



The State Bar *of California*

**OPEN SESSION
AGENDA ITEM
APRIL 2020
COMMITTEE OF BAR EXAMINERS ITEM O-405**

DATE: April 24, 2020

TO: Members, Committee of Bar Examiners

FROM: Natalie Leonard, Principal Program Analyst

SUBJECT: Action on Application for Provisional Accreditation – Abraham Lincoln University School of Law

BACKGROUND

Abraham Lincoln University School of Law (ALU) is a registered, unaccredited distance law school. 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 JD 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 JD 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

Abraham Lincoln University School of Law has been registered as an unaccredited distance law school since the University was founded in 1996. The school is a sub-chapter S corporation.

The University seeks "to provide accessible, career-focused and lifelong learning opportunities to students at the undergraduate and graduate levels." There are currently 228 students enrolled in the school's JD program. The school does not plan to add a full-time JD program if it should become accredited.

The law school was last inspected on October 14, 2015, and is due to be inspected this year. If the Committee advances this application today by requesting an inspection, that inspection will serve both as the inspection of ALU as a registered school and also as the evaluation of the school's readiness to earn provisional or full accreditation.

Abraham Lincoln Law School's proposed accredited JD program

If ultimately accredited, Abraham Lincoln School of Law plans to continue its current online JD curriculum consisting of 140 quarter credit units to be completed in four years. The school believes that this represents 4200 hours of engagement with 1400 of those hours in verified

academic engagement. Each quarter credit includes study hours, with ten hours of academic engagement and twenty hours of preparation.

If accredited, the school will, however, reconfigure its existing curriculum into annual terms, each containing four quarters, which will be a simpler, more convenient schedule for most students.

Currently, the school offers a range of custom schedules designed to accommodate the students' status as to the First Year Law Students' Examination, which would not be necessary going forward.

The school provided explained the proposed sequence changes that would be implemented for its part-time accredited program. Upon full accreditation, the school has indicated its intention to explore the addition of clinical opportunities.

The school's teachout plan indicates that students in the unaccredited program will generally qualify to transfer to the accredited program, but the school is also willing to teach out students in the unaccredited program who cannot or do not wish to transfer.

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

Abraham Lincoln University School of Law's application was detailed, thorough and clear. It appears that the school is at or near full compliance, with only minimal administrative details still to be arranged. The school represents that it is ready to proceed to an inspection to verify its substantial or full compliance in all areas, including the following substantive 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)). ALU has a full-time staff of six including three graduates of ABA approved law schools. They are supported by a registrar and compliance officer. This exceeds the full-time staffing level at most State Bar of California accredited law schools.

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)). The twelve hundred hour total does not include preparation or untracked homework. The school's JD program exceeds this standard by requiring 140 quarter credits to complete its JD program.

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). ALU uses Moodle's eLearn platform. The software track student interaction, whether it be watching taped or live lectures, taking quizzes, posting on discussion boards, or completing homework. Students can also chat with professors online or via e-mail. Students must post or engage with assignments in order to receive verified academic credit for watching taped or live content. Students submit weekly Academically-Related Activities (ARA) reports as well. A student who has not submitted a report for three weeks is academically dismissed.

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)).

ALU requires law students to complete at minimum fifteen (15) units of practice-based skills and competency training pursuant to Guideline 6.9 for the Accredited Law School Rules. While ALU does not offer externships, internships, clerkships or clinics, ALU requires the following practical skills training courses: Wills & Trusts, Professional Responsibility, Advanced Legal Research & Writing, Trial Techniques, Contemporary Ethical Issues, and Civil Litigation before Trial. Each course is worth four credits, and though some courses have standard doctrinal titles, they include significant research, drafting, and writing.

In the future terms of changes that could improve and expand the curriculum, ALU is interested in constructing more elective course topics for law students, as well as eventually having experiential and clinical courses for online law students. ALU is willing to add more competency training courses as well.

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) ALU's 2019 MPR is 56.5 percent.

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)) ALU requires law school applicants to possess a bachelor's degree or higher from a college or university accredited by an accrediting agency recognized by the United States Department of Education. The earned bachelor's degree must be evidenced by an official transcript sent directly to ALU. Degrees earned at institutions outside of the United States must be submitted to a Committee-approved credential evaluation service for verification that the degree is the equivalent of a comparable degree from the United States.

Additionally, law school applicants must take an online assessment test (timed) and submit a personal statement and professional resume. The personal statement is a 500-1000 word statement describing personal and professional goals and an explanation of why the applicant is pursuing a JD degree. The applicant is also asked to describe why they feel they will be successful in an online JD program. These important components of the admissions process inform the Admissions Review Committee about whether an applicant has a reasonably good chance of succeeding in the online Juris Doctor program.

The school does not expect to alter its admissions policy if it becomes an accredited school.

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). ALU complies with these requirements.

Division 8 Library Requirements can be fulfilled by making either physical or electronic library volumes available to the students. The school provides Westlaw access to establish compliance. The school's legal research class is taught online, and the class includes instruction on how to use both electronic and hard copy resources for legal 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 has long delivered its program online, and it uses standard packages by Moodle and Adobe made for this purpose. Therefore, the school will not need to make changes to deliver its educational program, academic support, or student records and accounts.

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 have to make significant changes to comply with the accredited rules, as the coursework is already developed and available. The school appears to have sufficient financial resources, even as it has experienced some recent challenges, and the school believes it may experience enhanced revenue by as much as ten to twenty percent.

Other Administrative Requirements

The school also 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's compliance can be further assessed at an inspection. The school has a formal governance structure as required by its regional accreditation through the Distance Education Accrediting Commission. Its records are fully online. The school appears to be in compliance 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 and believes it does so already, to the extent allowed for a registered school.

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 current conditions may delay the scheduling beyond sixty days, and that online inspections may be considered in order to continue to advance the process. (Rule 4.123(B)).

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 Abraham Lincoln University 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 or as soon as possible thereafter under current conditions 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: Abraham Lincoln University School of Law Application for Provisional Accreditation Self-Study

SELF-STUDY REPORT FOR LAW SCHOOLS ACCREDITED BY THE STATE BAR OF CALIFORNIA PREPARING FOR A PERIODIC INSPECTION

GENERAL INSTRUCTIONS AND SELF-STUDY TEMPLATE

Use this template to prepare the self-study required under Accredited Rule 4.163 in preparation for a periodic inspection. The template and general instructions are intended to help the law school prepare for its upcoming periodic inspection to be conducted on behalf of The State Bar of California and the Committee of Bar Examiners (the Committee). The Committee and its inspection team will use the self-study to prepare for and carry out a site visit to assess and report on the law school's compliance with the accreditation standards found in Accredited Law School Rules (Rules) and with each of the relevant Guidelines for Accredited Law School Rules (Guidelines).

A self-study should offer the Committee a comprehensive, candid and, most importantly, an objective report that both confirms and discusses the law school's compliance with all policies, procedures, and operational requirements of the Guidelines relating to its governance, administration, faculty, curriculum, admissions, academic and scholastic standards, and performance on the California Bar Examination (CBX). It may also be used to discuss the law school's current and future efforts to improve or expand its program of accredited legal education.

Each section in this self-study requires both a narrative and analysis relating to each Rule and associated Guidelines, and a compilation of all attachments and references to the law school's materials (citing either a written or electronic document) used to support the conclusion that the law school is compliant with each specific Rule and/or Guideline. This template is intended to simplify the inspection process by guiding the law school to prepare a self-study that will assist in promoting an efficient and effective inspection.

Content

The self-study must analyze and provide documentary support regarding the law school's:

- prior efforts to comply with each of the mandatory actions and recommended suggested actions found in the most recent periodic inspection report submitted to the Committee
- current necessity and status of any Committee-granted Guideline waiver, and any anticipated need for a renewed request for this or any new waiver request

- demonstration of the law school’s current compliance with the Rules and Guidelines, and/or a discussion of any issue of substantial compliance or non-compliance found during the preparation of the self-study and all current efforts to address or remedy any perceived substantial compliance or non-compliance
- compliance in each location, whether main campus, satellite, branch, or online program
- current or anticipated plans, supported by current goals or projections where appropriate, to assess the law school’s ongoing efforts to improve, expand or maintain its compliance with all applicable accreditation standards and associated Guidelines over the next five years or until its next periodic inspection
- Any issue relating to the law school’s current governance or operation if it operates within another institution or entity.

Format (Self-Study Template and Attachments)

Law Schools should respond to each of the 19 sections below, as labeled, with a separate narrative inserted where indicated.

The law school’s responses should be clear, concise and complete. Refer specifically to each Rule or Guideline cited, and address each specific topic listed. Each section provides directions on the requested narrative and, where applicable, a list of all required attachments. Suggested scope and page limits are offered, but the school should feel free to share additional properly labeled information if this is helpful in demonstrating the school’s unique circumstances and compliance. The law school is expected to discuss, in detail, its compliance (or not) with each of the following: 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. The law school must also submit attachments needed to demonstrate compliance. They must include all “required” attachments listed and should include all relevant portions of the law school’s catalog, student and faculty handbook (or equivalents), and any “additional” attachments cited in its narrative. When citing a reference or attachment, please refer to it consistently throughout the document. Electronic attachments are preferred.

Filing Requirements

- Submit the self-study to The State Bar of California, Office of Admissions, 180 Howard Street, San Francisco, CA 94105, or to admissions@calbar.ca.gov.



ABRAHAM LINCOLN UNIVERSITY
Since 1996

**Self-Study Report for
Abraham Lincoln University
School of Law**

100 W. Broadway, Suite 600

Glendale, CA 91210

213-252-5100

www.alu.edu

Date of Report: January 13, 2020

SECTION 1: PRIOR REQUIREMENTS AND RECOMMENDATIONS

Please review the most recent inspection report received by the Committee after the law school's last periodic inspection; please identify and discuss all efforts taken by the law school to respond to and carry each mandatory and/or recommended action adopted by the Committee. In doing so, please discuss any:

- any more recent or additional efforts taken or improvements implemented since the prior inspection to address each mandatory or suggested recommendation

Required Attachments

- Catalog (Item 1: ALU School of Law Catalog)
- Student Handbook (Item 2: ALU School of Law Catalog (*ALU's Student Handbook is the catalog*))
- Faculty Handbook (Item 3: ALU Faculty Handbook (*this faculty handbook is an institutional handbook that includes JD faculty policies*))
- Most recent periodic inspection report issued by the Committee

RESPONSE

Abraham Lincoln University School of Law ("ALU") is registered with the Committee of Bar Examiners from the State Bar of California as an unaccredited distance learning law school. This self-study provided the opportunity for ALU to identify the differences between compliance pursuant to the Unaccredited Law School Rules and Guidelines and the Accredited Law School Rules and Guidelines. ALU staff assessed its currently offered online Juris Doctor program and identified the following:

- 1) Where rules and guidelines overlap between the two levels, ALU is meeting compliance.
- 2) On crucial items related to the five-year minimum cumulative passage rate, ALU reviewed at the time of the application whether ALU met the 40% minimum, and did so by having a cumulative five-year bar passage rate of 56.45%, as submitted in its CBE accreditation application.
- 3) Where rules and guidelines differ, the types of changes to implement already exist in its current program or can be readily implemented in the 2020 annual cycle. In some cases, such as with the disclosures mandated by the Accredited Law Schools, ALU would not be in the position to post certain disclosures immediately since it would end up being misleading to the public (for example, not posting disclosures that only accredited law schools should.)

ALU has addressed any mandatory or suggested actions identified in its most recent inspection, as evidenced by files in the "CBE-related documents" folder.

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 standards without the waiver, with anticipated time frames
- anticipated need to request future waivers

Required Attachments

- Documents/Correspondence confirming waivers granted by the Committee

Suggested: up to 1 page

RESPONSE

Abraham Lincoln University School of Law currently does not operate under a Committee-granted Guideline waiver. For this reason, ALU does not have any Section 2 folder due to no attachments.

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.

Required Attachments

- Mission statement
- Current statement of academic objectives and goals

RESPONSE

The School of Law staff has operated the fully online Juris Doctor degree program since the founding of Abraham Lincoln University in 1996, with a focus on enrolling working professionals who, due to family and work commitments, cannot realistically complete a traditional on-site law school program. By offering a program that recognizes real world limitations, ALU provides a feasible structure and schedule to non-traditional students for a legal education. For this reason, ALU's mission statement is: "ALU's mission is to provide accessible, career-focused and lifelong learning opportunities to students at the undergraduate and graduate levels" (see Section 3 folder, Mission Statement subfolder).

The mission statement provides an announcement to the public about who ALU is and who is served, what is done and how it's done, and what ALU values. The mission statement is an overarching framework from which all university functions must emanate and is our touchstone.

By providing the mission for review and input at different levels, the institution keeps review of the mission as a core focus in discussions related to the continued viability of the institution in the online higher education space.

The mission is evaluated by the Board of Directors annually. Higher level leaders also review the mission statement each year with advisory councils. The Chief Academic Officer and the Dean of the School of Law coordinate distribution of the mission statement to faculty, staff and students.

ALU is committed to continual improvement through rigorous and substantive self-evaluation framed by the two key documents, the Institutional Effectiveness Plan and the Strategic Plan Review. These documents institutional effectiveness and strategic planning policies, practices, procedures, calendared meetings of stakeholders, and metrics. The self-evaluation process has

annual cycles and is multi-layered by involving input from all stakeholder levels. ALU leaders are involved in setting the annual strategic initiatives supported by budget planning. Input from department managers on resource needs is an outcome of periodic analysis of project metrics to determine what works, does not work, and resources needed. ALU progress is documented in reports and meeting minutes.

ALU's institutional research practices and data analysis processes are oriented around compiling and reviewing data for yearly reports, such as the DEAC, BPPE and State Bar annual reports. The Chief Academic Officer and the Dean of the School of Law also gather data to evaluate practices for systematic research, evaluation, and quality controls for institutional improvement through implementing the Institutional Effective Plan and the revised Outcomes Assessment Plan, which continues to be ways that ALU systematically collects and analyzes data for the sake of learning how to improve operational and academic outcomes. The Dean of the School of Law, in conjunction with the Registrar, monitors results for the FYLSX or CBX in order to suggest adjustments that improve the Juris Doctor program statistics. Examples of additional data utilized by the School of Law are the types of data that are collected in Annual Compliance Reports as well as course surveys, alumni and faculty surveys, and analysis of enrollments.

In addition to the institutional mission, the School of Law Educational Objective contains a statement of outcomes that is located in the School of Law Catalog (see Section 3 Folder → Academic Objectives). The Institutional Objectives focus on critical thinking, diversity, accountability, continuous improvement, and information literacy. The educational objective of the School of Law is "to educate qualified individuals through advanced educational technology to gain a comprehensive command of the fundamental areas of law".

ALU utilizes online curriculum content, educational technology and faculty and staff to achieve its objectives and goals for the program. It is through improvement of maintenance of its New Student Orientation, first year courses, upper level courses including courses that include skills training, and academic support initiatives that the law school constantly strives to be a better educational option for its students.

The leadership team at ALU identified the opportunity for State Bar accreditation as a crucial one to improve and enhance the online Juris Doctor degree program in 2020. ALU expects to keep its focus on delivering one course at a time with weekly live engagement sessions, and modest and conservative growth at most (10-20% at the Juris Doctor program level per year) in order to manage the impacts of handling program transition optimally.

SECTION 4: 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 (HIPPA) 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, its 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 as to its students, the law school's plans to address any concerns in relation to 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 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 laws governing disabilities, such as the ADA or FERPA

RESPONSE

Abraham Lincoln University, Inc. is a sub-chapter S corporation. The corporation is 75% owned by the founder and Chairman of the Board, Hyung Joo Park, and 25% owned by the Secretary and Treasurer, Soon Hee Park.

ALU received initial accreditation from the Distance Education Accrediting Commission in 2011 and was granted institutional approval via ALU's DEAC accreditation by the California Bureau of Private Postsecondary Education (BPPE) for its University programs (while the Juris Doctor program remains exempt from BPPE). ALU participates in federal financial aid programs, signing an initial Program Participation Agreement (PPA) in the beginning of 2016. ALU's loan default plan is submitted in the Section 4 folder; at this time, ALU has not yet needed to report on loan default rates.

As evidenced in the Section 4 folder, ALU is committed to compliance in ways that Section 4 raises and provides the required attachments for the Section. ALU understands the importance of being in compliance with all applicable local, state, and federal laws and regulations such as those noted. ALU documents adherence and awareness to policies in policy manuals for relevant stakeholders, such as faculty, staff and students, including description of procedures as evidenced in the written policy materials found in the catalog. The catalog is updated annually after company-wide review of all content.

Regarding HIPAA, ALU avoids improper uses and disclosures of employee's health plan related information through written policies and procedures and training of employees. Protected health information (PHI) is defined and security risks are analyzed. Training guides employees interacting with PHI how to protect it from unauthorized uses and disclosures.

ALU maintains its approvals and licenses through ALU staff implementing annual and 5-year cycles of renewal. The finance office handles updating on business licenses while Academic Affairs staff manages updates related to major policies such as FERPA and ADA as outlined in the Juris Doctor catalog. ALU submits reports and renewals to regulatory and accreditation agencies according to a compliance calendar that includes key event dates.

SECTION 5: 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(a) and section 6061.7(c) and, 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(A))
- 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), Business & Professions Code section 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 grading system used; when pass/fail grades are used; when students are required or may 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(G))
- 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) if applicable and the California Bar Examination (CBX).
- if the law school offers any professional degree in addition to the Juris Doctor degree, list the date of acquiescence for each degree and confirm compliance with 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 Business and Professions Code sections 6061.7(a) and 6061.7(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 Business & Professions Code section 6061.7(a) and 6061.7 (c); Guideline 2.3(D); and, as applicable, Guideline 2.3(E) and Guideline 13.3. (See instructions)
- Current Information Report (Bus. & Prof. Code section 6061.7(a))
- Policies and procedures on the following topics:
 - 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

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

RESPONSE

Section 5: Rule 4.160(B) – Integrity

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.

As a registered law school with the Committee of Bar Examiners since 1996, ALU has been subject to the requirements of the *Unaccredited Law School Rules*, including Rule 4.240(B), which is identical to Rule 4.160(B) of the *Accredited Law School Rules*. Both rules mandate schools to “demonstrate integrity in all of its programs, operations, and other affairs.” ALU has demonstrated compliance with this mandate on an annual basis through the Annual

Compliance Report under Rule 4.242 of the *Unaccredited Law School Rules*, as well as two self-studies and the corresponding site visits under Rules 4.243 and 4.244.

With regards to a professional degree, the School of Law department has not offered any of what is listed in Guideline 11.1 for the Unaccredited Law School Rules and the University system has a Master of Science in Law degree program that is an extension of the Paralegal and Legal Studies programs at the University. ALU maintains separation of catalogs including pertinent policies for the University programs and the School of Law and practices maintaining clarity for consumers that the Master of Science of Law has no connection to the State Bar of California's registration for the law school which makes the Juris Doctor bar-eligible.

[How the law school operates with honesty and integrity from the perspective of the public, prospective students, applicants and enrolled students \(Guideline 2.1\).](#)

ALU has long established procedures and practices that demonstrate an ongoing commitment to conducting its operations in an honest and forthright manner, which Guideline 2.1 from both the *Guidelines for Unaccredited Law School Rules* and the *Guidelines for Accredited Law School Rules* mandate.

ALU's compliance with Guideline 2.1 begins from when an individual requests information about the JD program and continues through an individual's enrollment into the online Juris Doctor program through graduation. ALU provides clear and detailed information, including but not limited to, admissions requirements, practice limitations related to the law school's status as a registered unaccredited distance learning law school in California, the JD curriculum, program outcomes, transfer policies, academic policies, financial assistance, tuition and costs of attendance, State Bar of California admissions requirements, and consumer information disclosures, through its public website, www.alu.edu, and the School of Law catalog, also available online. All policies written in the catalog represent what law students can expect in a fair and objective way.

When an individual contacts ALU to inquire about the Juris Doctor program, an admissions representative responds via phone, email, or live chat. This allows the prospective student to ask questions about the program and provide them with the opportunity to get to know what ALU offers to meet their educational goals. Once a prospective student submits an application to the JD program, they are provided, via email, with the School of Law catalog.

Prior to enrollment, new students are provided the B&P Code Section 6061.7(a) disclosure form, which is also posted at the ALU website. They review and sign an enrollment agreement which clearly sets forth the program length, number of credits required for satisfactory program completion, total costs for the program, a summary of education and services

provided, rights and obligations of students, information regarding complaints and grievance policy, refund and cancellation policies, as well as disclosure verbiage mandated by the State Bar of California. Additionally, new students sign the student disclosure statement pursuant to Rule 4.241 of the *Unaccredited Law School Rules*, which sets forth pertinent information related to FYLSX and CBX pass rates, faculty qualifications, and attrition rates, among other items.

The New Student Orientation (NSO) is another law school activity that illustrates ALU's commitment to operate in an honest and forthright manner. Prior to the commencement of the first course, every new JD student, whether 1L or transfer, is required to complete the NSO, which provides an overview of law school study skills and an introduction of the doctrinal subject matter with the professor of the upcoming first year course. The NSO is a two-part process which first requires new students to watch pre-recorded videos covering an introduction to law study, a technology overview of the learning management system – eLearn, and JD program requirements and policies. The JD program requirement and policies video places special emphasis on catalog policies, the student consumer information packet, and syllabi policies. Upon completion of the videos, students then complete a corresponding quiz to demonstrate their understanding of the content provided.

The second part of the NSO is a live orientation where students are invited to participate in person or online to meet first year faculty, the Dean of the School of Law, the founder of ALU Hyung J. Park and other members of staff such as the President and the associate dean of academic support. Upon completion of the live component, students are directed to sign and upload two certifications to eLearn. The Code of Conduct/Honor Code certification is an acknowledgement of their awareness and understanding of the Student Code of Conduct Policy and Honor Code as stated in the School of Law catalog, while the Orientation certification is verification of completion of NSO and acknowledgement of receipt of various documents, including the Student Consumer Information packet and B&P Code Section 6061.7(a) disclosure form.

Prior to the start of every course, law students receive access to their first year course syllabus and textbook information to have adequate time to order required materials for their course. The syllabus includes the weekly schedule of lectures and assignments for the entire course and includes a detailed course description, expected student learning outcomes, grading chart and policy, and examination information.

Program requirements and graduation requirements are stated in the School of Law catalog.

[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\(B\)\)](#)

ALU conducts its financial affairs in an honest and forthright manner. As a DEAC-accredited institution, ALU's financial practices comply with DEAC's strict financial responsibility standards. DEAC schools are required to demonstrate financial responsibility by providing comparative financial statements covering its two most recent fiscal years and providing evidence of sufficient resources to meet financial obligations to provide quality instruction and service to its students. DEAC further requires that financial statements are audited or reviewed and prepared in conformity with generally accepted accounting principles in the United States and that the school's budgeting processes are sufficient to allow the institution to accomplish its mission and goals.

ALU demonstrates financial responsibility by completing an annual financial audit with Weworski & Associates, a certified public accounting firm specializing in the needs of post-secondary educational institutions. Additionally, the U.S. Department of Education deems an institution to be financially responsible when its composite score is at least 1.5. For the 2017 and 2018 calendar years, ALU's composite score was 1.8 and 2.0, respectively.

For additional oversight and monitoring to help ensure compliance with federal regulations on financial aid, ALU has sought the services of RGM, a 3rd party servicer for financial aid. Further, ALU demonstrates financial responsibility through internal controls and security procedures in managing company finances and student accounts' financial aid.

The tuition refund policy is published in the School of Law catalog and on ALU's public website, as well as in the JD Enrollment Agreement. ALU's refund policy allows for the refund of any monies due within 30 days of the student cancellation or withdrawal. A clear explanation of the method of calculation is provided.

[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\(a\)\)](#)

Honesty in communications is at the forefront of ALU's communications and dealings with the State Bar of California, the Committee of Bar Examiners, its stakeholders, the public, and its students. Clear and detailed information about the JD program is available on ALU's public website and School of Law catalog; all are available and easily accessible to the general public. Both prospective and current students can find information on costs, <https://www.alu.edu/alu-admissions/affordable-tuition/>, CBX and FYLSX passage rates at <https://www.alu.edu/alu-admissions/consumer-information/> and financial assistance, <https://www.alu.edu/alu-admissions/federal-financial-aid/>, for qualified individuals. Admissions requirements are available on the public website, <https://www.alu.edu/apply/>, and in the School of Law catalog, which help to ensure that prospective students are properly qualified to be admitted into the JD program

Additionally, ALU maintains a consumer information page on its website that contains information mandated by federal regulations set forth by The Higher Education Act of 1965 (amended): <https://www.alu.edu/alu-admissions/consumer-information/>. There, a member of the public can access ALU's Consumer Information Guide, net price calculator, Annual Security Report, CBX and FYLSX passage rates, as well as the disclosures mandated by the Committee of Bar Examiners, including the required verbiage under Guideline 2.3(D)(1) and the B&P Code §6061.7(a) disclosure form.

If accreditation is granted, ALU would implement revisions to its Accreditation page to include the required verbiage under Guideline 2.3(E)(1). Because ALU, as a registered law school, is already subject to and in compliance with Guideline 2.3(D)(4) of the *Guidelines to Unaccredited Law School Rules*, it would pose no difficulty to comply with Guideline 2.3(E)(2) of the *Guidelines for Accredited Law School Rules*, which has a similar mandate.

[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 \(Guidelines 2.4, 2.5\)](#)

Abraham Lincoln University, Inc. is a sub-chapter S corporation with a 75% ownership interest held by the founder and Chairman of the Board, Hyung Joo Park and a 25% ownership interest held by Secretary and Treasurer, Soon Hee Park.

ALU does not compensate any of its employees based on the number of applicants or enrollments into the JD program. As ALU is accredited by the Distance Education Accrediting Commission (DEAC), ALU admissions representatives must sign onto and adhere to the DEAC Code of Ethics for student recruitment personnel.

[All policies and procedures governing student discipline \(Guideline 2.6\)](#)

ALU has several written policies governing student discipline: the Academic Integrity Policy and Honor Code and the Student Code of Conduct Policy.

Academic Integrity / Honor Code

The Academic Integrity policy explains the establishment of the Honor Code to reinforce the personal and academic integrity of our law students and prepare them for their professional and legal responsibilities as sworn officers of the court. The Honor Code includes provisions for written notice of specific charge or charges to the accused person ("Respondent") should the Chair determine that the complaint covers a reported act that falls within Article II of the Honor Code and the opportunity for an informal hearing before a panel of impartial members of the faculty and administration (where a legal representative and witnesses are permitted). The

Honor Code also includes a written final determination (including a statement of facts, conclusions and penalties) and the types of penalties listed in 2.6(A).

The Student Code of Conduct Policy

The Student Code of Conduct policy is an institution-wide policy that covers a broader range of student behaviors, which includes harassment of others within the community and misuse of facilities. This Code of Conduct policy also includes provisions for written notice of specific charge or charges to the accused person (“Respondent”) and the opportunity for a hearing before a panel of impartial members of the faculty and administration with the opportunity for witnesses. The Honor Code also includes a written final determination and the types of penalties listed in 2.6(A) that applies to the types of behaviors described in the policy.

Grading

Pursuant to Guideline 2.7(A), ALU has adopted written academic standards that are fair and provides adequate notice to students prior to the implementation of any changes to academic policies.

ALU’s School of Law catalog sets forth the written policies required under Guideline 2.7(A)(1)-(8).

(1) The type of grading system used

Grading Scale

Abraham Lincoln University has established the following grading scale. Faculty members comply with this scale and its equivalents. These grades may be assigned on individual assignments within a course or as the final course grade.

Grade		Points
A	<i>outstanding</i>	90-100
B	<i>above average</i>	80-89
C	<i>average</i>	70-79
D	<i>below average</i>	60-69
F	<i>Fail</i>	<60
P*	<i>passing</i>	

**Valid only for Pass/Fail Courses and not included in the calculation*

As indicated in the grading scale above, grades indicate whether the student's level of achievement is excellent (outstanding), good (above average), adequate (average), fair(average), inadequate but passing (below average), or failing (fail).

(2) When pass/fail grades are used

Pass/Fail or Credit/No Credit grades are not used in courses that are subjects tested on the CBX.

(3) When students are required to or allowed to repeat a class

The Course Repeat Policy, which can be found in the School of Law catalog, requires that a student who fails a course by receiving a final course grade must repeat the course and pay tuition for the repeated course. When a course is taken a second time with a new course grade (typically due to a CBE continuous study rule issue), the original grade shall also remain on the transcript. To request a repeat of a course, a student must submit an Academic Exception Request form to the Academic Standards Committee and pay a petition fee of \$20.

(4) The definition or requirements for academic good standing

All courses in the JD curriculum are required to graduate. The courses are laid out in the School of Law catalog under Year and Course Sequence, which also indicates the program total units of 140 quarter units required for graduation.

Policies on Good Standing, Academic Probation and Dismissal can be found in the School of Law catalog as follows:

Good Standing, Academic Probation and Dismissal

The following are the standards implemented by the school's Academic Standards Committee. Additionally, students on academic probation should review the **Academic Success Program Escalations section of this catalog**.

First-Year (1L) Students

First-year (1L) students must maintain a cumulative average grade of 70 or above to remain in good academic standing.

*J.D. students in the first academic year must pass every course with a 70 or above to receive full credit for the units studied in the 1L and for ALU to certify the student for the First-Year Law Students' Examination (FYLSX), as required by the State Bar of California. Please see **Academic Requirements for First-Year Law Students' Examination (FYLSX)**.*

All students with a cumulative average grade of 60 and above and below 70 will be placed on academic probation. A student who is placed on academic probation, and who is unable to improve his or her cumulative average grade to 70 or above by the end of the academic term (35 quarter units) will be academically dismissed.

Any student whose cumulative average grade falls below 60 at the end of his/her 1L curriculum will be academically dismissed. Students who are academically dismissed may petition the faculty for reinstatement based upon a clear showing of special circumstance and good cause.

Upper Level Students

Please see **Academic Requirements for Continuing Into Second Year (2L) Coursework**.

Upper level students must maintain a cumulative average grade of 70 or above to remain in good academic standing.

All students with a cumulative average grade below 70 will be placed on academic probation. A student who is placed on academic probation, and who is unable to improve his or her cumulative average grade to 70 or above by the end of the academic term (35 quarter units) will be academically dismissed.

Any student whose cumulative average grade falls below 60 and fails to raise cumulative average grade to a minimum of 67 by the end of the academic term will be academically dismissed. Students who are academically dismissed may petition for reinstatement based upon a clear showing of special circumstance and good cause.

(5) The use of anonymous grading

The Grading Policy in the School of Law catalog covers usage of blind grading procedures, which are used specifically for essay assessments within midterms or final examinations (see next section response below).

(6) Whether and how students are informed of all factors used to issue final grades

The Grading Policy in the School of Law catalog provides the following:

Grading Policy

All grading at Abraham Lincoln University is accomplished by the faculty members using a combination of objective multiple-choice questions and subjective evaluation of essays and other forms of coursework. The final grade in a course is based on the student's homework, examinations and papers. Faculty members rate student achievement on content, accuracy, legibility, presentation, analysis and overall quality. Blind grading procedures apply to essay assessments included in midterms or final examinations.

Grades will be issued to students after the end of each course. All students will have coursework evaluated and reported by the faculty using the following grading scale.

Grading Scale

Abraham Lincoln University has established the following grading scale. Faculty members comply with this scale and its equivalents. These grades may be assigned on individual assignments within a course or as the final course grade.

Grade		Points
A	<i>outstanding</i>	90-100
B	<i>above average</i>	80-89
C	<i>average</i>	70-79
D	<i>below average</i>	60-69
F	<i>Fail</i>	<60
P*	<i>passing</i>	

**Valid only for Pass/Fail Courses and not included in the calculation*

(7) The standards and circumstances governing academic probation and disqualification

See above in Good Standing, Academic Probation and Dismissal.

(8) Whether students may remain enrolled while on probation and how they may be taken off probation

See above in Good Standing, Academic Probation and Dismissal.

(9) The methods used to confirm the authenticity of student work

Pursuant to Guideline 2.7(C), ALU’s Student Identity Verification policy is available in the School of Law catalog. To ensure that the same student who registers in a distance education course or program is the same student who participates and completes the course or program and receives the academic credit, ALU provides a secure login and password to enrolled students, administers live mandatory proctored examinations at regular points, and keeps student identity documents in student files for verification of identity purposes.

(1) How students obtain a review of grades received and how all such requests are handled and resolved

The relevant policy can be found in the School of Law catalog as follows:

Requests for Review of Grades

Effective January 2020

If a student believes that an examination or final course grade is based on a clerical or calculation error, unfairness, arbitrariness, or is not in alignment with established grading criteria outlined in the course syllabus, they may file an Academic Grade Appeal. The appeal must indicate the basis for review, from

among those listed above, and must offer evidence to support the claim. If there is no evidence provided to support the appeal, the appeal will be automatically denied, and no re-submission will be allowed.

To ensure prompt resolution of the student's concern, the appeal process has deadlines for each stage. If the student does not file the Academic Exception Request form and related required paperwork within 2 weeks after final grades are released, the student cannot appeal. All deadlines for the process must be met; otherwise, the appeal ends, and the student has no further recourse. Prior to submitting the Academic Grade Appeal, students must follow the following steps:

Step 1: *The student will discuss the concern in dispute with their course faculty member (instructor) prior to the submission of the appeal.*

Step 2: *If the concern is not resolved with the course faculty member, and the student wishes to pursue the concern, the student will submit an Academic Exception Request form, including a comprehensive, written summary of the facts and data from the student's point of view. Upon receipt of the appeal, the Academic Standards Committee, sitting as the school's Grade Review Committee, will submit the appeal to the course faculty member.*

The course faculty member will review the appeal and submit a written response to the Academic Standards Committee regarding the student's concern within 5 business days. The Academic Standards Committee will review the response and will render a decision and advise the student within 7 days of the receipt of Faculty's written response.

Step 3: *If the student chooses to pursue the concern further, the student shall notify the Academic Standards Committee within 5 business days of receipt of the decision that the student wishes to have the matter reviewed by the President and Chief Academic Officer. The Academic Standards Committee will contact the President and Chief Academic Officer and will forward all documentation. The President and Chief Academic Officer will review the matter within 5 business days of receipt of the appeal to resolve the concern. The decision of the President and Chief Academic Officer is final. No further appeal will be permitted.*

If the Academic Standards Committee grants a student's Academic Exception Request, the Committee will assign the regrading of the assessment to a professor other than the professor who originally graded the assessment. The assessment will be regraded, and the resulting grade can go up or down. The student will be notified via email of the results of the regrading. The student's grade will reflect the regraded score only, and the student will not be able to elect to keep the original grade.

In practice, students discuss concerns in dispute with the faculty member or where students do not get to discuss their concerns, a record of good-faith attempts made by the student is reviewed. Students are asked by staff to submit the Academic Exception Request Form and the Academic Standards Committee can review the concerns, working with the course faculty member, and determine whether there is any need for external regrading.

[How privacy and confidentiality of student records are maintained \(Guideline 2.8\)](#)

ALU protects student privacy and the confidentiality of student communications and records as set forth in the School of Law catalog in the Maintenance and Confidentiality of Student Privacy and Records section:

Maintenance and Confidentiality of Student Privacy and Records

Abraham Lincoln University's policy regarding confidentiality and student privacy is in keeping with the Family Educational Rights and Privacy Act (FERPA) which affords students certain rights with respect to their education records, a summary of which follows:

- The right to inspect and review the student's education records within 45 days of the day Abraham Lincoln University receives a request for access.
- The right to request the amendment of the student's education records that the student believes are inaccurate.
- The right to consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent.
- One exception which permits disclosure without consent is disclosure to school officials with legitimate educational interests. School officials are individuals or entities working for or on the behalf of the educational institution. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility.
- As allowed within FERPA guidelines, Abraham Lincoln University may disclose education records without consent to officials of another school, upon request, in which a student seeks or intends to enroll.
- The right to file a complaint with the U.S Department of Education concerning alleged failure by Abraham Lincoln University to comply with the requirements of FERPA

At its discretion, Abraham Lincoln University may provide directory information in accordance with the provisions of the Family Education Rights and Privacy Act. Directory information is defined as that information which would not generally be considered harmful or an invasion of privacy if disclosed.

To protect student privacy, student's directory information is released only upon approval of the Registrar. Students may withhold directory information by notifying the Registrar in writing; please note that such withholding requests are binding for all information to all parties other than for those exceptions allowed under the Act. Students may access their rights to the Maintenance and Confidentiality of their Student Records as outlined under FERPA.

How the law school maintains appropriate security and backup for its records, whether maintained in hard copy files or electronically. (Guideline 2.9)

ALU has established and maintains reasonable security and backup procedures to protect its computer systems, communication systems, and written and electronic records. A Backup Disaster Recovery Plan is laid out in the Emergency Management and Facilities and Equipment Maintenance Plan.

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))

ALU publicly states services and activities provided to law students in the Juris Doctor program catalog and on its public website, at <https://www.alu.edu/academics/juris-doctor/>.

The services and activities include:

- Delta Theta Phi - ALU's law students after meeting minimum cumulative grade average thresholds are given the opportunity to join Delta Theta Phi, one of the oldest law

fraternities in the United States, dating back over 100 years. The Park Senate was created in early 2017. Through membership in Delta Theta Phi, students can participate in the Adelpia Law Review, which publishes articles dealing with new legal topics, controversial topics, and complex legal issues.

- Academic Success Program – Students admitted or placed on academic probation must participate in the Academic Success Program. All students are welcome to receive additional academic support and a course site with academic support resources is available to all students.
- Student Center – All students may access an administrative center for students.
- Part-time student access to the online Westlaw Law Library, including staff support, 24/7 attorney reference desk, and Westlaw account manager
- Quarterly ALU Newsletter
- ALU Blog articles

Academic counseling in general is provided by the Associate Dean of Academic Success and the Academic Program Coordinator, in conjunction with the Student Services department.

[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 FYLSX or CBX.](#)

In 2018, ALU revamped its optional FYLSX review course after noting data trends for the JD program as reviewed by the dean. Whereas previous iterations of the review course had been offered for free to FYLSX first-time takers, participation in the redesigned FYLSX review course required a fee from first-time takers of \$400 in 2018. The rationale behind the implementation of a fee was that student engagement would increase, thus leading to better outcomes for ALU. Students enrolled in the FYLSX review course participated in live and pre-recorded lectures, submitted practice essay questions for scoring and feedback, and completed a mock baby bar examination at the end of the 9-week course.

ALU is currently exploring the logistics of offering a non-credit CBX review workshop done through online modules as well as exploring, once CBE accreditation status is approved, structuring an elective oriented around bar exam preparation which is permitted under **Accredited Law School Guideline 1.8 California Bar Examination Review or Preparation Courses** (“A law school may offer and grant academic credit for a bar examination review or preparation course. A law school may also require successful completion of a bar examination review or preparation course as a condition of graduation. Total credits for bar review courses must be kept to a minimum.”).

Under **Unaccredited Law School Guideline 1.11 First-Year Law Students’ Examination and Bar**

Examination Review Courses Permitted; Limitations, ALU cannot offer any review course for credit: “A law school may offer and charge for a First-Year Law Students’ Examination and bar examination review course. Any such review course must not be part of the credit requirements to obtain a J.D. degree. The law school may not condition any student's continued enrollment or graduation on the student taking a review course offered by the law school or otherwise. The law school may also permit commercial First-Year Law Students’ Examination and bar examination review courses to post advertisements and promote their courses to law students. Law school administrators, instructors and staff must not compel or solicit students to attend any particular review course.”

[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](#)

The School of Law does not offer a professional degree aside from the Juris Doctor degree. The University offers a Master of Science in Law within the Paralegal and Legal Studies department, which is in the University catalog and University enrollment agreement paperwork refers to BPPE approval only. Student-facing documents are separate, with the State Bar registration discussed in detail only in the catalog for the Juris Doctor program, while Bureau of Private Postsecondary Education approval is discussed in the University catalog includes the diploma, associate, bachelor’s, master’s and doctorate degrees.

SECTION 6: 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 of form of the law school's governance of each such 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; a resumé and job description of each person identified
- 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

RESPONSE

Abraham Lincoln University (ALU) School of Law is a sub-chapter S corporation 75% owned by the founder and the Chairman of the Board Hyung Joo Park, and 25% owned by Soon Park. The Board of Directors is composed of:

- Hyung Joo Park, JD, MBA, CPA, Chairman of the Board – 75%
- Soon Park, JD, Secretary and Treasurer – 25%
- Dr. Leslie Gargiulo, Board Member

Board members are appointed until further notice. They set the long-term direction for ALU, and provide guidance on strategic institutional issues.

ALU has an Academic Advisory Council to assist in program and curriculum development, planning, and related matters. The AAC is comprised of members of the local bar and judiciary, administrators, and faculty. Administrative members include Jessica Park, Lydia Liberio, and Bernadette Agaton. Faculty members include George Ackerman and Stacey Sharp. External members include Jonathan Kramer, Carolyn Torres, Valerie Granata, Luna Veronese, Marina Samson, Marianna Noli, and Gina Miller. Academic Advisory Council meetings are typically held annually, but can meet more frequently, as is the case with the last three Council meetings being in December 2018, September 2019 and December 2019. The Academic Advisory Council provides input to ALU Committees and the Board of Directors regarding its programs and direction. Credentialing information for the Board of Directors and Academic Advisory Council is included in the Section 6 folder.

The organizational structure of ALU includes the following administrative officers who are employed full-time:

- Dr. Leslie Gargiulo, President and CEO
- Jessica K. Park, JD, Vice President and Dean of the School of Law
- Lydia Liberio, JD, Associate Dean of Academic Success
- Bernadette Agaton, JD, Associate Dean of Accreditation and Compliance
- Andrew Cho, JD, Academic Program Coordinator
- Elizabeth Gomez, Registrar

The organization chart is attached in Exhibit 6.

Resumes and job descriptions for the deans, administrators, and registrar are included in the Section 6 folder.

Vice President and Dean of the School of Law Jessica Park earned her law degree from Stanford University. The Board of Directors provides the Dean of the Law School the authority and support necessary to discharge the responsibilities of the position. Associate Dean of Academic Success Lydia Liberio earned her LLM degree from the University of Southern California School of Law and her law degree from Loyola Law School. The Associate Dean of Academic Success is charged with ensuring student success in program completion and bar exam pass rates. The Associate Dean of Compliance and Accreditation, Bernadette Agaton, earned her law degree from Southwestern Law School. The Associate Dean of Compliance and Accreditation is charged with managing all compliance and accreditation data and reports. The Registrar, Elizabeth Gomez, earned her Bachelor of Science degree from the University of the East, Manilla, Philippines. The Registrar is the custodian of all student records and assists students with enrollment through graduation activities.

The Dean is responsible for the formulation and administration of the educational programs of the law school, including admissions, curriculum, methods of instruction, and standards for retention, advancement, and graduation of students. Admission decisions are made by the Dean, Associate Dean of Academic Success, and the Academic Program Coordinator. The criteria for admission are set forth in the School of Law Catalog.

Decisions regarding academic policy, curriculum, grading, academic disqualification, and other academic decisions are made by the Dean, Associate Deans, and faculty. Such matters are handled by the Academic Standards Committee (ASC) which meets every other week, includes the Registrar, often with the President in attendance. Faculty members recommend, discuss and debate these issues, and votes are taken regarding policies proposed. Policies approved are then implemented. Faculty members also vote at the ASC meetings on some student petitions for reinstatement, petitions for re-grading, withdrawal, leave of absence, and academic dismissal. In the event a student is not satisfied with the decision, ALU has a grievance procedure pursuant to which an appeal of the decision may be presented to the president.

ALU is not part of a larger institution or entity, and does not have more than one campus.

SECTION 7: 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 able to devote adequate time to provide students both sound instruction and adequate counseling; please refer to all requirements noted in Guidelines 4.1-4.9.

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 of faculty offering reasonable office hours (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 (Guideline 4.6)
- the process, timing, and procedures used to evaluate faculty (Guidelines 4.7 and Guideline 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, with description by function and membership roster
- Academic Freedom policy
- Faculty orientation and training materials, if any

RESPONSE:

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.

The institution’s academic leadership guides law school faculty to devote adequate time to provide sound instruction and adequate counseling. Besides having an invested Board of Directors where Chairman Hyung J. Park, the founder of ALU, presides, ALU has leadership in the Academic Affairs and School of Law departments with substantive experience in the field of distance learning administration and instruction.

Jessica Park serves ALU's Vice President and Dean of the School of Law and has nine years of distance learning and accreditation experience, with five years primarily focused on the academic administration of the online Juris Doctor program. Academic administration includes academic support coordination, curriculum revisions and updates, faculty support, student support related to ALU's courses and management of learning resources such as Westlaw, ALU's online law library. She earned a JD degree from Stanford Law School and a B.A. from Stanford University as a Phi Beta Kappa honoree. External to ALU, Dean Park has volunteered as an Educational Standards Evaluator for the Distance Education Accrediting Commission (DEAC) and has served three years on DEAC's Standards Committee, now currently serving as the Chair of the Standards Committee.

Dr. Robert Abel Jr., the institution's Chief Academic Officer, graduated with a Ph.D. in Psychology from Northcentral University and a M.Ed. in Curriculum and Instruction from University of Nevada, Las Vegas. He brings extensive experience in teaching and academic administration, having served as a high school teacher, department chair, university adjunct professor teaching both campus and online courses and university dean, most recently as National Dean for Center of Teaching Excellence at DeVry University.

Lydia Liberio, Associate Dean of Academic Success, earned a JD degree from Loyola Law School of Los Angeles, an LLM in Alternative Dispute Resolution from USC, an MBA from Daniel Webster College, and a B.A. from UC Irvine as a Phi Beta Kappa honoree. She brings a diverse background of legal practice experience in civil business, employment, family, and estate planning law, as well as teaching law, editing law and project management textbooks, and creating academic curricula. Ms. Liberio volunteers as a Judge Pro Tem and Daily Settlement Officer (mediator) for Los Angeles Superior Court; mediates for the Los Angeles County Department of Consumer and Business Affairs, U.S. EEOC, and California Lawyers for the Arts; and arbitrates for the Los Angeles County Bar Association ACOMAS panel.

The School of Law department orients, monitors and evaluates law school faculty at the assessment and course level. The hiring process includes vetting of faculty candidates for proper credentials and areas of competencies in the area of law school teaching, attorney expertise or both. In orientation, School of Law staff work one to one with faculty on areas of classroom technology, system access, expectations for classroom management and coverage of the syllabus including discussion of deadlines and turnarounds related to grading, video creation and academic support for students.

During each course, School of Law staff, including the Dean of the School of Law and the Associate Dean of Academic Success, checks in with faculty weekly and highlight tasks to be done each week. The Associate Dean of Academic Success serves in a support role to law school

faculty by being able to counsel on best practices with student communications and to review exam materials with faculty. School of Law staff also provide feedback to faculty and clarify whether faculty are meeting expectations at a weekly level in a course, including the tone and accuracy of faculty communications to students and the meeting of academic task deadlines. Through these processes, the School of Law staff assures that law school faculty are devoting adequate time for sound instruction and adequate counseling.

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)

Faculty are involved in student discipline for the Juris Doctor program (such as Honor Council) and grade review (requests for grade review provide for the students discussing with course faculty on grades first before any further request is submitted to the Academic Standards Committee, where School of Law staff are committee members). The Dean works with the Chief Academic Officer, the Associate Dean of Academic Success and faculty on the evolution of academic and non-academic policymaking and serves as a liaison to Advisory Council and faculty committees that discuss topics such as curriculum, outcomes assessment and faculty development. A list of committees at ALU with law school faculty is included in the Section 7 folder.

- current student-faculty ratios, by campus, for multi-campus schools (Guideline 4.3)

ALU has one campus and manages faculty at that campus. The Dean works with the Chief Academic Officer, the Associate Dean of Academic Success and faculty on program coordination, course coordination and student evaluation.

The average student-faculty ratio for 2019 is 38.74, but that overall average reflects a wide disparity of class sizes from year to year: the average student-faculty ratio at the first year level is 87.6 in 2019; 31.8 for second/third year level; and 15.4 for the fourth year level. Due to the numbers at the first year, ALU has had first year coaches and Juris Doctor program staff regularly working alongside first year faculty to coordinate sufficient support to students for test-taking and essay-writing skills and to manage homework assignment grading for a high-volume class. ALU continues to explore strategies related to the first year, including coaches, graders and the creation of sections to manage and improve outcomes in those courses. For example, ALU expanded the first-year coaching team in 2019, including the professor, the lead coach and two additional coaches for the purpose of student feedback on writing during the LF200 Criminal Law course, making the professor a key input into calibration on grading for each assignment – therefore, in this way, despite there being one professor in a class of 86, in

terms of student experience, the professor is assisted by 3 staff available to provide student feedback to students, which provides a support ratio of roughly 22:1.

- [current faculty course loads \(Guideline 4.4\)](#)

In ALU's current academic calendar, faculty can only teach at one level at a time and one course at a time, meaning that their focus is completely on one course for any given project. Faculty must schedule engagement hours per week with students. Each faculty member is available to counsel students and to address questions by email or in office hours with students. In terms of pre-recorded lectures and live engagement sessions, as well as office hours, faculty typically handle 4-6 hours a week per course, and are not scheduled for more than one course.

- [policies and practices to ensure reasonable office hours are provided \(Guideline 4.4\)](#)

The Faculty Handbook and the Faculty Agreement outline the performance expectations and policies for faculty-student engagement. Faculty members required to provide office hours and to be available on a weekly basis to students through live engagement sessions within the virtual classroom and emails outside of eLearn system. The virtual classroom permits students to chat by text and as well as voice-to-voice, face-to-face interactions in classes where the faculty is enabling those features. Typically, Trial Techniques uses this feature the most. Pre-recorded lectures and live engagement sessions are scheduled at regular points per week, making it easier for students to anticipate when they may want to reach out to the professor at what point during the course.

- [current faculty credentials \(Guideline 4.5\)](#)

As can be viewed through ALU's prior Annual Compliance Reports and the Section 7 folder where law school faculty resumes are included, 100% of ALU's faculty for the Juris Doctor program is well-qualified to teach. All of ALU law school faculty has been and is admitted to practice of law in a jurisdiction in the United States, a judge of a United States court or a court of record in any jurisdiction of the United States, or a graduate of a law school approved by the American Bar Association or accredited by the Committee. The faculty as a whole possess a wide range of educational backgrounds for their undergraduate and legal education. ALU does not employ students as instructors, therefore, students are not the sole instructors of any course, seminar, program or activity for academic credit.

- [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 \(4.6\)](#)

All Juris Doctor program faculty must have earned a Juris Doctor degree and have maintained good standing with the California State Bar or another state's attorney-regulating authority by the time they begin teaching at the School of Law. In addition, the Dean of the School of Law and the Associate Dean of Academic Success review prior teaching, curriculum development ability and practitioner experience according to what is needed in the course. At the first-year level, the Dean prefers faculty members who have greater experience in instructional design and academic support knowledge since the first year is where ALU wants to increase engagement and retention during the first year of law school and after the first year when students advance to the First-Year Law Students' Examination. For upper year levels, the Dean of the School of Law looks for professors who can provide more advanced coverage of analytical and legal writing and legal practice skills. Faculty are recruited through formal and informal means. Formally, job postings are placed, e.g. Monster.com, Indeed.com. Informally, faculty are recommended by existing faculty.

The faculty are oriented into each course through logistical training on systems including eLearn and Adobe Connect (where the virtual classroom is held). Regarding course materials, the Dean of the School of Law and the Associate Dean of Academic Success are strong support figures to help guide the professor on coverage of topics in relations to course assessments. There is also further systemic training that is shared institution-wide and described in p. 43 of the Faculty Handbook.

Hired as subject specialists, faculty are expected to update their courses about changes about the law. The Dean of the School of Law supports this effort with faculty through resources and updates from the legal casebook or textbook publishers. Faculty's instructional skills are enhanced through the onboarding, technology training, collaborative work with administrators and coaches, participation on committees, through informal feedback from students, and formal performance evaluations.

- [the process, timing and procedures used to evaluate faculty \(Guidelines 4.7, 4.8\)](#)

The JD Faculty Handbook contains written procedures for regular evaluation of instructor competence, which is provided to each incoming JD faculty member. Regular evaluations and renewed Faculty Agreements for each course taught are ways in which ALU promotes faculty retention. Faculty Agreements outline the course expectations and compensation and these agreements are adjusted for each course taught. Adjustments can be made in compensation recognizing the value and skills of the instructor.

In regards to regular evaluation, the qualifications of faculty candidates prior to hiring were measured by their legal education, their relevant professional experiences and their experience

with post-secondary education and online teaching and learning. In particular, the School of Law department recruited faculty candidates who have engaged in distance education instructional design or teaching at the law school level, to increase the level of optimal distance learning teaching practices in the program. The School of Law department focused also on evaluating prior work that faculty had done at other legal education institutions (such as teaching and curriculum development) and receiving recommendations regarding faculty candidates.

Both new and continuing faculty are expected to demonstrate: solid current subject expertise, strong communication skills, values supporting online learning, student engagement, timely and effective feedback, respect for others, passion for teaching, and commitment to continuous improvement in curricular, instructional and professional development, as well as to contributions to the development of the learning community. The School of Law department coordinates orientation of incoming faculty regarding curricular and technology logistics for the course. As necessary, the School of Law department can provide informal feedback to a faculty member regarding the logistical coordination of the course. The School of Law department also reviews the development of assessment materials, including midterms and final exams, and provides comments directly to the faculty member on assessments that the professor develops.

By the end of a course, the School of Law department has a multi-faceted view of a teaching candidate's understanding and competence to teach the course. The member of the School of Law department in direct supervision of the faculty member provides a written evaluation after the faculty member's first course; thereafter continuing faculty member are evaluated once every year or two years (depending on when a course is taught again, which is annually or once every two years in the JD program). Faculty observation evaluations provide substantive guidance, as well as the opportunity for faculty to provide explanatory comments, using the Faculty Observation Form in the Faculty Handbook.

Faculty are scored on a 4 point scale on various aspects in broader categories including: (1) course facilitation and evaluation of student learning; (2) provision of exceptional learning experience; and (3) professionalism and faculty engagement, along with overall feedback as to the course observation, as well as compliance with school policies, procedures and turnaround times for grading and responding to student communications. The School of Law department debriefs with faculty after the initial observation and later annual observations, and periodically informally review lectures or class websites as well. The Faculty Improvement Plan can be used as effective tool to realign performance with expectations where necessary, as determined through faculty observations.

P. 44 of the Faculty Handbook provides the following regarding faculty evaluation policies:

Faculty Observation and Evaluation Process

The observation and evaluation process are an ongoing process that takes place over the specified time period with the aim of providing faculty feedback for continuous improvement. Faculty observations are conducted by academic administrators (Program Chairs, Deans, and Chief Academic Officer) in formal and informal ways and incorporate a variety of methods for data collection, evaluation and assessment. This data includes formal end-of-course student evaluations of the faculty. Informal observations will be done throughout the year by any of the academic administrators to evaluate course facilitation and evaluating learning, providing exceptional learning experience, professionalism and faculty engagement, and professionalism and faculty engagement. As such, a formal review/observation will be performed by academic administrators, a minimum of onetime per year. Informal observations will be provided at different times during the session and feedback will be provided to the faculty. The observation process is designed with the following primary purposes:

- *Ongoing improvement of a faculty members performance*
- *Recognition and acknowledgement of exceptional performance*
- *Gap analysis for faculty selection, training, and development*
- *Personnel decisions*

The observer will use the Faculty Observation Form (APPENDIX 2) with faculty prior to an observation and encourage faculty to use the form for use as a self-appraisal tool. After the observation, the observer will provide written feedback to faculty within 48 hours. Should the faculty not meet expectations, the observer must complete the Faculty Improvement Plan (APPENDIX 3) with the faculty to be submitted to the Dean or CAO for review.

A copy of the Faculty Observation form is in the Section 7 folder.

Where there are positive faculty evaluations, law school faculty members have the opportunity to advance in terms of title (Instructor to Professor to Senior Professor) with corresponding increases in pay paid on a semimonthly basis.

A copy of the Faculty Observation form, as well as a sample, is in the Section 7 folder.

- [The Academic Freedom Policy](#)

A copy of this policy is in the School of Law catalog, excerpted below:

Academic Freedom

Abraham Lincoln University adheres to the following principles of academic freedom. As a higher education institution, ALU holds the pursuit of education in highest regard and strives to provide an environment that promotes the pursuit of truth and mutual respect to support the generation of new knowledge and reasoned argument based on scholarly justification.

Students and faculty are expected to adhere to academic integrity, the highest ethical standards, and professional conduct in all processes and practices. It is reasonable that the teaching and learning

environments will be open to diverse opinions and voices and that the same course content can be presented in multiple ways in order to achieve the same outcome goals. Teaching and learning styles may differ and it is not unexpected that differences in styles, opinions, and approaches may occur.

Toward these ends and in respect for diversity, the following guidelines should be followed:

1. Abraham Lincoln University recognizes that each faculty member will express his or her opinions and philosophies freely without censorship. Concurrently, it is important that faculty members realize their responsibility to this University to make their students understand that their expression does not represent the opinions of Abraham Lincoln University.

2. The thorough discussion of topics from diverse perspectives within the faculty members' subject is encouraged. Controversial subject matter outside of each faculty member's area of expertise is strongly discouraged within courses.

SECTION 8: RULE 4.160 - (E) EDUCATIONAL PROGRAM. The law school must maintain a sound program of legal education. (Guidelines 1.8 and Guidelines 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) is achieved and measured in the law school’s educational program, including noting how a student’s work is 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 and CBX results and all efforts undertaken to improve academic performance and CBX results

Required Attachments

- Most recent Annual Compliance Plan submitted to the Committee
- 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 2 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
- Any additional studies or statistics internally prepared which measure or correlate academic performance and eventual success on the CBX

RESPONSE:

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.

ALU regularly reviews the Juris Doctor program through the process of self-evaluation and outcomes assessment, which stems from its strategic planning and institutional improvement processes.

The program outcomes describe a student's significant and essential learning that has been achieved and can reliably be demonstrated at the end of a course or program. For the Juris Doctor degree, much of the program objectives were influenced by The MacCrate Report, published by the ABA Task Force on Law Schools and the Profession, which had a comprehensive Statement of Skills and Values to narrow the gap between legal education and the actual practice of law by legal professionals. The program outcomes uses Bloom's Taxonomy to indicate the appropriate level of outcomes for the credential being awarded. For the Juris Doctor, all course objectives stress the ability to not only comprehend information but synthesize and analyze with the information. Also, research and writing are emphasized in higher level courses, which covers legal writing, legal research, legal citation, persuasive writing, trial techniques, effective oral advocacy and effective communication regarding legal issues.

ALU's primary instructional materials for the Juris Doctor program are written casebooks and supplemental outlines. Faculty uses standard legal casebooks and references from major legal publishers to teach the most courses. These commercial materials are specific to each legal subject matter and are a result of extensive research and development by law professors, legal scholars, test preparation experts and publishers.

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

The Juris Doctor program has a one-course-at-a-time academic calendar that has first year, second and third year, and fourth year courses that run on yearly schedules. The first-year curriculum includes the core courses required to qualify for the California State Bar's First-Year Law Students' Examination (FYLSX), Contracts, Torts and Criminal Law. See the table below for a full program overview.

Juris Doctor Program Table

<u>Program Objectives</u>	<p>School of Law Educational Objective</p> <p>The educational objective of the School of Law is to educate qualified individuals through advanced educational technology to gain a comprehensive command of the fundamental areas of law.</p> <p>This objective is achieved through a learner-centered curriculum that is intended to produce the following outcomes.</p> <p>Graduates will have sufficient knowledge and skills to:</p> <ul style="list-style-type: none"> • Understand the theories and principles of law, their qualifications and limitations, and their relationships to each other. • Effectively evaluate possible legal issues in personal and professional situations. • Engage in legal analysis and problem solving. • Develop effective preventative legal strategies. • Communicate legal issues in a thorough, organized and persuasive manner. <p>The School of Law’s educational objectives are attained through a comprehensive curriculum covering courses that are largely similar to the majority of American Bar Association approved law schools. However, the School of Law’s curriculum is delivered through advanced educational technologies such as live and archived streaming video and interactive chat rooms and discussion boards to make it available to working professionals and to increase its educational effectiveness.</p>
<u>First Year Courses</u>	First Year Term = 35 Quarter Units, 52 Weeks
LF100A	Contracts A (7 Quarter Units, 11 weeks)
LF100B	Contracts B (6 Quarter Units, 9 weeks)
LF200	Criminal Law (10 Quarter Units, 14 weeks)
LF300A	Torts A (6 Quarter Units, 9 weeks)
LF300B	Torts B (6 Quarter Units, 9 weeks)

<u>Upper Level Courses</u>	Second Year/Third Year/Fourth Year Term =
	35 Quarter Units, 52 Weeks each
LU01	Real Property (8 Quarter Units, 12 Weeks)
LU02	Wills and Trusts (integrated with legal research and writing of a memorandum) (8 Quarter Units, 12 Weeks)
LU03	Criminal Procedure (4 Quarter Units, 6 Weeks)
LU04	Business Associations (8 Quarter Units, 12 Weeks)
LU05	Remedies (7 Quarter Units, 10 Weeks)
LU06	Evidence (8 Quarter Units, 12 Weeks)
LU07	Civil Procedure (8 Quarter Units, 12 Weeks)
LU08	Professional Responsibility (4 Quarter Units, 6 Weeks)
LU09	Constitutional Law (8 Quarter Units, 12 Weeks)
LU10	Community Property (7 Quarter Units, 10 Weeks)
<u>(cont.) 4th Year¹</u>	
LU41	Advanced Legal Research and Writing (4 Quarter Units, 6 Weeks)
LU60	Trial Techniques (4 Quarter Units, 6 Weeks)
LU62	Advanced Business Associations (4 Quarter Units, 6 Weeks)
LU63	Contemporary Ethical Issues (4 Quarter Units, 6 Weeks)
LU64	Future Interests and Mortgages (4 Quarter Units, 6 Weeks)
LU66	UCC Section 2, 3, and 9 (3 Quarter Units, 5 Weeks)
LU67	Civil Litigation Before Trial (4 Quarter Units, 5 Weeks)

¹ By default, ALU staff only permits students who completed first, second and third years to take fourth year courses or electives. However, special circumstances can apply. If a transfer student has fulfilled a required topic, or there is any issue created due to the continuous study rule that causes a student to be at risk of loss of a full year of credit, then the Registrar may create under limited exceptions a special study plan where a student takes a course out of the fourth year course list, when normally they would need to complete first, second and third years prior to taking any fourth year course.

<u>Electives²</u>	
<u>Elective I</u>	August – late September
LU68	Product Liability Litigation (4 Quarter Units, 6 Weeks)
LAW720	International Business Law (4 Quarter Units, 6 Weeks)
<u>Elective II</u>	September - November
LU61	First Amendment (4 Quarter Units, 6 Weeks)
LAW740	Immigration Law (4 Quarter Units, 6 Weeks)
<u>Total Credits</u>	<u>140 Quarter Units</u>

All courses above in the table are required, except for the elective courses. During two elective periods that take place between August – November, students may select which elective course to take for the Elective I period and the Elective II period.

For a look at a typical law student’s program, see Section 8 folder → JD Course List subfolder → JD Catalog Course List and look for catalog pages that go over Year and Course Sequence.

At this time, ALU requires law students to complete at minimum fifteen (15) units of practice-based skills and competency training pursuant to Guideline 6.9 for the Accredited Law School Rules. While ALU does not at this time have practical skills training outside the classroom, such as through externships, internships, clerkships or clinics, ALU requires the following practical skills training courses (see next page).

² A student must choose an elective during the Elective I period that runs August – September and another elective during the Elective II period of the yearly academic calendar for the School of Law.

Course	Units	Competency Training Basis
LU02 Wills & Trusts	8 quarter units	<i>Legal Research and Writing: Memorandum (closed research)</i>
LU08 Professional Responsibility	4 quarter units	<i>Client service, professional civility and professional responsibility: coverage of professional responsibility topics and legal ethics</i>
LU41 Advanced Legal Research & Writing	4 quarter units	<i>Legal Research and Writing: Legal Memorandum (open research) and Appellate Brief</i>
LU60 Trial Techniques	4 quarter units	<i>Oral Presentation and Advocacy; Trial Practice Skills; Collaboration, Project Management and Time Management: Mock Trial Team Oral Exercises</i>
LU63 Contemporary Ethical Issues	4 quarter units	<i>Client service, professional civility and professional responsibility; applied legal writing: Professional Skills exercises (motion to withdraw, website disclaimer, conflict of interest disclosure, fee agreement)</i>
LU67 Civil Litigation Before Trial	4 quarter units	<i>Pre-trial preparation and fact investigation, including discovery, e-discovery, motion practice, assessing evidence or utilizing experts: Motion to Strike / Demurrer</i>

The School of Law has largely focused on multistate topics that are tested on the California Bar Exam. Where improvements to curriculum have occurred, those have largely been captured through changes to assessments and projects within courses. For example, while Trial Techniques has been included in the required curriculum for a long time, the course delivery that emphasizes an online mock trial format has been the more recent innovation in the past five years, compared to the prior version that was more text-based and offered fewer live trial advocacy practice opportunities. When Federal Civil Procedure was added as a multistate topic to the California Bar Examination, the following run of LU07 Civil Procedure included altered major assessments such as midterms and final exams that included multiple choice questions. When the 3-hour performance exam changed to a 90-minute performance examination at the California Bar Examination level, LU41 Advanced Legal Research and Writing’s final exam also changed accordingly.

However, there have been a few minor changes to course titles: LU04 Business Associations and LU62 Advanced Business Associations were once LU04 Corporations and LU62 Agency & Partnership until School of Law staff determined that it was easier to find casebook version updates that supported business associations texts, rather than corporations-only or agency and partnership-only texts. LU41 Advanced Legal Research and Writing was once LU41 Advanced Writing. ALU also experimented in a few ways with professional skills courses. Prior to 2015, ALU staff split some units away from their doctrinal counterparts and became separate professional skills class with 1-2 quarter units assigned to each. However, since some students did not engage well with a separate course while learning doctrinal topics, especially one that only counted for 1-2 quarter skills-related units, those courses were eventually integrated back into their larger doctrinal counterparts, although several high-value skills-related assignments were kept and integrated into their respective courses.

Due to ALU staff working with transfer students who had already completed some of ALU's first, second and third year course offerings, yet needed to fulfill the necessary 24-26 or 48-52 week continuous study run required at ALU, some of ALU's Juris Doctor curriculum expanded due to the need for more courses beyond its regular required curriculum. Those courses will be the electives that ALU's Juris Doctor program will offer more broadly in the 2020 academic year, while also being used in those special cases where a transfer student has fulfilled a required topic, yet needs the weeks, or there is some other issue created due to the continuous study rule that causes a student to be at risk of loss of a full year of credit unless they are given sufficient coursework to fill a gap. In those cases, the Registrar may create a special study plan for those students under limited exceptions.

In terms of changes that could improve and expand the curriculum, ALU is interested to construct more elective course topics for law students, as well as eventually have experiential and clinical courses for fully online law students. With regards to experiential and clinical courses, in order to find the kind of faculty to facilitate such experiences well, ALU would research on how such courses have been conducted by accredited law schools, what ways those courses would need to meet Committee of Bar Examiners' requirements for accredited law schools, and weigh the benefits and costs of whether some of these courses would need to have a required in-person component for the student with regards to a specific organization or clinic where the students wishes to volunteer or work. ALU would be interested in adding more competency training courses as well.

Lastly, taking into account that the Guidelines for the Accredited Law School Rules differ from the Guidelines for the Unaccredited Law School rules on California Bar Examination Review or Preparation courses at the Juris Doctor level, ALU would consider how to offer and grant academic credit for a bar examination review or preparation course, at least to ensure that

students are seriously investing in the necessary planning and practice involved for bar exam success.

- all policies and procedures, if any, for granting exceptions to the required curriculum, and how often and under what circumstances exceptions are made

In general, ALU law students have to complete at least 140 quarter units in the Juris Doctor program prior to graduation. By default, ALU keeps law students on their regular program level calendar wheels at the first, second, third and fourth years. However, special circumstances do exist.

If a transfer student has fulfilled a required topic already, or there is any issue created due to the continuous study rule that causes any student to be at risk of loss of a full year of credit unless they are given sufficient coursework to fill a gap, then the Registrar may create a special transfer student study or a unique study plan for a student, under limited exceptions.

Transfer credit evaluation and/or FYLSX exemption can leave transfer students with a different amount of credits for their law school studies. In such cases, the Registrar must evaluate what would be the equivalent to ALU's required curriculum, using the bar evaluation attestation required to be in any transfer student's file. Where transfer students have already taken required curriculum, but do not have the appropriate amounts of credits or weeks for the continuous study rule in their special study plan, the Registrar may assign them courses, if available, for them to complete their program to fulfill the appropriate amount of credits or weeks for that term. Any credit evaluation by the Registrar that results in a special study plan for a transfer student is documented by the Registrar in the student's profile on the student information system.

In addition, due to the guidelines and rules for unaccredited law schools, ALU runs into cases where students may lose years of credit due to the continuous study rule. As stated in the Juris Doctor program catalog, the Committee of Bar Examiners requires that students accrue JD program units in increments of 24-26 consecutive weeks or 48-52 consecutive weeks. Students whose studies are interrupted in the middle or end of any continuous study increment, whether the interruption is due to the student failing to meet attendance requirements for academic credit, failing a course, taking a leave of absence, withdrawing, or being dismissed, lose credit for coursework completed within the continuous study increment affected by the interruption. Loss of credit due to the continuous study rule requirement renders previously accrued credit in a given continuous study increment or year of study invalid for the purposes of progress towards graduation and any certification requirements for State Bar of California exams.

However, there are times when the Registrar can save some program units for a student who accrued credits in a 24-26 week period within a larger 48-52 week run that was rendered invalid for the purposes of progress towards graduation and any certification requirements for State Bar of California exams. However, some of ALU's curriculum can fall within 24-26 week periods so that one course's start is at the beginning of the 24-26 week period and another course's end is at the end of that same period. Therefore, the Registrar can sometimes validly save credit. In such cases, a unique study plan may need to be given to a student who got credits saved. That study plan may allow the law student not to take a course normally required for all other law students at the same program level and in a 52-week continuous study run, because that law student already took a course that had been previously saved by the Registrar. Instead, the Registrar may place another law school course offering that is live or archived, so that the student's current continuous study run does not have to stop due to prior saved credit.

In addition, due to the guidelines and rules for unaccredited law schools, ALU runs into cases where students may lose years of credit due to the continuous study rule. As stated in the Juris Doctor program catalog, the Committee of Bar Examiners requires that students accrue JD program units in increments of 24-26 consecutive weeks or 48-52 consecutive weeks.

In such cases, the Registrar must evaluate what would bring the law student closest to the live course offerings then-scheduled within program levels calendar wheels, that would help that student feasibly fulfill as much of ALU's program requirements as possible. Any unique study plan determined by the Registrar for a student is documented in the student's profile within the student information system.

- [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](#)

ALU's Juris Doctor program is fully online and the program is conducted by means of distance-education technology. The JD program curriculum is within an online learning management system called eLearn, a Moodle-based system. Staff, faculty and students can engage on sites where announcements, discussion board forums, homework assignments, quizzes and timed midterm and final exams can all be placed within sites, including course sites. ALU also can store files and announcements on eLearn, as well as set up helpful pages such as a Student Center for Law Students for administrative support and an Academic Success Program page as a 24/7 online law school academic support resource. ALU's usage of Adobe Connect, a virtual meeting software application, permits live-streaming engagement and facilitates recording of video by faculty and staff. Adobe Connect engagement points can be embedded link-wise at the eLearn site in individual course sites, and that is how ALU can direct law students to engage weekly in courses with their law school faculty.

ALU will continue using fully online methods of instruction for its curriculum. In terms of changes that could improve and expand the curriculum, ALU is interested to construct more elective topics for law students, as well as eventually have experiential and clinical courses for fully online law students. With regards to experiential and clinical courses, in order to find the kind of faculty to facilitate such experiences well, ALU would research on how such courses have been conducted by accredited law schools, what ways those courses would need to meet Committee of Bar Examiners' requirements for accredited law schools, and weigh the benefits and costs of whether some of these courses would need to have a required in-person component for the student with regards to a specific organization or clinic where the students wishes to volunteer or work.

Lastly, taking into account that the Guidelines for the Accredited Law School Rules differ from the Guidelines for the Unaccredited Law School rules on California Bar Examination Review or Preparation courses at the Juris Doctor level, ALU would consider how to offer and grant academic credit for a bar examination review or preparation course, at least to ensure that students are seriously investing in the necessary planning and practice involved for bar exam success. ALU would consider the option to make successful completion of a bar examination or preparation course a condition of graduation with total credits for the bar review course being kept at a minimum, given that a necessary threshold to maintain CBE accreditation would be the 5-year minimum passage rate of 40% requirements for all recent graduating cohorts in a 5-year period who take one of the 10 CBX administrations in that period.

- [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](#)

ALU's current Juris Doctor program structure is a 4-year program structure, which each yearly term running 52 weeks. The 140 quarter units included in the program, according to the Carnegie unit credit hour formula, would come out to 4,200 hours of study across four years, and 1,400 of those at minimum are academic engagement hours under the Carnegie unit credit hour formula. This is due to every quarter unit being 30 study hours, which includes 10 hours of academic engagement and 20 hours of preparation outside of the classroom. By the nature of its structure, ALU's Juris Doctor program exceeds the 1,200 hours of verified academic engagement requirement due to the following:

- (1) the equivalent of 80 semester units in quarter units is 120 quarter unit, and ALU's Juris Doctor program has 140 quarter units;

(2) an extra 20 quarter units equates to an extra 600 study hours with 200 of them being extra academic engagement hours.

In addition to the above, it's crucial to remember that the Carnegie unit credit hour formula is framed around undergraduate education, which a Juris Doctor program exceeds in terms of academic rigor. Even without express inclusion of final examination time, which is permitted under 6.5(B)³, ALU has substantive documentation tracking student participation in a "synchronous or asynchronous curriculum offered through distance-learning technology"⁴ due to students actively working on quizzes, homework assignments, and discussion board postings in each course. Students have mandatory engagement points with each professor, having 3-4 hours of faculty-prepared lectures and live engagement sessions to attend weekly (sometimes even higher depending on the types of course activities they must handle in the course). Students can chat online with their professor through live engagement sessions where professor focus on applications and practice scenarios of concepts being covered, providing many available opportunities for live engagement and Q&A per course. Beyond that, students also can email their professors questions on course content or other logistics, as well as receive support with School of Law and Academic Success staff in relation to their academics or academic support requests.

- [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\(C\)](#)

ALU requires regular and punctual attendance in academic engagement as required by Guideline 6.5 (C). ALU's written policy is provided in the Juris Doctor program catalog and clarifies to students what is expected. The policy must require completion of not less than eighty percent of the academic engagement in regularly scheduled class hours or not less than eighty percent of the minimum number of hours of other types of academic engagement required in each course in which the student is enrolled. ALU does not have an approved experiential or clinical program, so the following will not include those at this time.

The written policy from the School of Law catalog is as follows:

³ Final examination time, not exceeding ten percent of the total number of hours of academic engagement, may be included as academic engagement hours, and counted toward the 1,200 hour requirement.

⁴ This language is from the Guidelines for Accredited Law School Rules, Guideline 6.5 Quantitative Academic Requirements, (B) Academic Engagement.

Attendance Requirements

For successful studies and to comply with online education requirements, students must adhere to **both** the (1) University's Participation Policy and (2) the Committee of Bar Examiners' attendance standards.

1. ALU's Weekly Participation Policy Requirement

To determine if students are "attending" the University, students **must** actively participate in a weekly ALU academically-related activity (ARA). ARAs are used to determine a student's official last date of attendance as well as the effective date of active and withdrawn enrollment statuses. Online courses begin on a Sunday for the School of Law and end on a Saturday. Regardless of when assignments are due, students must submit weekly ARA submissions in each week of the course (the week beginning on Sunday and ending on Saturday). Weekly ARA submissions are due in each week.

The following are considered academically-related activities (ARAs) and meet the University's Participation Policy Requirement:

- Participation in online Discussion Board Postings
- Submission of Homework Assignment(s)
- Submission of Quiz/Exam
- Attendance at a live online or in-classroom lecture or online live engagement session with online submission of discussion board posting, quiz, or assignment (local students who opt to physically attend live-in classroom sessions located in Glendale must log into the designated campus computer workstation)
- Viewing archived streaming video with online submission of discussion board posting, quiz, or assignment

The following are not academically-related activities (ARAs) and do NOT meet the University's Participation Policy Requirement:

- Attending a live (online or in-classroom) session *without any discussion board posting, quiz, or assignment submission*
- Viewing archived streaming videos *without any discussion board posting, quiz, or assignment submission*
- Seeking academic counseling or advisement

ALU's learning management system captures when students complete the above academically-related activities (ARAs) online. The data captured on this learning management system will be used to monitor student progress.

Students who do not complete ARAs within the first 14 days of the term start date will be constructively withdrawn from their classes and their enrollment will be administratively cancelled.

Students who fail to complete ARAs for 21 consecutive calendar days will be out of compliance with ALU's participation policy and will be academically dismissed from the

University as recorded on the student's transcript/records. Abraham Lincoln University will issue an Academic Dismissal Warning Letter to students who have no ARA for two consecutive weeks (14 days) and who are in jeopardy of not meeting ALU's Participation Policy.

2. Committee of Bar Examiners (CBE) Minimum Requirements

Students must participate in **a minimum of 80% of the regularly scheduled and required events (lectures and online live engagement sessions) in each course by the time of the date for the Final Exam as stated in the course syllabus, in order to receive credit for the course;**

- Regular and punctual participation in interactive courses is required;
- CBE requires that students accrue JD program units in increments of 24-26 weeks or 48-52 weeks.

The following meet CBE's attendance requirements:

- Attend at least 80% of the available live online or in-classroom sessions in the course;
- View at least 80% of the archived streaming video in the course

The following do not meet CBE attendance requirements:

- **Downloading ALU audio files only**
- Attending optional sessions (e.g. office hours, academic counseling or advisement)
- Taking and completing the Final Exam does not constitute an agreement by ALU that the student has in fact complied with this 80% attendance rule.

ARA Deadline Extensions and Special Circumstances

To request a weekly ARA deadline extension, students must submit an Extension Request form on their online course site and must follow all instructions on the form for approval. To request an extension on an exam, students must submit a separate petition to the Registrar's office.

A student may appeal the University's participation policy if the student can demonstrate that he/she is on pace, engaging in activities not captured, by default, by ALU's learning management system. Such activities may include initiating contact with faculty to ask questions about subject studied, posting subject related content in required live lectures or live engagement sessions, etc. The student must submit their request, in writing, and must provide supporting documentation to the ASC Academic Appeals Subcommittee. The ASC Academic Appeals Subcommittee will review the appeal, documentation, and will inform the student of the outcome.

- [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\(C\)\)](#)

ALU does not have approved experiential or clinical programs at this time.

- 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))

ALU does not require student attendance in a physical classroom at this time.

- 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)

ALU does not have a summer session at this time.

- 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)

ALU does not have a summer session at this time.

- 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))

ALU's Juris Doctor program structure is a 4-year program structure, which each yearly term running 52 weeks. The 140 quarter units included in the program, according to the Carnegie unit credit hour formula, would come out to 4,200 hours of study across four years, and 1,400 of those at minimum are academic engagement hours under the Carnegie unit credit hour formula. This is due to every quarter unit being 30 study hours, which includes 10 hours of academic engagement and 20 hours of preparation outside of the classroom. By the nature of its structure, ALU's Juris Doctor program exceeds the 1,200 hours of verified academic engagement requirement due to the following:

- (1) the equivalent of 80 semester units in quarter units is 120 quarter unit, and ALU's Juris Doctor program has 140 quarter units;
- (2) an extra 20 quarter units equates to an extra 600 study hours with 200 of them being extra academic engagement hours.

In addition to the above, it's crucial to remember that the Carnegie unit credit hour formula is framed around undergraduate education, which a Juris Doctor program exceeds in terms of academic rigor. Even without express inclusion of final examination time, which is permitted under 6.5(B)⁵, ALU has substantive documentation tracking student participation in a

⁵ Final examination time, not exceeding ten percent of the total number of hours of academic engagement, may be included as academic engagement hours, and counted toward the 1,200 hour requirement.

“synchronous or asynchronous curriculum offered through distance-learning technology due to students actively working on quizzes, homework assignments, and discussion board postings in each course. Students have mandatory engagement points with each professor, having 3-4 hours of faculty-prepared lectures and live engagement sessions to attend weekly (sometimes even higher depending on the types of course activities they must handle in the course). Students can chat online with their professor through live engagement sessions where professor focus on applications and practice scenarios of concepts being covered, providing many available opportunities for live engagement and Q&A per course. Beyond that, students also can email their professors questions on course content or other logistics, as well as receive support with School of Law and Academic Success staff in relation to their academics or academic support requests.

Both Adobe Connect and eLearn are systems that can track synchronous and asynchronous activities for users, and ALU also asks law students to submit weekly study logs on their law school studies. Currently, in 2020, ALU will also begin to use end-of-course questions that gather data on how students are spending time in their courses.

Lastly, ALU staff can also verify further that students are engaging in the course site and earning their credits legitimately through live mandatory proctoring points, where students must bring government-issued identification and show that to a live proctor prior to sitting for their final exam. In all these ways, ALU can check that the student is earning the online Juris Doctor program validly according to 6.5(A) and 6.5(B) .

In terms of addressing minimum and maximum length of the Juris Doctor program, ALU at this time offers four years of 52-week terms. However, law students take a long time to complete their program. There are many reasons for this: the working adult demographics, the proficiency requirements that students must meet before ALU will certify them for the FYLSX, and the default policy of the law school that no students continue by default to the second year without FYLSX passage in advance (instead needing to petition and have sufficiently high grades before they may be permitted to continue to the second year by the Academic Standards Committee). Therefore, students may exceed the eighty-four month period that is mandated by the Guideline 6.5(A) for Accredited Law School Rules. However, since mid-2019, the Academic Standards Committee has been denying reinstatement petitions from law students if they have been gone too long due to leave of absence related to the FYLSX, withdrawals or other reasons, informing them that they only can re-start their Juris Doctor program. In this way, ALU is demonstrating commitment to be able to comply eventually with the provision: *“A law school must require the course of study for the J.D. degree be completed no earlier than thirty months and no later than eighty-four months after a student has commenced law study at the law school or a law school from which the law school has accepted transfer credit.”*

Given that the FYLSX is a hurdle that currently unaccredited law school students must take at ALU prior to entry into the second year, except a few factors that can be petitioned for, ALU would not presently publish a written policy that makes 84 months the maximum program length; however, upon receiving approval for CBE accreditation, ALU would institute the 84 months as a maximum program length.

ALU does not have approved experiential or clinical programs at this time.

- [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\(F\)](#)

The Juris Doctor program is a part-time program with 6 or more hours of academic engagement per week for its law students. As explained above, the Juris Doctor program is rigorous. It includes challenging texts and lectures and discussions that test even those with strong ability to comprehend concepts and applications is challenged. In the first year, regularly, students are taking many hours each week to actively engage with the course site in discussion boards, quizzes, homework assignments and exams in the part-time program that ALU provides. Besides mandatory engagement points with each professor, having 3-4 hours of faculty-prepared lectures and live engagement sessions to attend weekly, students have at times required sessions with coaches or Academic Success staff to get the advice on law school studies that they need. Students also have to spend time checking their own comprehension, going over materials or following up with a professor or coach through the discussion board forums or on email.

Reading the casebook, reviewing an outline, using a study aid, going to study groups, and practicing essays and multiple choice questions are activities that can occur offline, and therefore can be considered "preparation outside of the classroom" time, and those hours proportionately increase in a rigorous graduate academic program along with the academic engagement hours. For that reason, when ALU checks on the study time reported in minutes and hours by students on a number of different activities, including casebook reading and briefing, supplemental reading, study groups, homework problems, study for exams, and usage of online study aids like outlines or multiple choice question generators, all first year, second and third year students in the past five years have reported that academic engagement and preparation outside of the classroom hours are higher than what the Carnegie unit formula would predict. Only at the fourth year do students report hours that are about the same or marginally lower than what Carnegie unit formula would predict, but that only is occurring after students had at least three years in the law school program, which includes required multistate topics with timed exams for the vast majority of that coursework.

Academic engagement includes engagement with faculty-prepared lectures and live engagement sessions, posting of discussion board forums, taking of quizzes, working on homework assignments and exams on the site, and students can also seek additional coaching and academic support. For all the reasons stated, ALU has 6 or more hours of academic engagement per week.

- 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 that they meet the Guideline 6.5(A) requirements concerning 1,200 hours of study in aggregate (Guideline 6.5(H))

For any student that completes a portion of their legal studies at another registered, unaccredited law school, ALU has catalog policies in place for transfer students including the need for transfer students to get a law study evaluation.

“Transfer Students

In addition to the requirements listed previously for new students, students transferring from other law schools must also provide the following items:

1. Law Study Evaluation - You must submit your official law school transcripts to the State Bar of California’s Office of Admissions and submit an Application for Evaluation of Law Study Completed and Contemplated. The cost of obtaining this evaluation from the State Bar is \$100.

ALU will review any law study evaluation critically to make sure that what the student is getting transferred into the Juris Doctor program is sufficient.

In addition, with regards to meeting requirements, such as provision below, the Juris Doctor program at ALU can meet those provisions.

“§ 6060(e)(2)(E) requires four separate years of study in a law school (accredited or unaccredited), in each of which the student was enrolled in a course of study requiring at least 270 hours of classroom attendance. For this purpose, a “year” is any period of twelve consecutive months.”

ALU’s current Juris Doctor program structure is a 4-year program structure, which each yearly term running 52 weeks. The 140 quarter units included in the program is about 4,200 hours of study, with 1,400 of those at minimum being academic engagement hours. However, practically speaking, the rigor of the Juris Doctor program makes it so that ALU easily have students who have more than six hours of academic engagement per week.

Therefore, ALU’s Juris Doctor program will meet the at least 270 hours of classroom attendance within a course of study requirement, as well as 6.5(A)’s 1,200 hours of study (specifically,

academic engagement) required in the aggregate prior to a graduate of an accredited law school being eligible to take the California Bar Examination.

- [the policies, procedures and controls used to grant credit for internships, externships or other non-classroom activities; please discuss their utility and effectiveness](#)

ALU does not offer internships, externships or other non-classroom activities for credit at this time.

- [the relationship between graduates’ final grade point averages to CBX results and all efforts undertaken to improve academic performance and CBX results](#)

In a recent analysis of ALU grades with California Bar Exam passage, ALU studied recent takers of the California Bar Examination who also graduated from the School of Law between January 1, 2014 and May 30, 2019. In total, there were seventy graduates who completed the Juris Doctor program between January 1, 2014 and May 30, 2019 and who took the California Bar Exam at least once up to the July 2019 CBX administration. Out of these seventy, thirty-four graduates successfully passed the exam (48.57%). Sixteen out of thirty-four overall passers were first-time passers. Two out of the thirty-four were transfer students, who both became repeater passers.⁶

	Overall Takers	All Passers	First-Time Passers	Repeater Passers	Non-Passers
Number per category	70	34	16	18	36
Lowest ALU grade average	67.44	67.44	68.26	67.44	68.77
Highest ALU grade average	86.62	86.62	86.62	81	85.23
Mean	78.02	79.24	81.54	77.36	76.86
Median	78.14	79.45	83.66	78.89	75.96

While the sample size is small, the fact that the recent takers of the California Bar Examination graduated from the School of Law between January 1, 2014 and May 30, 2019 and took the

⁶ For analysis done with this group about undergraduate GPA and California Bar Examination passage, please see the end of Section 12.

California Bar Exam at least once up to the July 2019 CBX administration reflects a sufficient period of time to see whether ALU grade data is significantly different between non-passers, passers, first-time passers and repeater passers.

The mean and median of the first-time passer data are 81.54 and 83.66, with the all-passer data's mean and median at 79.24 and 79.45. However, the range of data in both of those columns indicate that those with lower grades can pass even first-time. However, the lower range below the median is much more spread across a larger range, compared to the upper range above the median. For all passers, half of the passers fall between 67.44-79.45 (12 points), while the other half fall between 79.45-86.62 (7 points). For the first-time passers, the spread is even more marked: half of the first-time passers fall between 67.44-83.66 (16 points), while the other half fall between 83.66-86.62 (3 points).

The non-passer data has a mean and median of 76.86 and 75.96, which is markedly lower than the mean and median of other categories. However, those still seem relatively high given that ALU's academic good standing policies orient around 70 as a threshold. There are ways that the School of Law should consider stronger differentiation in grading on assignments that correlate with the student's ability to write timed legal analysis, which is the major way that ALU attempts to assess students for their aptitude for law school study and for eventual bar exam passage.

Findings:

- All passers had at least a 67.44 ALU cumulative grade average, but the means of the passer categories are in the higher 70s. Assuming that grading will be consistent and that passing categories may have similar means in the future, School of Law should consider whether to require a minimum cumulative grade average of 70 or above in order to graduate from the Juris Doctor program, if not higher.
- Given that the mean for first-time passers is 81.54, Academic Success Program at the School of Law should do further studies to identify what best practices and capabilities those who achieve cumulative grade averages at that level (81 and above) have, and consider how to motivate students so that they can be improving to work at that level.

For further analysis:

- Although the sample size limits the strength of correlations, the School of Law can do further studies into this data set to check for any available correlations between ALU grades and California Bar Examination passage.
- In combination with Section 11's datapulls, correlations can be checked for undergraduate GPA and ALU grades for passers, but a more fuller data set is needed to

check for correlations with undergraduate GPA data for all takers (not just passers). Also, a more fuller data set regarding whether transfer student information about all takers (not just passers) could provide a fuller look at trends among that subset of ALU students through graduation and California Bar Examination passage.

- ALU School of Law graduates face a variety of short-term logistical issues as they attempt the California Bar Examination. At times, family issues, work events (even positive events like promotions) or medical issues can drastically affect the time the student can prepare for the California Bar Examination. ALU Academic Success Program staff can note these factors more clearly per student per graduate cohort, in tandem with outreach and guidance efforts related to advising for bar examination preparation, so that there can be more insight into what students were facing at the time of their bar exam attempts, rather than data points that are indifferent to the kinds of issues that impact how well students can be prepared in the short term.

SECTION 9: 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. Discuss what measures are in place to ensure students enroll for and complete those courses, as well as tracking progress towards completing this requirement.

In responding to the Guidelines, discuss in particular:

- 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, 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
- the policies, procedures and controls used to grant credit for internships, externships or other non-classroom activities, including a discussion of their utility and effectiveness

Required Attachments

- 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 as to all credit given for internships, externships or legal work performed outside the classroom
- A five-year comparison of average class size, with any reasonable projections of whether average class size is expected to increase or decrease

RESPONSE:

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.

Guideline 6.9 states: “Competency training must develop the concepts underlying a particular practice-based skill or subject matter, provide opportunities for individual student engagement in addition to traditional classroom discussion, provide for student feedback from a faculty member, and provide opportunities for student self- evaluation.”

The following courses are courses that contain competency training (syllabi are accessible in the Section 9 folder). All students will fulfill the requirements of competency training through required curriculum as it is sequenced from program level to program level.

Course	Units	Competency Training Basis
LU02 Wills & Trusts	8 quarter units	<i>Legal Research and Writing: Memorandum (closed research)</i>
LU08 Professional Responsibility	4 quarter units	<i>Client service, professional civility and professional responsibility: coverage of professional responsibility topics and legal ethics</i>
LU41 Advanced Legal Research & Writing	4 quarter units	<i>Legal Research and Writing: Legal Memorandum (open research) and Appellate Brief</i>
LU60 Trial Techniques	4 quarter units	<i>Oral Presentation and Advocacy; Trial Practice Skills; Collaboration, Project Management and Time Management: Mock Trial Team Oral Exercises</i>
LU63 Contemporary Ethical Issues	4 quarter units	<i>Client service, professional civility and professional responsibility; applied legal writing: Professional Skills exercises (motion to withdraw, website disclaimer, conflict of interest disclosure, fee agreement)</i>
LU67 Civil Litigation Before Trial	4 quarter units	<i>Pre-trial preparation and fact investigation, including discovery, e-discovery, motion practice, assessing evidence or utilizing experts: Motion to Strike / Demurrer</i>

Discuss what measures are in place to ensure students enroll in, progress in, and complete those courses.

The courses for competency training are mandatory for students to take in their upper level years as those courses must be taken within their levels and cycles. Students are properly enrolled in the courses in their program sequence, and to progress to their next course must complete the competency course.

In responding to the Guidelines, discuss in particular the following.

- 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

All of the above are covered in Section 8.

For Section 9's attachments, please look at Section 8 for the following:

- *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 as to all credit given for internships, externships or legal work performed outside the classroom*
- *A five-year comparison of average class size, with any reasonable projections of whether average class size is expected to increase or decrease*

Please look at Section 9's folder for the following:

- *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*

SECTION 10: 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; 3) ensure that grades accurately reflect students' abilities and their likelihood of passing the California Bar Examination; and 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, 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, faculty handbook)
- Policies regarding time allotted to submit grades, provide grading comments, express limits on the use of any grading "curve" (refer to the catalog or 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.

RESPONSE:

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.

The Academic Standards Committee and School of Law staff implement and maintain sound scholastic standards related to good standing, academic probation and academic dismissal.

First-year (1L) students must maintain a cumulative average grade of 70 or above to remain in good academic standing. All students with a cumulative average grade of 60 and above and below 70 will be placed on academic probation. A student who is placed on academic probation, and who is unable to improve his or her cumulative average grade to 70 or above by the end of the academic term (35 quarter units) will be academically dismissed. Any student whose cumulative average grade falls below 60 at the end of his/her 1L curriculum will be academically dismissed. Students who are academically dismissed may petition the faculty for reinstatement based upon a clear showing of special circumstance and good cause.

Upper level students must maintain a cumulative average grade of 70 or above to remain in good academic standing. All students with a cumulative average grade below 70 will be placed on academic probation. A student who is placed on academic probation, and who is unable to improve his or her cumulative average grade to 70 or above by the end of the academic term (35 quarter units) will be academically dismissed.

Any student whose cumulative average grade falls below 60 and fails to raise cumulative average grade to a minimum of 67 by the end of the academic term will be academically dismissed. Students who are academically dismissed may petition for reinstatement based upon a clear showing of special circumstance and good cause.

Lastly, transfer students who enter Abraham Lincoln University in good standing must maintain a yearly average grade of 70 or above in classes attended at Abraham Lincoln University.

Students with a cumulative Abraham Lincoln University average grade below 70 will be placed on academic probation. A student who is placed on academic probation, and who is unable to

improve his or her cumulative average grade to 70 or above by the end of the academic term (35 quarter units) will be academically dismissed.

Any student whose cumulative average grade falls below 60 and fails to raise yearly average grade to a minimum of 67 by the end of the academic term will be academically dismissed. Students who are academically dismissed may petition the faculty for reinstatement based upon a clear showing of special circumstance and good cause.

The Office of the Registrar tracks progress with the Student Services staff, who can check in the eLearn center how students are progressing in attendance, student assignments, quizzes, discussion boards and homework assignments. Student Services emails the students if they did not submit their weekly assignments and the Associate Dean of Academic Success also contacts students to motivate students to maintain progress. Further details about how ALU maintains scholastic standards in a way that is aligned with Guidelines 7.1-7.12 are discussed below.

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

The School of Law's current policies, procedures and efforts to grade in a way that maintains uniform grading standards, identifies and curbs grade inflation and ensure that grades accurately reflect student's abilities and their likelihood of passing the California Bar Examination are as follows:

Grading for the JD program is accomplished by faculty, which can include those that faculty are supervising to support faculty to handle grading within turnarounds (attorney graders). Faculty perform grading of homework assignments, essays, legal writing projects, such as memoranda, client letters and trial and appellate level briefs, performance style tests, presentations of legal research, legal advocacy presentations, and research-based term papers. Attorney graders can be called upon to assist faculty with grading of weekly assignments, as deemed appropriate by the Dean of the School of Law, to meet grading turnarounds, but any such arrangement include faculty supervising on the grading. Several courses that involve writing projects use detailed grading rubrics that are included in the syllabus or otherwise published to students. The final grade in a course is based on the student's examinations and assignments. Faculty rate student achievement on content, conformity with legal writing conventions, accuracy, legibility, presentation, analysis and overall quality. The Associate Dean of Academic Success and the Dean of the School of Law monitors grading by faculty.

Below are the types of substantive assessments that exist in the JD program, how they assess students on legal analysis, writing skills or presentation skills, and how each are handled with processes and practices that keep uniform grading in mind.

Homework Problems

Homework assignments typically consist of problems from published course casebooks or related workbooks, which require students to apply distinct legal doctrine to a factual hypothetical problem. Typically, homework problems are assigned in every other week, alternating with quizzes. Faculty access the homework assignments via the course site in the learning management system and review, grade and return assignments with feedback to students; in cases where there is a large class size, the Dean and faculty coordinate supporting coaches with attorney qualifications to grade the homework loads within grading turnarounds, with Dean. The Associate Dean of Academic Success and the Dean of the School of Law monitors grading by faculty on homework and provide guidance and feedback regarding homework scoring and feedback.

Essay Questions

Midterm and final examinations typically include essay questions designed to measure a student's ability to analyze legal issues arising from hypothetical fact patterns. Faculty teaching each course create essay questions and issue outlines. Student answers are expected to demonstrate the student's ability to analyze the facts of the question, to distinguish between material facts and immaterial facts, and to discern the points of law and facts upon which the legal outcomes turn. The answer must show knowledge and understanding and application of the pertinent principles and theories of law, their qualifications and limitations, and their relationships to each other. The answer should be a demonstration of the student's ability to apply the law and logical reasoning to the given facts to identify a sound conclusion. A student should not merely show that he or she remembers the legal principles but should also demonstrate his or her proficiency in practical applications of the correct legal principle to a given situation.

The faculty who is teaching the course typically grades both midterm and final essay examinations, providing feedback to students via the course website, and directing students with major deficiencies to seek academic support; in cases where there is a large class size, the Dean and faculty coordinate supporting coaches with attorney qualifications to grade the essay loads within grading turnarounds, with Dean and faculty leading and reviewing on grading of coaches. Blind grading procedures are applied to examination essays, which constitute major grade weights for every course. These procedures help students to understand that essay

grading is done on content of each essay and can alleviate concerns regarding potentially biased grading due to knowledge of student identity.

The Associate Dean of Academic Success and the Dean of the School of Law monitors grading by faculty and any coaches on essays and provide guidance and feedback regarding essay scoring and feedback.

Multiple Choice Questions

Midterm and final examinations for courses covering subject that are eventually tested through the multistate bar examination also include multiple choice questions designed by professors teaching the courses. Faculty may also give interim quizzes to students using multiple choice questions. Faculty are required to write answer explanations for these questions. Prior to giving the exam, the exam is reviewed by the Dean of the School of Law, the Associate Dean of Academic Success and/or by another faculty with knowledge of the substantive material for the course. After the exam is administered, the Dean of the School of Law and faculty teaching the course review the statistical analysis of the multiple choice exam to assess the validity of the exam, and to address any issues with any of the questions.

Performance Exams

Performance exams are designed to test a student's ability to understand and apply a select number of legal authorities in the context of a more complex factual scenario presenting a legal problem. Each question consists of a file (similar to a client file, setting forth the factual scenario and legal problem) and library (including legal authority such as cases and statutes) with detailed instructions advising the student what task(s) should be performed. Faculty creating performance exams create a model answer or issue outline. Student answers are graded based on that answer. In addition to measuring a student's ability to analyze legal issues, performance exam questions require students to:

- i) Sift through detailed factual material and discern the relevant facts, assess the consistency and reliability of those facts, and determine the need for and source of additional facts.
- ii) Analyze the legal rules and principles applicable to a problem and formulate legal theories from facts that may be only partly known and are being developed.
- iii) Recognize and resolve ethical issues arising in practical situations.
- iv) Apply problem solving skills to diagnose a problem, generate alternative solutions, and develop a plan of action.
- v) Communicate effectively, whether advocating a legal position, advising a client, eliciting information, or effectuating a legal transaction.

Faculty grade performance exams, providing feedback to students via the course website, and directing students with major deficiencies to seek academic support. The Associate Dean of Academic Success and the Dean of the School of Law monitors grading by faculty on performance exams and provide guidance and evaluation for faculty's scoring and feedback.

Oral Presentations

Some upper level courses require students to make oral presentations regarding legal research projects which are the subject of term papers or to demonstrate oral advocacy skills by presenting opening statements, closing arguments, jury voir dire, and direct and cross-examinations. For each presentation, a rubric is published to students to explain the skills students must demonstrate and the allocation of points. Students are graded in reference to that rubric, and in addition, provided with constructive comments by the faculty so that students may improve in oral presentation.

The Associate Dean of Academic Success and the Dean of the School of Law observe oral presentations recorded on videos within a course site and check faculty's scoring and feedback when faculty submit grades for the gradebook on presentations.

Legal Writing Assignments

Upper level courses require students to produce legal writing assignments including legal research memoranda, client letters, motions, and appellate documents. These assignments typically are derived from course books and are graded against the samples and guidelines as described in the associated teacher's manuals. Faculty grade legal writing assignments, providing feedback to students via the course website, and directing students with major deficiencies to seek academic support.

The Associate Dean of Academic Success and the Dean of the School of Law guide and evaluate faculty's scoring and feedback when faculty submit grades for the gradebook on legal writing assignments.

Holistic Grading

Faculty may use holistic grading to assess legal writing assignments, such as the essay questions and performance test. In holistic grading, the legal writing assignment is examined as a whole, without treating the technical content and writing style (including grammar and mechanics) as separate categories to grade.

In particular, holistic grading does not follow the usual formula for deducting points for particular analytical deficiencies. Rather, it sets forth defined standards for various grades against which the entire document is judged. As a result, an essay or assignment is judged based on the student's overall level of competency in the subject matter and on the student's

use of necessary skills to complete the assignment given. A sample answer or issue outline is generally used to form the basis for holistic grading. Student answers are then assessed according to how similar they are to the sample answer or issue outline.

Holistic Grading Guidelines

In holistic grading, students are assessed with incremental grading. An essay or assignment is judged based on the student's overall level of competency of the subject matter or skills necessary to complete the assignment given. A sample answer is generally used to form the basis for the grading. Student answers are then assessed as close to the sample as possible. In holistic grading, students are usually assessed a five-point increment number grade.

Grading Scale:

- 90 – 100: Generally, very few student essays fall within this range. The student essay is better than the released or sample answer, because it identifies more legal issues and makes creative, sound arguments about those legal issues. The analysis is very well-developed, and the student has used facts skillfully to support a sound legal conclusion. The student has even identified additional facts or alternative versions of facts that are not in the sample answer.
- 80 – 89: This essay identifies all the major and minor issues contained in the released or sample answer. The issues are well developed and the student has discerned key points on which the case may turn, using facts and the law to discuss all the legal stances that parties may take.
- 70 - 79: This essay identifies all of the relevant major issues, but may miss some minor issues. The student has discussed all the relevant legal rules and elements to those rules. The analysis is average with most of the major facts and major points being discussed, but there may not be complete acknowledgement or development of all the legal stances that parties may take.
- 60 – 69: This essay identifies most of the relevant issues, but misses several minor issues or even a major issue. While most of the necessary discussion about legal rules and elements is present, the student has not used the facts sufficiently in an analysis to discuss all the points on which a case may turn. Some analysis of key issues is missing in the student's answer.

60 and lower: This essay misses most or all of the relevant issues. It fails to discuss the legal rules and elements of those rules correctly. Analysis is weak because it fails to discuss the facts sufficiently, or it is inadequate because the student was completely off-track in identifying the relevant legal issues.

The Associate Dean of Academic Success and the Dean of the School of Law train faculty regarding grading and the importance of providing written feedback to an essay or assignment. Besides the grading scale above, faculty are given examples of feedback, which are also given to students in the syllabus:

1) Good or Poor IRAC. This area of feedback contains an assessment of the individual IRAC style of the student. A good use of IRAC uses clear headings to identify the issue being discussed; states a clear, concise rule or definition; has both legal and factual analysis of the issue; arrives at a sound conclusion and uses short paragraphs for each issue identified. A poor use of IRAC is deficient in any or all of the above characteristics of a good IRAC style.

2) Good or Poor Rule Statement. This area of feedback evaluates the accuracy, completeness and relevance of the legal rule that the student needed to discuss. A good rule statement clearly and concisely provides a definition for each element in a legal rule, while a poor rule statement does not do so.

3) Good or Insufficient Analysis. This area of feedback evaluates the thoroughness of a student's analysis. A good analysis identifies all the relevant facts and applies those facts to each and every element of the legal rule that the student should discuss. The student takes key phrases from the stated facts and uses those key phrases appropriately to discuss how elements of a legal rule have been met or not.

For example, in Criminal Law, the crime of burglary requires the elements of breaking and entering into a residence. If a Criminal Law student reads that a party in a fact pattern “smashed the window,” the student should use that phrase to discuss how the element of breaking was met within an analysis of whether a burglary has occurred. Similarly, if the fact pattern states that the person then “ran away when the alarm sounded,” a student should use that phrase to discuss how the element of entering was not met for burglary.

4) Analysis Off-Track. This feedback informs the student that he or she is not analyzing facts relevant to the issue identified, the student is analyzing an irrelevant issue or the student is analyzing a different issue than the one that the student identified.

5) Poor Organization. This feedback informs the student that the order in which legal issues are identified is not logical.

Faculty are instructed to write comments and feedback for all assignments graded to justify the grade being given and are asked to only be grading in the eLearn system (rather than through email). Official grade results are available to the students through eLearn.

Faculty members are encouraged to allocate weight in grading according to the elements in examinations or assignments. To ensure accuracy, fairness and consistency of scoring of essays and other subjective materials, the Associate Dean of Academic Success and the Dean of the School of Law review grading materials from faculty and reviews application of those materials.

There are also two academic policies that support consistency and fairness in grading, the academic integrity policy and the student grievance policy. The academic integrity policy provides a framework and set of definitions on producing original work and definitions to use to make fair assessments if there has been a violation. First, the student must work with the faculty directly. If unsatisfied, then bring the complaint to the Dean of the School of Law, and if unsatisfied, bring the complaint to the Chief Academic Officer. Under the student grievance policy, if a university or law student is not satisfied with grading through an escalating disciplinary process.

Currently ALU is developing generalized rubrics for key assignments in all courses. These assignments are discussion board posts, case studies, and essay (IRAC) writing. Stage 1 of the project is having the Curriculum Development Committee create rubrics to address the key learning assignments tied to course learning outcomes to implement in all courses. Stage 2 will involve developing customized rubrics for specific assignments (key learning assessments) in courses.

The Registrar under the supervision of the Chief Academic Officer and Dean helps ensure that all records accurately reflect accurate, fair, and consistent grading.

- [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](#)

ALU maintains a team of professionals who support each student's progress through the degree. Each student has direct access to faculty and is assisted by ALU staff, including key staff from Student Services and Academic Affairs from admission to graduation.

The School of Law provides academic support to all students to ensure a consistent and integrated approach in the learning environment. However, students placed on Academic Probation must participate in the Academic Success Program and must review and sign letters indicating their understanding of terms to remain in the program, which includes standard steps such as attendance and assignment submission, but includes additional steps such as check-in with the Associate Dean of Academic Success. Students may get onto Academic

Probation upon Admission due to a lower performance on a few aspects of their application; the Academic Standards Committee reviews the right to check on that student through the duration of his or her first house and the student must engage with the Associate Dean of Academic Success prior to midterms and exams. Students on Academic Probation who fail to participate in the Academic Success Program as directed are subject to academic dismissal upon recommendation by the program's Director or Dean and subject to approval for academic dismissal by the Academic Standards Committee.

- [policies and procedures designed to evaluate the quality, accuracy and reliability of grades](#)

The Dean of the School of Law for respective programs assures that all grading is conducted accurately, fairly and consistently. The Registrar under the supervision of the Dean helps ensure that all records accurately reflect accurate, fair, and consistent grading. Also, coaches or coordinators at the ground level work with the faculty, the Associate Dean of Academic Success and the Dean of the School of Law regarding proper feedback to provide students, mainly throughout their legal studies, whether at the discussion board, homework assignment or the essay level. At the first year level, where the student sample size is larger, the faculty and the coach discuss guidelines for grading assignments and can interrelate their grading throughout the course.

There are also procedures for request for review ("Academic Grade Appeal petition"), if a student believes that an examination or final course grade is based on a clerical or calculation error, unfairness, arbitrariness, or is not in alignment with established grading criteria outlined in the course syllabus. The appeal must indicate the basis for review, from among those listed above, and must offer evidence to support the claim. If there is no evidence provided to support the appeal, the appeal will be automatically denied, and no re-submission will be allowed. Staff encourages students to discuss the concern in dispute first with their course faculty member and good-faith action is taken or the concern is resolved, staff is not involved further. However, if the student wish to pursue the concern, then the student can submit an Academic Exception Request form, including a comprehensive, written summary of the facts and data from the student's point of view. Upon receipt of the appeal, the Academic Standards Committee, sitting as the school's Grade Review Committee, submits the appeal to the course faculty member.

The course faculty member will review the appeal and submit a written response to the Academic Standards Committee regarding the student's concern within 5 business days. The Academic Standards Committee will review the response and will render a decision and advise the student within 7 days of the receipt of Faculty's written response. If the student continues

to move forward within 5 business days of receipt of the decision, the student may continue to have the matter reviewed up the organization chart until it reaches finality with the President.

If the Academic Standards Committee grants a student's Academic Exception Request, the Committee will assign the regrading of the assessment to a professor other than the professor who originally graded the assessment. The assessment will be regraded, and the resulting grade can go up or down. The student will be notified via email of the results of the regrading. The student's grade will reflect the regraded score only, and the student will not be able to elect to keep the original grade.

- [procedures used to develop and evaluate use of grading "curves" if any](#)

ALU does not enforce a grading curve in the law school program.

- [academic support classes and programs, including any current or planned effort to expand and improve such efforts, especially for students on probation](#)

The Academic Success Program works with all students into the Juris Doctor program and are key players in the law school's New Student Orientation event, where students first go through pre-recorded viewings of policy, academic support and technology, and take quizzes on materials they've learned in the week or weeks prior to their coming to ALU's classroom and campus. The content of the live orientation session at ALU's office includes time to learn essential law school skills with staff and faculty, and get exposed to the types of assessments (multiple choice and essay). Sign-offs on certification statements at the end of live orientation to encourage students to recall what they have been provided during the live orientation, which can include their course materials (syllabus) as well as other academic and policy-related materials.

The Academic Success Program continues post-orientation as well, in the first support chat given within a term, with a post-orientation chat session to help students to navigate the interface of their course site and eLearn, and how to get started on the logistics of their law school homework.

- [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](#)

The School of Law provides academic support to all students to ensure a consistent and integrated approach in the learning environment. However, students placed on Academic Probation must participate in the Academic Success Program and must review and sign letters indicating their understanding of terms to remain in the program, which includes standard steps such as attendance and assignment submission, but includes additional steps such as check-in with the Associate Dean of Academic Success.

Students may get onto Academic Probation upon Admission due to a lower performance on a few aspects of their application; the Academic Standards Committee reviews the right to check on that student through the duration of his or her first course and the student must engage with the Associate Dean of Academic Success prior to midterms and exams. Students on Academic Probation who fail to participate in the Academic Success Program as directed are subject to academic dismissal upon recommendation by the program's Director or Dean and subject to approval for academic dismissal by the Academic Standards Committee.

In addition, students who go through the first year of law study must meet certain hurdles prior to being able to be certified for the FYLSX (effective August 2012) – they must meet proficiency requirements in all first year courses, earning a 70 or above in each course, prior to becoming certified to take the FYLSX exam. This is due to a prior data set in 2013 that indicated that first year law students were not passing the FYLSX at significant rates if they were scoring lower than 70 in their subjects, and the proficiency policy, including exams and courses, were meant to focus on getting students clearly at risk to proficiency levels.

ALU also set clear rules stating that students could not by default continue into their second year without FYLSX passage. Students may petition to continue, but the School of Law Catalog specifies that the student must have a cumulative grade average of 77 to be able to go into the second year without documented FYLSX passage. This is due to the fact that ALU wanted to prevent students who did not demonstrate strong capacity to pass the FYLSX over-straining themselves with work, family, second year studies and FYLSX studies, and undergoing the costly risk of losing all second year credit within a juggling effort that is beyond their bandwidth and capacity.

These rules have had the effect of prolonging some of the paths of students through the first year and towards the FYLSX, especially if they're struggling with test-taking. Although Academic Success Program staff can reach out and work with students on areas of weakness, sometimes students feel discouraged with the fact that they need to take extra steps in order to become eligible to take the FYLSX exam.

For that reason, attrition has occurred steadily in recent years, but in a more prolonged way for some students, and with at least a focus by ALU staff to stress with students struggling on test-taking the need to improve on their multiple choice and exam-taking skills at set points as established by the schedules for proficiency exams and courses.

In terms of the size of FYLSX-taking cohorts, ALU has seen smaller FYLSX-taking cohorts with higher percentages of passers out of each cohort since August 2013, a year after the proficiency policies effective August 2012 took place, and with that, much of the flow towards upper level was impacted as well.

ALU revised its proficiency policies in 2018 in an effort to make the steps for students better scheduled and sequenced, after noting that the open-ended nature of some of the timeframes given to students did not necessarily make them take advantage of time to prepare and pass their proficiency exams or courses as expeditiously as possible, while they would still retain relatively fresher knowledge of a course. ALU School of Law staff plans to continue studying the effects of the proficiency policies on its student demographics and modifying it to be a more expeditious and clearly streamlined process for students to undergo if they don't pass a class at 70 or above.

ALU also adjusted its FYLSX voluntary prep. course to be one that only those who had passed proficiency requirements could take in 2018, and required a \$400 fee for first-timers for the first time in 2017; this change made the number of students smaller, but the goal was to have groups that would be more responsive and persistent in putting in necessary work to prepare for the FYLSX within 10 weeks prior to each exam run in 2018 and 2019.

ALU also handled a change in the demographic of law students, at least financially, in that ALU started admitting financial aid recipients in 2016, after only admitting those on private pay or military/veteran's assistance from 2011 to 2016. This has created new and different pushes on staff time for student support, with students understandably wanting more support on the financial aid side. ALU has also adjusted after working more with those on private pay who tend to stay consistently motivated on a month-by-month payment plan to work with those who very much are reliant on their federal financial aid for law school tuition.

In ALU's current program structure, ALU may begin to see the first of the financial aid recipients at earliest in 2020 if some happen to pass the FYLSX as soon as they can after they complete the first year (which is predicated on them having passed all their coursework at 70 or above), with the possibility of that first cohort stretching out further beyond 2020, given the 4-year, 52-week a year structure in their program and their ability to re-engage in JD coursework being impacted by some of the factors described above. ALU would begin managing its students to be aware of the 84-month maximum limit to their program time, while transitioning students in a way that accommodates the bulk of their program's structure, which is still in the 52-week per term structure.

ALU is invested in strengthening academic good standing policies after a time where the current policy has largely oriented around avoiding harsh impacts of continuous study on our students due to our one course at a time structure. ALU has operated within the context of FYLSX certification and FYLSX exam passage be necessary for any second year studies, but reaching the CBE accreditation path permits ALU to explore more ways to achieve the outcomes necessary to maintain CBE accreditation. In terms of curricular content, the School of

Law department plans to revisit the alignment and articulation of JD program outcomes within the context of institutional learning outcomes and course learning outcomes, and such a project will offer the opportunity for ALU to take in the input of its Advisory Council members on growing a successful CBE-accredited Juris Doctor program that will be successful.

In admissions, besides necessary changes for CBE accreditation, the School of Law department will be assessing the strength of the content and delivery of its online admissions assessment and see if there are other tools that can help our Academic Success staff to identify sooner and better what capacity for law study an applicant has and where we can offer them support early and proactively in their first year law school experience, beyond the New Student Orientation and the post-Orientation Academic Success Program activities and tracking of students on their attendance and assignment submission.

- [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](#)

ALU's Juris Doctor program is fully online and the program is conducted by means of distance-education technology.

Specifically, ALU houses its JD program curriculum in eLearn, a Moodle-based system that permits faculty and students to have an interface to engage together on ("a course site") where announcements, discussion board forums, homework assignments, quizzes and timed midterm and final exams can be created, taken by students and graded by faculty – hence, permitting all kinds of asynchronous engagement. ALU is also able to store files and announcements on eLearn, as well as set up helpful pages such as a Student Center for Law Students for administrative support and an Academic Success Program page as a 24/7 online law school academic support resource for students who want to learn more about law school skills.

ALU also used Adobe Connect, a virtual meeting software application, that permit live-streaming engagement as well as pre-recorded videos to be recorded. These Adobe Connect engagement points can be embedded link-wise at the eLearn site in individual course sites, and therefore that is how ALU can direct its law students to be engaging weekly in their courses in sessions conducted by their law school professor.

One hundred and forty quarter units, by its nature under the Carnegie formula, includes 1,400 hours of verified academic engagement at minimum. The definitions of verified academic engagement according to Guideline 6.5(A) are the usage of distance learning technology for any of the following:

- “(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.”

ALU’s Adobe Connect virtual meeting/classroom system permits (1), (2), (3) and (4) to occur and these are regular weekly aspects of ALU’s current Juris Doctor program, as can be seen by weekly schedules at listed times. Lectures and videos are sequenced to build off one another and are all part of the faculty’s direction to and engagement with students in a law school course.

In courses that have an experiential activity, such as Trial Techniques where weekly team meetings and exercises to practice for a mock trial, Adobe Connect is also a platform for item (8) in the list above.

In addition, ALU’s eLearn system permits students also to have recorded time engaging in (4), (5), (6), (7) and (8), due to each week in a course involving a discussion board forum, quiz, homework assignment, exam or legal research project, which are linked to assignments assigned according to the faculty’s syllabus.

Both Adobe Connect and eLearn can track and report different kinds of synchronous and asynchronous time, and given that the Juris Doctor program is a rigorous program, ALU can use objective measures and controls that include using the objective reports generated out of each system that tracks down to individual student activity, while also interrelating this with a subjective measure, by asking students throughout their time of study how much time they’re spending on specific kinds of activities and engagements in the course site. Currently, ALU handles that in the form of weekly study logs, but in 2020, to match other programs in its institution, ALU will begin instituting end-of-course questions that ask students to provide estimates of time on different activities.

SECTION 11: 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 and minimum acceptable score, if any, reported by an applicant on the Law School Admissions Test (LSAT), and a description of all other factors or information used whether 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 admissions 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 Committee's "start-over" policy
- Number of students admitted under the "start-over" policy 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 bar examination 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
- Any statistical analysis conducted as to the student admissions, over each of the last five years, of the number of students admitted as:
 - Regular students, with a degree

- Regular students, without a degree
- Special students admitted
- Students with prior law school admitted and academically dismissed
- Students with prior law school admitted and not academically dismissed

RESPONSE

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

Pursuant to the CBE’s mandate in Guideline 5.1 that “a law school must adopt and maintain a sound written admissions policy” and only “admit those students that meet the pre-legal education requirements contained in §6060(c) of the Business and Professions Code, Title 4, Division 1 of the *Rules of the State Bar of California (Admissions Rules)*,” ALU requires law school applicants to possess a bachelor’s degree or higher from a college or university accredited by an accrediting agency recognized by the United States Department of Education. The earned bachelor’s degree must be evidenced by an official transcript sent directly to ALU. Degrees earned at institutions outside of the United States must be submitted to a Committee-approved credential evaluation service for verification that the degree is the equivalent of a comparable degree from the United States.

Additionally, law school applicants must take an online assessment test (timed) and submit a personal statement and professional resume. The personal statement is a 500-1000 word statement describing personal and professional goals and an explanation of why the applicant is pursuing a JD degree. The applicant is also asked to describe why they feel they will be successful in an online JD program. These important components of the admissions process inform the Admissions Review Committee about whether an applicant has a reasonably good chance of succeeding in the online Juris Doctor program.

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

- Process used to confirm an applicant’s compliant pre-legal education

ALU’s required basis for admission into the Juris Doctor program is a bachelor’s degree, which is above the minimum pre-legal education required in Business and Professions Code Section §6060(C).

There are three points where information about the applicant’s pre-legal education is requested and checked throughout the admissions process.

First, after an applicant has submitted an application for admission to the JD program through Populi, ALU’s student information system, the admissions representative assigned to the

applicant verifies that unofficial or official transcripts evidencing an earned bachelor's degree have been uploaded to the application site within Populi. Unofficial transcripts sufficient at this earliest point. Second, the Admissions Review Committee for the Juris Doctor program checks that undergraduate transcripts include a notation that a bachelor's degree has been conferred. Third, once an applicant has been accepted, the applicant is instructed by the Registrar to provide official transcripts to ALU no later than 30 days after the program start date, if they have not already provided official transcripts by that point.

- [Procedures used to monitor student files to confirm each contains all required information and transcripts within 45 days after they start attending classes](#)

Throughout the admissions process, students are informed that if accepted, they will need to provide official transcripts to ALU within 30 days after the beginning of the term or will risk being administratively dismissed. This 30-day deadline is stricter than the requirements of Guideline 5.2, which mandates a law school's receipt of official transcripts within 45 days after the beginning of a term. Prior to ALU's 30-day deadline, the Registrar checks student records and reaches out to students who did not yet submit official transcripts. Students who do not provide an official transcript evidencing their earned bachelor's degree within 30 days of their start date are administratively dismissed on that basis.

- [The identity of all persons responsible for preliminary and final admissions decisions](#)

The JD Admissions Review Committee (JDAR) consists of School of Law and Academic Success Program staff. Dean Jessica Park works with Academic Program Coordinator Andrew Cho and the Associate Dean of Academic Success Lydia Liberio to review admissions decisions. All members of JDAR are licensed attorneys (California for Dean Park; California and New York for Dean Liberio and Maryland for Mr. Cho). In the event that a tie-breaker is needed for a 2-person committee meeting, Chief Academic Officer, Dr. Robert Abel may join the committee to provide his individual tie-breaking vote.

- [The use of scores on the LSAT, the minimum acceptable score, if any, and a description of all other factors or information used in the decision to admit or deny an applicant](#)

ALU focuses on a working adult population that seeks online legal education and currently does not mandate all applicants to take the Law School Admission Test (LSAT), because ALU offers an online admissions assessment that can offer the JD Admissions Review Committee more recent information about a student's capacity to begin law school. The online admissions assessment contains a reading comprehension section, a logical reasoning section and an analytical reasoning section, similar to the LSAT. The essay-writing portion has an open-ended prompt where a test-taker must submit timed writing. A student must score 140 or higher on a prior

LSAT to be able to bypass the online admissions assessment. To be compliant with Guideline 5.6 for Accredited Law School Rules in January 2020, ALU will require the LSAT for any applicant seeking admission or readmission following disqualification for academic reasons, except those who have taken the test prior to their disqualification. The applicant must submit an official score report on the test to be retained in the applicant file prior to any law school decision to admit or readmit the 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

ALU does not currently admit special students as defined in Guideline 5.5.

- 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

Until January 2020, ALU’s current policies and procedures reflected guideline 5.34 for unaccredited law school rules, which permit the admission of previously disqualified students under these conditions:

5.34 Admission of Applicants Previously Disqualified for Academic Reasons.

Applicants previously disqualified for academic reasons may be granted admission when there is an affirmative showing by the applicant that he or she possesses the requisite ability for the study of law. Such a showing may be made:

(A) At any time, if the applicant presents credible evidence that the prior disqualification was not caused by the applicant's lack of capacity for the study of law, but resulted from a traumatic event or serious hardship that prohibited the applicant from performing at her or his normal level; or

(B) After at least two (2) years have elapsed since the disqualification, if the applicant demonstrates that work, study, or other experience during the interim has resulted in a stronger potential for law study than the applicant exhibited at the time he or she was previously disqualified for academic reasons.

In each case, the dean or admissions officer must sign and place in the applicant's file a statement of the reasons for admitting the applicant.

ALU’s policies and procedures also currently reflect guideline 5.31 for unaccredited law school rules, which requires the following:

5.31 Applications Must Ask About Prior Law School Attendance.

A law school must, on its application form, ask whether the applicant has ever attended another law

school and, if so, whether the applicant was in good standing. A law school should have an official transcript showing the applicant's status at the prior law school before granting admission.

Currently, when an applicant identifies as having been previously academically dismissed from another law school or where an applicant is known to be a former ALU law student who was academically dismissed, ALU admissions representatives obtain additional facts from the applicant to determine when the academic dismissal occurred and inform the applicant regarding the need to submit official transcripts showing the applicant's status at the prior law school. The ALU website and Juris Doctor program catalog include references to Guideline 5.34 so that the applicant understands that if the disqualification occurred less than two years from the time of the application to ALU, she or he must present to ALU "credible evidence that the prior disqualification was not caused by the applicant's lack of capacity for the study of law, but resulted from a traumatic event or serious hardship that prohibited the applicant from performing at her or his normal level." Typically, a writing must be produced where the Admissions Review Committee can find circumstances that do rise to the level of trauma or serious hardship that clearly inhibited an applicant's ability to show normal performance.

If at least two years have passed since the disqualification, the applicant is required to "demonstrate that work, study, or other experience during the interim has resulted in a stronger potential for law study than the applicant exhibited at the time of he or she was previously disqualified for academic reasons." This is a lower threshold, but the Admissions Review Committee looks for how the applicant handles the opportunity to share on what contributed to him or her having a stronger potential for law study since the time of prior academic dismissal.

The Admissions Review Committee also reviews the applicant file carefully to ensure that the applicant possesses the requisite ability for the study of law and that any prior circumstances that prevented the applicant from performing at their normal ability would no longer be at issue. An Admissions Review Committee member then prepares a statement of the Committee's reasons for admitting or denying an applicant, which is saved to the applicant's file.

ALU's policies and procedures in the 2020 JD Catalog now reflect guidelines for accredited law school rule 5.6, which permit the admission of previously disqualified students under these conditions:

5.6 Admission or Readmission of Applicants Previously Disqualified for Academic Reasons.

(A) Applicants previously disqualified for academic reasons may be granted admission or readmission when there is an affirmative showing by the applicant that he or she possesses the capability to satisfactorily study law. Such a showing may be made:

(1) At any time, if the applicant presents credible evidence that the disqualification was not caused by the applicant's lack of the capability to satisfactorily study law, but resulted from a traumatic event or serious hardship that prohibited the applicant from performing at her or his normal level;

(2) At any time, if the applicant passed the First-Year Law Students' Examination; or

(3) After at least two years have elapsed since the disqualification, if the applicant demonstrates that work, study, or other experience during the interim has resulted in a stronger potential for law study than the applicant exhibited at the time he or she was previously disqualified for academic reasons.

In each case, the decision to reinstate a previously disqualified student, regardless of which school disqualified the student, must rest with a committee established by the school and not with a single individual. The dean or admissions officer must sign and place in the applicant's file a statement of the reasons the committee gave for admitting the applicant.

(B) A law school must require all applicants seeking admission or readmission following disqualification for academic reasons to take the Law School Admission Test, except for applicants that had taken the test prior to disqualification. A school must not admit or readmit the applicant until the law school has received an official score report on the test. A copy of the report must be retained in the applicant's file.

Under this guideline, ALU would require the previously disqualified applicant to make an affirmative showing that they possess the capability to satisfactorily study law, which is a higher threshold than that of Guideline 5.34 of the Guidelines for Unaccredited Law School Rules, which requires the applicant to make the affirmative showing that he or she possesses the requisite ability for the study of law.

- 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

In the last five years, ALU has admitted 20 law students who, at the time of ALU admissions review, had academic dismissal from a prior law school as their latest academic status at the time of review.⁷ The table below is a data study of their outcomes as evaluated in December 2019.

⁷ It should be noted that for Attachment 9 for Compliance Annual Reports, the ALU Registrar historically included by default those with prior law school study even if they had no academic dismissal status at the time of ALU admissions review, as a way to track all those who had been subject to further review due to the fact that they had some prior law school study on record at all; however, in Attachment 12, the Registrar would count only those

Status as of December 2019 for Admits with Prior Law School Study & Who Were Disqualified for Academic Reasons at the time of ALU Admissions Review	Number of Students
Withdrawal after completion of 0-4 courses	3
Withdrawal after completion of 1L year	4
ULS Guideline 5.22 disqualification	3
Academic dismissal	2
Transfer to different program at ALU	1
Currently progressing through program on academic probation	2
Currently progressing through program in good academic standing	2
Currently progressing through program after passing FYLSX or establishing exemption	1
Completed 1L and awaiting FYLSX results	0
Graduated	2
TOTAL	20

Based on the data above, 7 out of 20, or 35%, admits with prior law school study and who were disqualified for academic reasons at the time of ALU Admissions Review are currently in pursuing status or have completed the JD program. One student (5%) has moved on to a different degree program at ALU. The remaining 12 students, or 60% have withdrawn, been academically dismissed or administratively disqualified by ULS Guideline 5.22.

with prior law school study who was previously academically dismissed in the corresponding slot, despite Attachment 9 being over-inclusive.

Since the resulting Attachment 9 submissions were over-inclusive, the Registrar re-verified data for 2015-2019 Attachment 9 and 12 of each yearly Compliance Annual Report. Attachment 9 in particular will remain overinclusive for earlier years, since that was how the attachment data was gathered, but where “Academically Dismissed” is indicated, that indicated that a student had been considered previously academically dismissed with prior law school study for the purpose that year’s Attachment 12 for each year.

The re-verification resulted in corrections, which are included in the Section 12 folder under “Admissions data for last 5 years” within subfolders for Attachment 9 (“CBE AR ATT 9”) and Attachment 12 (“CBE AR ATT 12”). A summary of corrections, with the updated attachments, was sent to the State Bar of California staff as an update.

This data study was a good opportunity to track outcomes for this specific subset of the student body and it is clear that more work related to data definitions and what subsets of the student body to track in terms of outcomes is necessary for ALU staff to identify where it can best provide support. There are other categories of admits with prior law school study that don't fall into the data study above, yet the checking of outcomes for those subsets in cyclical ways would be beneficial. While prior ALU Annual Report Attachment 9s were over-inclusive in including other subsets (administrative dismissals, withdrawals, etc. for those with prior law study), the benefit of that over-inclusiveness was that it was easier to keep on radar how many students were coming to ALU School of Law with prior law study and on what basis they were being admitted into the Juris Doctor program. It would be of interest, as a trend, whether the admit's reason for exiting a prior law school program was academic dismissal, administrative dismissal, withdrawal, or for another reason, to track whether that admits that exited prior law school programs are doing substantially better or not than those who have no prior law study record when entering the Juris Doctor program.

In addition, data studies give ALU better metrics to consider revising admissions requirements and policies. In December 2019, ALU School of Law implemented a policy requirement that all those who have prior law school study and latest status at a prior law school is disqualification for academic reasons must take the Law School Admission Test. Such a policy requirement will help ALU assess what kind of support a student may need.

Frequently, given the online nature of ALU's Juris Doctor program, students can state that their capacity to study law was affected by the need to go on-site to a past law school on top of difficult circumstances for them as working adults. However, the Law School Admission Test could provide another metric for assessing whether the kind of change that students need to be successful really is the flexibility and availability of an online Juris Doctor program or not, an assessment that can be difficult for Admissions Committee to make based on statements from students with additional documentation alone.

- [Policies on granting credit for any prior law study and in the event an admitted student passes the FYLSX](#)

ALU's School of Law catalog contains the following policy on transfer students:

Transfer Students

In addition to the requirements listed previously for new students, students transferring from other law schools must also provide the following items:

1. *Law Study Evaluation - You must submit your official law school transcripts to the State Bar of California's Office of Admissions and submit an Application for Evaluation of Law Study Completed and Contemplated. The cost of obtaining this evaluation from the State Bar is \$100.*
2. *All applicants who have been previously disqualified for academic reasons should review and submit documentation related to the section: **Admissions of Applicants Previously Disqualified for Academic Reasons.***

The law school may award transfer credit to an applicant, subject to the following limitations:

1. *Transfer law student must complete a minimum of two complete academic years in ALU's Juris Doctor degree program and their prior law school credit must be from law schools accredited or registered with the American Bar Association or the Committee of Bar Examiners of the State Bar of California in common law jurisdictions.*
2. *No transfer credit may be granted unless the requirements of § 6060(h) of the California Business and Professions Code have been met, that is, unless the applicant has passed the First-Year Law Students' Examination or became exempt while attending an accredited law school. To be exempt from the examination, the student must have successfully completed the first year at the accredited law school and have been advanced to the second year by the same law school.*
3. *A law school is not required to grant, but ordinarily could grant transfer credit for whole courses completed not more than twenty-seven (27) months prior to the date the applicant begins study at the admitting law school. This time limitation does not apply to students who have passed the First-Year Law Students' Examination. In some instances, such as illness, personal tragedy or military service, it may be appropriate to permit, under exception, transfer credit for studies completed more than twenty-seven (27) months prior to admission, but the dean must approve any exception and an explanation must be placed in the student's file.*
4. *For students who were disqualified for academic reasons at the prior law school, credit should be granted only for courses in which the applicant received a grade above passing. For students who were in good standing at the prior law school, credit may be granted for all passing grades. For all applicants who have passed the First-Year Law Students' Examination, credit may be allowed in Torts, Contracts, and Criminal Law, even if the grades at the prior law school were not above passing.*
5. *ALU School of Law may not grant credit for a course completed at the prior law school in excess of the number of units that ALU School of Law would award for a course with the same number of classroom or participatory hours.*
6. *ALU School of Law must also determine that the subject matter of, and the quality of the applicant's performance in, the courses for which transfer credit is allowed, were substantially the same as that for like courses and grades at ALU School of Law.*
7. *Transfer students are responsible for supplying the University with official transcripts of the previous law schools attended. Students transferring from other law schools may be interviewed by the admissions committee or dean to assess their previous performance in their legal studies and potential success. ALU School of Law has not entered into any transfer or articulation agreements with other Law Schools.*

As a registered unaccredited distance learning institution, ALU abides by the above set of guidelines related to transfer credit. However, once approved for CBE accreditation, ALU would

explore re-aligning transfer credit policies to Guidelines 5.7 and 5.8 for Accredited Law School Rules.

- Efforts to analyze the correlation between bases for students’ admission and success in passing the CBX and conclusions drawn from such analysis

Section 11’s data study is based off the same cohort as Section 8’s data study, those ALU students who graduated between January 1, 2014 and May 30, 2019 and took the California Bar Examination at least once up through the July 2019 CBX Examination (totaling seventy graduates). Out of seventy, thirty-four graduates successfully passed the exam (48.57%). Sixteen out of the thirty-four passers were first-time passers.

All thirty-four graduates who succeeded in passing the California Bar Examination, with the exception of two graduates, possessed bachelor’s degrees prior to attending the School of Law. One graduate submitted college-level education proficiency (CLEP) test scores as the basis of admission and the second graduate without a bachelor’s degree possessed an associate degree; both of these graduates’ alternate bases for admission were within ALU’s admission policies at the time of these two graduates’ admittance into the Juris Doctor program. Of the remaining thirty-two graduates who possessed a bachelor’s degree prior to commencing ALU’s JD program, one graduate did not have a cumulative grade point average on the face of his undergraduate transcript. For the remaining thirty-one graduates where undergraduate GPA information is available, the following descriptive statistical results were calculated:

	All Passers	First-Time Passers	Repeater Passers
Those with available UG GPA per category⁸	31 out of 34 had UG GPA available	15 out of 16 had UG GPA available	16 out of 18 had UG GPA available
Lowest UG GPA	2.29	2.29	2.44
Highest UG GPA	3.98	3.98	3.57
Median of UG GPA	2.93	2.93	2.93
Mean of UG GPA	2.98	3.02	2.95

⁸ UG = Undergraduate. The number of those with available undergraduate GPA per category depended on whether the graduates had a bachelor’s degree prior to law school admissions or whether an undergraduate GPA was available on the bachelor’s degree transcript.

Out of the thirty-four passers, two were transfer students, who both ultimately became repeater passers. All of those who contributed to ALU's first-time pass rates within the period of study were those who took all of their Juris Doctor program at ALU.

Comparing those who passed on their first attempt against those who passed on a subsequent attempt, the first-time passers had a mean undergraduate GPA of 3.02 while the repeater passers had a mean undergraduate GPA of 2.95. Both groups had the same median undergraduate GPAs of 2.93, respectively.

Due to the small sample size, it is difficult for ALU to reach a conclusion regarding admissions policies, but the analysis was for a significantly lengthy multi-year period, indicating that ALU should continue analyzing data for further findings, and determine how analyses can drive the revision of admissions standards and policies.

Findings:

- All the first time and repeater passers had at least a undergraduate GPA of 2.29, so ALU could consider having a minimum undergraduate GPA threshold of 2.29 in admissions requirements.
- Passers' undergraduate GPAs were evenly distributed between 2.29 and 3.98, further analysis is warranted to find whether other types of data at admissions has more correlation to California Bar Examination passage.
- Even though it is hard to conclude strongly based on the analysis's sample size and data distribution, first-time passers had undergraduate GPA of 3.85 and higher, while no repeaters had undergraduate GPA over 3.85.

For further analysis:

- Besides analyzing passers, ALU needs to do further analysis regarding those who do not pass the bar exam, which also may yield a stronger data set to attempt to find correlations (although the overall sample size is small).
- Paired with Section 8's data study, more insights can be drawn as admissions data is informed also by how students performed throughout their coursework at ALU.
- Most of ALU School of Law's graduates work several to many years after the completion of undergraduate studies, work experience and job types may be important to track besides the undergraduate GPA data points. Among ALU students, there are a variety of job types represented since students are doctors, dentists, paralegals, law enforcement personnel, teachers and school administrators, engineers and accountants and more. ALU should require that the School of Law Admissions Committee considers and collects information related to work experience and job type, including how long they worked and at what level that they worked, to be able to become an area of further analysis in

relation to admissions standards and policies. Besides undergraduate GPA, other data points such as work experience and job type, years of work, what level of work, should be included in data studies to inform a revised set of admissions policies.

- As mentioned in Section 8, ALU is also aware that the reality for many graduates is that they face a variety of short-term logistical issues as they attempt the California Bar Examination. At times, family issues, work events (even positive events like promotions) or medical issues can drastically affect the time the student can prepare for the California Bar Examination. ALU Academic Success Program staff can note these factors more clearly per student per graduate cohort, in tandem with outreach and guidance efforts related to advising for bar examination preparation, so that there can be more insight into what students were facing at the time of their bar exam attempts, rather than data points that are indifferent to the kinds of issues that impact how well students can be prepared in the short term.

SECTION 12: 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 Standards and Guidelines, 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 that 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.

RESPONSE:

ALU does not have branch or satellite campuses. For this reason, ALU does not have any Section 12 folder.

SECTION 13: 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, noting whether they are provided in hard copy or electronic form, as well as any restrictions on time or use for electronic materials
- students learn to use hard copy and electronic-based legal research
- students and faculty can access library resources, and any technical support if available
- describe the physical library facility (e.g., seating, shelving, technology, etc.)
- provide a schedule of hours the library is open for student use
- confirm that all mandatory hardcopy authorities are updated and compliant
- identify and describe all classes in which students receive instruction in both hard copy and electronic-based legal research
- describe all access by faculty and students to legal research materials in different formats (e.g., internet-based research services, microfiche, CD-ROMs, etc.) and internet connectivity
- discuss how the law school finances the library

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 6 -- 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

RESPONSE:

ALU provides Westlaw online law library access to faculty and students which includes mandatory authorities for faculty and students. Dean Park coordinates access for faculty engaged in legal research or writing exercises in their courses, such as for professors teaching

on memoranda or brief drafting in LU02 Wills and Trusts, LU67 Civil Litigation Before Trial and LU41 Advanced Legal Research and Writing. The syllabi and assignments for those courses are included in the Section 8 Folder, while the syllabus for LU02 and LU41 specifically are in the Section 12 folder since those regularly cover instruction on legal research.

Westlaw has an ALU Westlaw account manager and a hotline to an 24/7 attorney reference helpdesk that is referenced in student learning center manuals. Both ALU staff and Westlaw staff provide the students with support related to registration keys, log-in access, and registration renewal (when a student comes back from a leave of absence, for example). Dean Park also works with faculty to support students regarding questions on Westlaw, offering live support sessions throughout the course and being available for student questions via phone or email. Law school faculty are practicing attorneys who can answer questions regarding legal research and writing, and for courses that includes texts regarding legal research, both hardcopy research and electronic-based legal research is covered. Besides engaging with students in live interactive sessions, where students can have their questions answered in real-time, the faculty also can hold office hours that permit more individualized discussion with students on their questions.

Dean Park also holds live optional support sessions with students prior to major legal research and writing projects where the following topics are covered: the parameters for usage of ALU's Westlaw online library services, how to access research tutorials available for Westlaw Edge or seek further certifications or trainings with ALU's Westlaw account manager, Peter Lippmann, and tutorials of how to search for cases, statutes and secondary sources within the Westlaw system. Dean Park covers the West Key Number System, Case Headnotes, and KeyCite system to cite-check and discusses the importance of efficient research, especially when using an online law library system where access is tracked by time. The School of Law has part-time student access for students with a part-time schedule of daily access and a maximum of 40 hours per month per student, so these instructions especially during major project points for students help the law students manage their time on the online law library.

The Section 13 folder contains exhibits related to the Westlaw online library resources and support services offered at the School of Law, including ALU's last-submitted Annual Report attachment related to law library.

Anticipating the list of items for Guideline 8.1 in the Accredited Law School Rules being required for ALU, Dean Park conducted check of resources with ALU's Westlaw account manager and verified that all items under 1. General National Materials; 3. Annotated Reports; 4. American

Law Institute Publications; 5. Forms of Pleading and Practice and Legal Forms; 6. Uniform Laws Annotated; 7. California Materials; 8. Federal Materials; 9. National Reporter System; and 11. Law Reviews and Journals were within ALU's current Westlaw subscription, which is a comprehensive list in scope and coverage.

For item 2: Dictionaries, the Westlaw subscription includes Black's Law Dictionary and a number of other legal dictionaries. Dean Park can coordinate access to students for an online general dictionary.

For item 10: Texts and Treatises, ALU will continue to hold current text for all bar-tested courses on-campus or through electronic access with publisher's provided online accounts, as well as any required treatises or encyclopedia resources used in conjunction with courses taught. All of the Witkin resources are included in the current Westlaw subscription.

For item 12: Other Resources, besides what Westlaw provides (Westlaw does have legal periodicals, legislative history documents such as the United States Code Congressional and Administrative News resource, and local court rules for California, Dean Park can coordinate access to students for local county and city ordinances and local municipal codes, largely through Los Angeles County and City public online resources.

In this way, ALU is able to be fully compliant quickly in terms of scope and coverage of its online legal resources and law library to its law school students, faculty and administrators.

SECTION 14: RULE 4.160 (K) - PHYSICAL RESOURCES. The law school must have physical 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 law school location
- Copy of any lease agreement for law school facilities

RESPONSE:

Pursuant to Guideline 9.1, ALU, as a distance learning law school, maintains its administrative office and administers its technology platform in California. ALU's administrative office, located at 100 W. Broadway, Suite 600, Glendale, CA, houses all required records, files and materials of the law school. The current lease term is six years, which commenced on July 1, 2018 and will terminate on June 30, 2024. The office provides sufficient capacity for staff to support internal operations and provides a commercial traffic-friendly setting with a readily available parking garage for students who visit the office.

While lectures are delivered online, first year students have the option of attending coaching sessions at the Glendale office and some classes at the upper level may offer the option for

onsite attendance of specific events (e. g. mock trial for Trial Techniques). Also, where faculty opt to deliver their live lectures from the Glendale office, 1L students are welcome to attend in person. All students are able to visit the office for administrative services. The premises are accessible for those with disabilities through designated parking, ramps, and elevator access.

As ALU's administrative office is located in the Galleria Office Tower adjacent to the Glendale Galleria, its premises are patrolled by professional security officers provided by property management of the building. Entry to the administrative office is secured via access cards that employees must swipe upon entering the elevators in the lobby. Additionally, security controls access to the building by requiring visitors to sign in with the security guard on duty. Security officers have the authority to make citizens arrests and can hold individuals suspected of committing felonies until police arrive. Criminal incidents are referred to the local police who have jurisdiction over the Galleria Office Tower, where ALU's administrative office is located.

Pursuant to Guideline 9.3, ALU, as a distance learning law school, possesses and maintains instructional equipment and distance learning technology adequate to support the JD program. In its administrative office, two large conference rooms are designated as classrooms/studios where live online events can be broadcasted for streaming. The technology equipment in all offices and classrooms are sufficient for staff to maintain operations and promote school events. ALU's Technology staff maintain a dedicated server room that contains equipment essential for phone operations and storage of media. ALU's learning management system, eLearn, and student information system, Populi, are kept securely on off-site servers through third party vendors.

ALU uses the following technology and equipment to support the JD program:

- Moodle v3.0.4+ for learning management system (eLearn)
- Adobe Connect v10.5 for virtual classroom, delivery of live and pre-recorded lectures
- A Dell and a Gateway computer in server room with Microsoft Windows 10 for streaming video and audio from classrooms to Adobe Connect Server.
- Webcam and Microphone in classrooms for capture Video and Audio
- Two Dell desktops with TV monitors in classroom for display professor's live lecture information
- Two HP laptops with Microsoft Windows 10 for faculty in classroom
- A high speed internet with relate network equipment for network connection

As Guideline 9.3 mandates that a law school must have and allocate adequate resources and create and maintain adequate procedures to promptly and effectively address technology-related problems in the delivery of its educational program, ALU's Technology staff are available during regular business hours and during live lecture sessions to troubleshoot technology-related issues with students, faculty, and staff.

The law school also has an Emergency Management and Facilities and Equipment Maintenance Plan and Backup Recovery Plan that includes processes for disaster response and recovery procedures. Regardless of the type of local emergency, ALU students will continue to have access to their course(s) and the student portal account. The plan includes communicating with students to ensure that they are properly directed about any impact they may experience.

The law school maintains and provides access to all required files, records, and materials in the administrative office in Glendale. Financial records are stored on a dedicated computer with highly restricted access by the Director of Finance. HR records are securely stored in locked fireproof filing cabinets in a locked office with restricted access by the Director of Finance. Student administrative and academic records are maintained electronically on Populi, a student information system. ALU manages its employee access to Populi so that users only have access to information necessary to perform their assigned duties and responsibilities. Each Populi user has a unique login name and password, which ensures secured access to student records.

SECTION 15: 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, community at large, or through governmental or private grants

Required Attachments

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

RESPONSE:

Abraham Lincoln University is a tightly controlled family business. Hyung J. Park, Founder and Chairman of the Board, due to more than 35 years as a CPA, closely oversees financial accounting. The priority behind financial decisions is investment in the long-term success of the institution. Short-term profits are not a significant factor. All necessary revenue is reinvested to ensure sufficient academic and administrative support for the student body and to maintain the continued development of the educational technology that the institution uses.

ALU maintains sufficient resources to meet its financial obligations and provide quality educational offerings and service to students. ALU has no long-term debts and ALU's total equity in 2018 was more than \$1,000,000, reflecting the commitment of its ownership to continue to build and sustain the institution. The institution keeps reserves in excess of six months of operating expenses to honor future service obligations, bad debts and refunds. ALU's current financial conditions, along with conservative management of financial resources, and with additional funding by the existing shareholders as additional paid-in-capital as needed, are sufficient for ALU to continuously improve in quality of education, service, and operations.

ALU's annual budgeting process takes into consideration the program and operational needs. The process begins in the 4th quarter of each calendar year. Actual revenues and expenses for

the first three quarters along with fourth quarter projections are compiled. The revenue and expense projections for the budget year are based as well on the Strategic Institutional Improvement Plan (SIIP). During the budget year, comparisons of actual revenue and expenses to budget are scrutinized on a regular basis by the CEO, Director of Finance and senior staff members. Significant variances are identified and corrective action is taken when necessary.

The institution had experienced substantial losses for the last four years and the existing shareholder has contributed as needed with paid-in-capital. Table 1 is the five-year summary of operations between 2015-2019. The information in Table 1 reflects the overall operations of the law school since more than 90% of the revenue and expenses are related to the operations of the School of Law. During the three years of 2016, 2017, and 2018, the revenues increased substantially with expenses increasing gradually, which has reduced the loss substantially during the period. This trend is due to the cost containment efforts toward improved marketing efficiencies with more effective use of human resources, and Title IV funding starting from the middle of 2016 for the School of Law. Based on further interim analysis of 2019 (7 months and 9 months), we expect the School of Law will generate positive net income during 2019, which will provide funds to develop and improve our law school programs along with enhanced individualized academic support.

Table 1. Summary of the Operations, Owner's Contribution and Cash Balance

Year	Revenue	Expenses	Net Income or Losses	Owner's Contribution as Paid in Capital	Cash in Bank Available at Year End
2015	\$984,631	\$1,238,669	\$(254,138)	\$0	\$1,349,306
2016	\$994,704	\$1,496,617	\$(501,913)	\$150,000	\$1,037,947
2017	\$1,175,176	\$1,508,539	\$(333,363)	\$150,000	\$996,012
2018	\$1,555,346	\$1,605,515	\$(50,139)	\$250,000	\$1,047,551
2019 (as of 7/31)	\$977,531	\$931,746	\$45,785	\$0	\$1,070,223
2019 (as of 9/30)	\$1,390,381	\$1,254,643	\$135,738	\$0	\$1,205,676

Further, management decided to toughen admissions and academic standards along with investing more to modernize academic teaching technologies. Our three-year projections show a consistent conservative cost containment approach with average profitability of 11%. Current shareholders (Park's family) have contributed \$4,250,000 to Abraham Lincoln University since it was founded in 1996 and are ready to contribute more as needed.

ALU is committed to our mission to offer an accessible law school program by holding tuition to the lowest quartile compared to those of peer institutions. Over the years ALU has developed effective services and instructional practices that allow for lower tuition. ALU has high respect for our student demographic, working professional adults, by providing them a unique instructional model, affordable tuition, and compliant policies such as refund and cancellation. ALU has enrolled, serviced and graduated students in a sound and ethical manner for over 20 years. ALU is not associated with activity that could damage the standing of the accreditation process or our reputation.

Audited comparative financial statements are in the Section 15 folder.

Three-year revenue and expense projections are in the Section 15 folder.

SECTION 16: RULE 4.160 (M) – RECORDS. 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) responsible for maintaining the various records at each location

Required Attachments

- Written policies and procedures regarding recordkeeping

RESPONSE

Unless indicated otherwise as pertains to the records, reports, and documents in this section, ALU maintains required records in electronic format through its student information system, Populi, as well as through local data storage which is hosted in school private network, which allows the university to easily produce paper copies of the records when needed.

The law school’s electronic records are maintained in a safe and secure environment through ALU’s student information system Populi and Google Drive. Additionally, internal security controls only allow those users with predefined security levels to access records. These security levels are approved by the Chief Operations Officer and Chief Academic Officer. Records are backed up on a predetermined schedule that encompasses all law school files requiring backup. For disaster recovery purposes, backups are stored offsite in a secure location.

Physical files are stored in fire-rated cabinets located in the administrative office, which is accessed only by authorized personnel during business hours. After hours, the administrative office is locked and the entrance and exit are under video surveillance. These files are maintained and updated by the Administration and Finance staff and Registrar. Accessing and releasing information contained in the student files is done in accordance with FERPA.

The Registrar oversees the records department, updates student academic records and transcripts through Populi, and produces paper copies of records when requested. As discussed below, ALU maintains a permanent file for each law student that includes transcripts, signed disclosure statements, memoranda of accommodations, records of faculty/administrative

action regarding academic performance, disciplinary actions, leave of absence, disqualifications, and any other matter required by the *Rules*.

ALU refers to federal and state law, as well as requirements by accreditation and registration entities, for its document retention practices.

For each academic term, applications are maintained electronically in ALU's student information system, Populi. The application contains information including, but not limited to, the name of the applicant, the date the application was submitted, LSAT test scores and dates taken, where applicable, degrees received, previous law schools attended, if applicable, and undergraduate GPA. Records maintained by the registrar indicate action on the application and if admitted, whether the applicant registered or enrolled. Registrar, admissions, and operations staff maintain a JD Start Ready spreadsheet documenting the life cycle of an applicant from the application stage through enrollment.

For each applicant admitted but not enrolled, ALU maintains a file through Populi that includes the application, transcripts evidencing an earned bachelor's degree or higher from a college or university accredited by an accrediting agency recognized by the United States Department of Education, official transcripts of any law study at another law schools, and LSAT test scores, if applicable. Action taken on the application is recorded in the JD Start Ready spreadsheet. As both ULS Guideline 5.30 and Guideline 5.3 of the Guidelines for Accredited Law School Rules allow for the receipt of official transcripts of undergraduate study within 45 days of the beginning of a term, ALU currently allows for unofficial transcripts during its admissions review process. However, once a student has been accepted to the JD program, they are instructed to provide official transcripts within 30 days of the beginning of their law study. Failure to do so results in cancellation of their enrollment.

For each applicant admitted who did register or attend, a permanent file is maintained in Populi that contains the same documents in the preceding paragraph. A record of each date the student took the FYLSX is maintained in the student file in Populi and made available on the official transcript. Any record of faculty or administrative action regarding the student's academic performance or any disciplinary action, leave of absence or other interruption of studies, any disqualification prior to graduation, and any other matter pertaining to a variance between the student's course of study and the rules of the law school, the Accredited Law School Rules and its Guidelines is maintained in the student file through Populi.

ALU's official transcripts are generated through Populi and are set up to input all of the requirements of 11.1(D) – information that clearly identifies the student; date of admission; the student's status as a JD degree candidate; any transfer credit from another law school accepted by ALU, including the name of the law school, the name of the courses taken, the date of when

the courses were taken, the amount of unit credit allowed, and the grades received; all academic credit granted for courses taken at ALU, and all course in which the student registered, clearly indicating, by beginning and end dates, the academic term and year, and their unit value, credit granted, and grades received; notations pertaining to leaves of absence or other interruptions of study; and the date and nature of the final termination of studies, whether withdrawal, disqualification, transfer, graduation, or otherwise, and if graduated, the degree conferred.

ALU has a written policy that provides that transcript entries may be changed only upon a showing of good cause. The policy details the procedure to be followed to apply for and approve a transcript change under a showing of good cause.

Class records under Guideline 11.1(E) are permanently maintained in Populi. ALU is in compliance with Guideline 11.1(F) in that it maintains five years of all examinations given to its law students in Google Drive, one year of students' final examination papers and any midterm examinations that are part of the calculation of a student's final course grade, a permanent record of grades on all examinations in each course, a permanent record of course grades in each course, and an annual grade distribution chart, by course, and instructor for all courses.

Administrative and faculty personnel files are maintained by ALU. For each law school administrator, ALU maintains a file that contains a CV or resumes documenting a summary of their professional career and qualifications as an administrator, undergraduate and graduate education, and if applicable, law school education and law license information from any applicable jurisdictions. Official transcripts evidencing undergraduate, graduate, and law school degree are required of all administrators at ALU. Prior to the commencement of teaching at ALU, faculty personnel, including academic coaches and graders, are required to submit official transcripts evidencing their undergraduate, graduate, and law degrees and resumes indicating their prior teaching experience. Faculty files also contain course evaluations performed by the dean and/or other academic staff and evidence of current admission status with the State Bar of California or other jurisdiction. A record of all courses taught, by academic terms and years, is maintained in Populi.

Meeting minutes of faculty meetings, board meetings, and advisory council meetings for the last five years are maintained through Google Drive.

Operating records sufficient to prepare the Annual Compliance Report, periodic self-studies, and other reports mandated by the *Rules* are maintained through Populi and Google Drive. Catalogs, bulletins, brochures, and handbooks are maintained through Google Drive. ALU maintains a permanent file of all correspondence to and from the Committee, including the Annual Compliance Reports, certifications, petitions and requests for waivers, and any

supporting materials on Google Drive. Additionally, ALU maintains a permanent file of all reports, self-studies, questionnaires, and inspection reports for accrediting agencies, including the Annual Compliance Report (for Registered, Unaccredited Law Schools).

Guideline 11.1(O)(2) requires an Annual Academic Program Report that ALU would be prepared to implement following the attainment of accreditation with the Committee of Bar Examiners.

SECTION 17: RULE 4.160 (N) - MINIMUM, CUMULATIVE BAR PASS RATE. The law school must maintain a minimum, cumulative bar examination pass rate (MPR) as determined and used by the Committee in the evaluation of the qualitative soundness of a law school's program of legal education. (Guidelines 12.1-12.2)

For the last reporting period as defined by Guideline 12.1, please confirm whether the law school is currently with the Committee's minimum, cumulative pass rate (MPR); discuss all efforts taken to improve the law school's MPR since its last inspection; discuss any proposed changes to the law school's curriculum, academic support, bar review or bar preparation classes intended to improve its graduates' success on the CBX.

Required Attachments

- All Minimum Cumulative Pass Rate Compliance Forms filed with Committee

RESPONSE

For the last reporting period as defined by Guideline 12.1, please confirm whether the law school is currently with the Committee's minimum, cumulative pass rate (MPR)

For the 2019 MPR Period (August 1, 2013 through July 31, 2019), ALU calculated how many students graduated and took the California Bar Examinations administered from February 2014 through and including July 2019. Any results from the February 2019 California Bar Examination was also reviewed if a student graduated from law school within 10 administrations from the February 2019 GBX (March 2014 or later).

Out of 62 Qualified Takers for the Reporting Period (those who took the CBX during the Reporting Period of the first February administration after the Reporting Period that was also no more than 10 administrations after the Qualified Taker's graduation date), 35 students passed within the Reporting Period or the first February administration after the Reporting Period that was no more than 10 administrations after the Qualified Taker's graduation. This results in 56.45%, which is higher than the requisite 40% under Division 12 of the Guidelines for Accredited Law School Rules. Please see Section 17's folder for a copy of the "Worksheet for Calculating the Minimum Cumulative California Bar Examination Pass Rate (MPR) Under Guideline 12.1" that was submitted with ALU's application for CBE accreditation.

Discuss all efforts taken to improve the law school's MPR since its last inspection

ALU has its last inspection in 2015-2016. Just to provide initial context, a summary of crucial changes prior to 2015 is included below before discussing additional efforts taken to improve the law school's MPR since 2015-2016:

- i. Admissions standards for the Juris Doctor program were changed in 2011 so that only those with bachelor's degrees could gain admission to the program (except for students who were grandfathered in under ALU's older admissions standards). Also, the School of Law made TOEFL or an equivalent exam mandatory where there is an international applicant whose native language is not English and have not completed their studies at an accredited U.S. college or university.
- ii. In August 2012, students admitted to the School of Law were subject to a proficiency requirement in order to be able to be certified for the First Year Law Students' Examination (FYLSX). Student who did not attain a grade of 70 or above needed to (1) take a proficiency exam under proctored conditions or (2) take the course again, but on a non-academic status that was purely oriented around fulfilling the proficiency requirement. This policy was designed to encourage students to achieve the level of mastery in their courses that is required for the FYLSX.
- iii. Starting at a similar time as the August 12 proficiency requirement policy, an additional policy was put into effect: law students could not continue to the second year of study unless they had a cumulative grade average of 77 or above and had submitted a special petition to request to be able to continue to an upper level. The Academic Standards Committee may decline where the student does not meet the grade requirement or the timing of the student's entry is not optimal when it comes to offering courses that the student has not yet taken.

Since 2015, these additional changes below occurred to support higher bar passage rates on both the First Year Law Students' Examination and the California Bar Examination:

- i. In 2015, the School of Law mandated live mandatory proctoring after a 3-year pilot study to check how the logistics of live mandatory proctoring among a fully online student body could work.
- ii. In 2016, the School of Law regularly increased grading weights for its final exams in 2016 to become a majority grade weight in each course, since contents of final exams were timed legal analysis through multiple choice and essay writing, which is similar to the assessment categories on all of the First Year Law Students' Examination and the California Bar Examination.
- iii. Since 2015 through 2019, ALU invested in acquiring staff who could help the institution evaluate its educational services as well as educational designs and models. The School of Law staff encouraged staff and faculty to improve homework assignments and quizzes, which could then yield valuable mid-class data on how students are grasping concepts.

- iv. In 2018, the School of Law re-designed the voluntary FYLSX preparation course, with coaches to turn around grading and feedback across 8 weeks of study, which included a mock exam in the end. Students needed to pay for the course before accessing materials as well as complete any outstanding proficiency requirements before entering the voluntary course.
- v. In 2018, the School of Law revised the format for New Student Orientation so that there were more points where students had to review recorded materials and handouts prior to completing assessments that related to the recorded materials and handouts.
- vi. In 2019, the School of Law restructured proficiency policies and schedules for proctored proficiency exams to encourage students to make more timely progress and expanded the depth of proficiency feedback to focus students on areas requiring improvement.

Discuss any proposed changes to the law school's curriculum, academic support, bar review or bar preparation classes intended to improve its graduates' success on the CBX.

The School of Law has oriented its curriculum to be on California Bar Examination-tested topics, and in terms of academic support, has offered in-program support activities and voluntary FYLSX preparation courses twice per year.

In terms of looking at future changes to curriculum and academic support, beyond those that have been discussed in Section 8, ALU is considering the following changes, which also pertain to any discussion of bar review or bar preparation classes intended to improve graduate success on the CBX:

- i. Due to unaccredited law school guidelines, specifically 1.11, the School of Law cannot offer any review course for credit. However, Accredited Law School Guideline 1.8 permits a law school to offer academic credit for "a bar examination review or preparation course." Within what Guideline 1.8 permits and once CBE accreditation is approved, the School of Law would explore having review course for credit.
- ii. Besides continuing to coordinate the voluntary FYLSX preparation courses, the Associate Dean of Academic Success in 2020 will be working on initiatives that help connect law school students and graduates to resources that will help with essay-writing evaluation, whether through panels, workshops or talks by School of Law staff and alumni.

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, by reference to 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

RESPONSE

ALU is committed to providing equality of opportunity and prohibiting unlawful discrimination in its operations and practices. The Section 18 folder contains the relevant policies from the School of Law catalog that prohibit unlawful discrimination.

ALU draws its 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 from the Compliance Annual Reports in the Section 18 folder.

The two tables on the next page contain numbers for student and faculty demographics in the past five years.

ALU Student Demographics (Attachment 21 of Annual Compliance Reports)

	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020
Total	168	144	162	212	228
Black	15 = 8.92%	20 = 13.89%	23 = 14.19%	32 = 15.09%	21 = 9.21%
Hispanic	3 = 1.78%	7 = 4.86%	25 = 15.43%	31 = 14.62%	26 = 11.4%
Asian	20 = 11.9%	24 = 16.67%	26 = 16.05%	28 = 13.20%	15 = 6.58%
Pacific Islander/Filipino	2 = 1.19%	2 = 1.38%	1 = 0.62%		
American Indian/Alaskan	2 = 1.19%	3 = 2.08%	4 = 2.47%	2 = .94%	1 = .44%
White	62 = 36.9%	54 = 37.5%	61 = 37.65%	82 = 38.68%	74 = 32.46%
Not known	64 = 38.09%	34 = 23.61%	22 = 13.58%	37 = 17.45%	92 = 40.35%
Female	76 = 45.24%	67 = 46.53%	76 = 46.91%	100 = 47.17%	121 = 53.07%
Male	92 = 54.76%	77 = 53.47%	86 = 53.09%	112 = 52.83%	107 = 46.93%

ALU Faculty Demographics (Attachment 4b of Annual Compliance Reports)

	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020
Total	17	16	21	21	21
Black	3 = 17.65%	2 = 12.5%	5 = 23.81%	3 = 14.29%	2 = 9.52%
Hispanic	0 = 0%	0 = 0%	0 = 0%	1 = 4.76%	1 = 4.76%
Asian	5 = 29.41%	5 = 31.25%	6 = 28.57%	4 = 19.05%	2 = 9.52%
Pacific Islander/Filipino	0 = 0%	0 = 0%	0 = 0%		
American Indian/Alaskan	0 = 0%	0 = 0%	0 = 0%	0 = 0%	0 = 0%
White	4 = 23.53%	4 = 25%	3 = 14.29%	7 = 33.33%	6 = 28.57%
Not known	5 = 29.41%	5 = 31.25%	7 = 33.33%	6 = 28.57%	5 = 23.81%
Female	8 = 47.06%	7 = 43.75%	9 = 42.86%	12 = 57.14%	14 = 66.67%
Male	9 = 52.94%	9 = 56.25%	12 = 57.14%	9 = 42.86%	7 = 33.33%

Gender demographics are split evenly for both faculty and students, with there being a growth in the percentage of women among faculty and the student body. 2019-2020 was the first year where there were more female students than male students in the student body, while 2018-2019 is the first year for the trend to appear in the faculty data. Minority populations for both faculty and students grow percentage-wise between 2015-2017 but then decline in 2019 (note the high number of unknowns, however, in 2019's student data, which can occur when students do not respond to the demographic survey). ALU will continue to track these numbers through Annual Compliance Reports and review trends.

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, by reference 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

RESPONSE

Abraham Lincoln University regularly submitted required reports and complied with Unaccredited Law School Rules and Guidelines since its most recent inspection report. As stated in Section 1, ALU is not working at this time to address any mandatory or suggested actions identified in its most recent inspection, since all those have been completed.

Files in "CBE-related documents" supply the CBE's site visit follow up summary, ALU's response, and affirmation of approval.

ALU regularly filed an Annual Compliance Report every year in accordance with unaccredited law school rules and guidelines. ALU is providing in this report a copy of any items that is expected for an Annual Compliance Report for a California-accredited law school, as well as materials that go towards an annual academic program report.

ALU also maintains a permanent file of correspondence to and from the Committee, including Annual Compliance Reports and other reports, certifications, petitions and requests for waivers, together with supporting materials and action taken by the Committee. ALU also maintains a permanent file of reports, self-studies, questionnaires, and inspection reports for accrediting or licensing agencies; Annual Compliance Reports; and similar documents relating to evaluation of the law school.

ALU does not have any Section 19 folder due to no attachments.