

COMMITTEE OF BAR EXAMINERS OPEN SESSION AGENDA ITEM

AGENDA ITEM: **May 2018 – O-401**

DATE: April 20, 2018

TO: Subcommittee on Educational Standards

FROM: Natalie Leonard, Program Manager, Educational Standards

SUBJECT: **Glendale University College of Law – Periodic Inspection Report**

BACKGROUND

Attachment A is the five-year Periodic Inspection Report (Report) of the inspection of Glendale University College of Law (GUCL) conducted October 17-19, 2017 by an Inspection Team (Team) comprised of Committee of Bar Examiners (Committee) member Patricia Villalobos, Academic Dean Justin Atkinson of the San Joaquin College of Law and Sally Perring, Educational Standards Consultant, Office of Admissions. Attachment B is the correspondence received from GUCL Dean Darrin Greitzer confirming that the law school accepts the Report and each of its mandatory recommendations.

GUCL is a California-accredited law school (CALS) located in Glendale. It was initially accredited by the Committee of Bar Examiners (Committee) in 1978 and was last inspected in 2011. The law school operates as a for-profit corporation, wholly owned by two owners, Dean Darrin Greitzer and his sister, Administrative Dean Kimberly Greitzer, as the successors to their late father, Dr. Seymour Greitzer, who founded the law school. Opened in 1967, GUCL recently celebrated its 50th anniversary of operating in the Glendale community.

The law school has a current enrollment of 88 students. It operates on a quarter system, with each quarter comprised of 10 weeks of classes, an examination preparation week and a week of examinations. To earn their J.D. degrees, students attend evening classes, year-round for four years. To graduate, students must complete 126 quarter units (equivalent to 83 semester units) in good academic standing. The curriculum is taught by an experienced faculty.

Most recently, graduates attained a 41% first-time pass rate on the July 2017 CBX administration, well-above the 33% overall rate for the graduates of all of the CALS.

Based upon the findings made by the Team, it is recommended that accreditation of Glendale University College of Law be continued; that the law school be required to provide a letter within 120 days documenting the progress made regarding each of the

following Recommended Mandatory and Suggested Actions; and that the next periodic inspection of the law school be scheduled for the spring of 2022.

Recommended, Mandatory Action:

1. Pursuant to Guideline 2.7(B), the law school must revise the format of all syllabi used in each class to provide students a clear and complete statement of all factors used by the faculty to calculate the final grade given in each class.
2. Pursuant to Guideline 2.6, the law school must amend its written student discipline policy to provide students written notice for each charge that might warrant non-academic discipline, an opportunity for a meaningful hearing before a panel of impartial faculty and administrators, whether there is a right to counsel and a written final decision and determination that discipline is warranted.
3. Pursuant to Guidelines 4.2 and 11.1(I), the law school must maintain minutes of meetings of its Academic Council to record faculty participation in both academic and non-academic policy making and any decision made that affects students.
4. Pursuant to Guidelines 4.7 and 4.8, pursuant to its otherwise compliant written faculty evaluation policy, the law school must carry out regularly-scheduled faculty evaluations and have each evaluation documented in a manner consistent with the Guidelines and then placed in file of each member evaluated.
5. Pursuant to Guideline 7.3(A), the law school must offer academic support to students placed on probation to help such students achieve and maintain good academic standing.

Recommended, Suggested Actions:

1. Pursuant to Guideline 2.7(D), the law school should ensure that all final course grades are issued in a more timely manner to provide students with adequate notice of whether they are at or below academic good standing.
2. Pursuant to Guidelines 4.1, the law school should retain additional administrative support staff to assist each Dean as they carry out their academic and operational duties to help the law school remain operationally compliant.
3. Pursuant to Guideline 6.9, the law school should develop classes and begin granting credit for work performed by students in an approved clinical setting or externship in order to offer 15 semester units (or their equivalent) of practice-based skills and competency training by the 2020-2021 academic year.
4. Pursuant to Guidelines 11.1 (H) and (J), the law school should audit the contents of its faculty files to confirm each is compliant and it should create and maintain minutes of all meetings of its Board of Directors.

DISCUSSION

In his letter of April 13, 2018, Dean Greitzer accepted the Report and recommendations (Attachment B), but took exception to several of the recommendations and provided his point of view, to which State Bar consultant Sally Perring responded (Attachment C). After considering feedback from both, the recommendations are still proposed and the school is requested to give them further attention.

RECOMMENDATION:

Based upon the findings made by the Team, it is recommended that accreditation of Glendale University College of Law be continued; that the law school be required to submit a letter within 120 days advising of all progress related to both the Mandatory and Suggested Actions enumerated in the inspection report; and that the next periodic inspection of the law school be scheduled for the spring of 2022.

PROPOSED MOTION:

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

Move that the Periodic Inspection Report (Report) of the inspection of Glendale University College of Law (GUCL) conducted October 17-19, 2017 by an Inspection Team (Team) comprised of Committee of Bar Examiners (Committee) member Patricia Villalobos, Academic Dean Justin Atkinson of the San Joaquin College of Law and Sally Perring, Educational Standards Consultant, Office of Admissions, as corrected, be received and filed; that the response submitted by Dean Darren Greitzer, dated April 13, 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 submit a letter within 120 days providing a narrative discussion of all progress it has made in addressing each of the Recommended Mandatory and Suggested Actions enumerated in the Inspection Report; that accreditation of GUCL be continued; and that the law school's next periodic inspection be scheduled for the spring of 2022, unless an earlier visit is found needed by the Committee.

GLENDALE UNIVERSITY COLLEGE OF LAW

PERIODIC INSPECTION REPORT

Inspection conducted
October 17-19, 2017

Inspection conducted
Pursuant to *Rule 4.162* of the
Accredited Law School Rules

Visitation Team:

Patricia Villalobos, Member, Committee of Bar Examiners, State Bar of California

Justin Atkinson, Academic Dean of the San Joaquin College of Law

Sally Perring, Educational Standards Consultant, Office of Admissions,
The State Bar of California

GLENDALE UNIVERSITY COLLEGE OF LAW
220 North Glendale Avenue, Glendale, California 91206

EXECUTIVE SUMMARY AND RECOMMENDATIONS

A periodic inspection of Glendale University College of Law (GUCL) was conducted from October 17-19, 2017 by an inspection team (Team) comprised of Patricia Villalobos, a member of the Committee of Bar Examiners; Justin Atkinson, Academic Dean of the San Joaquin College of Law; and Sally Perring, Consultant for Educational Standards, Office of Admissions, State Bar of California.

GUCL is a California-accredited law school (CALS) located in downtown Glendale. It was initially accredited by the Committee of Bar Examiners (Committee) in 1978 and when it was last inspected in 2011 it was found to be operating compliantly. The law school operates as a for-profit corporation, wholly owned by two owners, Dean Darrin Greitzer and his sister, Administrative Dean Kimberly Greitzer as the successors to their late father, Dr. Seymour Greitzer, who founded the law school. Opened in 1967, GUCL recently celebrated its 50th anniversary of operating in the Glendale community where its ownership, administrators and faculty have sought to fulfill its mission of providing an affordable opportunity to obtain a quality legal education to a diverse group of students, many of whom full-time during the day at a wide variety of careers or business entities.

The law school has a current enrollment of 88 students. It operates on a quarter system with each quarter comprised of 10 weeks of classes, an examination preparation week and a week of examinations. To earn their J.D. degrees, students attend evening classes, year-round for four years. Each year of the curriculum is mandatory so students are required to enroll in each class when offered. Almost all of units needed to graduate are allocated to subjects tested on the California Bar Examination, in addition to classes that offer instruction in legal research and writing, litigation skills, examination writing skills, along with a relatively small number of electives. To graduate, students must complete 126 quarter units (equivalent to 83 semester units) in academic good standing. The curriculum is taught by an experienced and motivated faculty.

As a result, the law school's graduates generally perform above the average for graduates of the other CALS on the California Bar Examination (CBX). As posted on the State Bar's website, the currently-reported, five-year cumulative CBX pass rate for GUCL graduates is 64.2%, while it self-reports reports a 71% five-year cumulative pass rate. Most recently, graduates attained a 41% first-time pass rate on the July 2017 CBX administration, well-above the 33.0% overall rate for the graduates of all of the CALS.

Recommendation:

Based upon the findings made by the Team, it is recommended that accreditation of Glendale University College of Law be continued; that the law school be required to address in its 2018 Annual Compliance Report all progress it has made in addressing

each of the following Recommended Mandatory Actions; and that the next periodic inspection of the law school be scheduled for the spring of 2022.

Recommended, Mandatory Action:

1. Pursuant to Guideline 2.7(B), the law school must revise the format of all syllabi used in each class to provide students a clear and complete statement of all factors used by the faculty to calculate the final grade given in each class.
2. Pursuant to Guideline 2.6, the law school must amend its written student discipline policy to provide students written notice for each charge that might warrant non-academic discipline, an opportunity for a meaningful hearing before a panel of impartial faculty and administrators, whether there is a right to counsel and a written final decision and determination that discipline is warranted.
3. Pursuant to Guidelines 4.2 and 11.1(I), the law school must maintain minutes of meetings of its Academic Council to record faculty participation in both academic and non-academic policy making and any decision made that affects students.
4. Pursuant to Guidelines 4.7 and 4.8, pursuant to its otherwise compliant written faculty evaluation policy, the law school must carry out regularly-scheduled faculty evaluations and have each evaluation documented in a manner consistent with the Guidelines and then placed in file of each member evaluated.
5. Pursuant to Guideline 7.3(A), the law school must offer academic support to students placed on probation to help such students achieve and maintain good academic standing.

Recommended, Suggested Action:

1. Pursuant to Guideline 2.7(D), the law school should ensure that all final course grades are issued on a more timely manner to provide students with adequate notice of whether they are at or below academic good standing.
2. Pursuant to Guidelines 4.1, the law school should retain additional administrative support staff to assist each Dean as they carry out their academic and operational duties to help the law school remain operationally compliant.
3. Pursuant to Guideline 6.9, the law school should develop classes and begin granting credit for work performed by students in an approved clinical setting or externship in order to offer 15 semester units (or their equivalent) of practice-based skills and competency training by the 2020-2021 academic year.
4. Pursuant to Guidelines 11.1 (H) and (J), the law school should audit the contents of its faculty files to confirm each is compliant and it should create and maintain minutes of all meetings of its Board of Directors.

REPORT

Report of the Self Study:

To help the Team prepare and conduct the inspection, GUCL prepared and submitted a well-organized self-study with all relevant and appropriate attachments. It provided a comprehensive narrative regarding the current status of the law school's compliance and was helpful throughout the inspection and with the drafting of this Report.

Conduct of Site Visit:

The Team conducted a series of meetings, starting with an introductory meeting with Dean Greitzer and then received a tour of the school. Following the tour, the Team then met with Dean Darrin Greitzer and Administrative Dean Kimberly Greitzer to discuss its preliminary questions and concerns. The Team had a working lunch with GUCL's Board of Directors and subsequently met with various staff members and the Deans. A confidential meeting with students was followed by Team members observing classes.

The following day the Team had additional meeting with staff and then conducted a review of student files, records and inspected the library. The Team had another working lunch with the law school's Advisory Council, which is comprised of faculty and administration members and then viewed a demonstration of its customized software. A dinner meeting with faculty members was followed by additional class audits. On the final day, the Team completed its review of final examinations, files and records and the inspection concluded with a comprehensive exit interview.

Throughout the process, the Team found members of the faculty, staff and students all to be candid, helpful and supportive of the Team throughout its inspection. With regard to Deans Darrin and Kimberly Greitzer, the Team found each helpful and cooperative throughout the inspection but, at times, somewhat guarded in response to a few of the Team's question regarding various issues of the law school's compliance.

(A) Lawful Operation. The law school must operate in compliance with all applicable federal, state and local laws and regulations. (Guideline 1.6)

GUCL complies with all applicable federal and state laws and regulations and is compliant with the requirement to operate lawfully. The law school operates as a California for-profit corporation and provided appropriate documentation of its corporate status and evidence of its lawful operation as a business in the City of Glendale.

The law school maintains a compliant policy to protect the privacy of its employees and students and has an appropriate substance abuse policy. GUCL complies with federal disabilities law and will provide reasonable accommodations to disabled students. Access to the second floor of its facility for its students, faculty and staff is provided by an external elevator which, when needed, is accessible with a key. While the law school's sexual harassment policy is appropriate, to make it more responsive, it should

consider adding another administrator, in addition to the Dean as a person to whom anyone with a claim of harassment could report.

(B) Integrity. The law school must demonstrate integrity in all of its programs, operations, and other affairs. (Guidelines 2.1 - 2.10)

GUCL operates in an honest and forthright manner and is in substantial compliance with each Guideline governing how it is to manage its finances and in how it communicates.

The law school's website and written materials provide all mandatory disclosures regarding the limitation of attending a CALS, while its website has the information report form mandated by California *Business and Professions* Code section 6061.7(a). The administration works with each student to minimize the debt needed to finance a legal education, while it provides students an interest free tuition option.

The law school maintains a compliant student refund policy and students may access their financial records at any time through a student portal account. The law school's accounting practices are supported by a sufficient system to double check for inconsistency, and a payment authorization system provides adequate financial safeguards. Data security, with appropriate backup procedures, of both financial and student records is compliant through GUCL's use of proprietary software system.

The law school provides students with a compliant statement of its academic services, most importantly those relating to academic support and counseling. As to academic counselling, most is provided by Dean Darrin Greitzer, Administrative Dean Kimberly Greitzer and Ms. Arakelyan, a recent graduate who is now a member of the faculty.

As was also recommended in the 2011 inspection report, GUCL's student discipline policy must again be reviewed and amended to insure that it is compliant such that students subject to discipline receive written notice of any charges, that each has the opportunity for a hearing before an appropriate panel and that they receive a written decision. As currently structured, the Dean makes a preliminary decision and a hearing panel merely reviews the Dean's decision. (Recommended Mandatory Action 2.)

The law school provides students a clear and compliant statement of its grading system. Grades are based a numeric 40 to 100 scale with grades which correlate to an A-F system: 70 is a mid-C grade; 59 is an F. First year students must achieve a 70.00 cumulative GPA to advance in good standing into their second year. They automatically receive probation if they have only a 69.5 GPA. In a recent revision of its academic good standing policy, upper division students must now maintain not only a 70.00 cumulative GPA, determined quarterly, but may not fall below a quarterly GPA of 70.00 for two consecutive quarters without being subject to academic disqualification. During the most recent academic year reported (2016-2017), a total of six students were academically disqualified, including two in their second and third years of study. These totals, however, were down by 40% from just the prior academic year.

The law school offers no pass/fail classes and students are not allowed to repeat a course except as an extraordinary remedy authorized by the Academic Council. Students may challenge their grades under the law school's compliant grade review policy and procedures and all final examinations are graded anonymously using student ID numbers being newly generated each quarter by a proprietary software system.

During their fourth year of law school, students may take a variety of practical skills classes in addition to several mandatory classes designed to prepare them to pass the CBX. A two-quarter legal writing course, Advanced Document Drafting, focuses on performance test writing and a course that uses commercial CBX materials focuses on four bar subjects and multiple-choice questions. Students must achieve a cumulative GPA of 70.00, in the both bar preparation courses, in order to graduate.

A sample review of class syllabi confirmed that students are not properly informed, as required by Guideline 2.7(B), of the basis on which their final grades are calculated. As required, students should know the extent to which their final examination, any mid-term examination, class performance or any other form of evaluation is used to calculate the final grades given in each class offered in the GUCL curriculum. Accordingly, to achieve compliance with this Guideline, it is recommended that the syllabi of each such class be reviewed and revised accordingly. (Recommended Mandatory Action 1.)

(C) Governance. The law school must be governed, organized, and administered so as to provide a sound educational program. (Guidelines 3.1-3.2)

The law school is well governed and effectively administered. As its owners and most senior administrators, Dean Darrin Greitzer and Administrative Dean Kimberly Greitzer provide GUCL with strong and decisive leadership. Each has years of experience in their respective positions and, as co-owners of GUCL, each is highly motivated to provide their students a sound and well governed program of legal education.

Dean Darrin Greitzer earned a J.D. degree at Willamette University School of Law, an ABA-approved law school. He then joined GUCL as an administrator in 1997 and was appointed Dean in 2000. Since then, as the law school's full-time administrator under Guideline 4.1(B), Dean Greitzer works hard to lead the law school as its chief academic officer. Given his position as both an owner of and Dean, he works hard toward the improvement of and continuing success of the law school.

Administrative Dean and Registrar Kimberly Greitzer holds two baccalaureate degrees, one in Spanish from San Diego State University and a J.D. degree earned at GUCL. She joined GUCL in 2000 as its Administrative Dean and has, since then, worked full-time to support the law school's students and its program of legal education.

As a corporation the law school technically operates under the control of its Board of Directors; Dean Darrin Greitzer holds the position of president, while Administrative Dean Kimberly Greitzer acts as its vice-president. Together they are the sole shareholders of the corporation. There are three other Board members, each of whom

has served for several years. The Team found the entire Board engaged and very knowledgeable about operations at the law school and supportive of each of the Deans.

Each of the GUCL Deans is well qualified and clearly motivated to carry out their respective academic, administrative and operational duties. However, given the law school's current enrollment, along with the labor intensive nature of providing it with meaningful oversight over its curriculum, faculty and operational transcripts and files, the Team found that both the law school and its students would benefit from additional administrative support to maintain its operational compliance. In discussing this issue with the Dean, he confirmed that he has actively sought to recruit another high-level administrator and hopes to retain the appropriate candidate soon. As a result, the Team recommends that another administrator with appropriate experience be retained to support various operational and academic needs, such as the faculty evaluation process and academic support program. (Recommended Suggested Action 2.)

(D) Dean and Faculty. The law school must have a competent dean or other administrative head and a competent faculty that devotes adequate time to administration, instruction, and student counseling. (Guidelines 4.1- 4.10)

The law school's curriculum is taught by a well-qualified adjunct faculty consisting of practicing attorneys and sitting state-court judges. All but three are graduates of ABA-approved law schools, including those at Georgetown University, the University of Michigan and U.C.L.A. The remaining members of the faculty are graduates of GUCL. The judges who teach at GUCL sit on the Superior Court of California in both Los Angeles County and San Bernardino County.

The faculty participates in the academic affairs of the law school through its Academic Council. Along with a member of the GUCL Board and each of the Deans, faculty members are appointed to terms on the Council which both offers recommendations as to academic policy and is responsible for handling student petitions regarding their academic disqualification. The Team met with the members of the Council and found all to be well informed and engaged in carrying out its functions. To provide better consistency of its consideration and its decision in regard to petitions filed by academically disqualified students, the Team recommends that minutes of each meeting of the Council be kept to record the basis for each its decisions as to each academically disqualified student. (Recommended Mandatory Action 3.)

Members of the Team met with the faculty to discuss their collective experience as adjunct professors at GUCL and then sat in to observe several classes offered during two evenings of the inspection. During each of the classes observed the Team found each faculty member teaching to be both well prepared and engaged with their students and each was clearly motivated to have their students master the subject matter being taught. The Team observed various teaching styles and found that some of the faculty has creatively adopted a variety of methods to help students improve their performance in their classes. All clearly embrace the mission of the school and recognize the value of

the law school to the local community. All of teaching observed was evaluated as being from no less than satisfactory to being very good.

With regard to the regular evaluation of its faculty, as required by Guidelines 4.7 and 4.8, the law school has adopted a compliant faculty evaluation policy that is designed to use a mix of administrative and peer review. However, as confirmed during the inspection, it appears that faculty evaluations are not carried out on a regular basis or otherwise in accordance with any schedule mandated by Guideline 4.7(C). As a result, it does not appear all mandated evaluations have taken place, most importantly that “each newly hired instructor” be evaluated at once in their first year of instruction.

Based upon this apparent failure to abide by its own policy, the Team recommends that the law school immediately schedule and then carry out a compliant schedule of faculty evaluations within the next 12 months. (Recommended Mandatory Action 4.)

Finally, students confirmed that professors are accessible to meet and discuss course content, before and after class, and also by telephone or email, while the faculty appeared to be very willing to meet or speak with all students although, as adjunct faculty, professors do not post or maintain formal office hours to meet with students.

(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)

GULC has adopted and maintains a sound, written admissions policy. It markets to and attracts applicants who live within a reasonable commuting distance to the law school. Almost all of those admitted have earned a bachelor’s degree; for the most recent academic reported (2017-1018) a total of 83% (34/41) of those admitted hold a four-year degree. Historically, all applicants were required to take and report a score on the Law School Admissions Test (LSAT). However, following a recent policy change, successful applicants may now support their application with additional letters of recommendation and if they submit a written essay on a given topic in lieu of taking the LSAT. To assess this change, the Deans are tracking the ultimate success of those admitted under the new policy to confirm their future graduation success rate.

Over the prior five years, GUCL has chosen not to admit any applicant, as a “special student” who did not earn at least the minimum of 60 units of acceptable college credit.

Almost every applicant is personally interviewed by either the Administrative Dean or the Dean. They seek to admit only those who understand and are willing to accept the significant commitment of both time and money needed to succeed in law school. The law school informs and works with its students to minimize any debt they need to incur, especially during the first year. While GUCL is not qualified to offer its students access to federal financial aid, they are able to apply for either private or government supported

loans. The law school also permits students to stagger their tuition and fee payments due each quarter for a small fee, but charge no interest on the financed payments.

The GUCL application compliantly asks applicants whether they previously attended law school and admits only a small number of students with any prior legal education. Those admitted who do and were not in good academic standing when they left their prior law school have an appropriate notation in their files supporting admission. Almost all such students are admitted under the Committee's policy to allow disqualified applicants to "start over" as incoming first year students. The law school also admits some law students with prior law study who left in good academic standing with most being admitted under the "start over" policy although a few are awarded transfer credit for previous legal studies. The law school is also tracking the future success of all such students to determine whether their admission was ultimately advisable.

To its credit, over the past three academic years the law school's admissions rejection rate (even with a declining number of applicants) has increased. For example, for the 2017-2018 academic year, the law school rejected 52.3% (45/86) of all complete applications for which a decision was made; in comparison, two years earlier (2015-2016), it rejected only 38.7% of such applicant files.

A sample review of applicant files confirmed that the law school exercises sound and appropriate judgment in deciding whether or not to admit an applicant. Any reasons for their non-admission are properly documented in the applicant's file. Notations were also seen as to whether an applicant took the LSAT or has sought admission under the new policy without an LSAT score. All student files reviewed confirmed that their undergraduate transcripts were properly received and then filed within the 45-day period of the start of the quarter as required by Guideline 5.3. The files of students with prior law school credit were found to have either law school transcripts or a letter of standing.

(F) Academic Program. The law school must maintain a sound program of legal education. (Guidelines 6.1 - 6.14)

GUCL provides its students with a sound program of legal education. Its J.D. degree curriculum is offered through a four-year, part-time evening program. Each academic year consists of four-quarters starting in September, December, March and June; each quarter has 10 weeks of classes and two weeks of study and examinations. Students must attend at least three summer sessions during the four-year part-time program.

To graduate, students must complete no fewer than 126 quarter units with a cumulative GPA of 70.00 and, as recently adopted, have earned a grade of at least a 70 in the following classes: Appellate Advocacy, Document Drafting and the CBX review course. In completing 126 quarter units, students receive instruction of at least 1380 hours of classroom study, far in excess of minimum 1200 hours required by the Guidelines.

For those admitted in the fall quarter, the first-year curriculum is similar to that offered by other accredited law schools; GUCL students take Torts, Contracts, and Criminal

Law during their first three quarters and a three-quarter course covering basic lawyering and examination skills writing. Students are also permitted to enroll in either the spring and summer quarter. Those starting in the spring take only one substantive class, a concentrated Torts course designed to teach the subject of Torts in one quarter, and the Legal Methods class. Students starting in the summer take only the Criminal Law class.

In addition to the Legal Methods and an “Examsmanship” course, as required in the first year, students are also given access to online BarBri materials online to help with their understanding and to strengthen their law school test-taking skills. The Legal Methods class is partitioned into small sections to help each student get individualized attention.

Second year and third year classes cover all other bar-tested subjects: Civil Procedure, Real Property, Business Organizations, Professional Responsibility, Constitutional Law, Evidence, Trusts and Estates, Wills, Community Property, Criminal Procedure, and Remedies. The curriculum offers Commercial Sales and Business and Financial Literacy, which are among core courses offered in the second and third year curricula. Students in their third year must take a three-quarter appellate advocacy course. The last year focuses on lawyering skills with Moot Court, Pretrial and Trial Practice classes. Bar preparation classes focus on the performance exam and multiple-choice examination. Over the course of their education, usually over the summer quarter, students are required to take three non-core (“elective”) courses as scheduled.

Depending on which quarter in which they first enroll, students must register for the courses then being offered and may not vary their schedule and, thus, have no choice in which classes to take. The number of units assigned each course is typical and appropriate for the hours of amount of required class time and difficulty of the material.

The required texts used in most classes throughout the curriculum mirror those used by other accredited law schools, with many being available from the Interactive Casebook Series which offers both hardcopy and electronic materials. Professors use a standardized syllabi format to provide students with all required information regarding each course’s subject matter and factors used in calculating their final grade. A review of the form and content of the final examinations confirmed that adequately test students’ mastery of the subject matter being taught. The grades issued in most bar-tested subject courses are based on a single, three-essay final examination, with some professors also using MBE-like multiple choice questions in lieu of one essay question.

Experienced professors, almost all experienced legal practitioners, teach virtually all classes in the GUCL curriculum. Each of the professors observed were well-prepared were found to offer their students a varied approach to legal pedagogy. The law school reports some recent turnover in its faculty which offers it an opportunity to recruit and retain promising new instructors. Classes usually have 30 or fewer students, with the first year classes of Torts and Contracts often being an exception. The Contracts class is usually the single largest class since, in being offered only in the fall quarter, it includes all students who enrolled during the previous spring or summer quarter.

Final exams and all course grading practices are strictly overseen by Dean Greitzer. While the GUCL grading scale ranges from 40 to 100, the effective range is 65 to 80. Half of all grades given are typically within the 70 to 74 range and slightly less than a quarter are from 65-69 and 75-79, while very few failing grades (59 or below) or high grades (80 and above) have been issued over the last three.

GUCL maintains and strictly enforces a compliant attendance policy to confirm that students granted credit in any course attend no less than 80% of its class sessions. Students who have missed multiple classes and are close to falling below minimum attendance are required to notify the Administrative Dean and are placed on notice of possible disqualification from the course if they miss an additional class.

Unlike many other California-accredited law schools which offer credit for supervised work performed outside of a classroom, as permitted by Guideline 6.6, GUCL offers no such credit so its students have no opportunity to work in a legal clinical or approved externship. With the recent amendments to Guideline 6.9 (Practical Skills), which now require that all California-accredited law schools “provide the opportunity for students in the J.D. degree program to complete a minimum of fifteen (15) units of practice-based skills and competency training,” GUCL’s faculty and Deans are encouraged to develop and then offer a variety of such classes, including approved externships, so its curriculum will become and remain in compliance with this important new requirement.

(G) Scholastic Standards. The law school must maintain sound scholastic standards and must as soon as possible identify and exclude those students who have demonstrated they are not qualified to continue. (Guidelines 7.1 – 7.11)

GUCL maintains sound written scholastic standards that are designed, as required by Guideline 7.1, to “ensure that students who lack the capability to satisfactorily complete the law school’s J.D. degree program are not allowed to continue in that program.” To remain compliant with this requirement, GUCL uses a relatively strict system of academic standards. While students are not subject to being excluded before the end of their first year of study, they are properly evaluated each quarter thereafter.

First year students are required to achieve a cumulative, good standing GPA of 70.00. Those that fail to do so, but finish their first year with a cumulative GPA of between 69.5 and 69.99, may enroll in the second year but are placed on probation. Students who have a first-year, cumulative GPA below 69.5 are academically disqualified but, if they choose to, they may petition the Academic Council, which has the authority to grant probation upon such terms and conditions as it deems appropriate.

Under a policy adopted in 2015, after their first year all GUCL students are now evaluated quarterly and if they fail to maintain a cumulative GPA of 70.00 at the end of each quarter, they are placed on probation. If at the end of the next quarter they remain below a cumulative GPA of 70.00, they may be disqualified. GUCL students must also achieve an annual cumulative GPA of 70.00 or be subject to being disqualified.

The new policy is somewhat problematic for two critical reasons. First, with a quarterly schedule, students are required to attend four full quarters a year with only one- or two-week breaks between quarters. As a result, students are often required to start the next quarter within only one week off following their final examinations. This scheduling requires very prompt grading by the faculty which is often hard to achieve. Moreover, to ensure grading consistency, the Dean then reviews all of the grades given in each course to confirm that the grades issued fall within relatively strict grading parameters. This takes additional time and involves having some final examination answers re-read to confirm both the accuracy and appropriateness of grades given.

The quarterly schedule and grading practice often delay the release of grades. As noted in its self-study: "Turnaround time on the release of exam and/or course grades varies, but typically occurs before the midpoint of the following quarter. For administrative efficiency, grades are not posted until all grades for a group of students (1L, 2L, etc.) are finalized by the Dean." While neither the quarterly class schedule nor the grading policy created this issue when students were evaluated annually, the new policy of academic assessment after each quarter offers underperforming students too little time (five weeks or less) to remedy learning or comprehension issues in the hope of earning better grade to avoid being academically disqualified.

The second issue is that, under the quarterly assessment policy is that the law school is less able to provide, as required by Guideline 7.3(A), any meaningful academic support to students placed on probation. Currently, the law school has no express policy to provide any academic support to students on probation. While several faculty members mentioned that provide some form of assistance to students enrolled in their classes, the support provided is neither uniform nor targeted to help those students on probation. The law school must therefore devise an academic support program which encompasses not only first-year students progressing to the second year on probation, but all upper division students who, during any quarter are below academic good standing and on probation. (Recommended Mandatory Action no. 5.)

The law school should also conduct a comprehensive review to determine the effect quarterly evaluation has had on all students, including those in good standing, given the timing (and delay) in issuing final grades. (Recommended Suggested Action no. 1.)

Finally, in assessing the benefits of a more rigorous quarterly assessment policy, it should be noted that fewer GUCL students are being academically disqualified. As reported in its 2017 Annual Compliance Report, despite only an 8% drop in enrollment between the 2015-2016 academic year (104 students) and the 2016-2017 academic year (96 students), the law school academically dismissed 37.5% (16 v. 10) fewer students. The reason fewer students are being dismissed should also be evaluated to confirm that quarterly assessment is, in fact, achieving the goal of disqualifying all students who should be dismissed given their history of poor academic performance.

The Team reviewed several final examinations, student answers and the grades issued by the faculty member who taught the course. The Team also reviewed a sample of

graded student answers with a full range of grades. The review confirmed that the overall form and content of examinations was good, most reflecting both the scope and difficulty of essays given on the CBX. Several of the examinations incorporated MBE-like multiple choice questions. The grades given appeared appropriate for the quality of the student's answer and a scaled grade was given on the multiple-choice questions. While provided by a few professors, GUCL should consider having all professors prepare and publish of either "model" answers to the examination questions or a matrix or rubric of issues used to calculate the grades given. Currently, students receive only a copy of their examination questions and an unmarked copy of their answers.

The law school does not allow course repetition, except as an extraordinary remedy given by the Academic Council. No distance education courses are offered by GUCL and it does not appear that it admits anyone as either an auditor.

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

GUCL maintains a compliant library that holds in excess of 30,000 volumes of hardcopy materials, far beyond Guideline requirements. It contains all required hardcopy authorities, including all mandatory California case reports, an annotated set of California codes, a full set of *Witkin* authorities, and all required treatises or hornbooks. While the law school receives timely updates for many its hardcopy authorities, not all were found to have been placed within the volumes being updated. For those authorities not updated, each is available to students electronically. The law school also maintains a large number of hardcopy volumes the subscription of which has been suspended. Most are esoteric materials which are seldom used by students.

The library is open to students on weekdays from 2:30 p.m. through 8:30 p.m., with student proctors on duty to offer help; it is also open on weekends. GUCL also offers students and faculty 24/7 access to Westlaw's online law library. As such, all available online resources are accessible through computers provided by the law school or through a student's personal computer. The GUCL Wi-Fi system provides good coverage and is available throughout the its building and classrooms.

As required, the GUCL curriculum provides students with instruction in legal research, including online research, offering a first year class entitled Legal Methods and, later through its Appellate Advocacy course. Students have the opportunity to use hard copy materials in addition to electronic materials in these courses.

The law school separately accounts for all library purchases. They spend a substantial amount each year keeping materials current and subscribing to electronic services.

(I) Physical Resources. The law school must have physical resources and an infrastructure adequate for its programs and operations. The law school must, at a minimum, maintain its primary administrative office in the State of California.
(Guidelines 9.1 - 9.3)

GUCL offers its students both physical and technological resources that are compliant and adequate to support its program of legal education. The law school occupies a building it leases from its owners, Deans Darrin and Kimberly Greitzer. Rent paid by the law school is well below current market rates for commercial real estate in Glendale and the Greitzers recently invested a significant sum to upgrade and improve the building.

The law school's administrative offices are on the first floor, with the Deans' offices located in a small suite of offices off the library on the second story. Classroom space is abundant, with both large and small classrooms on both the first and second floors. The law library is on the second floor and has ample seating for students. New carpeting and chairs were recently installed in all classrooms. There is a private courtyard in the center that offers handicapped parking and easy access to an exterior elevator to the second floor for students and faculty with mobility issues. Except for the receptionist, each staff member has a private office with a computer and monitor, including the GUCL Board member who acts as its chief technology officer. There is also office space for faculty members to meet privately and counsel students.

GUCL offers its students advanced educational technology. It uses both proprietary software along with commercial educational software such as ExamSoft, Populi and SharePoint. The law school uses online resources to store its student files, student financial records, examinations and supplemental course materials, all of which is accessible to students through a customized, online portal. As required, all electronic files and information are also available through printed hardcopy.

Student and administrative online systems and files are independently maintained to protect administrative integrity. While student accounts are kept as part of the student management system, such accounting is separately duplicated in another program to insure accuracy. The law school houses its own servers and regularly backs up all critical information and utilizes a secure, off-site storage facility to ensure its integrity.

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

The law school operates in a fiscally sound manner and has adequate revenue to maintain its current and foreseeable operations. It also maintains a substantial amount of retained earnings to help weather a drop in its enrollment and tuition income.

As noted, GULC operates as a for-profit corporation with its sole shareholders being the Dean and Administrative Dean. However, the law school operates more as a non-profit since, as confirmed by Dean Greitzer, its shareholders do not receive any its profits,

instead each receives a salary for their professional services and, as landlords, the sums of rent paid by for the law school's use of the building. Any annual profits are, instead, used for to maintain and improve the building and IT infrastructure, for the acquisition of online commercial materials for students, or moved to retained earnings.

The law school earns all of its operating income through student tuition. However, given its sound fiscal management and the shareholders' decision not to take annual profits, Dean Greitzer confirmed that the law school currently maintains an account containing retained earnings in excess of \$500,000. As such, GUCL is clearly compliant with its financial obligations and is well protected from any foreseeable financial instability.

(K) Records and Reports. The law school must maintain adequate records of its programs and operations. (Guidelines 11.1)

GUCL is generally but not fully compliant with all Guideline recordkeeping requirements.

A review of applicant, student and graduate files confirmed that all are in excellent condition. Each was found to contain all required documents including submitted applications, all timely-received undergraduate transcripts and, where required, prior law school study. Student transcripts were produced for all files reviewed, though each is kept separately from the student files. Memoranda supporting the admission of students with prior law school credit were found. A copy of the letter informing students of the results of petitions to the Academic Council were also found in each appropriate file, although a copy of the petition submitted for the relief requested was not. All materials regarding disability accommodations are kept separately by the Dean.

While almost all course records and examination materials are now maintained electronically, hardcopies of various records were, as required, promptly produced for the Team to review. Such records included recent examinations, student answers, grades on each exam provided and course grades. Attendance records are also all preserved electronically. Through the student portal students have access to their own information on exams, including clean copies of their answers, grades and attendance.

The Team's review of records confirmed that some are not properly maintained, or were found incomplete. Under Guideline 11.1(I), the law school must retain for five years any and all minutes of faculty and faculty committee meetings. However, despite this requirement no minutes of any Academic Council meetings have apparently been kept, nor is there any record of the administrative or academic actions taken by the Council since copies of student petitions to the Council are apparently not preserved.

To ensure that the Council's decisions are consistent, most importantly when they relate to its decisions regarding the academic standing of students, each petition must be maintained then either attached to the relevant minutes of the Council's meetings or placed in the student files with a copy of the Academic Council's decision. Furthermore, in the absence of any meeting minutes of the Academic Council, it is difficult, if not

impossible, to confirm the full extent of faculty involvement in the law school's academic policy-making process under Guideline 4.2. (Recommended Mandatory Action 3.)

Faculty files were also found to be poorly organized and not updated since many did not contain all information as required by Guideline 11.1(H). The faculty files that are maintained were found in a single binder with tabs separating one faculty member from another. Some files were nearly complete, while others were far from complete. The binder did not appear to segregate currently active faculty from those not currently teaching. It is therefore recommended that the an administrator audit all such files and then create a similar list as used with student files to insure that all faculty files are complete and current. Finally, it appears that the corporation has not kept or maintained minutes of any Board of Directors meetings as required by Guideline 11.1(J) (Recommended Suggested Action 3.)

All materials related to and from the Committee were retained, typically in the format sent or received, either electronically or in hard copy. The law school had hard copies of all past annual reports and certifications to the Committee. The law school no longer has a formal catalog; materials on the law school website substitute for the transmission of information in a traditional catalog. The law school has both current and past Student and Faculty Handbooks.

(L) Minimum, Cumulative Bar Examination Pass Rate. (Guidelines 12.1 – 12.1)

Based upon the current, publically-reported CBX pass rates reported by all California-accredited law schools for the five-year period that ended on July 31, 2014, GUCL is compliant with Guideline 12.1 with a 64.2% cumulative, minimum pass rate (MPR). Moreover, based upon its own, internal tracking of graduates who have taken and passed the CBX since 2015, the law school currently calculates its MPR at 71%. Both figures are significantly above minimum MPR of 40% mandated by Guideline 12.1.

Given the recent change in California law, that again allows the State Bar to provide each California law school with the name-specific results of their graduates who passed or failed the CBX during the years of 2015 and 2016, all California-accredited law schools will be required by the Committee of Bar Examiners to calculate and report the respective MPR results for the reporting period that ended on July 31, 2017. Based upon such information, GUCL is expected to report a compliant MPR given the above-average more recent success of its graduates as first-time takers on the CBX.

(M) Equal Opportunity and Non-Discrimination. Consistent with sound educational policy and these rules, the law school should demonstrate a commitment to providing equal opportunity to study law and in the hiring, retention and promotion of faculty without regard to sex, race, color, ancestry, religious creed, national origin, disability, medical condition, age, marital status, political affiliation, sexual orientation, or veteran status. (Guidelines 14.1)

GUCL provides equal opportunity to all individuals in regard to its admission of students and the hiring of its staff and faculty. As such it does not engage in unlawful discrimination in either operations or in how it offers its program of law.

As reported in its 2017 Annual Compliance report, the law school's enrollment is remarkably diverse with only 19.35% of students reporting their ethnicity identified as being White, while the remaining 80.65% of students reporting did so as member of an ethnic or racial minority. As discussed during the inspection, for a significant percentage of enrolled students, English is a second (or third) language.

As to gender diversity, GULC reported that women comprise 64.47% of its student enrollment, while the remaining 35.53 are men.

Given its exceptionally diverse student enrollment, the GUCL faculty is less diverse, with only 28% of the faculty reported as non-White and only 27% of the faculty comprised of women. While relatively diverse, the law school should continue to seek and retain a more diverse faculty to better reflect both the diversity of its students and the very diverse nature of the general population of both Glendale and greater Los Angeles.



GLENDALE UNIVERSITY
COLLEGE OF LAW

April 13, 2018

Committee of Bar Examiners
State Bar of California
180 Howard Street
San Francisco, CA 94105

Re: Glendale University College of Law Periodic Inspection Report 2017

Dear Committee Members:

We are pleased to learn of the visitation team's overwhelmingly favorable findings in relation to the law school's compliance with the Accredited Law School Rules and Guidelines and its recommendation that accreditation be extended through the next visitation in 2022. It is good to know that the pride we feel in the caliber of the law school's operations and academic standards have been recognized by designees of the Committee.

The Deans, Board of Directors and administration wish to again thank the visitation team for their efforts during the October 2017 periodic site inspection. The visitation itself, as well as the preparation of the five-year Self-Study, provided a productive opportunity for institutional evaluation.

Pursuant to Rule 4.162(B) of the Accredited Law School Rules, GUCL respectfully submits the following responses and exceptions to the findings, conclusions and/or recommendations found in the Period Inspection Report resulting from the site visitation by State Bar of California representatives from October 17-19, 2017.

Thank you for your consideration.

Sincerely,

Darrin Greitzer, Dean
Glendale University College of Law

ATTACHMENT B

Division 2. Honesty and Integrity
Guidelines 2.1 – 2.10

Response to Recommended Mandatory Action 1, 2, and Recommended Suggested Action 1

2.7 (B) GUCL provides students with a written statement explaining the factors used in determining a final grade. Exception is taken to the contrary finding that students are not properly informed of the basis on which their final grades are calculated.

GUCL syllabi are exceptionally comprehensive. To that extent, the Periodic Inspection Report (PIR) asserts on page 9, paragraph 5 that “Professors use a standardized syllabi format to provide students with *all required information* regarding each course’s subject matter and factors used in calculating their final grade.” That assertion directly contradicts the statement on page 5, paragraph 3 of the PIR that “A sample review of the class syllabi confirmed that students are not properly informed, as required by Guideline 2.7(B), of the basis on which their final grades are calculated.” To resolve this contradictory finding, GUCL proposes the addition of a simple paragraph further clarifying grade calculation to standardized comprehensive syllabi.

2.7 (D) GUCL advises its students of the grade received on each examination within a reasonable time. Exception is taken to the finding that GUCL’s quarterly schedule and grading practice delay the release of grades. Exception is also taken to the finding that GUCL’s new policy of academic assessment, in the context of the quarter system, offers underperforming students insufficient time to remedy learning issues.

GUCL maintains an effective and compliant academic program based on the quarter system. The entire premise for structuring the law program on the quarter system is to afford students more frequent feedback on their performance. The release of exam grades consistently occurs in a reasonable and timely manner given the multiple factors that are involved in such a critical process. The adjunct faculty at GUCL are keenly aware that students are awaiting results and do not unnecessarily delay grading. It is prudent that all course grades submitted be administratively reviewed prior to release assuring that the grading range and standards applied are compliant with institutional norms. In addition, GUCL maintains an exceptional level of technology for an institution its size, that facilitates the quick, timely distribution of anonymous individual grades and anonymous data on the overall performance of a class.

The rigors of the law program are made abundantly clear to all as prospective students, in new student orientation, in syllabi, and beyond. Students are well-aware that success demands continuous full engagement on their part as the curriculum at GUCL moves forward, on the quarter system, at a steady and predictable pace. Further, a nine-month academic support course, Legal Method & Examsmanship I, II, III, is required of all students in the critical first year of study.

Division 4. Dean, Full-Time Administrator, and Faculty
Guidelines 4.1 – 4.10

Response to Recommended Mandatory Action 3, 4, and Recommended Suggested Action 2

4.1 GUCL is well-governed and effectively administered and has taken steps to secure additional administrative support staff. Exception is taken to the finding that the law school should retain additional administrative support staff to remain operationally compliant.

In 2016, Ms. Irena Arakelyan – a GUCL alumnae – joined the administrative staff full-time as Assistant Registrar and Instructional Coordinator. She provides administrative support to both Deans, assists in matters of operational compliance, and is available for student academic needs. She also co-instructs the first-year Legal Method and Examsmanship course.

4.2 The faculty at GUCL actively participate in the formulation, implementation, and administration of academic and non-academic policies and programs. Exception is taken as to the finding that no record of administrative or academic actions taken by the Council and the related students petitions have been preserved.

GUCL maintains records of administrative and academic actions taken by the Council including student petitions and Council decision letters. Digital records, albeit not in the format of a log, with individual petitions, and detailed decision letters reflecting the Council's actions are readily retrieved from the server with a simple last name search.

4.7 & 4.8 GUCL maintains an active faculty evaluation policy using a basis of administrative and peer review. Exception is taken to the finding that faculty evaluation is not carried out on a regular basis.

The Dean works with the faculty and is aware of the methodology, material, and quality of instruction. New faculty members are closely supervised and have regular meaningful contact with the Dean. Evaluation of an instructor's knowledge of the subject area and ability in the classroom will generally be determined by administrative review, classroom observation, material coverage in the course, examinations given (both as to form and content of questions), and the extent to which examinations and grading standards employed provide a reasonably accurate appraisal of each student's ability. The Dean may choose to visit the classroom, visit with students, and/or visit with faculty to evaluate performance and discuss strengths and weaknesses with faculty members. A cross grading/cross reading system of peer review to monitor examination quality and accuracy of grading is also employed. A small institution with an actively involved Dean, he is consequently aware of what occurs in the classrooms. A faculty member who performs inadequately is readily identified. If intervention and counseling by the Dean does not result in marked improvement, no matter how well-liked the instructor may be, he/she is not invited to teach again.

Division 6 – Academic Program
Guidelines 6.1 – 6.14

Response to Recommended Suggested Action 6

6.9 GUCL provides its students with a sound program of legal education as well as practical training. Exception is taken to Recommended Suggested Action 3 in that the Guideline 6.9 Practical Skills requirement for completion of 15su (22.5qu) units of practice-based skills training is satisfied by attendance in relevant substantive courses. In fact, GUCL currently exceeds the requirement by providing 18su (27qu) of practice-based skills training.

GUCL takes seriously the need for practical training of law students. The profile of the typical student attending GUCL – adult, working fulltime, with family commitments – in most instances makes unfeasible participation in externships and/or clinical programs as permitted under Guideline 6.6. It should be notated that based on the quarter system, (4-year, year-round program), GUCL students have no summers off from school to pursue such interests.

As a consequence of time constraints managed by students, GUCL places a priority on development of academic and practical skills and competencies within the defined structure of the substantive courses that make up the law school's curriculum.

While new Guideline 6.9 Practical Skills (F) requires implementation of a practice-based skills and competency training program beginning in the 18/19 academic year, GUCL has been offering compliant practical training opportunities to its students for years.

Pursuant to Guideline 6.9 Practical Skills (B)(1), “parts of any substantive course that are dedicated to developing skill-based competencies may be used to satisfy this requirement.” Accordingly, GUCL asserts its compliance with Guideline 6.9 in the offering of compliant practical skill development within the following substantive courses:

- Legal Method & Examsmanship III (3qu)
- Professional Responsibilities of Attorneys (3qu)
- Appellate Advocacy (3qu)
- Pretrial Practice (6qu)
- Moot Court (1qu)
- Trial Practice (6qu)
- Advanced Document Drafting (2qu)
- Financial Literacy for Law Students (3qu)

Guideline 6.9 (A) (1) sets forth a requirement of 15su (22.5qu) of practice-based skills and competency training. Totaling 18su (27qu), the above referenced courses – even if fractionalized – exceed the required number of units to be compliant.

Division 7 – Scholastic Standards
Guidelines 7.1 – 7.12

Response to Recommended Mandatory Action 5

7.3 (A) GUCL provides academic support to all its students, including those who have been placed on probation. Exception is taken to the finding that GUCL is lacking in academic support to students placed on probation or otherwise.

By design and through on-going cultivation, the learning culture is actively academically supportive. GUCL relies on healthy means to achieve successful learning outcomes. All students receive great benefit from knowing the learning culture is respectful, fair, and serious. The school's learning culture is focused on self-improvement and does not foster competition between students. Students are not "ranked" but are provided other means to assess their individual performance in relation to other students. Additionally, and of great importance, the entire premise for structuring the law program on the quarter system is to afford students more frequent academic feedback. The success of the supportive learning culture is evidenced by the school's successful learning outcomes.

Beyond the cultivation of a healthy learning environment, below are specific resources available for academic support:

1. A nine-month academic support course, Legal Method & Examsmanship I, II, III, is required of all students in the critical first year of study.
2. Faculty facilitate learning by being direct and clear, by respectfully challenging student thoughtfulness and thoroughness of preparation, and by maintaining a serious and respectful classroom learning culture. The school does not permit "aggressive" teaching and does not "hide the ball" as a teaching technique.
3. Faculty are available for academic support before, during and after a class session, by email and by appointment. The Dean is also readily available for academic counseling.
4. Hired in 2016, Irena Arakelyan is a full-time administrator/instructor. Academic support is one of her responsibilities and she team-teaches Legal Method & Examsmanship. Doing so permits students to develop a working relationship with her so that she may provide support as students advance in the program.
5. An online portal makes available past exam questions and answers and an individual student's answers for review.



**THE STATE BAR
OF CALIFORNIA**

**THE COMMITTEE OF BAR EXAMINERS
OFFICE OF ADMISSIONS**

MEMORANDUM

DATE: April 24, 2018

TO: **THE COMMITTEE OF BAR EXAMINERS**

FROM: Alex Lawrence and Natalie Leonard

SUBJECT: **Sally Perring, Educational Standards Consultant, Comments to the Response from Dean Greitzer of the Glendale University College of Law Periodic Inspection Report**

The following are the comments from Sally Perring, Educational Standards Consultant, in response to the letter of April 13, 2018 from Dean Greitzer of the Glendale University College of Law (GUCL) taking exception to some findings in the Periodic Inspection Report. The comments provide sufficient evidentiary support to uphold the recommendations in the report.

- 1) On page 5 of the site report it is clearly stated that the syllabi do not currently inform students how final grades are calculated as required by Guideline 2.7(B); this is the case. The statement on page 9 merely needed "except as noted above" at the end;
- 2) GUCL has adopted a policy requiring upper division students, independent of an annual cumulative GPA applicable to all students, to achieve a 'good standing' GPA of 70 each quarter or be placed on probation. A second, successive quarter of a below 70 GPA results in academic exclusion. The team found that grades for each quarter are released somewhere between 4 to 6 weeks after the end of the quarter. Students by then are 4 to 6 weeks into the next quarter when they receive the previous quarter's grades. They may learn that they are on probation for inadequate performance from the prior quarter, well into the succeeding quarter. They have as little as 4 or 5 weeks to remedy their performance or be excluded. Guideline 2.7(D) requires only that students must be advised of examination and course grades within a reasonable time. While 4 to 6 weeks after the end of a course may fall within the realm of reasonableness, the strict academic retention policy for upper division students makes this delay a hardship on students. The availability of the Legal Method & Examsmanship course in the first year does nothing to address the needs of upper division students;
- 3) In areas where the team found noncompliance, the Dean cited lack of time to meet all criteria, most notably in compliantly evaluating faculty and providing

academic support. If Ms. Arakelyan can provide this administrative support that would be great;

- 4) No minutes of the Council meetings were taken. Thus there is no written record of their involvement in the “formulation, implementation, and administration” of policies and programs or their decisions relating to academic petitions. Guideline 11.1(l) requires the keeping of minutes of faculty meetings. As for petitions and decisions of the Council, no consistent records were offered to the site team, though parts were found in student files given to the site team. If they all existed on the server, team members were not offered copies or access to my knowledge;
- 5) GUCL has adopted a faculty evaluation policy compliant with the requirements of Guidelines 4.7 and 4.8. They have not implemented the policy. While much of what the Dean says about a small school is accurate, though I’d note that no evaluations appeared in faculty files (such as they were). Regardless, the Guidelines set forth explicit requirements for evaluation and this is not being done;
- 6) While the new Practical Skills Guideline had not been adopted at the time of the site visit, the team did note and observe practical skills training taking place at the school. While credit for experiential opportunities would be a boon for students, nothing in the Guidelines requires them. I agree with the Dean;
- 7) Academic support was discussed multiple times during the site visit, both with the Deans and the faculty, and was of clear concern to the site team. At the conclusion of the site visit I asked the Dean to write exactly how such support is being provided, especially to students on probation. I received nothing. As I was finishing writing the report I asked him again to provide me with something in writing. I received nothing. While the Dean’s response appears accurate, it fails to address specifically how students on probation, including those moving to the 2d year on probation and especially upper division students placed on probation for failing to achieve a quarterly GPA in good standing, are supported. Guideline 7.3(A) provides in part: “For those students placed on probation, the law school is required to provide academic support to help such students achieve and maintain good standing. The nature and scope of all such support to be provided will be determined at the discretion of the law school.”