disabilities have the use of built-in assistive tools, like magnification, screen readers, class archives, and closed captioning (which can be implemented when a student is accommodated in that way.) Unlike the live, physical classroom, where these items must be implemented manually with great distraction to other students, online students are *all* able to benefit from them if desired. (And why should all students not use, for example class archives, if it helps them learn?)

What Changes, If Any, Are Currently Contemplated to Improve and Expand the Curriculum

The SFL curriculum already includes most or all courses available in most law school curricula, and some (e.g., LAW 714A Professional Skills II – Introduction to Contract Drafting) that are not but ought to be. SFL re-evaluates its curriculum and adjusts it periodically as a routine matter, and when outcomes data suggests the need for improvements, student expectations or needs suggest additions, or courses become outdated. At the time of this report,

SFL has recently added some courses, and is working on new courses that it expects to implement in the next few years, such as the Clinical Experience courses, Accounting and Finance for Lawyers, and Introduction to Business Planning. If student outcomes or expectations indicate the need for additional courses, or adjustments to existing courses, SFL will undertake those changes. For example, Immigration Law is also under consideration for this reason, as is Jurisprudence and a general Family Law curriculum.

Regular adjustments to improve occur each time a course is reviewed. For example, it is anticipated that LAW 739 Legal Negotiation, LAW 791 Criminal Procedure, LAW 714A Professional Skills II – Introduction to Contract Drafting will all be reviewed in 2020.

Whether The Number Of Hours Of Instruction For The J.D. Degree That Are Academic Engagement Are Or Will Be Verified In Accordance With The Requirements Of Guideline 6.5(B), Including A Discussion Of The Minimum 45-Hour Requirement For Each Semester Unit And How The School Will Ensure That A Minimum Of 15 Hours Of Each Semester Unit Will Be Taken Through Academic Engagement

The number of hours of instruction for the J.D. degree that are academic engagement will be verified in accordance with the requirements of Guideline 6.5(B)(b), by the compliant design of distance learning curriculum in accord with guideline 7.11(C)(1). SFL verifies academic engagement as permitted by Guideline 7.11(C) in each course design. SFL courses use distance learning best practices for the designation of compliant learning activities to support learning outcomes, and their measurement for student clock hour and credit hours purposes. SFL has a curriculum requiring more than 1,200 hours of verified academic engagement with the faculty and curriculum for graduation from the J.D. program and law school.

SFL employs methodologies that are distance learning best practice employed in course design to determine the allocation of student work time when designing to the number of hours of students work required for each quarter unit of credit.

LEARNING ACTIVITY	YEAR	NORM
Reading in Law School casebooks (not including briefing the cases therein)	First Year	8 pages per hour
Reading in Law School casebooks (not including briefing the cases therein)	Other Years	10 pages per hour
Reading in Other Materials (e.g., statutes)	First Year	10 pages per hour
Reading in Other Materials (e.g., statutes)	Other Years	12 pages per hour

Case Briefing	First Year	3 cases per hour
Case Briefing	Other Years	10 cases per hour
Videos and Other Recorded Media	All	Actual
Timed Assessments (quizzes, writing, exams)	All	Actual
Skills Assignments	First Year	1 hour per 2 pages expected
Skills Assignments	Other Years	1 hour per 3 pages expected
Discussions, Complete Assignment	First Year	1 hour per 2 pages expected
Discussions, Complete Assignment	Other Years	1 hour per 3 pages expected
Discussions, Participate in Community	First Year	30 minutes each assignment
Discussions, Participate in Community	Other Years	20 minutes each assignment
Class Time	All	Actual
Preparation for Class (each)	All	30 minutes
Class Review (each)	All	15 minutes
Timed Assessment (quizzes and essays) Preparation	First Year	30 minutes
Timed Assessment (quizzes and essays) Preparation	Other Years	15 minutes
Skills Assignment Research & Preparation	First Year	45 minutes
Skills Assignment Research & Preparation	Other Years	30 minutes
Final Exam Review and Preparation	First Year	1.5 hours / unit per course
Final Exam Review and Preparation	Other Years	1 hour / unit per course
Other Preparation (e.g., review, outlining, etc.)	First Year	10 hours / unit per course
Other Preparation (e.g., review, outlining, etc.)	Other Years	10 hours / unit per course
Other Assignments	All	As Assigned

Some academic engagement data on individual students is collected through 1) live class attendance; 2) LMS usage statistics; and 3) study logs. SFL has not attempted verification of actual hours of individual student's academic engagement under Guideline 7.11(C)(2), but collects data that assures it that students are engaged in the curriculum generally as it was designed in accord with Guideline 7.11(C)(1). For example, student reports demonstrate, often, more than the 960 to 1020 expected study hours per year (the designed typical study hours for 32 to 34 quarter credits, the typical year.)

Evidence:

- Attachment 9-6 is an excerpt from SFL study log tracking worksheet for 2019, de-identified, demonstrating the sampling done to verify hours of academic engagement designed into the compliant curriculum permitted by Guideline 6.5(B)(b) and 7.11(C)(1).

The School's Published or Planned Policy Requiring Regular and Punctual Attendance in Verifiable Academic Engagement, Per the Standards Set Forth in Guideline 6.5(C)

SFL requires regular and punctual attendance (participation) in academic engagement activities across the curriculum. Students are expected to complete frequent assignments and learning activities and attend every class session for each course in which they are registered, except in case of illness, emergency, or other excuse. Attendance and active participation in the interactive classes are tracked and graded by the professor. (That is, attendance and participation have points assigned in the syllabus and are graded by the professor. This occurs in nearly all courses, the exceptions being Independent Study and other courses where regular classes are not scheduled.) Participation in other forms of academic engagement – for example, timed quizzes, writing, and exams – is also graded.

SFL courses are comprised of “seminars” on particular topics within the subject. Each seminar equates to one week of study and includes a variety of classes, assignments, assessments, and other learning activities and experiences on the topic(s) of the seminar. Both live classes and other learning and assessment activities are academic engagement within the meaning of Guideline 7.11(C). Attendance is measured by participation in the 1) assigned learning activities, and 2) live interactive classes, of each Seminar of each course in which the student is enrolled.

Attendance monitoring serves multiple purposes, some at odds with each other. Monitoring ensures student compliance, owing to the knowledge that the school will spot and act upon inadequate attendance. Regulatory verification is accomplished, in part, by attendance monitoring. Somewhat differently, attendance plays an important role in academic and institutional integrity and operations. Minimum attendance determines the point at which a student can no longer drop a course without a record being made of the student's performance (or non-performance) in the course. Timing of attendance and non-attendance affects refunds, dismissals, leaves, and other administrative matters. And differently yet again, satisfactory academic progress determinations are driven by attendance as that term is defined in federal regulations.

These purposes drive various policies on attendance, such as the definition of minimum seminar attendance. SFL defines seminar minimum attendance == for purposes of satisfactory academic progress, leave, dismissal, and administrative withdrawal or other penalty for inadequate attendance -- as follows:

A student is deemed to have attended a Seminar if:

- (1) the student submitted at least one assignment or discussion board posting during the Seminar, if assigned; and
- (2) the student attended at least one or more of the live interactive classes in the Seminar, if assigned.

Students are required to participate with professors and other students in live interactive classes approximately three hours per week, using the School's online technologies for face-to-face and voice-to-voice interaction. Students are expected to participate by video and audio in each class, except in unusual or extraordinary circumstances. Classes are generally held on Tuesday and Thursday evenings from 6:00 p.m. through 7:30 p.m., Pacific Time.

Students are required to participate in at least 85 percent of the regularly scheduled interactive classes. Attendance is monitored. Students who do not meet the minimum required attendance may be subject to corrective action which could include administrative withdrawal, the loss of credits earned in a course, or other penalties. SFL defines live class minimum attendance == again for purposes of satisfactory academic progress and administrative withdrawal or other penalty for inadequate attendance -- as follows:

A student is deemed to have attended a live interactive class if:

- (1) the student was present at the time attendance was recorded by the professor, or if not present then is approved by the professor for addition to the attendance list; and
- (2) remained present and participatory throughout the substantial majority of the class time; or,
- (3) received approval for an absence from the professor, reviewed the recorded class, and if requested by the professor, submitted a summary of the class that was approved by the professor as equivalent in learning to attendance and active participation in the live interactive class session.

A student may be administratively withdrawn or placed on leave due to inadequate attendance. Inadequate attendance includes, but is not limited to, any of the following:

- (1) The student does not attend for the first Seminar of the course.

(2) The student does not attend for two consecutive Seminars.

(3) The student does not attend at least 85% of the course.

SFL students who complete course requirements by design complete academic engagement of 10 hours per unit of credit, as academic engagement is defined in SFL policy. SFL defines academic engagement to comply with Guideline 7.11(B) definitions of academic engagement: (1) participating in a synchronous class session; (2) viewing and listening to recorded classes or lectures; (3) participating in a live or recorded webinar offered by the law school; (4) participating in any synchronous or asynchronous academic assignment in any class monitored by a faculty member; (5) taking an examination, quiz or timed writing assignment; (6) completing an interactive tutorial or computer- assisted instruction; (7) conducting legal research assigned as part of the curriculum in any class; and (8) participating in any portion of an approved clinical or experiential class or activity offered through distance learning technology.

SFL presently maintains records of participation in verifiable academic engagement through 1) attendance and participation monitoring by the faculty; 2) study logs; and 3) learning management system participation data.

Evidence:

- *Attendance*, SFL General Catalog (page 12-13): <https://stfrancislaw.com/academics/catalog/>
- *Curriculum*, SFL General Catalog (page 37-43): <https://stfrancislaw.com/academics/catalog/>

The School's Published or Planned Policy Specifying the Requirements to Verify Student Participation in An Approved Experiential or Clinical Program, And to Monitor That (Guideline 6.5(C))

SFL does not conduct an experiential or clinical program approved under Guideline 6.6. It does, however, conduct experiential learning in many courses, and offer externship opportunities that are part of the distance learning curriculum authorized by Guideline 6.5 (D)(2).

Students participating in experiential learning experiences as part of a doctrinal or skills course have their participation monitored in the ordinary course of the class, by the faculty members conducting it. That is, course design and credit granted conform to SFL credit hour policies, including the allocation of student work via course design and the verification of student work via study hour logs.

For participants in LAW 950 Legal Externship, study logs evidencing the hours spent in various non-classroom activities are required, as is a reflection on the externship experience, which may include artifacts of the work product produced by the student during the externship. The faculty member or law firm supervising the externship completes an evaluation of the extern that includes the number of hours of supervision and the types of activities required of the extern. These are reviewed by the faculty member supervising the externship, who also meets with the supervisor and extern periodically through the course of the externship.

The LAW 950_ Legal Externship course, completed by the student while on externship. Includes the assignments described as regular course assignments, and is graded by the supervising faculty member. The course may be taken only once, for 4 quarter units of credit, which represents much less than 40% of the hour requirement for a year of credit, and much less than 10% of the total hours required for graduation, per Guideline 6.6.

SFL policies respecting LAW 950_ Legal Externship are contained in the course description and syllabus and other documents in the course. Please see the attachments for these documents.

Evidence:

- *Credit Hour Definitions*, SFL General Catalog (page 18): <https://stfrancislaw.com/academics/catalog/>
- *Curriculum*, SFL General Catalog (page 37-43): <https://stfrancislaw.com/academics/catalog/>
- Attachment ___ is the *Legal Externship Course Policies* document from LAW 950_ Legal Externship

If the School Requires Student Attendance in A Physical Classroom, Whether the School Is Using Either Semester or Quarter Terms of Study (Guideline 6.5(D)(1))

SFL does not require student attendance in a physical classroom. SFL uses quarter terms of study.

If the School Has A Summer Session, Discussion of How That Is Defined (Five Weeks for A Semester-Based Law School, Three Weeks for A Quarter-Based Law School, Or Other), Including the Credit Offered. Focus the Discussion on Guideline 6.5(D)(1) And Guideline 7.3(C)

SFL does not offer a summer session.

For A Law School Offering A Summer Session and Requiring Student Attendance in A Physical Classroom or Its Equivalent, Demonstration That the Summer Session Is Within the Scope of Guideline 6.5(D)(1) And Guideline 7.3(C)

SFL does not offer a summer session.

For A Law School In Which Students Earn Credit For Academic Engagement Through Participation In An Approved Synchronous Or Asynchronous Curriculum Taught Through Distance-Learning Technology Or By Participation In An Experiential Or Clinical Program Approved Under Guideline 6.6, Or A Combination Thereof, Discuss How Credits Are Earned As Authorized By Guideline 6.5(A). (See Guideline 6.5(D)(2))

The SFL J.D. curriculum requires 130 quarter credits (equivalent to approximately 84 semester units) for graduation. These units are earned over a 4-year period via four terms of approximately 48 to 52 weeks each (or half terms of 24 to 26 weeks each.)

SFL quarter units, by design, require approximately 10 hours of academic engagement and 20 hours of preparation, totaling approximately 30 hours of student work per quarter credit hour. The approximately 10 hours of academic engagement included in each quarter credit comprise live classes and other forms of academic engagement permitted by Guidelines 6.5 and 7.11. The SFL credit hour definition is designed to comport with Department of Education regulations concerning credit hour calculation and allocation (the so-called “Carnegie Unit” formulation embodied in 34 CFR 600.2, and modified in 34 CFR 668.8 (k) and (l), and explained in Program Integrity Questions and Answers (<https://www2.ed.gov/policy/highered/reg/hearulemaking/2009/credit.html>) of the Department.) This equates directly to the State Bar’s 45-hour requirement for each semester unit of credit. This also comports with the definition of quarter units provided in Guideline 6.5(D)(1). Academic engagement is authorized as a means of gaining credit in a law school program by Guideline 6.5(B) Please see the discussion in this section on credit hours, quarter credit hours, and the construction of SFL curriculum for further information.

SFL does not conduct an experiential or clinical program approved under Guideline 6.6. It does, however, conduct experiential learning in many courses, and these are part of the distance learning curriculum authorized by Guideline 6.5 (D)(2).

Evidence:

- *Attendance*, SFL General Catalog (page 12-13): <https://stfrancislaw.com/academics/catalog/>
- *Curriculum*, SFL General Catalog (page 37-43): <https://stfrancislaw.com/academics/catalog/>

The Law School's Published Policy Discussing the Verified Academic Engagement for A Full- Time Student as Defined in Guideline 6.5(E) Or A Part-Time Student as Defined In 6.5(F)

SFL curriculum meets the study hours requirements of Guidelines 6.5 for full time students. As described elsewhere, SFL students who complete course requirements by design complete academic engagement of at least 10 hours per unit of credit, as academic engagement is defined in SFL policy. SFL defines academic engagement to comply with Guideline 7.11(B) definitions of academic engagement: (1) participating in a synchronous class session; (2) viewing and listening to recorded classes or lectures; (3) participating in a live or recorded webinar offered by the law school; (4) participating in any synchronous or asynchronous academic assignment in any class monitored by a faculty member; (5) taking an examination, quiz or timed writing assignment; (6) completing an interactive tutorial or computer- assisted instruction; (7) conducting legal research assigned as part of the curriculum in any class; and (8) participating in any portion of an approved clinical or experiential class or activity offered through distance learning technology.

While Guideline 6.5 (E) and 6.5 (F) do not require a published policy, SFL does ensure that its curriculum meets the requirements of Guideline 6.5 (E) and 6.5 (F). SFL quarter units, by design, require approximately 10 hours of academic engagement and 20 hours of preparation, totaling approximately 30 hours of student work per quarter credit hour. The approximately 10 hours of academic engagement included in each quarter credit comprise live classes and other forms of academic engagement permitted by Guidelines 6.5 and 7.11.

Students complete a part time student load in accord with Guideline 6.5(F). A typical course is 4 quarter units taken over 6 weeks. Each quarter unit represents approximately 10 hours of academic engagement, so the 4-unit course includes 40 such hours (at minimum). In each of the six weeks, then, academic engagement represents just under 7 hours of student work per week, exceeding the minimum of 6 hours per week in Guideline 6.5(F).

In truth, academic engagement normally equals much more time per week. Student attend live classes every Tuesday and Thursday for those six weeks (12 classes) for 90 minutes each. This represents 21.6 hours of academic engagement since, as authorized by Guideline 6.5(C)(3), each 50 minutes of instruction represents one hour of academic engagement. (1080 minutes, divided into 50 minutes equals 21.6 hours instruction.) Outside of class, students complete Discussions (peer-reviewed argument, discussion, research, writing, and skills exercises, typically two per week), writing assignments (timed essays), skills assignments (untimed drafting and other skills assessments) quizzes (timed multiple-choice and/or short answer assessments), and exams, all of which are activities authorized for academic engagement credit in an approved synchronous or asynchronous distance learning curriculum by guidelines 6.5 and 7.11.

SFL requires each student to spend approximately 960 to 1020 hours each year devoted to academic engagement and preparation. (That is, each year typically comprises at least 32 to 34 quarter units of courses, which equates to 960 to 1020 hours of student work.) These hours include many learning activities of academic engagement with the school faculty and its curriculum, including lectures, quizzes, discussions, essays, skills writing assignments, drafting

assignments. Students are required to confirm the number of hours they spent preparing for each class and engaging with the faculty, curriculum, and courses.

Evidence:

- Attachment 9-6 includes an excerpt from the SFL study log tracking worksheet for 2019 de-identified, demonstrating the sampling done to verify hours of academic engagement designed into the compliant curriculum permitted by Guideline 6.5(B)(b) and 7.11(C)(1).

For Students That Have Completed A Portion Of Their Legal Studies At A Registered, Unaccredited Law School And Subsequently Graduate From An Accredited Law School, The Policies In Place To Ensure That They Meet The Guideline 6.5(A) Requirements Concerning 1,200 Hours Of Study In Aggregate (Guideline 6.5(H))

Students completing a portion of their education at another institution and receiving transfer credit from SFL accrue the number of study hours represented by the credit granted, using the Department of Education and State Bar formulation of study hours per unit of credit. For example, transfer students credited with one year of prior law study comprising 23 semester units would be considered to have completed 1,035 study hours (23 x 45) including 345 hours of academic engagement (1/3 of 1,035, per Department of Education definitions of credit hours.) This equates to 11.5 hours of academic engagement per week, in accord with Guideline 6.5(E) and (F) (two semesters of 15 weeks, each comprising 11.5 hours per week of academic engagement equals 345 hours of academic engagement.) The calculation for a student transferring quarter units would be comparable.

Students enrolled in the J.D. program must complete at least one-half of the program requirements at SFL to qualify for the J.D. (i.e., 65 units and 2 years of study). Thus, transfer credit for prior law studies is limited to 65 quarter credit units of their semester credit unit equivalent.

The Dean and Registrar review applications for transfer admission. Applicants requesting transfer credit submit transcripts of prior law studies and, if available and/or required, the State Bar's Evaluation of Law Studies Completed and Contemplated. The Registrar reviews these for units attempted and completed and degree program requirements. The Dean reviews courses, as needed, for comparability. The Dean and Registrar formulate a likely credit transfer –subject to verification -- and furnish it to the Admissions Representative, who conveys it to the applicant.

Evidence:

- *Transfer Credit for Prior Law Studies*, SFL General Catalog (page 9): <https://stfrancislaw.com/academics/catalog/>

The Policies, Procedures and Controls Used to Grant Credit for Internships, Externships or Other Non-Classroom Activities; Please Discuss Their Utility and Effectiveness

The SFL externship program is set up as a course. Credit is controlled through completion of assignments, logging of study hours, and a reflection on the experience, as well as an evaluation by the supervising attorney. The LAW 950 Legal Externship course is completed by the student while on externship. It includes the assignments described as regular course assignments, and is graded by the supervising faculty member. The course may be taken only once, for 4 quarter units of credit, which represents much less than 40% of the hour requirement for a year of credit, and much less than 10% of the total hours required for graduation, per Guideline 6.6.

Policies and procedures are set forth in in the Syllabus for the course, including Forms A through E, which are attached as Exhibit 13. To date, the externship elective has been completed by a limited number of students, but has generally be quite well valuable to them, and the community. SFL students have worked on research and briefs for a number of important cases, including prisoner rights, commercial transactions, and general litigation matters.

Evidence:

- Attachment 9-8 include the syllabus for LAW 950 Legal Externship and Forms A through E used in administering the LAW 950 Legal Externship course.

The Relationship Between Graduates’ Final Grade Point Averages to CBX Results and All Efforts Undertaken to Improve Academic Performance and CBX Results

SFL students graduating with a cumulative GPA in the J.D. program of 3.50 or higher have a very high probability of successfully passing the CBX. The chart below shows the correlation between SFL grades and first time and ultimate CBX passing for SFL graduates since inception. It demonstrates an excellent correlation between grading and external measures of program outcomes.

CBX & GPA – All Students		
SFL Final GPA	CBX 1st Time	CBX Overall
3.5 – 4.0	82%	82%
3.0 – 3.49	0%	0%
2.5 – 2.9	NA	NA
2.0 – 2.4	NA	NA

Moreover, the 63.64% cumulative pass rate of SFL graduates on the CBX exceeds the State Bar's minimum cumulative pass rate (MPR) embodied in Guideline 12.1 and 12.2 by more than 50%. It compares very favorably to the best performing CALS, and exceeds that of more than one third (1/3) of presently accredited CALS.

Evidence:

- *Pass Rates*, SFL Website at: <https://stfrancislaw.com/academics/pass-rates/>

SECTION 10: RULE 4.160 (F) – COMPETENCY TRAINING. The law school must require that each student enrolled in its Juris Doctor degree program satisfactorily complete a minimum of six semester units (or their equivalent) of course work designed to teach practice-based skills and competency training. Such competency training must teach and develop those skills needed by a licensed attorney to practice law in an ethical and competent manner. (Guideline 6.9)

Describe the courses offered that fulfill the requirement for competency training, noting any difference between the ways that these students will fulfill the requirements based on whether they are enrolled in a fixed facility classroom program, a hybrid program, or an online program. Discuss what measures are in place to ensure students enroll in, progress in, and complete those courses.

In responding to the Guidelines, discuss in particular the following, if they were not already provided under Section 9 – Educational Program above.

- the current curriculum, providing a detailed discussion relating to the total units and required courses needed that qualify as competency training; all elective classes, and the law school's efforts to expand or improve the curriculum since its last inspection
- all policies and procedures, if any, for granting exceptions to the required curriculum, and how often and under what circumstances exceptions are made
- methods of instruction used (*e.g.*, lecture, performance, court appearance, appearance at administrative hearing, etc.), alternative teaching platforms used (*e.g.*, in class, distance-learning), and what changes, if any, are currently contemplated to improve and expand the curriculum
- the policies, procedures and controls used to grant credit for internships, externships or other non-classroom activities, and discuss their utility and effectiveness

Required Attachments (unless they were all provided under Section 9 – Educational Program and, if so, reference those sections in the narrative above):

- List of courses offered; include units of credit given, whether graded or pass/fail, any necessary prerequisites or sequencing requirements and whether exceptions are made, and whether course is required or elective
- Policies and procedures, if any, for making exceptions to required curriculum
- A typical student program
- Book list, syllabi template and syllabi, if any, and
- Policies, procedures and controls as to all credit given for internships, externships or legal work performed outside the classroom

Suggested: 7-11 pp.; emphasize particularly Guideline 6.9

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

The Current Curriculum, Providing A Detailed Discussion Relating to The Total Units and Required Courses Needed That Qualify as Competency Training; All Elective Classes, And the Law School's Efforts to Expand or Improve the Curriculum Since Its Last Inspection

In compliance with Guidelines for Accredited Law School Rules Guideline 6.9, SFL offers 6 designated Professional Skills courses totaling 9 quarter units of credit (e.g., LAW736 Professional Skills IV – Drafting Motions), and 13 others courses, totaling 40 quarter units that fully or largely concentrate on skills development (e.g., Advanced Legal Writing.) In addition to courses focused on skills, students complete extensive practical training exercises embedded in doctrinal courses (e.g., Planning the voir dire of a police officer based on a police report involving domestic violence, in LAW801 Evidence I.) Units of credit for these embedded skills development exercises are also recorded on student transcripts in accord with the guidelines in Guideline 6.9.

Since 2016, SFL has increased the number of its skills elective course offerings by 100%. At the time of its last inspection in 2016 study, the school reported that 4 such electives had been offered and 3 more were expected in the next several years. Since 2016, in fact, the school has offered 11 skills-related elective courses, some multiple times, and expects to offer 4 more in the next few years.

Since 2016, the school has reviewed and/or revised nearly every one of its skills courses and created 4 new ones (LAW735 Professional Skills III – Drafting Discovery, LAW736 Professional Skills IV – Drafting Motions, LAW739 Professional Skills VI – Legal Negotiation, LAW765 Law Practice Management.)

Each course focuses on developing practical, professional skills through demonstration, practice, critique, simulation, developmental feedback, guided reflection/discussion, exemplars, and skills-teaching other techniques and best practices. In LAW 739 Legal Negotiations, for example, students review short readings and lectures on concepts of negotiation planning and conduct, see demonstrations, complete planning worksheets, view worked exemplars of planning, exchange practice negotiation communications, and conduct four negotiation simulations, in class and via email/phone. The professor conducts in-class critiques, and students give peer feedback on their own and others' performance.

SFL researches and adopt best practice for online legal education to continually improve delivery of learning outcomes through application of research-based best practice to learning design decisions. Among these efforts, the Dean regularly reviews new legal education skills training product offerings with representatives of legal publishers to ascertain what improvements can be made in existing and planned courses. This year, for example, the school adopted *Paul v, Dynamo Sporting Goods, Dillon & Hanson, A Motion Practice Case Study*, from NITA, for simulations in the LAW736 Professional Skills IV – Drafting Motions course. Improvement of courses is a constant, ongoing process across the curriculum.

Evidence:

- Curriculum, SFL General Catalog (page 37 - 43):
<https://stfrancislaw.com/academics/catalog/>

All Policies and Procedures, If Any, For Granting Exceptions to The Required Curriculum, And How Often and Under What Circumstances Exceptions Are Made

The policies and procedures for granting exceptions to required skills curriculum are the same as those described in Section 9 for the curriculum generally. Students may petition for an exception to a curricular requirement, If, upon consideration by the Dean, the exception should be reviewed by the faculty, the dean consults one or members of the faculty with expertise in the subject matter of the exception, or submits the question to the Faculty Academic Committee for review. If, upon recommendation of the faculty or Faculty Academic Committee the exception should be granted, and concurrence by the Dean and alignment with the student's step plan (degree plan) is verified, the exception is granted by the Dean and noted in the students Education Record. This is an exceptionally rare event (on the order of one time in five years.)

Evidence:

- Attachment 9-3 is the SFL Petition Process SOP

Methods Of Instruction Used (E.G., Lecture, Performance, Court Appearance, Appearance At Administrative Hearing, Etc.), Alternative Teaching Platforms Used (E.G., In Class, Distance-Learning), And What Changes, If Any, Are Currently Contemplated To Improve And Expand The Curriculum

SFL uses various methods of instruction in practical skills training, depending on the course and learning outcome. A comprehensive list of all learning activities would require many pages, but one can get a sense of the scope of practical skills training by reviewing the list of learning activities on the Curriculum page of the SFL website and the example, already given, of LAW 739 Legal Negotiation learning design.

Alternatives to Canvas and WebEx teaching platforms are used in Independent Study and Externship courses, where students complete a substantial percentage of their instruction independently or under the supervision of non-faculty in law office or other settings. The range of activities undertaken in Legal Externship includes research and writing, drafting, supporting client meeting and court appearances, preparation for trial, drafting points and authorities memoranda, preparing motion oral arguments, and other activities.

Curricular enhancements principally focus on the development of additional practical skills courses, the review and improvement of existing courses (after one or more experiences delivering them), and the development of supervised clinical experience courses, which is expected to take several years.

Evidence:

- *Curriculum*, SFL General Catalog (page 37 - 43):
<https://stfrancislaw.com/academics/catalog/>

The Policies, Procedures and Controls Used to Grant Credit for Internships, Externships or Other Non-Classroom Activities, And Discuss Their Utility and Effectiveness

All SFL practical skills training is encompassed within law school courses. Credit is controlled through completion of assignments, logging of study hours, and compliant course designs. Students participating in practical skills training as part of a regular doctrinal or skills course have their participation monitored in the ordinary course of the class, by the faculty members conducting it. That is, course design and credit granted conform to SFL credit hour policies, including the allocation of student work via course design and the verification of student work via study hour logs.

SFL does not yet operate its Clinical Experience courses. Before doing so, the school needs to engage a faculty member to lead clinical training at the school and develop clinic procedures, scope, agreements, etc. Students will not be scheduled or permitted to take LAW 881 Clinical Experience I or LAW 882 Clinical Experience II until these systems are further developed. Development is proceeding, but is expected to take several years.

The SFL externship program is set up as a course. Credit is controlled through completion of assignments, logging of study hours, and a reflection on the experience, as well as an evaluation by the supervising attorney. Policies and procedures are set forth in in the Syllabus for the course, including Forms A through E, which are attached as Exhibit 13. To date this option has been utilized by a very limited number of students, but has generally be quite effective as learning. SFL students have worked on research and briefs for a number of important prisoner rights cases, commercial transactions, and general litigation matters.

Evidence:

- Attachment 9-8 include the syllabus for LAW 950 Legal Externship and Forms A through E used in administering the LAW 950 Legal Externship course
- *Basis for Final Grade*, SFL General Catalog (page 17 - 18):
<https://stfrancislaw.com/academics/catalog/>

SECTION 11: RULE 4.160 (G) - SCHOLASTIC STANDARDS. The law school must maintain sound scholastic standards and must as soon as possible identify and disqualify those students who lack the capability to satisfactorily complete the law school's J.D. degree program. (Guidelines 7.1-7.12)

Please describe and explain how the law school maintains sound scholastic standards and meets its obligation to identify and disqualify students who lack necessary capability, by reference to each of the specific provisions of Guidelines 7.1-7.12.

In responding to the Guidelines, discuss in particular the law school's:

- policies, procedures and efforts to: 1) maintain uniform grading standards; 2) identify and curb grade inflation; and 3) ensure that grades accurately reflect students' abilities and their likelihood of passing the California Bar Examination 4) otherwise satisfy the factors addressed in Guideline 7.9
- policies, procedures and efforts to promote identification and disqualification of students who are not academically capable, including those related to decisions on good standing, probation, academic dismissal, course repetition and graduation
- policies and procedures designed to evaluate the quality, accuracy and reliability of grades
- procedures used to develop and evaluate use of grading "curves" if any
- academic support classes and programs, including any current or planned effort to expand and improve such efforts, especially for students on probation
- law school policies and procedures to determine which students are in need of academic support and how such support is offered, and how such efforts have affected the law school's attrition/retention rate over the past five years
- current or planned use of distance-learning technology in its J.D. curriculum, including verifying academic engagement, with an explanation of which methods of those in Guideline 7.11(B) have been, are now, or will be implemented

Required Attachments:

- Requirements for graduation (refer to the catalog where stated, or otherwise provide)
- Academic policies regarding good standing, probation, dismissal and course repetition (refer to the catalog or where otherwise provided to students)
- Analysis of first-year grades and the pass rate for students for the last five years
- Policies and procedures regarding examination formulation, review and grading (refer to the catalog and faculty handbook)
- Policies regarding time allotted to submit grades, provide grading comments, express limits on the use of any grading "curve" (refer to pages in faculty handbook or other publication if included there, or otherwise provide)
- Analysis of grades issued, by groups (*e.g.*, by class year) of students comparing the several instructors teaching the class
- Year-to-year comparisons for each instructor

- Instructor-to-instructor comparisons where multiple instructors teach the same subject matter
- An analysis, if performed, of class enrollment, attrition and retention rates, differentiating between academic exclusion and other withdrawals

Suggested: 7-10 pp.; emphasize particularly Guidelines 7.2-7.4

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

Policies, Procedures And Efforts To: 1) Maintain Uniform Grading Standards; 2) Identify And Curb Grade Inflation; And 3) Ensure That Grades Accurately Reflect Students' Abilities And Their Likelihood Of Passing The California Bar Examination 4) Otherwise Satisfy The Factors Addressed In Guideline 7.9

The Dean periodically surveys grading on individual assignments in currently running courses to evaluate compliance with grading guidelines and standards. The Dean and Registrar confer on final grades in courses at the time final grades are entered into the student information system. The Director of Academic Excellence reviews grades entered in first year courses to ensure proper application of the grading system and correlation between multiple sections of the same course, where applicable. If aberrations are noted, they are either corrected before posting or the professor is counseled regarding adherence to the grading guidelines in the next instance of the course. Adjunct faculty members who consistently fail to adhere to the grading system will not be re-engaged or will be engaged in other courses.

All exams are developed by professors with expertise in the area of law in the course. The Dean and/or the Director of Academic Excellence also reviews exams. Written sample answers are developed for each exam before the examination is administered. Professors teaching the course also review each final exam before it is administered for any issues, including course coverage and emphasis.

All final exams are proctored. The School of Law has proctored exams live via WebEx, with professors watching students take the exam on live video in real time. SFL conducts proctoring via RPNOW. This software authenticates student identity and records all audio, video of the student taking the exam via web camera, and all computer activity, which RPNOW then reviews for any irregularities. Any issues are marked, and the exam and video are then forwarded to SFL for review. These are reviewed and acted upon accordingly. Students are introduced to the proctoring software in the Orientation.

Evidence:

- Attachment 11-5 is SFL Exam and Course Grading Policies
- Attachment 11-6 is SFL Faculty Grading Policies from the Faculty Handbook
- Attachment 11-4 is SFL analysis of first year grades in relation to the FYLSE pass rate for the last 5 years

- Attachment 11-6 is SFL’s analysis of Grades Issued by Groups
- Attachment 11-7 is SFL’s analysis of Year-to-Year Comparisons for Each Instructor
- Attachment 11-8 is SFL’s analysis of Instructor-to-Instructor Comparisons
- *Basis for Final Grade*, SFL General Catalog (page 17 - 18):
<https://stfrancislaw.com/academics/catalog/>

Policies, Procedures and Efforts to Promote Identification and Disqualification of Students Who Are Not Academically Capable, Including Those Related to Decisions on Good Standing, Probation, Academic Dismissal, Course Repetition and Graduation

The Registrar, at the conclusion of each course or term, reviews student grades and GPAs and identifies students on academic probation or at risk of academic probation (at or near the minimum GPA for Good Standing on the step scale). The Registrar notifies students on academic probation promptly after the determination is made. The Registrar also notifies the Director of Academic Excellence, who contacts students on academic probation and establishes an individualized academic support process with each. Students on academic probation are required to participate in academic counseling and other activities.

Decisions on good standing, course repetition, academic dismissal; and graduation are made by the Dean in consultation with the Registrar, in compliance with SFL policies. The Registrar conducts periodic interim audits of each student’s degree plan and progress toward graduation, and in the months before graduation conducts a full degree audit to ensure that students have the correct study schedule and degree plan to ensure all required course are completed and the student has attained enough credits for graduation. The Registrar certifies to the Dean the list of graduates meeting degree program requirements.

Evidence:

- Attachment 11-1 is SFL’s Standard Operating Procedures (SOPs) on Degree Plan Review and Degree Audit
- Attachment 11-2 is SFL Requirements for Graduation
- Attachment 11-3 is SFL Good Standing, Probation, Removal from Probation, GPA and Course Repetition policies
- *Basis for Final Grade*, SFL General Catalog, page 17
- *Academic Standing and GPA*, SFL General Catalog, page 13
- *Retention and Advancement Step Scale*, SFL General Catalog, page 14
- *Academic Probation Policy*, SFL General Catalog, page 14
- *Removal from Academic Probation* SFL General Catalog, page 14
- *Academic Dismissal*, SFL General Catalog, page 14
- <https://stfrancislaw.com/academics/catalog/>

Policies and Procedures Designed to Evaluate the Quality, Accuracy and Reliability of Grades. Procedures Used to Develop and Evaluate Use of Grading "Curves" If Any

SFL does not employ grading “curves”. Course grades are the compilation of grades on individual assessments, including both formative assessments and summative assessments. Professors generally do not assign a final grade in the course except insofar as they grade individual assignments, attendance and participation throughout the course. In this sense, students always know their level of academic achievement in the course, as they strive toward completion of all assignments and earning points toward the total course score/grade.

Assessments are also graded using one of several standard grading rubrics. Students are made aware of the rubric for each assignment before undertaking the assignment.

The Dean surveys, each quarter, grading on individual assignments in select courses to evaluate compliance with grading guidelines and standards.

The Dean and Registrar ensure final grades in courses are entered into the student information system. At this time, the Dean evaluates grading for any anomalies and works with the faculty on them. The Director of Academic Excellence reviews grades entered in first year courses to ensure proper application of the grading system and correlation between multiple sections of the same course, where applicable.

Evidence:

- *Basis for Final Grade*, SFL General Catalog (page 17 - 18):
<https://stfrancislaw.com/academics/catalog/>

Academic Support Classes and Programs, Including Any Current or Planned Effort to Expand and Improve Such Efforts, Especially for Students on Probation

SFL has designated Professor Karen Travis as the Director of Academic Excellence. In this role, she provides academic support to all students, as well as individual counseling, particularly in connection with the FYLSE.

Students placed on academic probation are directed to contact Prof. Travis for academic assistance. Prof. Travis reaches out to them by scheduling phone conferences to discuss weaknesses in the student's performance and remedial suggestions for improved performance.

Other students who are experiencing academic challenges may access the services of Professor Travis. Professors are made aware of the availability of these services through faculty meetings and other efforts, and may refer students to Prof. Travis, in which event, she contacts these students offering academic assistance.

Prof. Travis also conducts voluntary essay writing workshops for students at the II level. These essay writing workshops precede the FYLSE preparation course and cover contracts, torts, and criminal law. These are announced in courses via the learning management system, and scheduled and conducted within the school's live class platform (presently WebEx.)

Prof. Travis also creates and provides classes or short videos on general topics to improve academic performance such as essay writing, the importance of reviewing professor feedback, and success on multiple choice questions.

She also maintains the Academic Resources Program site. This site provides students access to academic support materials, as well as topical course information and other resources for students. The site also includes career information, including career talks given by professors and guests. Prof. Travis, Dean Buckner and several other faculty members have created videos that summarize a variety of bar tested topics. These videos are also housed on the site.

SFL continually evaluates its programming for challenged students and makes adjustments based on identified needs. For example, in 2019, Professor Travis conducted several multiple-choice skills workshops for first year students, targeted to particular subjects (e.g., Contracts) to support student development and performance in those courses. The need for these workshops was determined by reviewing student performance on early multiple-choice assessments in some courses.

Evidence:

- *Academic Support*, SFL General Catalog (page 16):
<https://stfrancislaw.com/academics/catalog/>

Law School Policies and Procedures to Determine Which Students Need Academic Support and How Such Support Is Offered, And How Such Efforts Have Affected the Law School's Attrition/Retention Rate Over the Past Five Years

Students on academic probation or at risk of academic probation (at or near the minimum GPA for Good Standing on the step scale) are identified for academic support. The Registrar and the Director of Academic Excellence confer at the conclusion of each course or term respecting student grade and GPA to make this determination and referral.

Students thus identified are contacted by the Director of Academic Excellence, who typically counsels them individually on a weekly basis. Students on academic probation are required to participate in counseling and other activities. Students identified as at risk are permitted and encouraged to participate, and most do.

Due to the high degree of variability in student participation in academic support activities, analyzing data with appropriate levels of validity and reliability is a challenge. Anecdotal evidence indicates some students achieve marked improvement in their academic

performance after participating in academic support activities. The School reviews FYLSE and CBX pass rates as a metric for all academic efforts. It can, however, be said with confidence, from anecdotal and survey evidence, that most students express a high degree of satisfaction with their law school experience including academic support programming.

Evidence:

- SFL FYLSE and General Bar Exam Pass Rates, *Pass Rates*, <https://stfrancislaw.com/academics/papss rates/>
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- *Basis for Final Grade*, SFL General Catalog, page 17.
- *Academic Standing and GPA*, SFL General Catalog, page 13.
- *Retention and Advancement Step Scale*, SFL General Catalog, page 14.
- *Academic Probation Policy*, SFL General Catalog, page 14,
- *Removal from Academic Probation* SFL General Catalog, page 14,
- *Academic Dismissal*, SFL General Catalog, page 14.
- <https://stfrancislaw.com/academics/catalog/>

Current or Planned Use of Distance-Learning Technology in Its J.D. Curriculum, Including Verifying Academic Engagement, With an Explanation of Which Methods of Those in Guideline 7.11(B) Have Been, Are Now, Or Will Be Implemented

SFL has implemented most of the distance learning methods described in Guideline 7.11. Please see Section 9 and 10 for a description of the sound program of legal education offered by SFL via various distance learning methodologies.

SFL verifies academic engagement in the ways permitted by Guideline 7.11(C). First, all SFL courses are designed using distance learning best practices for the designation of learning activities to support learning outcomes, and their measurement for student clock hour and credit hours purposes. SFL has a curriculum requiring more than 1,200 hours of verified academic engagement with the faculty and curriculum. Academic engagement data on individual students is also collected through 1) live class attendance; 2) LMS usage statistics; and 3) study logs. SFL has not attempted verification of actual individual student engagement under Guideline 7.11(C)(2), but collects data that assures it that students are engaged in the curriculum generally as it was designed.

Each student is responsible for ensuring that the learning management system reflects the student's attendance, participation, assignment submissions, credits, courses, and grades. Student are counseled that any errors should be reported immediately to the professor for the course or the administration.

Students are required to certify that they have spent the requisite number of preparation and study hours for each course and term they are enrolled. Students who do not submit the

required study logs for their previous course will lose access to their current course and will be blocked from future registration.

Evidence:

- *Preparation and Study Hours*, SFL General Catalog, page 13.
<https://stfrancislaw.com/academics/catalog/>

SECTION 12: RULE 4.160 (H) - ADMISSIONS. The law school must maintain a sound admissions policy. The law school must not admit any student who is obviously unqualified or who does not appear to have a reasonable prospect of completing the degree program. (Guidelines 5.1-5.9)

Please describe and explain how the law school maintains a compliant admissions policy with specific reference to each of the specific requirement of Guidelines 5.1-5.9.

In responding to the Guideline provisions, describe the law school's:

- process used to confirm an applicant's complaint pre-legal education
- procedures used to monitor student files to confirm each contains all required information and transcripts within 45 days after they start attending classes
- the identity of all persons responsible for preliminary and final admissions decisions
- the use of scores on the Law School Admissions Test (LSAT), the minimum acceptable LSAT score, if any, and a description of all other factors or information used in the decision to admit or deny an applicant
- policies and procedures used in the admission of special students, as defined in Guideline 5.5, whether their admission is limited, and the monitoring of the academic standing of those admitted
- policies and procedures for deciding on admission of previously disqualified students, including the basis and number of those disqualified by law school and readmitted and those admitted from other law schools under the State Bar's "start-over" policy. Please discuss the number of such students admitted over the last five years, their academic progress and, as applicable, results on the FYLSX and CBX
- policies on granting credit for any prior law study and in the event an admitted student passes the FYLSX
- efforts to analyze the correlation between bases for students' admission and success in passing the CBX and conclusions drawn from such analysis

Required Attachments:

- Admission criteria (refer to pages in catalog or student handbook)
- Policies and procedures as to incomplete student files
- Policies as to the use of the LSAT
- Policies and procedures related to special students, including admission
- Policies and procedures related to admission of previously disqualified students
- Policies on granting credit for prior law study
- Student admissions data, for each of the last five years, showing the number of students admitted as:
 - Regular students, with a degree
 - Regular students, without a degree
 - Special students admitted

- And, if conducted, o Students with prior law school admitted and academically dismissed
- Students with Prior law school admitted and not academically dismissed

Suggested: 5-8 pp., emphasize Guideline 5.6.

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

Process Used to Confirm an Applicant's Complaint Pre-Legal Education

The SFL policy on pre-legal education requires the applicant to establish, via official transcripts, the attainment of a bachelor's degree, from an approved school, with a cumulative GPA of not less than 2.5:

An applicant is eligible for admission if such applicant has a bachelor's degree or a master's or doctorate degree earned from an accredited institution approved by an accreditor recognized by the Council for Higher Education Accreditation or the United States Department of Education, or the equivalent, meets or exceeds the pre-legal education requirements of the California State Bar, and attained an overall average GPA of 2.5 or higher on a 4.0 scale, or its equivalent, in all prior post-secondary education.

See: *Minimum Admission Criteria*, SFL General Catalog, pages 7 – 8.

In some cases, admission may be conditioned upon receipt, by St. Francis, of an acceptable Evaluation of Pre-Legal Education prepared by the California State Bar, or a plan of study approved by the California State Bar under the its Starting First-Year Law Studies Over Certification process. If satisfactory completion of the pre-legal education requirements of the California State Bar is in question, the applicant is referred to the State Bar to may submit an Application for Evaluation of Pre-Legal Education to the California State Bar at:

<http://www.calbar.ca.gov/Portals/0/documents/forms/admissions/Pre-LegalEducationApp.0616 R.pdf>

Applicants educated outside the U.S. and applicants who have completed any post-secondary education outside of the United State provide St. Francis with a course-by-course evaluation of their prior studies conducted by a Credential Evaluation Service approved by the Committee of Bar Examiners. Applicants are provided the State Bar list to assist them in selecting a service provider. [Review a list of approved Credential Evaluation Services.](#)

Evidence:

- Attachment 12-1 contains SFL Admission Criteria from *Minimum Admission Criteria*, SFL General Catalog (pages 7 – 8): <https://stfrancislaw.com/academics/catalog/>
- *Applicants Educated Outside the U.S.*, SFL General Catalog (page 8): <https://stfrancislaw.com/academics/catalog/>

Procedures Used to Monitor Student Files to Confirm Each Contains All Required Information and Transcripts Within 45 Days After They Start Attending Classes

The Academic Acceptance Committee (AAC) will not review incomplete applications for admission. If, at the time a file is submitted to the AAC for review any required document is not included, the files st returned to the file completion process for additional work.

The SFL Registrar is responsible for determining the completeness of student files for admitted students. Upon admission, the Registrar and Student Services Coordinator review both the secure, online Google Drive folder established for each student and the duplicate paper file, against a file checklist. If any item is found to be missing – a rare event – the Registrar is responsible for obtaining the missing item(s) before the student starts, or within forty-five (45) thereafter. The Registrar will not certify admission of a student to the State Bar i essential documents are missing from the student’s file.

Evidence:

- Attachment 12-2 contains SFL SOP regarding File Completion Verification
Attachment 12-4 contains SFL SOPs regarding Admissions, Admissions Certification, File Complete Verification

The Identity of All Persons Responsible for Preliminary and Final Admissions Decisions

The Academic Acceptance Committee (AAC), charged with reviewing applications for admission, is presently comprised of the Dean (Gregory J. Brandes) and the Director of Academic Excellence (Karen Travis). It may include additional faculty members but at present it does not.

The Use of Scores on The Law School Admissions Test (LSAT), The Minimum Acceptable LSAT Score, If Any, And A Description of All Other Factors or Information Used in The Decision to Admit or Deny an Applicant

SFL considers LSAT scores an important part of any applicant’s admission records, if provided. SFL also considers GRE and GMAT scores, when provided, as important indicators of law school preparation. SFL does not require every applicant to provide an LSAT, GRE, or GMAT score, or require a minimum score. LSAT scores, when received, are considered a valuable indicator of academic potential.

Additional factors given importance in the admission decision include undergraduate GPA, undergraduate institutions attended, undergraduate grades in individual courses, undergraduate degrees attempted, undergraduate degrees awarded, letters of recommendation, personal statements, interviews, student explanations, statements regarding academic discipline or criminal convictions, and other facts.

Evidence:

- Attachment 12-3 contains SFL Admission Policy respecting use of the LSAT from *Admissions*, SFL General Catalog (pages 7 – 9): <https://stfrancislaw.com/academics/catalog/>

Policies and Procedures Used in The Admission of Special Students, As Defined in Guideline 5.5, Whether Their Admission Is Limited, And the Monitoring of The Academic Standing of Those Admitted

SFL does not admit special students. All applicants are required to demonstrate, via official transcripts, the attainment of a bachelor's degree, from an approved school, with a cumulative GPA of not less than 2.5.

On occasion, applicants will establish, via official transcripts, completion of an advanced degree (e.g., Medical Doctor, or Doctor of Dental Surgery) in a degree program which does not grant a bachelor's or master's degree, with sufficient units to include a bachelor's degree. These students are classified, per instructions, from the State Bar Office of Admissions Eligibility Section, as Regular Students without a bachelor's Degree.

Evidence:

- Attachment 12-8 contains SFL Admission Data for the last 5 years, by type of student, showing some students admitted with advanced degrees (e.g., D.D.S.) from programs that did not award a bachelor's degree
- *Minimum Admission Criteria*, SFL General Catalog (pages 7 – 8): <https://stfrancislaw.com/academics/catalog/>

Policies and Procedures for Deciding on Admission of Previously Disqualified Students, Including the Basis and Number of Those Disqualified by Law School and Readmitted and Those Admitted from Other Law Schools Under the State Bar's "Start-Over" Policy. Please Discuss the Number of Such Students Admitted Over the Last Five Years, Their Academic Progress And, As Applicable, Results on The FYLSX and CBX

SFL has, in the last five (5) years, admitted and enrolled two (2) students previously academically disqualified from another law school. SFL has not, in the last five (5) years, admitted and enrolled any students previously academically disqualified from this law school. Several students not academically disqualified but with prior law studies were admitted each year, either as transfer students or under the State Bar's "Start Over" policy.

Evidence:

- Attachment 12-6 contains SFL Admission Policy respecting Previously Disqualified Students
- Attachment 12-8 contains SFL Admission Data for the last 5 years, by type of student, showing some students admitted with advanced degrees (e.g., D.D.S.) from programs that did not aware a bachelor's degree
- SFL Annual Reports filed with the State Bar, for 2015, 2016, 2017, 2018, and 2019.

Policies on Granting Credit for Any Prior Law Study and In the Event an Admitted Student Passes The FYLSX

Recognition of transfer credit will be subject to the completion of an Evaluation of Law Study Completed and Contemplated by the California State Bar Committee of Bar Examiners, Office of Admissions.

Assuming a consistent evaluation, SFL will accept transfers students with prior law studies who have passed the FYLSE with full credit for up to two years of law studies, or as specified by the State Bar in the Evaluation of Law Study Completed and Contemplated. Students enrolled in the J.D. program must complete at least one-half of the program requirements at St. Francis to qualify for the J.D. (i.e., 65 units and 2 years of study). Coursework may be transferred only if completed within the 27 months prior to a student's enrollment. Only courses with a B (3.0) or higher will be eligible for transfer credit consideration. In addition, transfer credit will only be considered for courses taken in a J.D. program at a law school that is:

1. ABA approved, or
2. Registered with the State Bar of California, or
3. Accredited by the State Bar of California.

Evidence:

- Attachment 12-7 contains SFL Admission policies regarding Credit for Prior Law Studies
- *Transfer Credit for Prior Law Studies*, SFL General Catalog (pages 8 - 9):
<https://stfrancislaw.com/academics/catalog/>

Efforts to Analyze the Correlation Between Bases for Students' Admission and Success in Passing the CBX And Conclusions Drawn from Such Analysis

Due to the relatively small sample size (number of graduates and number of graduates who have sat for the CBX) SFL has not, as yet, undertaken analyses of correlations between various individual admissions factors and pass rates on the CBX.

SECTION 13: RULE 4.160 (I) - MULTIPLE LOCATIONS. Accreditation is granted to a law school as an institution. If a law school receives approval to open a branch campus or a satellite campus, the branch or satellite campus must be operated in compliance with the Rules and Guidelines for Accredited Law Schools, subject to all site-specific operational requirements and any waivers approved by the Committee. (Guidelines 15.1-15.4)

For each branch or satellite campus the law school operates, confirm and explain how each operates compliantly as to each of the following Guidelines:

- Guideline 1.7
- Guideline 2.10
- Guideline 4.1
- Guideline 4.3
- Guideline 6.2(J)
- Guideline 15.4

Discuss all operational and administrative policies used to ensure each campus operates in parity with all other campuses (i.e., as to grading standards, course offerings, and extracurricular opportunities.) Emphasize any differences between the campuses. Discuss any anticipated changes or improvements to each campus to enhance compliance.

Suggested: 1-3 pages

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

St. Francis School of Law operates a 100% online J.D. program and has not sought or received approval to open a physical branch campus or a satellite campus.

SECTION 14: RULE 4.160 (J) - LIBRARY. The law school must maintain a library consistent with the minimum requirements set by the Committee. (Guidelines 8.1-8.6)

Demonstrate that the law school's library serves "the teaching, research, and other educational objectives of the law school," allowing students the "ability to perform legal research competently using both hard copy and electronic research resources," and faculty the ability to access "adequate legal research resources to supplement their preparation and research."

In responding to these Guideline provisions be sure to include explanations of how:

- all mandatory authorities are updated and compliant and available to both students and faculty
- students learn to use hard copy and electronic-based legal research
- students and faculty can access library resources, and any technical support if available

Required Attachments:

- List of items in the library collection, and the format in which the item is maintained, or provide the list from the last Annual Report with updates, if any
- Resumes and brief job descriptions of librarian or other library staff members, if any, to the extent they were not included as part of the organization chart submitted for Section 7-- Governance above
- Plan for development of the library resources, if available
- Syllabi for legal research courses
- If the law school relies on an external library, information or documentation concerning students' rights to use the facility
- Record of expenditures for hard copy and electronic library and research materials and other legal research resources for the last five years

Suggested: 2-3 pages

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

All Mandatory Authorities Are Updated and Compliant and Available to Both Students and Faculty

SFL maintains student and faculty subscriptions to LexisNexis, specifically the Lexis Advance service, Lexis' newest and most powerful legal research tool. It contains leading-edge features such as mind mapping tool Ravel View, and AI-based tools like reasoning-search tool Lex Machina and precedent tool Legal Issue Trail, as well important, traditional tools like Shepard's.

Lexis Advance allows student to access more than 60,000 sources of legal information including all mandatory authorities, including all state and federal case and code databases, practice guides, law reviews and journals, and administrative materials. Lexis provides automatic, immediate update of all materials.

See: <https://advance.lexis.com/firsttime?crd=18873582-a42f-4f67-9f36-a6a3a61416c8>

Lexis Advance also provides rich California-specific content, including several services that do not appear on Westlaw. According to Lexis:

Turn to LexisNexis for relevant federal and state case law, plus Deering's California Codes Annotated, California constitution, Advance Legislative Service and California court rules, as well as Barclays Official California Code of Regulations, California attorney general opinions, coverage of California Franchise Tax Board and Board of Equalization, pending California legislation and full-text bills. Secondary sources include California Forms of Pleading & Practice, Matthew Bender® practice guides and treatises, journals, docket records and Judicial Council of California Criminal Jury Instructions (CALCRIM). California Forms of Jury Instruction is available only on the LexisNexis® services. You can also access California public records and news and business sources.

See: <https://www.lexisnexis.com/en-us/products/lexis-advance/feature-premium-content.page>

Evidence:

- Attachment 14-1 shows the List of Required Library Titles indicating the format in which they are provided at SFL
- Attachment 14-2 is the resume of the SFL Librarian Patrick Mullane
- Attachment 14-4 contains the syllabi for SFL's two required legal research and writing courses
- Attachment 14-6 is a Record of Expenditures for Hard Copy and Electronic Library and Research Materials

Students Learn to Use Hard Copy and Electronic-Based Legal Research

SFL provides the following relevant learning outcomes in its two required legal research and writing skills courses (LAW741 Introduction to Legal Research and Writing and LAW 871 Advances Legal Writing):

LAW741:

1. LO1: Understand and apply proper methods for citation of legal authority.
2. LO2: Understand how to, and create a legal memorandum, including drafting the statement of facts, issue statement, brief answer, discussion, and conclusion.
3. LO3: Understand and apply the fundamentals of legal research, including researching case law, statutes, secondary legal sources, legislative history, and non-legal sources.
4. LO4: Learn how to efficiently and cost-effectively perform electronic legal research to evaluate legal issues.

5. LO5: Use legal research skills to evaluate and analyze hypothetical legal problems.
6. LO6: Conduct legal analysis to evaluate a hypothetical client scenario and incorporate legal analysis into a legal memorandum.
7. LO7: Understand the fundamentals regarding how to draft an opinion letter as compared with drafting a legal memorandum.
8. LO8: Understand the fundamentals regarding how to draft communications to the client.
9. LO9: Understand and apply key principles of legal ethics in the context of legal research and writing.
10. LO10: Understand and apply principles of professionalism in the context of legal communication.

LAW 871

1. LO1: Understand how to write a trial level motion, including the statement of facts and argument.
2. LO2: Prepare for and conduct an oral argument on a motion at the trial court level.
3. LO3: Understand and apply appellate standards of review.
4. LO4: Understand how to develop an appropriate and effective “theory of the case.”
5. LO5: Understand how to construct effective oral arguments at the trial and appellate levels.
6. LO6: Understand how to write an appellate brief.
7. LO7: Understand how to find and observe specific rules for the jurisdiction/court.
8. LO8: Continue development of legal research skills in the context of a trial level motion and an appellate brief.
9. LO9: Prepare for and conduct an oral argument at the appellate level.
10. LO10: Understand and apply professional ethical considerations related to legal advocacy.

Training in conducting electronic legal research is conducted principally through the completion of Lexis Learn course modules tailored for the learning outcomes and practice activities designed into these two courses. Lexis Learn provides an orientation to the process of legal research, the nature of legal materials of various kinds, the use of citations, and other fundamental legal research skills that are also applicable to research conducted in hard copy.

When delivering hard copy research skills, SFL strives to provide a training experience and content comparable to that of a modern, fixed-facility law school legal research training program. Legal research process, precedential and analytical thinking, research planning, conceptual skills transferable to either medium of research, and research sources (e.g., case reporters, codes, practice guides, etc.) represent the majority of the training provided in legal research courses in fixed-facility law schools. Law schools do not, any longer, teach Sherardizing in books, the uses of the West Keynote System (except online), and other legacy search tools, and the importance of digests, code numbering schemes, and other forms of summarizing and indexing has greatly declined in the era of smart, full text search and artificial intelligence available from anywhere 24 hours a day, every day. Even some legal publishers who provide these legacy tools do not provide training in their uses in a hard copy setting. (See, for example, Thomson Reuters “Using the West Key Number System” at: <https://legal.thomsonreuters.com/en/insights/articles/using-the-west-key-numbers-system>.)

Law librarians tell us that legal research students rarely conduct core hard copy research anymore, even for classroom exercises. SFL conforms to these norms in its training on research skills, providing introduction to legacy sources and methods, with information about their purposes and uses, with some examples, but not extensive training in using tools and methods no longer considered best practices by legal education or the profession. (For example, many partners would consider it incompetence in practice not to conduct case precedence research using an online tool such as Shepard's online from Lexis.) Students are, however, introduced to "Lib Guides" which are online tools provided by many libraries to orient students in the use of legal research sources, including some legacy tools, in case they find themselves using hard copy resources for a particular purpose.

Also comparable to a fixed facility setting, students receive orientation in physical law libraries. In a fixed facility setting students get a tour of their local physical law library, typically by a research librarian focused on helping students locate the books within the library's physical plant. Since students will use a variety of physical law libraries located near them – if they ever use a physical library in their modern legal careers – SFL focuses on showing students several different examples of physical libraries, and physical library resources, through online virtual tours. Student have visited, virtually, the law libraries of LA County, UCLA Law School, USC Law School, and others. Student are also encouraged to find and visit a law library located near them, and report their experience to the class and/or professor as part of the course.

Evidence:

- UCLA Law School Library Virtual Tour: <https://law.ucla.edu/library/online-library-tour/>
- USC Gould School of Law Library Research Guides: <http://lawlibguides.usc.edu/?b=s>

Students and Faculty Can Access Library Resources, And Any Technical Support If Available

Lexis Advance is available online from any computer and internet connection; it requires no special hardware or local network. Students access the library from home at any time of day or night, including access to Lexis research attorneys via web and toll-free phone lines. Lexis provides extensive training and use guides, and a Knowledge Base of community-generated user questions and answers, to assist students with research queries. Lexis/Nexis also handles most technical support, apart from user access, which is handled by the SFL Librarian. In addition, students can contact the SFL library for additional resources and the SFL Librarian for additional support and research assistance not provided by Lexis. Again, this assistance is available at any time, via email to the SFL Librarian.

Evidence:

- Lexis Advance: <https://www.lexisnexis.com/en-us/products/lexis-advance.page>
- Lexis Advance Support and Training: 800-543-6862 or <https://www.lexisnexis.com/en-us/support/lexis-advance/default.page>
- Lexis Advance Shepard's Citation Service: <https://www.lexisnexis.com/en-us/support/lexis-advance/shepards.page>

SECTION 15: RULE 4.160 (K) - PHYSICAL RESOURCES. The law school must have physical and technological resources and an infrastructure adequate for its programs and operations. (Guidelines 9.1-9.3)

Describe the adequacy of the physical resources and infrastructure provided by the law school and each campus it operates in reference to the requirements of Guidelines 9.1-9.3.

In responding to Guideline provisions, describe for each location:

- facilities and instructional equipment, including any available audio/visual or computer-based resources, computer labs and access to those labs
- lease terms, if any of the facilities are leased
- provisions made for security, including applicable policies and procedures
- accessibility for those with physical disabilities
- programs, services and technology used to provide distance learning

A law school offering its curriculum by means of distance learning technology must maintain its administrative office and administer its technology platform in California. If the school offers its curriculum through distance learning technology:

- provide information about the location and facilities of its administrative office and whether students can visit that location for service
- explain how the school will maintain and provide access to all required records, files and materials in the administrative office

Required Attachments:

- Diagram or floor plan of the physical facilities of each fixed facility law school location
- Copy of any lease agreement for law school facilities (redactions concerning identifiable persons and economic terms are permitted, if explained to the satisfaction of the Committee.)

Suggested: 1-2 pages

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

Facilities and Instructional Equipment, Including Any Available Audio/Visual or Computer- Based Resources, Computer Labs and Access to Those Labs

SFL maintains physical facilities for its administrative office and to administer its technology platform in secure, class A office space in Newport Beach, California. SFL does not use or maintain physical locations, computer labs, or other equipment, for instructional purposes.

Lease Terms, If Any of The Facilities Are Leased

SFL occupies offices within a Regus office suite complex on the third floor of the building at 895 Dove Street, Newport Beach, CA. The location provides flexible leasing arrangements to permit the school to expand without greatly increasing its expenses. The initial lease term was for three years and was renewed in 2019. Lease terms represent standard office suite leasing arrangements, with many inclusions and extra services available for a fee.

Evidence:

- Attachment 15-1 is the floorplan of the school's physical space at 895 Dove Street, Third Floor, Newport Beach, CA.
- Attachment 15-2 is the lease for the school's physical space at 895 Dove Street, Third Floor, Newport Beach, CA.

Provisions Made for Security, Including Applicable Policies and Procedures

Access to the principal academic and administrative office of SFL at 895 Dove Street, Third Floor is available to the public during business hours (8 AM to 5 PM Monday through Friday, Pacific Time.) Visitors during these hours should proceed to the third floor, where they will be greeted by the receptionist. During other hours, access to the building and the third floor is restricted to those with key cards coded to allow them access. Only the Dean, the Director of Academic Excellence, and the President have key cards coded to allow after-hours access. Parking is publicly accessible for a fee or with key cards coded to allow it.

Evidence:

- Attachment 15-3 contains SFL SOPs regarding Data Access and Security, Backup and Retrieval, and Security Access

Accessibility for Those with Physical Disabilities

The principal academic and administrative office of SFL at 895 Dove Street, Third Floor, is in a modern, accessible building, with elevator service, ADA-compliant accessible parking for people with disabilities, wheelchair ramps, wheelchair-appropriate doors, etc. Persons with disabilities visiting the main administrative office may arrange for additional assistance by calling 949-955-4952 in advance of their visit. Accessibility to online systems with those with physical disability is available through modern platforms and is arranged by Disability Services. Examples of accommodations which can be provided includes, but is not limited to, additional time, screen readers, dictation software, large print books, and closed captioning.

Programs, Services and Technology Used to Provide Distance Learning

SFL uses two main student-facing systems to provide its distance learning curriculum, all industry standard, secure, online platforms hosted and supported by large and respected firms.

Canvas, from Instructure, Inc., is the most widely respected learning management system (LMS) among prominent online schools and programs. SFL has its own “instance” of Canvas, meaning that the learning environment can be fully customized for law school uses. Canvas is a modern, cloud-based teaching and learning tool that provided a number of new features that enhanced SFL’s student (and teacher) experience, including:

Accessible from multiple devices, including smartphones

- A fully supported cloud-based application with a single version and rolling updates
- Efficient grading tools
- Paths for integration with other products, including more effortless integration with RPNow proctoring, audio and video systems, and online classroom tools
- 24x7 support with LMS experts and a robust community of resources

Canvas is maintained and supported easily, with excellent, responsive, 24/7 support for faculty and administrators direct from the vendor.

The Canvas Dashboard gives students and faculty instant access to their courses and a run-down of upcoming tasks, activities, classes, and assignments. (See the screenshot sample below.) Various other screens provide profile and customization, calendar, communication, and help options. While a comprehensive briefing on Canvas is beyond the scope of this study, an orientation can be found by briefly reviewing the following Figures or access Canvas directly at: <https://www.instructure.com/canvas/higher-education/research-and-customer-stories/research>

or

<https://www.instructure.com/canvas/higher-education>

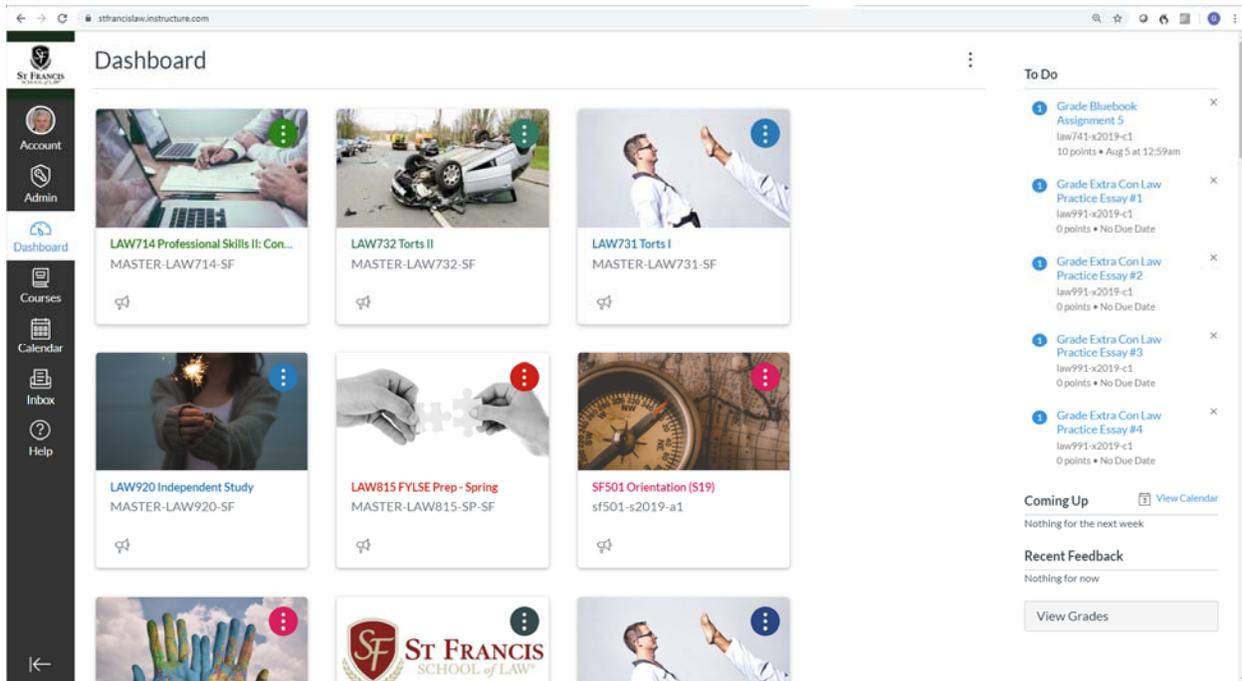


Figure 1, the Canvas Dashboard. Each “tile” represents a course the student is enrolled in or the faculty member is teaching, and the student or faculty member can access the course simply by clicking on the tile.

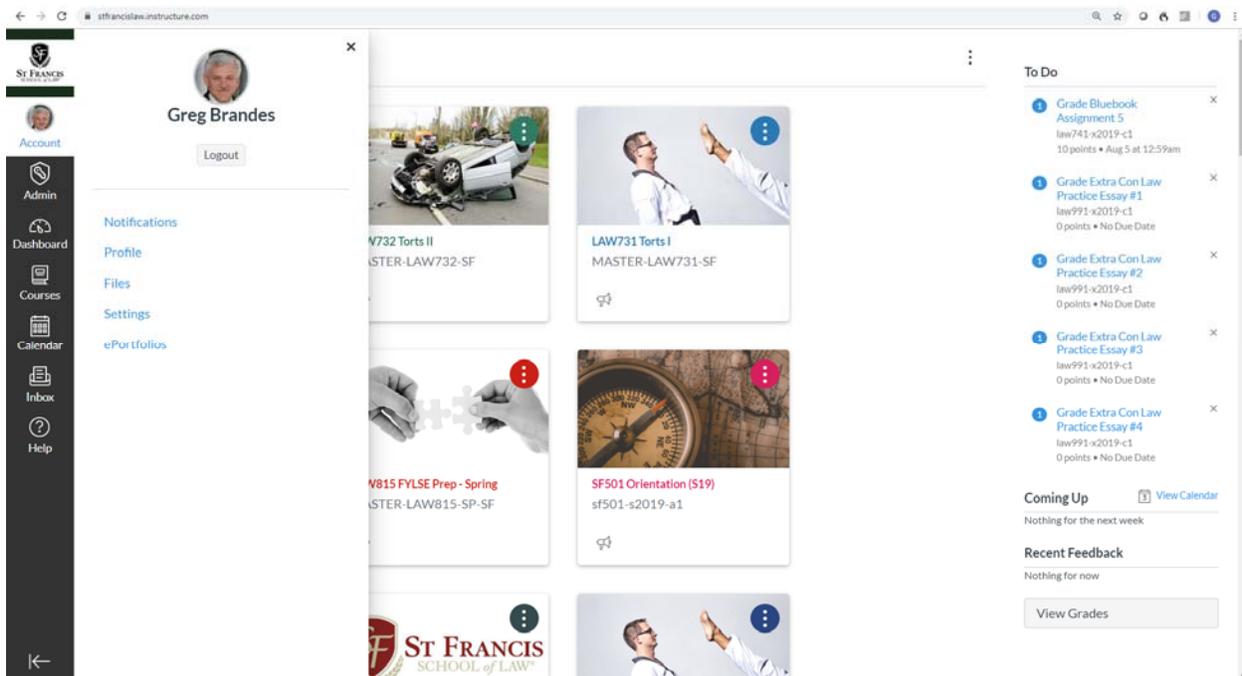


Figure 2, Account Options. Students and faculty can easily set preferences for Notifications, add a profile picture, connect to Google Drive and other applications and services, customize how their screen looks, and change other settings from the Account option.

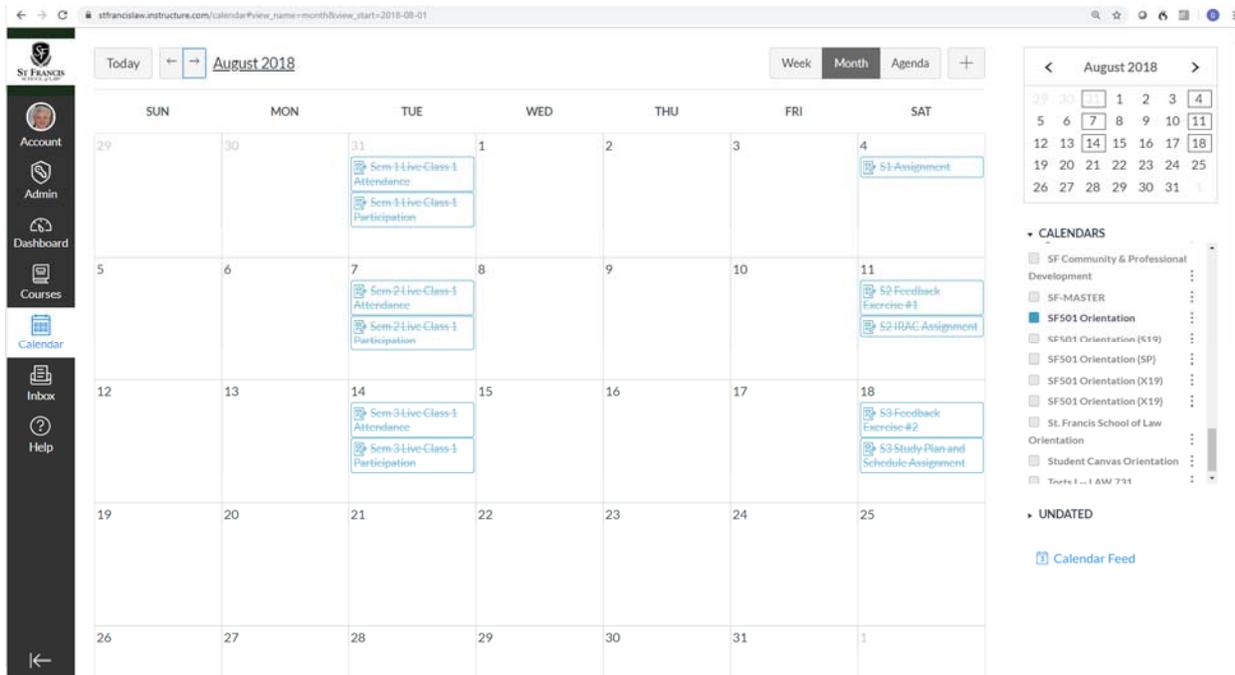


Figure 3, Canvas Calendar. Students and faculty can easily see upcoming (or past, as here) classes and assignments using daily, weekly, or monthly calendar views.

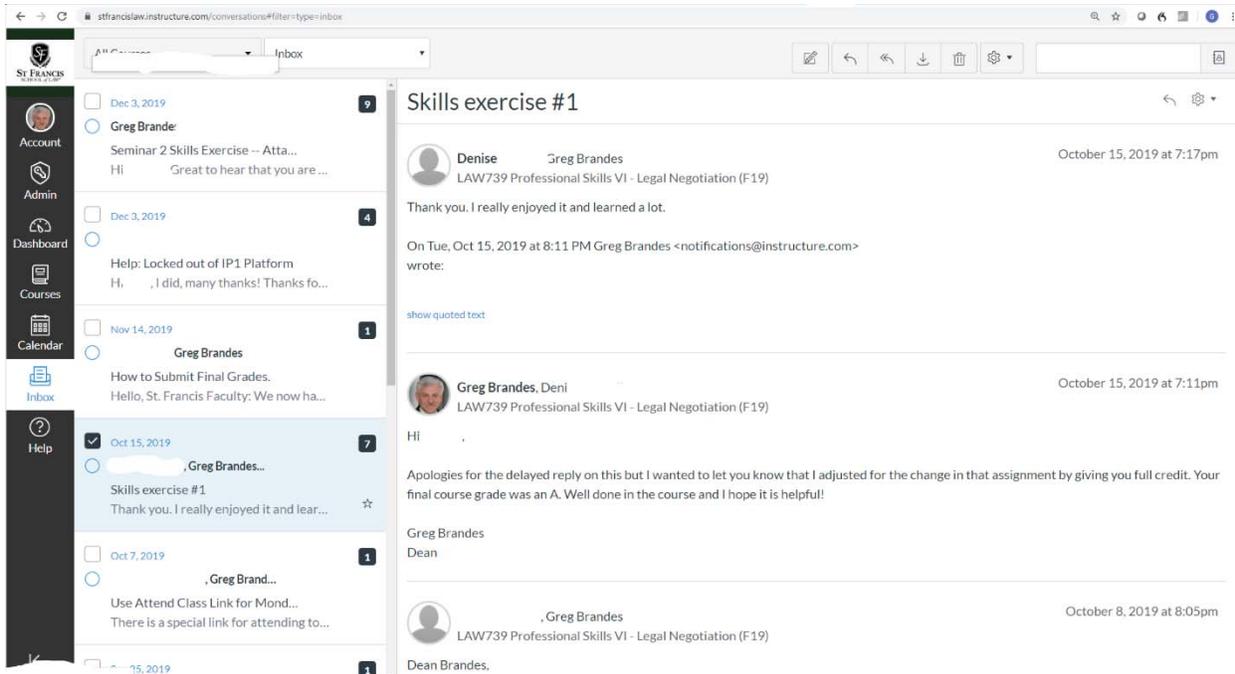


Figure 4, Canvas Email. Students and faculty use Canvas built-in email functionality to communicate about all matters, from substantive questions to scheduling.

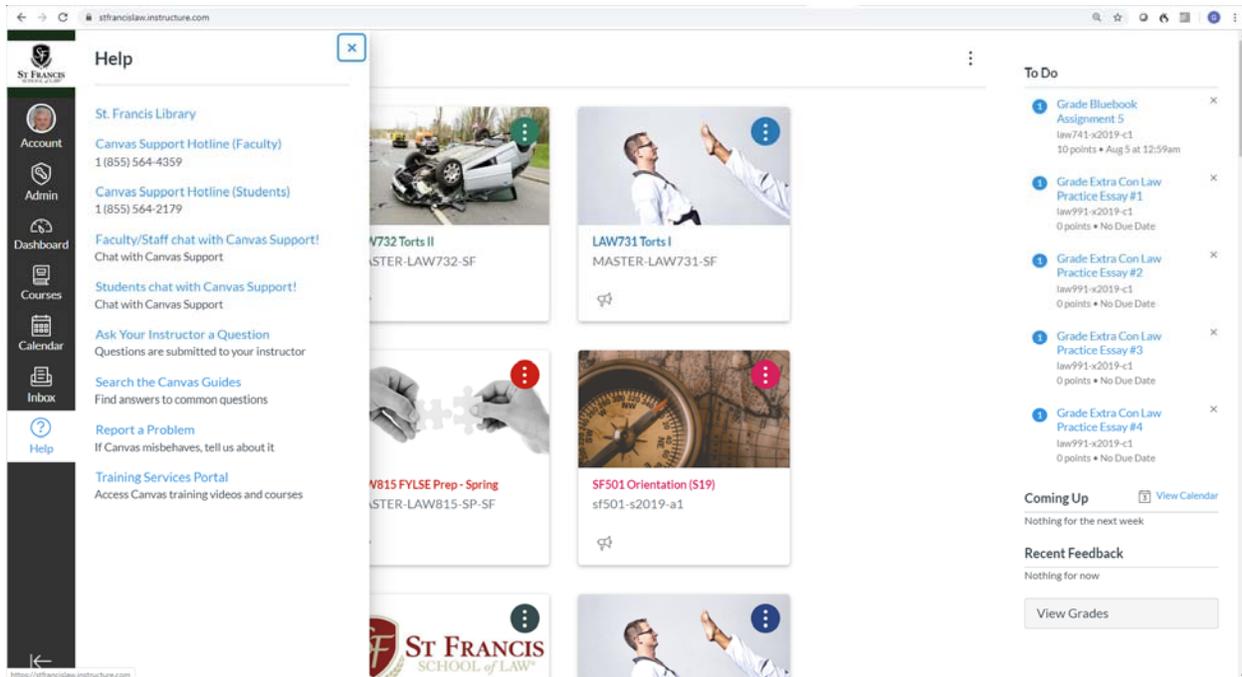


Figure 5, Canvas Help. 24/7 phone, email, and chat support is provided to students and faculty. Canvas support is responsive, expert, and highly customer service oriented.

WebEx, from Cisco Systems, Inc., is used for live classes in the SFL curriculum. Students meet with faculty and other students in live, synchronous classes at least two times per week using the WebEx platform. WebEx provides two-way video and audio, chat, live presentations (e.g., PowerPoint), application sharing (e.g., browsers), whiteboards, class recording to the cloud, and other features.

Live classes are archived for review anytime by students (and the Faculty Developer and Professor for development purposes.) While a comprehensive briefing on WebEx is beyond the scope of this study, an orientation can be found by briefly reviewing the previous Figures or accessing WebEx directly at: <https://www.webex.com/>.

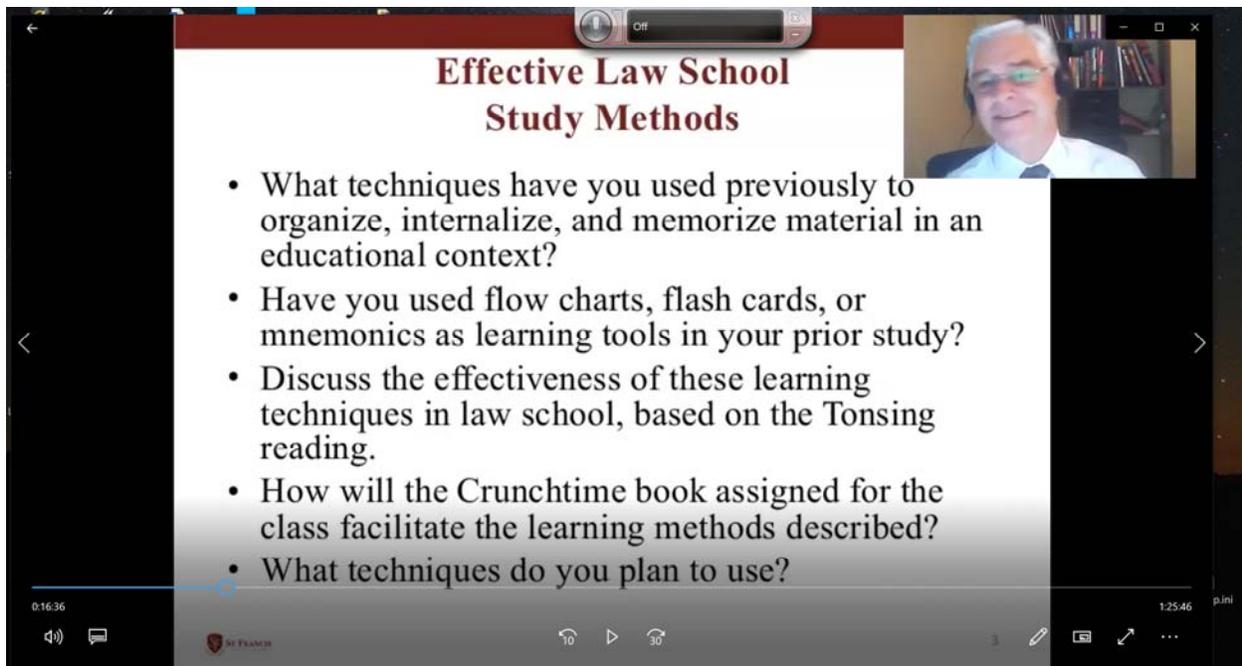


Figure 6, WebEx Classroom with PowerPoint. The Professor can share a presentation with the class while still being seen and heard by all students.

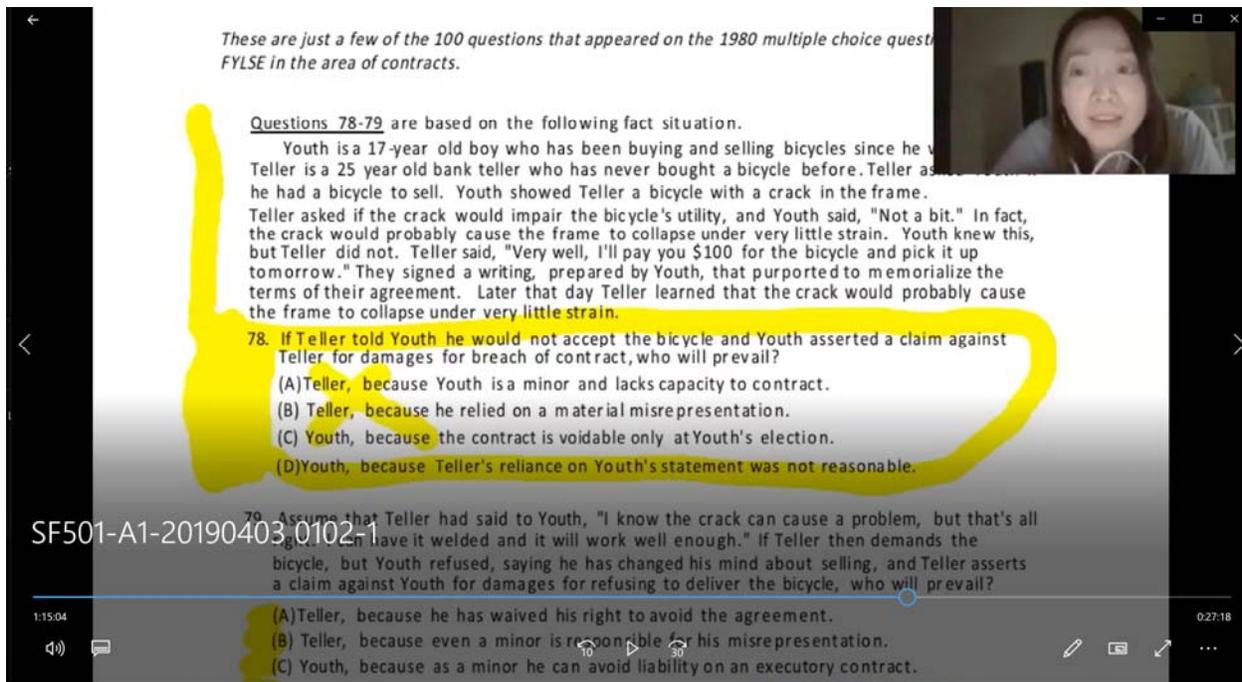


Figure 7, WebEx Classroom Student Participation. The classroom automatically selects the video and audio of the person speaking, to give each class participant a clear view of fellow students on their contributions to the class.

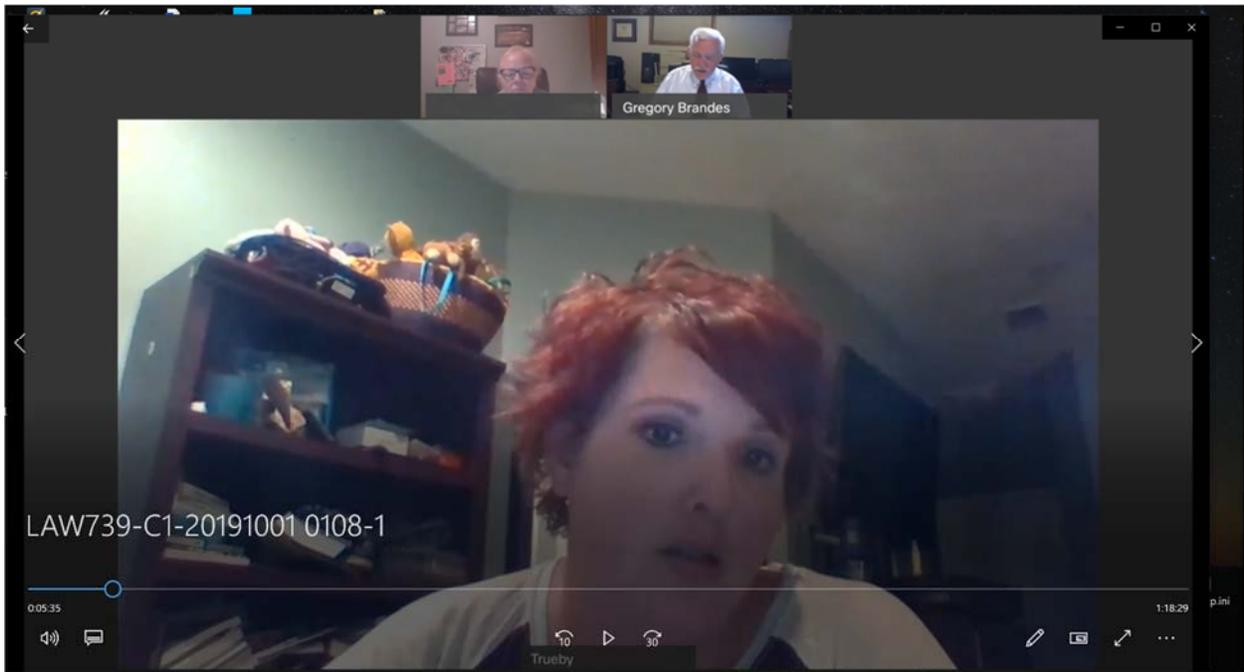


Figure 8, WebEx Classroom. Student can also take control and be the main presenter when called upon to present.



Figure 9, WebEx Class with Video Thumbnails. The user can configure the screen to show thumbnails views of all participants in the class, while still retaining the application being shared by the professor.

Provide Information About the Location and Facilities of Its Administrative Office and Whether Students Can Visit That Location for Service

The principal academic and administrative office of SFL is at 895 Dove Street, Third Floor, in Newport Beach, California. The location provides secure office space, conference rooms, office services on demand, telephone and high-speed internet access, mail and package services, parking, storage, and pass card security. It is home to many lawyers, as the building is owned by Newmeyer Dillon, one of Orange County's oldest and largest law firms.



Figure 10; The Dean's Office. Casual photo of the Dean's Office on a busy workday.

Students may visit the administrative offices, and have. Access is generally by appointment only, as security requirements must be satisfied. Students are advised of the location of the academic and administrative office via the website, catalog, and other communications.

Evidence:

- Attachment 15-1 is the floorplan of the school's physical space at 895 Dove Street, Third Floor, Newport Beach, CA.
- Attachment 15-2 is the lease of the school's physical space at 895 Dove Street, Third Floor, Newport Beach, CA. Contact, SFL Website at: <https://stfrancislaw.com/contact/>
- St. Francis General Catalog. Cover Page, <https://stfrancislaw.com/academics/catalog/>

Explain How the School Will Maintain and Provide Access to All Required Records, Files and Materials in The Administrative Office

Records required by Guidelines 9.1 through 9.3 are maintained in secure online password and access restricted Google Drive folders available to those with permission at the principal academic and administrative office of the school in Newport Beach, California, and remotely to the Registrar, the Admissions Representative, the Student Services Coordinator, and others. Google Drive provides cloud-based digital record access with unlimited storage size and back-up, available 24/7 to authorized persons, wherever located. Access is controlled folder-by-folder basis, and only folder collaborators with adequate permission levels can share it.

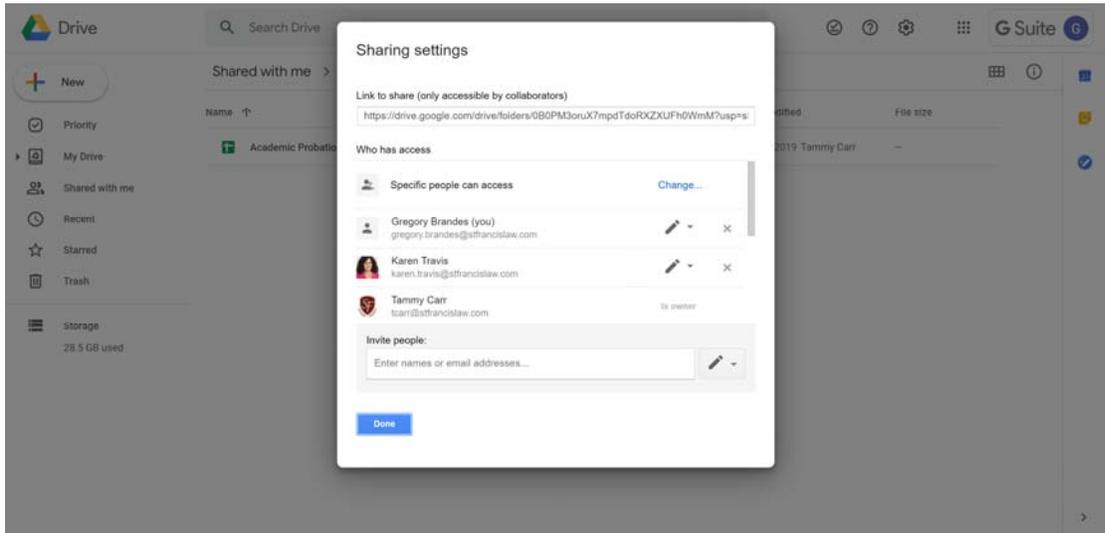


Figure 11: Google Drive Folder Security. Each folder can have one or many "collaborators" with varying rights.

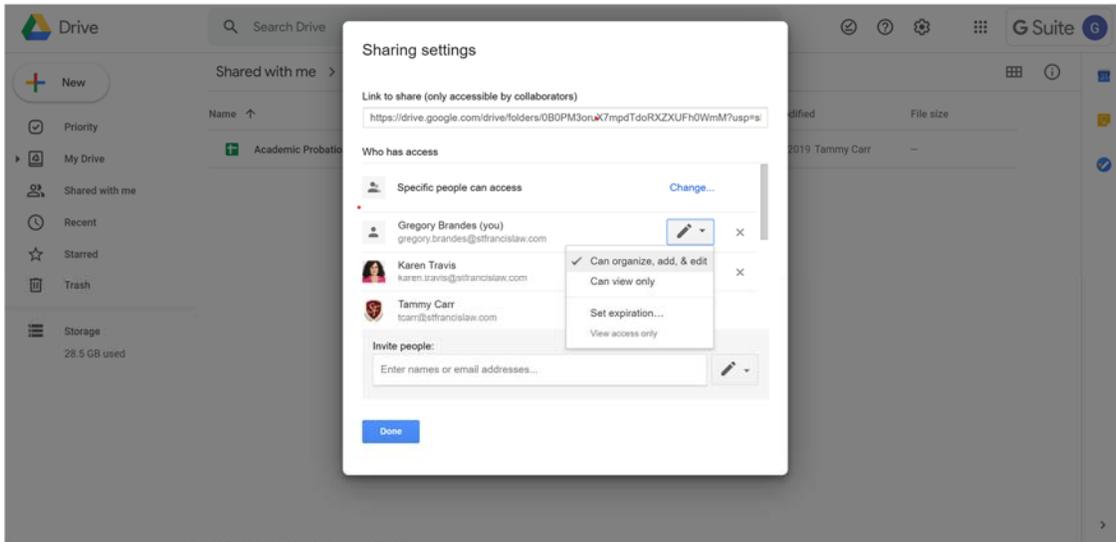


Figure 12: Google Drive Folder Security. Only folder collaborators with sufficient rights can share a folder.

Student Education Records, as defined in SFL policies, are maintained in duplicate online and in paper files stored in secure, sprinklered storage in the office of Baker College in Flint, Michigan. Offline physical backups of online Google Drive data are conducted periodically

and stored securely at the principal academic and administrative office of the school in Newport Beach, California.

Evidence:

- Attachment 15-3 contains SFL SOPs regarding Data Access and Security, Backup and Retrieval, and Security Access

SECTION 16: RULE 4.160 (L) - FINANCIAL RESOURCES. The law school must have adequate present and anticipated financial resources to support its programs and operations. (Guidelines 10.1-10.3)

Please describe how the law school meets its present and anticipated financial obligations to operate compliantly with reference to the specific requirements of Guidelines 10.1-10.3.

In responding to Guideline provisions, in particular:

- analyze the law school's current financial status and history over the past five years, specifically addressing any operational deficits, declining revenue or increased debt
- analyze future revenue projections
- describe current or planned efforts to raise funds from the alumni, the community or governmental or private grants

Required Attachments:

- Budget for current fiscal year
- Financial projections for the next three years
- Most recent financial review or audited financial statement
- Financial reports most recently submitted to another accrediting agency or governmental authority, if any

Suggested: 2-4 pages

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

Analyze the Law School's Current Financial Status and History Over the Past Five Years, Specifically Addressing Any Operational Deficits, Declining Revenue or Increased Debt

SFL anticipates continued, measured improvement in its financial status, predicted by the pattern of improvement over the last five (5) years. SFL anticipates annual revenues (net of refunds and discounts) of \$539,000 for the 2019-2020 fiscal year. SFL anticipates annual operating expenses of \$586,000 for the same period. This is an increase of almost 16% from 2018-2019 results and continues a pattern of slow but steady growth that characterizes SFL financial performance since inception. Revenue has grown steadily each year from a low of \$306,000 in 2015 – 2016, notably without an increase in tuition paid per student before the 2019-2020 fiscal year.

SFL typically operates at a small but sustainable deficit. Sustainability is provided by the law school's parent entity, Baker College, one of the largest private non-profit colleges in Michigan. Baker College's strategic plan for SFL was to prioritize building the quality of the SFL program, reflected in FYLSE and Cal Bar Exam pass rates, and budgeted loss for the first 5 – 8 years of ownership. SFL anticipates continuing small deficits from operations during 2020, as

conversions to new systems, personnel cost increases, investments in curriculum, and investments in marketing materials (e.g. website revisions) impact expenses.

As SFL operates on a non-profit basis, it is anticipated that for the next five (5) years, any operational surplus generated by SFL will be reinvested in the law school.

SFL has no debt and Baker College has designated a \$2M USD reserve fund to ensuring law school sustainability.

Evidence:

- Attachment 16-1 is the school's 2019-2020 Revised Budget
- Attachment 16-2 is the school's 3-year forecast of financial performance
- Attachment 16-3 is Baker College's 2018-2019 Fiscal Year Audit and Audit Letter

Analyze Future Revenue Projections

SFL anticipates continuing slow growth in enrolments and revenues, but also expenses. As SFL operates on a non-profit basis, it is anticipated that for the next five (5) years, any operational surplus generated by SFL will be reinvested in the law school.

Evidence:

- Attachment 16-2 is the school's 3-year forecast of financial performance, including operating income and expense. Three years is the limit of planning used by the school.

Describe Current or Planned Efforts to Raise Funds from The Alumni, The Community or Governmental or Private Grants

SFL does not now raise funds from the alumni, the community, or governmental or private grants and has no present plans to do so.

SECTION 17: RULE 4.160 (M) – RECORDS AND REPORTS. The law school must maintain adequate records of its programs and operations. (Guideline 11.1)

Describe and explain how the law school compliantly maintains all required files, transcripts and records with specific reference to all such records as identified in Guideline 11.1(A)-(O).

In responding to the Guideline provisions, in particular:

- describe all means and technology used to maintain the records and transcripts (hard copy and electronic) in a safe and secure environment, the policies and procedures used to maintain and confirm that all required records are accurate, complete and compliant
- identify the law school administrator(s) or employee(s) who are responsible for the various records, at each location

Required Attachments:

- Written policies and procedures regarding recordkeeping

Suggested: 1-3 pages

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

Describe All Means and Technology Used to Maintain the Records and Transcripts (Hard Copy and Electronic) In A Safe and Secure Environment, The Policies and Procedures Used to Maintain and Confirm That All Required Records Are Accurate, Complete and Compliant

Record Storage and Retrieval

SFL student academic records are maintained in a central student information database system, Jenzabar, which is the system of record for all SFL enrollments, grades, student information, and transcript data. Jenzabar is a secure, industry-standard student information system (SIS) used by hundreds of colleges and universities worldwide. It provides secure backup and role-specific access rules to permit student records to be available only to those with appropriate need.

Student transcripts are generated in real time, as needed, from data stored in the system of record, by reporting software (Cognos, by IBM). Some legacy student transcripts are retained in restricted -access Google Drive folders.

Other SFL student Education Records, including academic leave, withdrawal, re-admission, discipline, and other matters are maintained in electronic form in restricted -access Google Drive folders and duplicate paper records stored in secure, sprinklered locations.

Institutional Records, such as attendance, assessment performance, and study hours, are maintained in either the Canvas learning management system (LMS) or restricted access Google Drive folders.

When the Registrar transmits student records, e.g., when sending transcripts to students,

VIRTRU Protection is used to encrypt the email and attachments enroute to the recipient. Only the Registrar sends student transcripts.

Policies and Procedures

SFL has developed, and maintains, Standard Operating Procedures (SOPs) to implement school policies and compliance with applicable law and State Bar requirements. The SOP document is maintained by the Registrar and Dean and regularly amended and updated. SOPs include, among others, the following:

- Admissions
- Enrollment Agreement / Disclosure Statement
- Registration for Continuing Students
- Live Attendance Reporting
- Verification of Study Hour Requirements
- End Of Course - Posting Grades
- Instructor Grade Change
- Academic Probation
- Continued Academic Probation
- Removal from Academic Probation
- Academic Dismissal
- Student Initiated Withdraw
- Academic Leave of Absence
- St. Francis Initiated Withdraw
- Administrative Withdraw
- Administrative Dismissal
- Administrative Disqualification
- Return from Academic Leave
- Return from Administrative Withdraw
- California State Bar Forms
- Secured Email Policy
- Record Keeping
- Transcript Change Approval / Denial

SFL policies require that when a student Education Record is generated, it is contemporaneously duplicate filed in the student's restricted -access Google Drive folder and paper file. The person generating the record is responsible for delivering it to the designated record custodian, who is responsible for filing in both the student's restricted -access Google Drive folder and the student's paper file.

Information accuracy is the responsibility of the person generating the record, or if the student, the person collecting, and authorizing the storage of, the record. For example, if the Dean approves entry of an Incomplete grade for a student in a course, the Dean is responsible for an accurate entry in the student Education Record describing the reason for approving the Incomplete. If a record custodian finds a record inaccurate, incomplete, or missing, it is the responsibility of that custodian to ensure that the record is corrected, completed, or created.

Evidence:

- Attachment 17-1 contains selected SOPs regarding recordkeeping from the SFL SOP document.

Identify the Law School Administrator(S) Or Employee(S) Who Are Responsible for The Various Records, At Each Location

SFL student academic records are maintained by the Registrar, who administers the central student information database system, Jenzabar, which is the system of record for all SFL enrollments, grades, student information, transcripts and records. The Registrar is assisted by database administrators from Baker College and supported by dedicated technical support staff of the college.

Other SFL student education records, including those pertaining to academic leave, withdrawal, re-admission, and discipline, and Institutional Records, such as attendance, assessment performance, and study hours, are maintained in either the Canvas learning management system (LMS) or restricted -access Google Drive folders by the Dean (Gregory J. Brandes), the Registrar (Tammy Carr), the Student Services Coordinator (Tina Kattoula), the Director of Academic Excellence (Karen Travis) or the Administrative Assistant (Felicia Coughlin.) During admissions, the Admissions Representative (Brett Ripley) and Vice President of Admissions (Chuck Gurden) have access to, and may modify, student files, either the student's restricted -access Google Drive folder or the student's paper file its storage location. After the student begins the first class for credit, only the Dean, Registrar, and Student Services Coordinator have access to, and may modify, student paper files at the storage location.

Evidence:

- Attachment 17-2 is the website page identifying and describing the title of the principal members of the law school staff who serve students in various capacities (Note that certain changes will appear in the 2020 version of the catalog, including changes to the Board of Trustee's membership list reflected in the data provided elsewhere in this Study. An updated General Catalog will be provided upon publication.)

SECTION 18: RULE 4.160 (O) - Consistent with sound educational policy and these rules, a law school must operate in accordance with policies and procedures that comply with the Constitutions and all applicable laws of both the United States and The State of California so as to both provide equality of opportunity and prohibit unlawful discrimination. (Guideline 14.1)

Demonstrate that the law school complies with applicable laws and efforts taken to offer equality of opportunity and prohibit unlawful discrimination, focusing on Guideline 14.1.

In responding to the Guideline, in particular:

- describe policies and programs designed to further compliance with laws protecting equality of opportunity and prohibiting unlawful discrimination, including their implementation and effects
- provide information and analysis of available statistics relating to the gender, racial and ethnic makeup of the law school's faculty, staff and student body for the last five years

Required Attachments:

- Policies designed to address issues of equality of opportunity and non-discrimination
- Reports, including statistics, addressing gender, racial and ethnic makeup of student enrollment, current faculty and staff, if available

Suggested: 1-2 pages

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

Describe Policies and Programs Designed to Further Compliance with Laws Protecting Equality of Opportunity and Prohibiting Unlawful Discrimination, Including Their Implementation and Effects

SFL maintains the following policy of non-discrimination (from the school website):

Non-Discrimination

It is the policy of St. Francis School of Law not to discriminate on the basis of race, color, creed, religion, sex, national origin, age, disability, veteran status, marital status, genetic information or other protected characteristics in providing and administering of educational programs, services, activities, employment or recruitment.

Inquiries regarding this policy can be directed to the Dean of St. Francis School of Law at 895 Dove Street, 3rd Floor, Newport Beach., CA 92660.

The School of Law declares and reaffirms a policy of equal employment opportunity, equal educational opportunity, and non-discrimination, where applicable, in the provision of educational services to the public. The School of Law will make all decisions regarding recruitment without discrimination on the grounds of age, race, color, creed, religion, sex, national origin, sexual orientation, disability, Veteran status, marital status, genetic information, or other protected characteristics, which cannot lawfully be the basis for an admissions/employment decision.

See: <https://stfrancislaw.com/about-sfl/policies/>

SFL collects data on gender and race/ethnicity for reporting purposes only. It does not use such data in admissions or academic decision-making.

Evidence:

- Attachment 18-1 is the St. Francis School of Law General Catalog page containing the school's non-discrimination policy and its ADA Compliance SOP.

Provide Information and Analysis of Available Statistics Relating to The Gender, Racial and Ethnic Makeup of The Law School's Faculty, Staff and Student Body for The Last Five Years

SFL annually provides the State Bar information on gender and race/ethnicity of students and faculty. It does not collect, analyze, or report gender and race/ethnicity information on staff.

Evidence:

- Attachment 18-2 is the compiled gender and ethnic makeup of the law school's students and faculty as reported to the State Bar in 2019.

SECTION 19: RULE 4.160 (P) - COMPLIANCE WITH COMMITTEE REQUIREMENTS. The law school must demonstrate its compliance with these rules by submitting required reports and otherwise complying with the rules.

Demonstrate that the law school submits required reports and otherwise complies with the Rules and Guidelines, focusing on Guideline 11.1. In responding to the Guideline, in particular:

- confirm that the law school has regularly submitted required reports and complied with the rules since its most recent inspection report
- describe any perceived issues of weakness or non-compliance with respect to the rules and guidelines arising since the law school's most recent inspection report, and address efforts and progress toward remedy of any such issues

Required Attachments:

- None

Suggested: 1-2 pp.; emphasize particularly Guideline 11.1 (M-O)

[PLEASE INSERT NARRATIVE HERE]

SFL Response:

Confirm That the Law School Has Regularly Submitted Required Reports and Complied with The Rules Since Its Most Recent Inspection Report

SFL has timely filed Annual Reports for the years 2016, 2017, 2018 and 2019. SFL has timely filed Admission Certifications for the bi-annual new student admission cycles in Fall 2016, Spring 2017, Fall 2017, Spring 2018, Fall 2018, Spring 2019 and Fall 2019. An amended certification for Spring 2019 was filed after a misspelling was noted. SFL also responds promptly to State Bar requests. For example, SFL has responded to more than 25 State Bar requests for individual student certifications and information in 2019, including requests for Moral Character Certification, FYLSE and GBX Certification, Form F Accommodation Certification. And Pre-Legal Education Verification, in an average of 7.5 days.

Evidence:

- Attachment 19-1 contains SOPs related to reporting to the State Bar
- Attachment 19-1 is SFL's log of responses to requests for forms by the State Ba
- SFL filings with the State Bar since the last compliance inspection report are maintained in secure storage online and available for inspection upon request.

Describe Any Perceived Issues of Weakness or Non-Compliance with Respect to The Rules and Guidelines Arising Since the Law School's Most Recent Inspection Report, And Address Efforts and Progress Toward Remedy of Any Such Issues

SFL transitioned learning management systems (LMS) from Blackboard to Canvas beginning in Fall 2018. In connection with the termination of Blackboard access, certain outcomes data, student materials, assessment materials, and other data and records were not retrievable for archive by reasonable means. There are, therefore, gaps in the data record, particularly on outcomes assessment, since the last periodic inspection, and these will be reflected in some reporting and analyses.

This transition, while nearing its end, continues through the date of this report. Some aspects of prior data and analyses anticipated to be available in the new system are not yet implemented. We are working, for example, to retrieve assessment data on individual course-level outcomes from new Canvas courses and map course-level outcomes to programmatic and institutional outcomes to support the kind of analyses we once did on Blackboard course data. We anticipate completing this mapping project in 1Q 2020, with analyses projects continuing throughout the year.

It is important to note that there was no interruption in delivering learning outcomes and assessing them in the course of this transition and *thus no lack of compliance with any State Bar rule or guideline*. Data exists on student learning outcomes in the new Canvas LMS and its use and accessibility will continue to improve over time, eventually providing greatly improved access to student and program outcomes data. In the meantime, manual processes are being used to support continuous improvement and program outcome assessment in compliance with requirements.

Faculty evaluation and development processes were also temporarily disrupted during the transition to a new learning management system but have been established in the new system and are underway after a disruption of approximately one- and one-half years. This was also due to resource constraints and personnel issues during the transition and needed revisions in the evaluation processes and standards, which have now been completed. Finally, transition to the new LMS was burdensome for faculty and staff, and consumed all available resources for faculty development during this transition period. The school now has in place training and development resources on the LMS, online teaching, policies and procedures, and other subjects that actually exceed those previously available. Normal faculty development activities and events will resume in 2020.