

COMMITTEE OF BAR EXAMINERS OPEN SESSION AGENDA ITEM

AGENDA ITEM: May 2018 – O-400

DATE: April 20, 2018

TO: Subcommittee on Educational Standards

FROM: Natalie Leonard, Program Manager, Educational Standards

SUBJECT: Lincoln Law School of Sacramento – Periodic Inspection Report

BACKGROUND

Attachment A is the five-year Periodic Inspection Report (Report) of the inspection of Lincoln Law School of Sacramento (LLSS) conducted September 26-28, 2017 by an Inspection Team (Team) comprised of Committee of Bar Examiners (Committee) member Karen Goodman, Dean Janice Pearson of the San Joaquin College of Law and George Leal, Program Manager, Educational Standards. Attachment B is the correspondence received from LLSS Dean James Schiavenza confirming that the law school accepts the report and each of its recommendations.

LLSS was founded in 1969 and received its accreditation from the Committee in 1981. When last inspected in 2012, it was found to be operating compliantly.

The mission of LLSS is “to provide an excellent education at an affordable price” and “to provide educational opportunities to a diverse student population.” It offers only a J.D. degree curriculum taught through a part time, four-year program offered during evening hours. For the 2017-2018 academic year, LLSS had a total student enrollment of 230 students. Dean James Schiavenza and the law school's faculty offer students a sound and compliant program of legal education.

The law school's current tuition to earn a J.D. degree is \$49,020 (86 units at \$570/unit). The law school operates upon a solid financial foundation. Finally, LLSS graduates had a 70% cumulative pass rate on the California Bar Examination for the five-year reporting period for pass results through the February 2015 administration, which is the most recent period required. This is well above the 40% minimum requirement set by Guideline 12.1.

With the exception of three issues of technical noncompliance discussed in the Report, the Team found LLSS operating compliantly with the accreditation standards found in the *Accredited Law School Rules* and the operational requirements found in the *Guidelines for Accredited Law School Rules*. As a for-profit corporation, the law school is governed by a seven-member Board of Directors comprised of members of Sacramento's legal and

business communities. The faculty is comprised of practicing attorneys and almost one fourth of the faculty (a total of six) are judges in either a state or federal court.

The Team found LLSS to be in substantial compliance with all relevant accreditation standards set by the Accredited Law School Rules (Rules) and with most relevant Guidelines for Accredited Law School Rules (Guidelines). Its admissions and scholastic standards, curriculum, faculty, library, facilities and support staff, as led by Dean Schiavenza, combine to offer LLSS students a sound and compliant program of legal education.

It is recommended that each of the mandatory and suggested actions listed below be adopted; that the law school be required to report to the Committee, within 45 days of the Committee taking action on this Report, all efforts to address each such recommendation; that accreditation of LLSS be continued; and that its next periodic inspection be scheduled for the fall of 2022, unless an earlier visitation is deemed necessary by the Committee.

Recommended, Mandatory Actions:

Through its inspection, the Team found LLSS non-compliant as to three minor issues. To address each, the Team recommends that the Committee direct that the school carry out the following mandatory actions:

1. Guideline 2.6(B): The law school must amend its student discipline policy to provide written notice of the specific charge or charges issued to any student subject to discipline;
2. Guideline 4.7(C)(1): The law school must amend its faculty evaluation policy to require that all members of the faculty, regardless of their respective years of service, be evaluated once every three years.
3. Guideline 2.7(C): The law school must adopt a written policy and create appropriate procedures to authenticate the identity of each student submitting examination answers and all other written work.

Recommended, Suggested Actions:

The Team also recommends the following suggested actions to further increase the school's level of compliance:

1. Guideline 4.1(B): The law school's Board of Trustees should consider the creation of a new administrative position, such as Associate Dean, to provide qualified assistance to the Dean in the overall academic and operational administration of the law school and its student enrollment.

DISCUSSION

In his letter to the Committee dated April 9, 2018, Dean Schiavenza accepted the Report and its mandatory and suggested compliance actions.

RECOMMENDATION:

It is recommended that the Periodic Inspection Report be received and filed; that the mandatory compliance recommendations discussed in the Report be adopted; that, the law school be required to report to the Committee, within 45 days of the Committee taking action on this Report, all efforts to address each such recommendation; that accreditation of LLSS be continued; and that the law school's next periodic inspection be scheduled for the fall of 2022 unless an earlier visit is found to be needed by the Committee.

PROPOSED MOTION:

Should the Subcommittee agree with this recommendation, the following motion is suggested:

Move that the Periodic Inspection Report of Lincoln Law School of Sacramento (LLSS) conducted September 26-28, 2017 by an Inspection Team (Team) comprised of Committee of Bar Examiners (Committee) member Karen Goodman, Dean Janice Pearson of the San Joaquin College of Law and George Leal, Program Manager, Educational Standards be received and filed; that the response submitted by Dean James Schiavenza, dated April 9, 2018 and submitted on behalf of the law school be received and filed; that the mandatory compliance recommendations made in the Report be adopted; that the law school be required to report to the Committee, within 45 days of the Committee taking action on this Report, all efforts to address each such recommendation; that accreditation of LLSS be continued; and that its next periodic inspection be scheduled for the fall of 2022, unless an earlier visitation is deemed necessary by the Committee.

LINCOLN LAW SCHOOL OF SACRAMENTO

PERIODIC INSPECTION REPORT

Inspection conducted
September 26-28, 2017

Visitation Team:

Karen Goodman, Chair
Committee of Bar Examiners

Janice Pearson, Dean
San Joaquin College of Law

George Leal, Program Manager
Educational Standards, Office of Admissions

Lincoln Law School of Sacramento
3140 J Street, Sacramento, California

EXECUTIVE SUMMARY and RECOMMENDATIONS

A periodic inspection of the Lincoln Law School of Sacramento (LLSS) took place on September 26-28, 2017. The inspection team (Team) selected by Gayle Murphy, Director of Admissions, included Karen Goodman, Chair of the Committee of Bar Examiners (Committee), Janice Pearson, Dean of the San Joaquin College of Law and George Leal, Program Manager, Educational Standards, Office of Admissions.

LLSS was founded in 1969 and received its accreditation from the Committee in 1981. When last inspected in 2012 it was found to be operating compliantly.

The mission of LLSS is “to provide an excellent education at an affordable price” and “to provide educational opportunities to a diverse student population.” It offers only a J.D. degree curriculum taught through a part time, four-year program offered during evening hours. For the 2017-2018 academic year LLSS had a total student enrollment of 230 students. Dean James Schiavenza and the law school’s faculty, which includes several judges sitting in state and federal courts, offer students a sound and compliant program of legal education.

The law school’s current tuition to earn a J.D. degree is \$49,020 (86 units at \$570/unit). Through sound management, the law school operates upon a very solid financial foundation. Finally, LLSS graduates had a 70% cumulative pass rate on the California Bar Examination for the five-year reporting period for pass results through the February 2015 administration, well above the 40% minimum requirement set by Guideline 12.1.

Recommended Action by the Committee:

Based upon the specific findings set out in this Report, the Team found LLSS compliant with all relevant accreditation standards set by the *Accredited Law School Rules* (Rules) and with most relevant *Guidelines for Accredited Law School Rules* (Guidelines). Its admissions and scholastic standards, curriculum, faculty, library, facilities and support staff, as led by Dean Schiavenza combine to offer LLSS students a sound and compliant program of legal education.

It is recommended that each of the mandatory and suggested actions listed below be adopted; that the law school be required to report to the Committee, within 45 days of the Committee taking action on this Report, all efforts to address each such recommendation; that accreditation of LLSS be continued; and that its next periodic inspection be scheduled for the fall of 2022, unless an earlier visitation is deemed necessary by the Committee.

Recommended, Mandatory Actions:

Through its inspection, the Team found LLSS non-compliant as to only three minor issues. To address each, the Team recommends that the Committee adopt the following, mandatory actions for the law school to carry out:

1. Guideline 2.6(B): The law school must amend its student discipline policy to provide written notice of the specific charge or charges issued to any student subject to discipline;
2. Guideline 4.7(C)(1): The law school must amend its faculty evaluation policy to require that all members of the faculty, regardless of their respective years of service, be evaluated once every three years.
3. Guideline 2.7(C): The law school must adopt a written policy and create appropriate procedures to authenticate the identity of each student submitting examination answers and all other written work.

Recommended, Suggested Actions:

Through its inspection, the Team also found that, to achieve a higher degree of compliance, it suggests that LLSS take the following suggested actions:

1. Guideline 4.1(B): The law school's Board of Trustees should consider the creation of a new administrative position, such as Associate Dean, to provide qualified assistance to the Dean in the overall academic and operational administration of the law school and its student enrollment.

Report of Self-Study

LLSS was among the first CALS to use the Committee's revised and enhanced Self-Study template to submit its Self-Study prior to the inspection. As intended, the new template provides a law school being inspected a better means for it to provide the Team with all relevant information needed to confirm its compliance.

The Team found the LLSS Self-Study to be comprehensive, well organized and properly supported by all relevant documentation. As a result, it offered the Team significant assistance in preparing for and carrying out the inspection and in the drafting of this Report.

Report of Inspection

The inspection took place over two and one-half days during which the Team met with Dean Schiavenza, the law school's ownership, its registrar, faculty and staff. The Team also conducted a confidential meeting with students during which it

held a candid and informative discussion about a number of issues that are of interest to the students and that affect their experience and legal education.

Team members toured the facility and library; attended and observed numerous class sessions and conducted sample reviews of student files, faculty files, final examinations, student answers and other operational records. In response to requests for information made during the inspection, Dean Schiavenza and his staff responded promptly and provided the information requested.

The Team concluded the inspection with a candid and comprehensive exit interview with Dean Schiavenza, LLSS Founder Andrew Smolich and President James Smolich to discuss the Team's impressions, preliminary findings and anticipated recommendations. Throughout the visit, the Team was impressed with the cooperation and candor offered by all participants and by their collective commitment to the success of the law school and to all of its students.

Since the inspection, Dean Schiavenza submitted additional information relating to the Team's findings which has been incorporated into this Report.

SPECIFIC FINDINGS AS TO COMMITTEE ACCREDITATION STANDARDS

Below are the Team's findings, conclusions and recommendations regarding LLSS's compliance with each the Committee's accreditation standards, as set forth in the Rules, and with the requirements of each relevant Guideline.

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

LLSS operates compliantly with all applicable federal, state and local laws and regulations. It operates as a for-profit California corporation and is in good standing with the California Secretary of State. The law school also maintains a valid business license to operate lawfully within the City of Sacramento.

As an educational institution, the law school has adopted and maintains policies to comply with each of the following relevant federal laws:

American with Disabilities Act (ADA): As described in its Student Handbook, LLSS students who have a documented disability may seek and receive reasonable physical and educational accommodations under the ADA. All requests for accommodations are reviewed, verified and approved by the Dean.

Family Educational Rights and Privacy Act (FERPA): The privacy of all student records is protected in accordance with this federal law; as required by FERPA, students must provide written permission before their protected, personal information is released.

LLSS also maintains compliant admissions and employment policies which are intended to prevent all forms of unlawful discrimination and harassment.

Rule 4.160(B): Honesty and Integrity. The law school must demonstrate integrity in all of its programs, operations, and other affairs. Guidelines 2.1 – 2.10; Bus. & Prof. Code sec. 6061.7(a) and sec. 6061.7(c)

LLSS operates compliantly under Guidelines 2.2(A)–2.2(C) by conducting its financial affairs with honesty and integrity. Its financial statements are audited annually by a certified public accountant and it uses sound accounting procedures with appropriate safeguards to prevent fraud and to prepare its annual financial reports, monitor expenses and prepare an annual budget.

Under Guideline 2.2(B), the LLSS catalog and website accurately state its current tuition, fees, financial aid and refund policy. It compliantly offers tuition refunds of 100% if a student withdraws by the end of the second week of a semester, 75% within the 3rd to 4th week, 50% within the 5th to 6th week, 25% within the 7th to 8th week, and a zero refund thereafter. While the law school is not qualified to offer students federally-insured student loans, it does participate in the Sallie Mae loan program for credit-worthy students. The catalog also provides a description of the benefits due LLSS students who are veterans.

As required by Guideline 2.3(A), LLSS also communicates in an “honest and forthright” manner with “the Committee, the legal profession, the public, prospective students and students.” Its catalog and website both provide an accurate and current statement of its curriculum, academic standards and graduation requirements. Each also contains the notice requirements of Guideline 2.3(D) relating to the limited eligibility the law school’s graduates have to practice law outside of California, along with the required link to the “Statistics” page of the State Bar’s website which provides the most currently published results of LLSS graduates on the California Bar Examination (CBX).

LLSS is compliant with the multiple disclosure requirements of California *Business and Professions Code* §6061.7. Since January 1, 2017, all non-ABA-approved California law schools must post on their websites an Information Report Form which provides numerous disclosures regarding the law school’s admissions, current enrollment, tuition, financial aid, a survey of employment outcomes for past graduates and its current, cumulative pass rate on the CBX.

The law school uses *Populi*, an online website, to communicate with its students. Students go to a personal “portal” to access pertinent information regarding the law school, including the current academic calendar, course information, financial information and posted grades and their individual transcripts.

The law school has adopted a student discipline policy which, while generally compliant, currently lacks a key requirement of Guideline 2.6. As described in the Student Handbook, students must abide by a code of conduct under which non-academic discipline may be imposed for dishonesty, property damage, plagiarism and substance abuse. It also describes the various forms of discipline that may be issued, ranging from a verbal or written reprimand, cancellation of an examination and denial of course credit, probation suspension or expulsion.

Guideline 2.6(B), however, requires that a “written notice of the specific charge or charges” be given to any student subject to discipline. Given its absence, the Team recommends that the policy be amended accordingly. The current policy is compliant in providing students with “opportunity for a hearing before a panel of impartial members of the faculty and/or administration,” the right to counsel and, if they are found subject to discipline, to “a written final determination, which includes a statement of the facts, conclusions, and sanctions, if any.”

LLSS has adopted and uses compliant academic standards. Students receive numerical grades from zero to one hundred that are translated into a traditional letter grade scale, with an A being worth 4.0 grade points and so forth. The Student Handbook provides a description of how letter grades are converted into grade points, *e.g.*, C+ equals 2.3 grades points per unit. Minimum good standing is a grade point average of 2.0. Credit/No Credit grading is used in several required skills courses and most electives, but not in any course covering subjects tested on the CBX. Students are advised that anonymous grading is used for exams and are given a description of the circumstances under which they may be subject to academic disqualification.

As required by Guidelines 2.7(A)(3) – 2.7(A)(8), students are informed as to what constitutes academic good standing, which classes are mandatory, their eligibility to advance to the next year of study, academic probation, disqualification and all requirements needed to graduate and receive their J.D. degree.

Students are also provided with a written statement explaining how their final grades are calculated. As noted in the Self-Study, each professor’s course syllabi confirms the weight given to class performance and a student’s mid-term grade or other class assignments in formulating a student’s final grade. Students are also informed that grading of examinations is done anonymously.

Students have the right to inspect and copy their examination questions and their answers within a reasonable time after the examination is given. When, after reviewing an examination answer, a student wishes to challenge a grade, they are first required to meet with the professor who issued the grade to discuss the grade given. If such a meeting does not resolve the student’s issue, they may then file a Grade Challenge Petition which is then submitted and reviewed by the Dean who then submits the Challenge to the professor for his or her response. If still not satisfied with the professor’s written response, the student may then file

an appeal to the Grade Review Committee which is comprised of a panel of professors with at least three years of grading experience. If requested, the Committee may then hold a hearing, during which the student is entitled to appear. The Committee chair then issues a decision which is final and binding.

Under Guideline 2.7(C), the law school is required to have a written policy and procedures to authenticate the identity of student work product so as to ensure that the work submitted is that of the student claiming credit. As for examinations, anonymous grading using random student ID numbers achieves the intent of this Guideline. However, there is no expressed policy (other than a reference for potential discipline), nor any additional procedures to ensure the authenticity of student work other than by proctored examinations. Given the unfortunate prevalence of uncited or plagiarized work product available on the Internet, a better practice in legal academia is to adopt a policy to ban such behavior. As a result, the law school should consider implementing procedures to authenticate all forms of written work submitted by students. To achieve this goal, it should consider using commonly available software to detect plagiarism. Use of such software by other CALS have helped them to detect not only plagiarized work, but is also useful in classes teaching effective legal writing given the program's ability to identify grammatical and spelling errors.

Pursuant to Guideline 2.8, LLSS maintains strict policies to protect the privacy of student information and communications. It does so by adhering to the guidelines issued by the federal government under the Family Educational Rights and Privacy Act (FERPA). As required by Guideline 2.9, the law school maintains reasonable security and computer backup procedures to protect its electronic files and electronic data base.

Finally, as required by Guideline 2.10, the LLSS Student Handbook provides students with a statement of student services, experiences and activities to support and enhance a student's education. The law school uses an electronic student portal (Populi), email and Facebook to inform students of school activities and services. The law school supports a number of student groups, such as the Lambda and the Latina/o Student Association, as well as Delta Theta Phi, a professional fraternal organization. Academic services include course review and bar review and preparation classes, including Themis (for bar review) and AdaptiBar to prepare for the MBE portion of the California Bar Examination.

The faculty is also encouraged and many are regularly available, by appointment, for academic tutoring career advice. Dean Schiavenza also provides such support. Recently, the law school has instituted a very popular tutoring program known as the Friday Night Review Program. Taught by students, the sessions offer both small group tutoring and larger group review sessions for classes taught in first through third-years of the J.D. curriculum, and any student can attend regardless of their classification.

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

As a for-profit corporation, the law school is governed by a seven-member Board of Directors comprised of well-respected members of Sacramento's legal and business communities. They include: LLSS founder Andrew Smolich; Mr. James Smolich; Ms. Jan Scully Royse, an alumna of the law school and the former elected District Attorney of Sacramento County; Mr. Brian Bedford, CEO of Align Capital Region; Chris Wood, Esq., among other members.

Director James Smolich was recently appointed by the Board as the law school's C.E.O. Mr. Smolich is a graduate of the University of the Pacific's McGeorge School of Law and has been a practicing California attorney, working with his father, since 1985. He is also a former member of the LLSS adjunct faculty.

The Board has direct, but independent, authority to provide the law school with direction, guidance and policy-making authority over its program of legal education and student services.

The day-to-day administration of the law school is the primary responsibility of Dean James Schiavenza. He reports directly to C.E.O. James Smolich. Dean Schiavenza is an experienced trial attorney who served for over 30 years with the Office of the California Attorney General. Dean Schiavenza works with his fellow deans as the current president of the Association of California Accredited Law Schools (CALS). In this capacity, Dean Schiavenza regularly advocates on behalf of the CALS in regard to various, important issues including, most recently, the studies performed by the State Bar to evaluate the current passing score and subject matter content of the California Bar Examination.

In May of 2017, LLSS appointed a new Registrar, Ms. Britney Adkins Neumann. Ms. Neumann has extensive experience and expertise in the administration of educational entities. She also works closely with the Student Services Director, Melissa Fuller-Haskin and the school's administrative assistant. Ms. Peggy McGraw is the law school's chief financial officer and also handles its human resource issues. Ms. McGraw is a retired C.P.A. with experience working for a nationally-recognized accounting firm.

Given the professional expertise, dedication and hard work of the Dean and each of its administrators, the Team found LLSS to be well governed and competently administered. However, given its current enrollment (232 students, the largest of any CALS), his active role in admissions and faculty matters, combined with his many academic and operational duties, the Team found Dean Schiavenza's time and efforts to be overburdened. This situation has recently been exacerbated by the law school's current and ongoing effort to seek and attain WASC

accreditation, a very labor intensive process given the number and complexity of the various studies, data and reports needed to be prepared and submitted.

As a result, the Team came to the belief that both the law school and its students would benefit if Dean Schiavenza had the assistance of a well-qualified, full-time associate dean. A number of the CALS operate effectively with a Dean and an associate dean, someone qualified to focus on internal academic and operational matters, so the Dean has more time to focus his or her attention on the largest and most important academic and operations issues facing the law school. As a result, pursuant to Guideline 4.1(B), the Team recommends that the Board of Directors consider and take action to create a new position of associate dean to act as the senior academic administrator reporting directly to the Dean.

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

Dean Schiavenza has served as Dean on a full-time basis since 2011. He is a graduate of the Santa Clara University School of Law and, as noted, practiced law for many years with the Office of the California Attorney General. Dean Schiavenza acts as the law school's chief academic officer and, in this capacity, is involved in all of the law school's academic policy-making decisions. He is also a member of the faculty and regularly teaches the first-year Torts class. The Team found Dean Schiavenza hard working, very engaged with his students and faculty and clearly dedicated to the law school, its educational mission and to the success of all of its students.

The faculty consists of 25 adjunct members. All are licensed attorneys practicing primarily in the Sacramento area, in both the public and private sectors. All faculty teaching core classes have been licensed for over 10 years. Even more notable is the fact that almost one fourth of the faculty (a total of six) are judges of either a state or federal court. Over 45% of the faculty are graduates of ABA-approved law schools, such as those at University of San Francisco, U.C. Davis, University of the Pacific and Santa Clara University, while more than half, a total of 13, earned their Juris Doctor degree at LLSS. The law school also employs 10 adjunct "Legal Writing Readers," all licensed attorneys, who teach and tutor during Saturday class sessions integrated into the first-year legal writing course.

As the Team observed, some core classes are large (50+ students), particularly in the first-year curriculum, the teaching loads for members of the faculty appear manageable and, as confirmed by students, professors are readily accessible and supportive to provide counseling as mandated by Guideline 4.4. As reported in the self-study, the overall student/faculty ratios range from 8-to-1 to 10-to-1.

Consistent with Guidelines 4.4 and 6.10, faculty members are available to counsel students. While, as adjuncts, professors are not required to maintain

fixed office hours on campus, all are available to meet with students prior to the start of classes or by appointment, while students have their email addresses and work telephone numbers. Dean Schiavenza regularly counsels students by meeting with them in his office during both afternoon and evening hours. In the Team's conversation with students, several spoke highly of their professors' accessibility and their willingness to offer counseling.

The faculty takes an active role in the formulation, implementation and administration of the law school's academic policies, academic standards, curriculum and student enrollment. Starting in 2017, the faculty now meets four times a year, up from meeting only twice a year. At such meetings, the faculty discusses, debates and decides a broad spectrum of academic matters including grading standards and curves, curriculum changes, among others. Selected faculty members also serve on standing committees, such as: the Admissions Committee; Discipline Committee; Academic Standards; Grade Review Committee, Peer Review Committee and the Senior Faculty Advisory Committee.

Under Guideline 4.6, faculty members have a continuing obligation to improve their teaching skills and substantive expertise. LLSS seeks to promote faculty development in several ways. At various faculty meetings, teaching skills and techniques and student learning styles are discussed. Given the growing reliance on different types of teaching technology, members of the faculty are offered training to enhance their use of PowerPoint and video presentations.

LLSS has a generally compliant faculty evaluation policy. It has developed a Peer Review Program which is designed to provide faculty members with both formative and development feedback to help them improve their teaching. Each evaluation is conducted by two peers who make a comprehensive review of a professor's syllabi, class materials (including any PowerPoint presentations), past examinations and grades. A meeting with the professor and those performing the evaluation is held to discuss the materials reviewed before a classroom observation is made by both evaluators. Finally, a second meeting is held with the professor and Dean to discuss the review. Faculty evaluations are also sought from students. At the conclusion of each class, students complete an anonymous Student Faculty Evaluation. They are reviewed by the Dean who prepares a summary that is shared with professors after final grades are issued. They then also receive the student evaluations.

As required by Guideline 4.7, an evaluation of each new LLSS faculty member is to be performed during their first year they are teaching and again at the end of their second year. Faculty members who have been teaching between three to five years are to be evaluated annually, while those who have taught for five or more years are to be evaluated every three to five years.

This last time sequence is not technically compliant. As required by Guideline 4.7(C)(2) , all professors, regardless of how they have been teaching, must be

evaluated “at least once within the next three academic years of instruction and then not less than once every third academic year thereafter. . . .” Under this requirement, all LLSS faculty members should be evaluated every three years regardless of how long they have been teaching. A review of the files of those faculty members who have been teaching five or more years, confirmed that under the currently stated policy, several have not been evaluated for over five years and at least one member was last evaluated over eight years ago.

The Team therefore recommends that the LLSS faculty evaluation policy be revised so that all members of its faculty are evaluated at least once every three academic years regardless of how many years they have been teaching.

Members of the faculty are protected by a written academic freedom policy as required by Guideline 4.9.

Team members attended classes being taught in each year of the curriculum. Overall, they observed effective teaching with fair-to-good and, in some classes, excellent student engagement and participation. All professors observed were well prepared and had clear mastery of the subject being taught. The only less than optimal impression of some members’ teaching styles was more related to either the class size or the configuration of the some of the LLSS classrooms. In the large first-year classes (with 80+ students), more than one professor was observed focusing attention on students near the front, while in the medium-sized, elongated classroom, it was clearly harder for students at the far ends to hear and remain engaged in class discussion. Based upon these observations, it is recommended that faculty teaching in these classrooms be encouraged to be sure that students sitting in all parts of the classroom are able to follow and become engaged in class discussions. Finally, as with virtually all law schools, a few faculty members were observed spending too much time in what is often the monotonous and ineffective use of student recitation of assigned case materials.

Rule 4.160(E): 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 5.1-5.8

Given its mission “to provide an excellent legal education at an affordable cost to qualified applicants,” LLSS has adopted and maintains a compliant admissions policy. A description of its application procedures and admission requirements are found on its website and in its Catalog. As noted in the Self-Study, the law school recently updated its admissions process to require that all applicants to apply online. The application form requests information regarding an applicant’s undergraduate education, any prior law study (their status) and an LSAT score. Applicants holding a graduate degree (Master’s or higher) are not required to report a score on the LSAT. Official transcripts of all education or a Credential Assembly Service from the Law School Admissions Council are also required. The law school charges no application fee.

LLSS complies with the minimum undergraduate educational requirements of *Business and Professions Code*, §6060(c) and the Committee's *Admissions Rules* and Guideline 5.2. As such, most applicants who are admitted have earned a bachelor's degree, with relatively few admitted after earning only the minimum 60 units of college credit. For the 2017-2018 academic year, 119 of the 130 applicants LLSS admitted, 91.5% hold a bachelor's degree. The remainder (7.6%) has earned 60 or more units of acceptable undergraduate credit, while only one was admitted as "special student" with fewer than 60 units of such credit. Since 2012, the law school has admitted only five such special students.

All admission decisions are made by the Admissions Committee; it is comprised of one faculty member, Dean Schiavenza, and Registrar, Brittney Adkins Neumann. As applied to each applicant, the LLSS admissions process is comprehensive and well designed.

Each applicant is evaluated and assigned an index figure based upon their undergraduate GPA and LSAT score. Applicants with a high enough score are recommended to the Committee for acceptance; those assigned a lower figure must meet personally with the Dean before their application is forwarded to the Committee. Moreover, in addition to those required to meet with the Dean, LLSS has a long-standing policy of allowing any and all applicants to meet personally with Dean Schiavenza to discuss their interest and aptitude for the study of law. Given this policy Dean Schiavenza meets with almost 90% of all those admitted.

Once forwarded to the Committee, a decision whether to admit is based upon an appraisal of the "total person" applying. Under this policy, an applicant's complete personal history is considered, including their undergraduate education, whether they hold a professional license, any community activities, current employment, personal challenges, career goals and letters of recommendation.

In light of its policy and mission to provide opportunity to non-traditional student applicants with a 20% or higher LSAT score are favorably considered for admission. Those with a score of below 20% may be conditionally admitted with the requirement that they take and pass with a grade of C or higher in one or two, pre-first year classes. If they do, they are admitted into the first-year curriculum; if they do not, they are disqualified and not permitted to enroll as a student in the first-year courses.

LLSS is compliant with Guideline 5.6 in admitting or readmitting students who previously attended another law school, either LLSS or any other law school, including those academically disqualified from their former law school. For the past academic year only 13 such applicants have been admitted, with only seven after being previously disqualified, including one LLSS student readmitted after successfully petitioning the Faculty Committee on Academic Standards. To be recommended for re-admission, all such applicants must meet with the Dean. Consistent with Guideline 5.7, the only academic credit granted to such students is given to those courses in which the applicant earned a grade at or above the

level of good standing. Lastly, all admitted prior law students are required to achieve a cumulative GPA of 2.0 in their first academic year at LLSS.

Based upon its admissions policy, the law school has a high acceptance rate. As reported in its 2017 Compliance Report, over the past three academic years it has admitted 93.5% of all applicants with complete files. It doing so, it attracts and admits students from many well-regarded public universities, including several campuses of the University of California and the California State University, along with private institutions such as the University of the Pacific, University of San Francisco, University of Puget Sound, among others.

The 2017 Compliance Report confirms that for the 2017-2018 academic year, LLSS admitted applicants within a wide range of LSAT scores, ranging from a very high at the 89th percentile, down to the very low score at the 4th percentile. The overall average score for the class just admitted is in the 26th percentile. Despite the generally downward trend in both the number and the quality of law school applicants experienced by all law schools over the past few years, the overall average LSAT score for incoming classes enrolled by LLSS has remained relatively steady, dropping only two percentile points (28th to 26th) since 2015.

In contrast, the undergraduate GPAs for those admitted as regular students have gone up over the past three academic years, going from an average GPA of 2.95 in the 2015-2016 academic for those holding a Bachelor's Degree, to a 3.02 average for the class admitted in the 2017-2018 academic year.

Similarly, unlike a number of the CALS, LLSS has not experienced a significant decrease in its student enrollment. Over the past three years, its enrollment has dropped only 2.5%; it has a current enrollment of 232 students while its enrollment during the 2015-2016 academic year was 238 students. Such stability is reflected by a higher retention rate of students passing from the first-year into their second-year of study. As confirmed by Dean Schiavenza, the current second-year class had a higher retention rate of 81% than in past years.

Rule 4.160(E): Educational Program. The law school must maintain a sound program of legal education. Guidelines 1.8, 6.1 – 6.14

The law school offers its J.D. degree through a four-year, evening program designed to prepare graduates to practice law in California. To achieve this goal, the curriculum emphasizes the development of legal skills taught by practicing attorneys or sitting judges from the Sacramento community. As described below, the LLSS J.D. curriculum meets and exceeds both the quantitative requirements of Guideline 6.5 and the qualitatively requirement of providing students with a “balanced and comprehensive course of study” required by Guideline 6.8.

To earn their degree, students must complete at least 86 semester units, including 76 units of required classes and 10 units of elective courses. Of the 76 required course units, 62 are in doctrinal courses covering all subjects tested on

the CBX, with 12 covering practical skills courses such as Legal Writing, Advanced Legal Research, Moot Court, Trial Advocacy and Legal Analysis. In regard to elective classes, LLSS students are offered a particularly broad array of courses designed to help prepare graduates for the practice of law. Such classes include: Health Care Law; Employment Law, Family Law; Workers' Compensation; Taxation, Bankruptcy; Environmental Law, among others.

Students are admitted in fall, spring and summer sessions. Those who enter in spring or summer terms enroll in two courses designated as "Pre-First Year" classes: Introduction to Legal Studies and Laws and the Judicial System of the United States. Once completed with grades in good standing (for those admitted conditionally) students then join the regular first-year curriculum in the fall. This pre-first year program is designed to help students become familiar with the rigor of studying law and to help them develop skills they will need to succeed in law school.

The academic calendar includes two, 16-week semesters in the fall and spring, and a six-week summer session. Required classes are offered during fall and spring semesters, while elective courses (many of them two units) are offered during the summer session. The curriculum is properly sequenced with the first two years designed to provide students with a sound foundation in core substantive subjects, such as Torts, Contracts, Criminal Law, Real Property, Civil Procedure and Professional Responsibility, along with the essential skills of legal writing, legal reasoning and organization. Courses in the third and fourth years, Constitutional Law, Evidence Remedies, Legal Analysis, Applied Legal Reasoning, among other, are designed to further develop and refine skills in applying legal theories and to provide a sound foundation for practical skills.

To better assess their students academically, the LLSS faculty adopted in 2014 a set of Student Learning Outcomes and, more recently, a set of Performance Criteria to measure students' comprehension and knowledge. Such objectives include: judging whether students and then graduates possess sufficient ability to identify and understand key legal principles, as tested on the CBX; whether they are able to identify and apply applicable legal principles as they relate to facts; whether they are able to identify and effectively use fundamental tools of legal research; and whether they are able to write in clear, concise, well-organized, well-reasoned professional documents, among many others. At the time of the inspection, the law school had started an evaluation (which is expected to continue) of whether its curriculum, through curriculum mapping, is meeting the objectives of its Learning Outcomes and Performance Criteria.

With the Committee's recent adoption of the accreditation requirement that all LLSS students "satisfactorily complete a minimum of six semester units" of classes designed to teach practice-based skills and competency training (Rule 4.160(F), the law school has developed and added new classes designed to meet this requirement. They include: Taking and Defending Depositions and

Law Practice Management. Existing classes, such as Civil Law Pleading and Practice and Criminal Law Pleading are also designed and taught to help students meet the six unit requirement. Students are also able to meet this requirement by earning up to four units through approved legal internships working in a variety of public sector law offices (such as the California Rural Legal Assistance Office) and private law firms. As noted in its Self-Study, such programs are popular and well attended given that a majority of LLSS graduates over the past three academic years students earn such credit as an intern.

In regard to the new requirement of Guideline 6.9 (effective January 1, 2018), that requires that a CALS's curriculum eventually offer at least 15 units of such practical skills and competency training, the law school is committed to continue developing additional classes so that, by 2020, its curriculum will be compliant.

The law school's attendance policies satisfy Guideline 6.5(B) such that attendance is recorded in each class and any student with confirmed absences which exceeds 20% of the total number of classes held, will not receive credit for the class. As noted in the Student Handbook, at the professor's discretion, students who, while present, are unprepared for class, arrive late or leave early may be recorded as being absent.

To improve both its retention of students who might otherwise be academically disqualified, and to improve the success rate of its graduates on the CBX, the law school has expanded and improved its program of academic support. Such support starts with a two-day first-year orientation to provide incoming students with information and instruction in how to develop better study habits and skills to meet the challenges of law school. The LLSS faculty has been instructed to work with students, individually and in small groups, to help them master the subject matter being taught and to offer academic counseling when requested.

The most visible addition to the law school's academic support is relatively new and well received. The program is referred to as the Friday Review Program and is offered on a volunteer basis. High-ranking second, third, and fourth year students are selected and then, with guidance from members of the faculty, conduct both group review sessions and individual tutoring in various core courses on Friday evenings from 6:00-9:00 p.m. Over the course of each semester a total of 10 such session are held to cover a wide-range of classes offered in each year of the LLSS curriculum. The program is well attended and, as confirmed during the Team's meeting with students, considered very helpful to those who attend.

With these improvements in its academic support program, the law school has experienced a significant drop in its overall attrition rate, going from a rate of 68% for the class that graduated in 2012, to a 41% rate for the class of 2016. Moreover, as noted by Dean Schiavenza, this rate is expected to drop even

further with the class graduating in the spring of 2018 which is on track to have a retention rate of at least 80%.

A sample review of course syllabi confirmed that all were compliant; in addition to providing information regarding the course's content and reading assignments, each was found to offer students each of the factors used to calculate their final grades such as the weight given examination grades and class participation. As noted in the Self-Study, the law school has recently taken efforts to develop a more uniform and consistent format to be used in all classes and to have faculty provide their students with a more detailed course description, student learning objectives and assessment criteria. Future syllabi will incorporate specific Performance Criteria relevant to the instruction being offered in each class.

Finally, as required by Guidelines 6.11-6.13, a sample review of written final examinations given in classes in each year of the curriculum, confirmed that the faculty develops examination questions that are fairly test the fundamental principles and subject matter taught in each class. Many of the examination questions reviewed were judged to be good to very good. Only one class (taught by professor no longer on the faculty) was found to have final examinations that were judged too cursory or required students to provide too simplistic responses.

Rule 4.160(F): 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 – 7.10

LLSS maintains compliant scholastic standards to ensure that only those students who appear to have the ability to satisfactorily complete its J.D. program are allowed to remain enrolled. Its grading policies, as set forth in the Student Handbook define academic standing, academic disqualification, advancement in good standing and on probation, retention and the requirements for graduation.

The law school uses a letter grading system of A-F, with corresponding numerical scoring, as follows: A and A- (87.00-100); B+, B and B- (77.00-86.99), C+, C and C- (76.99-66.51), D+, D and D- (56.00-66.50); F (55.99 and below). Letter grades are also assigned a corresponding grade point equivalent: A (4.0); A- (3.7); B+ (3.3); B (3.0); B- (2.7); C+ (2.3); C (2.0); C- (1.7); D+ (1.3); D (1.0); D- (0.7); and F (0.0).

Students are graded anonymously and informed that LLSS does not use a mandatory curve to limit the number or range of final grades issued. The Faculty Handbook provides professors with the law school's grading policies and guidelines. As stated therein, the primary grading policy to be carried out by the faculty is to grade their final examinations following the same grading policies as those adopted by the Committee of Bar Examiners in how the CBX is graded. The faculty is also encouraged to grade consistently in a way that clearly distinguishes between students who submit passing and failing work product.

The academic standing of each student is assessed at the end of each spring semester. To advance in good standing to the next year of study, a student must earn a GPA of 2.0 in both the year just completed and as a cumulative GPA. First year students must earn a grade of C in at least two of the three core classes (Torts, Contracts and Criminal Law) to advance. Any student whose GPA falls below 2.0 is subject to being academically disqualified with the right to petition the Faculty Committee on Academic Standards. That Committee will then consider whether the student should be dismissed, advanced to the next year on probation or be required to repeat all or some of the academic year.

The Committee (comprised of five faculty members) is the final arbiter in all instances of academic disqualification or the imposition of probation. Over the course of the 2016-2017 academic year, the Committee took action as to a total of 40 students who were below academic good standing; 20 were found worthy of academic disqualification (six in their second and third year of study); 10 were required to repeat a year of study (four second- and third-year students) and 10 were permitted to advance on probation subject to various requirements. Those advanced on probation who do not achieve overall good standing by the end of their next year of study are not eligible to continue and are then dismissed.

Both the faculty and the Dean work to maintain overall grade consistency. Grade statistics are prepared and disseminated to all professors teaching the same cohort of students. Faculty teaching first year classes frequently compares their grades to assure overall consistency and the full faculty receives a grade distribution chart at the annual faculty conference. The Dean also reviews grades to check for obvious inconsistencies and to assure overall continuity.

Using these procedures, the law school's grading process seeks to yield grades that are accurate, valid, reliable and consistent, a fact confirmed by the grading data submitted in its 2017 Annual Compliance Report. As reported therein, LLSS maintains a relatively sound distribution of grades throughout its entire curriculum. However, given number of higher grades issued in some third and fourth year classes, some amount of grade inflation appears to exist. For example, during the 2016-2017 academic year, out of a total of 995 grades issued in all classes, a total of 441 grades of B+, B and B- were issued, compared to 372 grades of C+, C and C-, while a total of 92 grades of A and A- were issued, compared to 72 grades of D+ or D. Where appropriate, the grade of F (a total of 13) was also issued. A review of individual course grades for classes taught after the first year further confirmed that some professors teaching a few classes (Community Property, Business Associations, Wills and Trusts) issue higher-than-average grades compared to others teaching the same students.

Given the grading patterns noted, the Team recommends that an analysis be conducted to determine whether such discrepancies are, in fact, evidence of grade inflation, or whether other factors were responsible.

Rule 4.160(M): Minimum, Cumulative Bar Pass Rate. The law school must maintain a minimum, cumulative bar examination pass rate 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

In July 2015, to comply with a then-new accreditation standard established by Rule 4.160(M), each CALS reported to the Committee the cumulative pass rate (MPR) of its graduates on the CBX. The reporting period used to calculate this important new standard was August 1, 2009 through July 31, 2014, and the pass rate calculation was to be based upon the total number of all graduates who both graduated during the reporting period and took the CBX at least once through its February 2015 administration, whether they passed or failed. To be compliant with this standard, a CALS must report a MPR for its graduates of at least 40%.

As was then reported, LLSS was compliant with Guideline 12.1 with a 70.0% MPR. Since then, due to a state law which prevented the Committee from providing all law schools the names of any graduate who took the CBX, whether or not they passed or failed, the Committee temporarily suspended the MPR reporting obligation set out in Guideline 12.1. As a result, neither LLSS nor any other CALS was required to or able to report its MPR for either 2015 or 2016.

However, with a change in California law that took effect in late 2017, the Committee is again able to provide each CALS with the pass/fail results of its graduates on the CBX for the years 2015 and 2016. With such data each CALS will be able to calculate and report its MPR, for the reporting period from August 1, 2012 through July 31, 2017 on this upcoming July 1st. Based upon such information, LLSS is expected to report a compliant MPR given the above-average more recent success of its graduates as first-time takers on the CBX.

Over the past five years, LLSS has taken several initiatives to improve its graduates' CBX pass rates. Since 2012, it has contracted with AdaptiBar to better prepared students with the Multistate Bar Examination (MBE) portion of the CBX. Over the past four years, the law school has used the services of Themis, a well-respected provider of CBX review materials, to help the LLSS faculty integrate such materials into their classes. Themis materials include hardcopy outlines and online outlines, practice essay and multiple choice questions and answers and materials designed to help develop skills needed on the performance section of the CBX. As a final point of bar preparation, LLSS offers its graduates a mock CBX at no cost. The law school also, as noted, has revised its fourth-year curriculum to offer a review of subjects tested on the CBX.

Based upon each of these efforts, LLSS appears justified in the belief that its graduates' pass rates on the CBX will continue to improve over time.

Rule 4.160(H): Multiple locations. Accreditation is granted to a law school as an institution. If a law school conducts seminars or classes other than at its principal facility or branch campuses, the seminars and classes must be conducted in compliance with the Standards, except the Library Standard.

LLSS operates only a single campus and is not subject to this standard.

Rule 4.160(I): Library. The law school must maintain a library consistent with the minimum requirements set by the Committee. Guidelines 8.1 – 8.8

The LLSS law library is spacious and well maintained and holds over 18,000 hardcopy volumes, along with other electronic resources and legal authorities. The law school favors maintaining a significant hardcopy collection in the belief that it assists students in becoming proficient in traditional legal research and in the enhancement of their comprehension of legal principles. The Team found all required, hardcopy legal authorities to be fully updated. As such, the library meets and exceeds all content requirements of Guideline 8.4.

LLSS students have compliant access to the law library. The library is open seven days per week; Monday through Friday, 9:00 a.m. - 9:30 p.m.; Saturdays and Sundays, 10:00 a.m. – 10:00 p.m. It is staffed and overseen by a law librarian who is a licensed California attorney. Student assistants are also on-duty evening hours and weekends.

LLSS maintains compliant records of its expenditures spent to maintain both the hardcopy and electronic authorities found in its library.

The law school also provides students with compliant access to online library materials. Each has 24/7, remote access to Westlaw and its extensive online libraries of legal authorities throughout their enrollment at LLSS. The library also subscribes to CEB publications and maintains a library of CDs that may be checked out by both students and alumni. The library, as with the all other areas of the law school, offers students with a fast and reliable Internet connection.

As required by Guideline 8.5, the LLSS curriculum requires instruction in both hardcopy and electronic legal research. Students receive such instruction in each of these required courses: Legal Research & Writing; Moot Court and Trial Advocacy. While the LLSS curriculum is compliant with this Guideline, in the Team's meeting with students, several expressed the desire to receive additional instruction, particularly as to online research, to enhance their legal research and writing skills. Moreover, more than one student mentioned that they would appreciate receiving such instruction in their first year to help them in their study in core classes and to learn practical skills to help them find work in a law office.

In light of such comments, the Team recommends that the Dean and the faculty discuss developing additional ways legal research and writing can be

incorporated into substantive law classes, as may now be offered by Guideline 6.9, and whether a class in the first year curriculum is feasible and advisable.

Rule 4.160(J): Physical Resources. The law school must have physical resources adequate for its programs and operations. Guidelines 9.1-9.3

The law school's physical and technical resources are adequate and compliant. It has the exclusive use of a large, two-story building that it has occupied for years which contains four classrooms (one large, two medium sized and one small), the law library, administrative and faculty offices and meeting rooms.

The number and size of the classrooms meet the needs of the law school's relatively stable student enrollment. All have PowerPoint projection technology and each offers students wireless internet access, comfortable seating, access to electrical outlets for laptop use, good lighting and adequate heating, ventilation and air conditioning. Classroom acoustics are adequate in most circumstances, but the Team recommends that the law school evaluate whether sound amplification is needed in the largest classroom where it was noticeably difficult for students in the back to hear comments made by students sitting up front.

All areas of the building are ADA compliant since all classrooms, the law library and offices are accessible to persons with physical disabilities through the use of an internal elevator and, where appropriate, push-button doors that open.

The law school technically rents the use of the building on a month-to-month basis. However, both the law school and the building share common ownership so there is no operational or financial risk of it ever losing use of the building.

Rule 4.160(K): Financial Resources. The law school must have adequate present and anticipated financial resources to support its programs and operations. Guidelines 10.1 – 10.3

LLSS maintains a very solid financial foundation and operates in a fiscally conservative manner. It has a long history of operating profitably, has no long-term debt and maintains a sizable cash balance. Its income, expenses, assets and liabilities are audited annually by a certified public accountant, Propp, Christensen & Caniglia, LLP. Based on the auditor's most recent financial report issued, issued May 25, 2017, the law school continues to operate profitably.

As that report confirmed, the law school's total net assets were \$2.4 million at the end of its 2016 in fiscal year and it earned, as it has for many years, a net profit since the income it earns through tuition is relatively stable. Unlike many other law schools, both CALS and ABA-approved, LLSS has managed to maintain a consistently even enrollment over the past several years. Between the 2014-2015 and 2017-2018 academic years, the law school's enrollment has ranged from a high of 238 to a low of 225 students, a difference of only 5%.

Through prudent financial management and consistent annual revenue, LLSS has been able to maintain its tuition at a sum that is below the average for similar law schools. Charged at the rate of \$570 per unit, the current tuition incurred to earn a J.D. degree is \$49,020 (86 units at \$570/unit).

Based on its documented financial resources, the LLSS was found to be financially sound and compliant with the requirements of Guideline 10.1 in having “adequate present and anticipated financial resources to support its program of legal education and to ensure that all students admitted into its program have a reasonable opportunity to complete the program and earn their degrees.”

Rule 4.160(L): Records. The law school must maintain adequate records for its programs and operations. Guideline 11.1

LLSS creates, maintains and stores its records and files compliantly. The law school uses electronic database and student learning system, *Populi*, to maintain its student information. All such information is password protected, backed up regularly and accessible to all administrators. Such information includes the personal information of each student, their admission materials, educational information (grade transcripts) and attendance records.

Hardcopies of all student files are also maintained, stored in locked, fire-resistant cabinets. The law school uses a well-organized checklist to assist administrators in confirming that each contains all information required by Guideline 11.1(C). Similarly, LLSS maintains faculty files which were found to contain all required documentation mandated by Guideline 11.1(H). The hard copy records of graduates are initially stored in similar cabinets and then off-site.

All student files are audited on a regular basis by Registrar Britney Adkins Neumann.

A sample review of the following files confirmed their respective compliance: Applicant files and records of admissions (Guidelines 11.1(A), 11.1(B)); Student files and transcripts (Guidelines 11.1(C), 11.1(D)); Class records, examinations and grade tabulations (Guidelines 11.1(E), 11.1(F)); and Faculty and administrative files (Guidelines 11.1(G), 11.1(H)).

The Team also reviewed all other records required by Guidelines 11.1(I) through 11.1(O) including minutes of faculty meetings, minutes of the LLSS Board of Directors’ meetings, Annual Compliance Reports and correspondence with staff and the Committee. All were found to be complete and well-maintained.

Rule 4.160(N): Equal Opportunity and Non-Discrimination. 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 provide both equality of opportunity and to prohibit unlawful discrimination. Guideline 14.1

LLSS operates compliantly with Guideline 14.1. As its Self-Study notes, the law school is committed to diversity and “maintains equality of opportunity in the admission and retention of students, and the hiring, retention and promotion of personnel and faculty.” It also works to maintain a discrimination-free environment. In doing so, the law school notes its endorsement of diversity and equal opportunity in its Catalog and Faculty Handbook.

LLSS maintains a diverse student enrollment. As reported in its 2017 Annual Compliance Report, 52.5% of its enrollment identifies as African-American, Hispanic, Asian, American Indian or Pacific Islander/Filipino; 53.5% of its enrollment is female. The law school’s faculty is also relatively diverse with 32% reported being of a non-White heritage, while 48% of the faculty is female.

The law school supports and encourages student involvement with a number of student groups, including the National Asian Pacific Law Student Association, the National Black Law Students Association, the National Latina/o Student Association, Lambda, Delta Theta Phi and the Women’s Justice Society.

Rule 4.160(O): Compliance with Committee requirements. The law school must demonstrate its compliance with these rules by submitting required reports and otherwise complying with the rules.

LLSS has an excellent record of timely submitting all reports required by the Committee, including its Annual Compliance Report and its report of its cumulative bar examination pass rate under Guideline 12.1. The law school also compliantly submits, pursuant to Guideline, 4.10, timely notice of changes in its administrative personnel and, as noted above, its self-study, required by Rule 4.163, was timely submitted, comprehensive and well organized.

CONCLUSION AND RECOMMENDATION

The Team recommends that this Periodic Inspection Report be received and filed; that all suggested and mandatory recommendations be adopted by the Committee; that the accreditation of LLSS be continued; and that its next periodic accreditation inspection be scheduled for the fall of 2022, unless an earlier inspection is found necessary by the Committee.



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April 9, 2018

The State Bar of California
Office of Admissions
180 Howard Street
San Francisco, CA 94105-1639

Attention: Amy Nunez

Re: Response to Periodic Inspection Report

Dear Ms. Nunez:

Lincoln Law School of Sacramento accepts the conclusions and recommendations resulting from the September 26-28, 2017 site visit which are set forth in the March 28, 2018, Periodic Inspection Report.

In response, Lincoln Law School of Sacramento will do the following:

- Within 90 days of the date of this letter, the school will amend its student discipline policy to provide written notice of the specific charge or charges issued to any student subject to discipline.
- Within 90 days of the date of this letter, the school will amend its faculty evaluation policy to require that all members of the faculty, regardless of their respective years of service, be evaluated once every three years.
- Within 90 days of the date of this letter, the school will adopt a written policy and create appropriate procedures to authenticate the identity of each student submitting examination answers and all other written work.
- The school's Board of Directors will consider the creation of a new administrative position such as Associate Dean.

We were impressed with the effort put forth by the three-member inspection team and we are pleased that the team has recommended that Lincoln's

ATTACHMENT B

accreditation be continued. We look forward to our next periodic inspection in the fall of 2022.

Sincerely,


James M. Schiavenza, Dean

cc. Karen Goodman, Member, Committee of Bar Examiners
Janice Pearson, Dean, San Joaquin College of Law
James M. Smolich, Chief Executive Officer