



The State Bar *of California*

**OPEN SESSION
AGENDA ITEM
APRIL 2019
COMMITTEE OF BAR EXAMINERS ITEM O-401**

DATE: April 16, 2019

TO: Members, Committee of Bar Examiners

FROM: Natalie Leonard, Principal Program Analyst, Office of Admissions

SUBJECT: Report on Santa Barbara and Ventura Colleges of Law Periodic Inspection

EXECUTIVE SUMMARY

The Santa Barbara and Ventura Colleges of Law underwent its five-year periodic inspection on November 12-15, 2018. It is recommended that the Committee of Bar Examiners continue the accreditation of the school, receive and file the Periodic Inspection Report (Attachment A), and adopt the mandatory action noted therein. It is further recommended that the school's next periodic inspection be scheduled for the Fall of 2023, or sooner should the Committee so determine. In a letter dated April 15, 2019, the school agreed to address the mandatory recommended action, noting that the changes had already been implemented, and the State Bar consultant indicated that she had reviewed the changes. (Attachment B.) It is further recommended that the school's response be received and filed.

BACKGROUND

On November 12-15, 2018, The Santa Barbara and Ventura Colleges of Law (SBVCL) underwent a periodic inspection conducted by an Inspection Team comprised of Dr. Dolores Heisinger, Member of the Committee of Bar Examiners; Sandra Brooks, Dean of Cal Northern School of Law; and Sally A. Perring, State Bar Consultant.

The Inspection Team recommends that the school's accreditation be continued, that the Committee adopt the following mandatory action listed below, and that the school's next periodic inspection be scheduled for Fall 2023, unless an earlier visitation is deemed necessary by the Committee.

RECOMMENDED, MANDATORY ACTION

1. Pursuant to Guidelines 11.1 (H), (I), (J) and (M), the school must ensure that Faculty Files are complete, that Faculty Minutes are complete and accessible for the last five years, that Board Minutes are complete, and that all Committee correspondence is kept either electronically and/or in hard copy.

DISCUSSION

The inspection related to Santa Barbara and Ventura Colleges of Law involved several unique elements.

First, the school has long been composed of two separate campuses operating in tandem.

Second, since 2010, the school has engaged in an association with TCS, a Chicago based non-profit support organization affiliated with a number of different schools around the country. The school has appreciated the infrastructure support that the association has provided in areas related to instructional matters as well as overhead and support matters.

Finally, at the time of the inspection, the school's first class of Hybrid J.D. program students had just begun their program. The Committee approved this pilot Hybrid J.D. with the requirement that the school provide an update after the first year of operation. Therefore, more detail about the Hybrid J.D. program in particular will be available later this year. Students in this program attend classes online throughout the month, and then have a weekend residency on campus approximately once per month. The curriculum content is similar, but not identical, to the classroom J.D. The material is organized differently to facilitate delivery via an online modality. The first Hybrid J.D. class began its study in Fall 2018, and a second Hybrid J.D. class cohort started class in January 2019.

Looking at the school as whole, the school was found to be in compliance with the Rules and Guidelines for Accredited Law Schools. SBVCL Dean Jackie Gardina accepted the report and confirmed the law school has already addressed the single recommendation. Educational Standards Consultant Sally Perring confirmed that the school had provided her with updated documentation establishing that the school had addressed the mandatory recommendation. The school not only addressed the recordkeeping requirements, but also completed and updated existing files where necessary and reviewed its internal policies to ensure ongoing compliance. The school's proactive action to address the recommendation is greatly appreciated.

RECOMMENDATION

It is recommended that the Periodic Inspection Report be received and filed; that the suggested mandatory compliance recommendation discussed in the Report be adopted; that the school's response addressing the report's sole recommendation be accepted; and that accreditation of the Santa Barbara and Ventura Colleges of Law be continued; and that the law school's next periodic inspection be scheduled for the Fall of 2023 or sooner should the Committee so determine.

MOTION

Should the Committee agree with the staff recommendation, the following motion is recommended:

Move that the Periodic Inspection Report of The Santa Barbara and Ventura Colleges of Law (SBVCL) conducted on November 12-15, 2018 by the inspection team composed of Dr. Dolores Heisinger, Member of the Committee of Bar Examiners, Sandra Brooks, Dean of Cal Northern School of Law, and Sally A. Perring, State Bar Consultant, be received and filed; that the response submitted by Jackie Gardina, Dean of the Santa Barbara and Ventura Colleges of Law, dated April 15, 2019 and submitted on behalf of the law school be received and filed; that the mandatory compliance recommendation made in the Report be adopted; and that the school's response to the recommendation be accepted in satisfaction of the recommendation; that the accreditation of the Santa Barbara and Ventura Colleges of Law be continued; and that its next periodic inspection be scheduled for the Fall of 2023, or sooner should the Committee so determine.

ATTACHMENTS

- A. The Santa Barbara and Ventura Colleges of Law Periodic Inspection Report
- B. Letter from Dean Gardina Accepting the Inspection Report



The State Bar of California

The Santa Barbara and Ventura Colleges of Law

PERIODIC INSPECTION REPORT

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

November 12-15, 2018

Visitation Team:

Dr. Dolores Heisinger, Member
Committee of Bar Examiners

Sandra Brooks, Dean
Cal Northern School of Law

Sally A. Perring, Consultant
Educational Standards, Office of Admissions

**REPORT ON THE PERIODIC INSPECTION OF
SANTA BARBARA AND VENTURA COLLEGES OF LAW
ACCREDITED BY THE COMMITTEE OF BAR EXAMINERS, STATE BAR OF CALIFORNIA
EXECUTIVE SUMMARY AND RECOMMENDATIONS**

A periodic inspection of the Santa Barbara and Ventura Colleges of Law (SBVCL) was conducted from November 12 through November 15, 2018 pursuant to Rule 4.162(A) of the *Accredited Law School Rules*. The inspection team (Team) consisted of: Dr. Dolores Heisinger, a member of the Committee of Bar Examiners (Committee); Dean Sandra Brooks of the Cal Northern School of Law; and Sally A. Perring, Consultant for Educational Standards, Office of Admissions, The State Bar of California.

The Santa Barbara and Ventura Colleges of Law (SBVCL) operate in their respective communities as a single, non-profit, two-campus institution that was formed through the merger of two independent law schools. The Ventura College of Law was founded in 1969, while the Santa Barbara College of Law began operation six years later in 1975. The two schools merged in 1978 and each was then separately accredited by the Committee: The Ventura College of Law in 1979; and The Santa Barbara College of Law in 1981. Since 2010, SBVCL has been affiliated with the TCS Educational System, a non-profit entity headquartered in Chicago which operates various professional and graduate schools offering undergraduate and graduate education in psychology, education, nursing and the law. In addition to being accredited by the Committee, since 2015, SBVCL has been accredited by the Western Association of Schools and Colleges (WASC). WASC accreditation has allowed SBVCL to offer federal financial aid to qualifying students.

The Committee of Bar Examiners last inspected SBVCL in April of 2013 and both campuses were found to be operating compliantly.

While the school continues to offer its fixed facility classroom J.D. program, in Fall 2018, it added a pilot Hybrid J.D. program combining an asynchronous online legal education with weekend in-person residencies four times per semester. The Hybrid J.D. program requires the same number of units as the fixed facility J.D., which is a total number of 84 units, and it covers the same number of bar tested subjects, but it has a slightly different curriculum designed to allow flexible online study plus monthly weekend intensive class's onsite. The school has already developed an assessment protocol to assess performance across teaching modalities and within each modality. Later in 2019 the school will be providing the Committee with an update on this pilot Hybrid J.D. program.

The school also offers a Masters of Legal Studies (M.L.S.) degree. The M.L.S. degree is taught completely online. In partnership with The Chicago School of Professional Psychology, another school affiliated with TCS, SBVCL also provides its MLS students with the opportunity to earn dual-degrees, combining the MLS degree with an M.A. in Forensic Psychology or an M.A. in Industrial/Organizational Psychology.

"The mission of [the Colleges of Law] is to provide access to law and law-related professions through emphasizing opportunity, academic excellence, and community engagement." Its combined faculty, in addition to the Dean, includes two full-time professors and an adjunct faculty comprised of local practicing attorneys and judges. Dean Jackie Gardina was hired in 2016. For the 2018-2019 academic year, SBVCL has a collective enrollment of approximately 200 students in its Juris Doctor Degree programs.

The Team found SBVCL to be operating compliantly. Each fixed facility campus and the Hybrid J.D. program offer students a sound Juris Doctor Degree curriculum taught by well-qualified faculty. The law school is led by experienced on-site administrators and faculty and supported by the umbrella resources of TCS. The school has maintained consistent admission criteria and academic standards and operates with compliant operational policies and procedures. From August 1, 2012, through July 31, 2017, SBVCL's cumulative bar pass rate was 58.9 percent, decreased somewhat from the last inspection, but in line with national trends, and well above the required minimum of 40 percent.

RECOMMENDED ACTION BY THE COMMITTEE

The Team recommends that the Committee receive and file this Periodic Inspection Report, approve the Team's recommended actions, continue the accreditation of the SBVCL, and schedule its next periodic inspection in the Fall of 2023, unless an earlier visitation is deemed necessary by the Committee.

Recommended, Mandatory Actions

1. Pursuant to Guidelines 11.1 (H), (I), (J) and (M), the school must ensure that Faculty Files are complete, that Faculty Minutes are complete and accessible for the last five years, that Board Minutes are complete, and that all Committee correspondence is kept either electronically and/or in hard copy. Since the inspection visit, the school has addressed these recordkeeping requirements, completing and updating files when necessary and ensuring that internal policies are in place for ongoing compliance. They made the files available to the inspection team electronically for verification.

REPORT

Conduct of Visit

The inspection of the Santa Barbara and Ventura Colleges of Law (SBVCL) was conducted by the following Inspection Team (Team): Dr. Dolores Heisinger, Member of the Committee of Bar Examiners; Dean Sandra Brooks, Cal Northern School of Law; and Sally Perring, Consultant for Educational Standards. As part of the inspection, the Team met with Dean Gardina and Matt Nehmer, Ph.D., Executive Director. The Team also met remotely with Mehul Patel, the Chief Financial Officer of TCS. The Team had the opportunity to meet individually with full time faculty members Craig Smith and Andrea Funk, as well the Academic Standards and Admissions Committee, and separately with faculty at both campuses as well as those teaching in the Hybrid J.D. program. The Team also met with the Board of Directors for the Colleges of Law. The Team interviewed numerous administrative and staff members including: Registrar and Assistant Dean Barbara Doyle; Librarian Debi Jurgenson; Admission officers Shawn Taylor and Shannon Stark; Student Services officers Christian Winnewisser and Jennifer Mackie. Members of the Team had the opportunity to attend classes on two evenings, toured each school's classrooms and library, reviewed the law school's student and faculty files and reviewed a broad sample of final examinations and students' answers. Finally, the Team held confidential meetings with students enrolled at both the Santa Barbara and Ventura campuses and the Hybrid J.D. program.

On the last day of the visit, the Team conducted a comprehensive exit interview with Dean Gardina and Dr. Nehmer to discuss its preliminary findings and anticipated recommendations to the Committee. Throughout the visit Dean Gardina, her staff and the faculty, were cooperative and responsive to all queries and requests.

Report of Self-Study

As required by Accredited Law School Rule 4.163, SBVCL submitted a timely self-study prior to the visit which assisted the Team's assessment of the school's compliance with the *Accredited Law School Rules* (Rules) and *Guidelines for Accredited Law School Rules* (Guidelines). The self-study was detailed and contained both data and a comprehensive narrative regarding the law school's admissions policies, grading and academic standards, its operational policies, curriculum, current faculty, facilities and governance. The attachments supported the narrative of the self-study and provided data helpful to assessing the school's compliance with the Rules and Guidelines. Overall, both the self-study and attachments were comprehensive, informative and useful.

SPECIFIC FINDINGS AS TO COMMITTEE ACCREDITATION STANDARDS

Set forth below are the Team's specific findings, conclusions and recommendations regarding SBVCL's compliance with the accreditation standards as set forth in Accredited Law School Rule 4.160 and the related Guidelines.

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)

The law school demonstrated compliance with all applicable federal, state and local laws and regulations. It operates in good standing as a California non-profit public benefit corporation. As such, and along with its affiliation with the non-profit TCS Education System, SBVCL is classified by the Internal Revenue Service as a

501(c)(3) tax-exempt entity. Both campuses operate under the appropriate business licenses and permits issued by their respective municipal locations.

The law school has adopted and maintains a written policy in its General Catalog (which functions as a student handbook) intended to comply with the Americans with Disabilities Act (ADA). The school provides reasonable accommodations to students with documented disabilities including, but not limited to, both physical and learning disabilities. The General Catalog also provides that the law school is committed to meet its obligations under state and federal law to provide students with a learning environment free of all forms of harassment or discrimination, including sexual harassment, and one that has zero tolerance for the use of unlawful drugs and alcohol. The law school is also committed to protecting the privacy of its student communications and their academic records. Students are informed of their rights under federal law regarding academic privacy under the Family Educational Rights and Privacy Act of 1974 (FERPA). Finally, in the operation of Federal Student Aid, the school demonstrates compliance through annual audits.

Rule 4.160(B): Integrity. The law school must demonstrate integrity in all of its programs, operations, and other affairs. (Guidelines 2.1-2.10)

SBVCL complies with the requirements set forth in the Rules and Guidelines necessary to demonstrate honesty and integrity.

As required by Guidelines 2.2 SBVCL appears to operate in an honest and forthright manner in all its financial dealings. Adequate administrative staff and faculty are employed to deliver the promised programs to students. Applicants and students receive financial advice and, as with all schools offering federal financial aid, the school appears to comply with the requirements of the Department of Education. The school's refund policy complies with 30-day requirements set forth in the Guidelines.

As required by Guideline 2.3, SBVCL communicates with the public, applicants and currently enrolled students with both integrity and transparency. The school's website and promotional materials, both print and digital, provided accurate and updated statements relating to the Colleges' accreditation status, academic curriculum, current faculty and academic and operational policies.

As to its current academic and operational policies and procedures set forth in Guidelines 2.7, SBVCL communicates with its enrolled students and faculty in an honest and forthright manner. The school communicates with student through the General Catalog and with the faculty through a comprehensive Faculty Manual. Both documents provide detailed descriptions of the law school's current curriculum, grading scale, examination procedures, academic standards and grade appeals, the calculation of academic standing, probation and graduation requirements. The Catalog also contains a description of all policies as to tuition refunds, minimum attendance requirements and a description of the Student Code of Conduct and Student Code of Ethics and Conduct.

As required by Guideline 2.7(B), the law school has adopted academic standards that are fair and described fully to students. Each course syllabus sets forth the basis for the final grade in that course.

Pursuant to Guideline 2.7(F), students have the right to inspect and copy their examination answers and they may petition for a review and potential change of any grade given. As required by Guidelines 2.7(G) and 2.7(H), there are also written procedures to process all such petitions and each is considered anonymously and decided by Academic Standards and Admissions Committee.

The SBVCL website provides the public, applicants and students with an accurate description of its J.D. degree program, admission requirements, curriculum, tuition, financial aid and graduation requirements. In compliance with Guideline 2.3(D), the website has the required “Accreditation” webpage, which provides the mandatory disclosure regarding the law school’s accreditation by the Committee and the mandatory notice regarding the geographic limitations its graduates face if they wish to practice law outside of California. A copy of the Business and Professions Code section 6061.7 annual disclosure form is also posted in the proper location on its website. The website also has an active link to the “Statistics” page of State Bar’s website giving applicants and students easy access to the pass results for graduates of SBVCL on the prior ten administrations of the California Bar Examination.

The Catalog also provides adequate notice to students as to the issues of misconduct and discipline. It provides an extensive discussion regarding the “Student Code of Ethics and Conduct” and, in particular, describes conduct that may warrant non-academic discipline. It also provides students with a statement of the procedures used to investigate when a student is accused of wrongful or unethical conduct and, as required by Guideline 2.6(B)(1). This includes the right to appeal any such finding through a hearing before a qualified disinterested hearing officer or two or more members of the faculty or administration as selected by the Dean. As also required by Guideline 2.6(B)(3), the discipline procedures expressly provide that any student found to have engaged in misconduct will be given a written final decision that includes a statement of the facts, conclusions and sanctions.

As required by Guideline 2.10(A), the General Catalog states the various services, resources, academic experiences and activities that are offered to enrolled students. The law school’s curriculum offers students the ability to participate in legal externships, an interscholastic moot court competition and study abroad opportunities. In regard to services, SBVCL offers students access to wireless, high-speed Internet access, online legal research, video conferencing and other forms of academic support.

Finally, as required by Guideline 2.10(B), the law school provides a wide spectrum of academic counseling and support to all students. Each campus has a faculty academic advisor to provide guidance through one-on-one counseling, workshops, substantive subject review sessions and examination answer writing strategies. Students on academic probation must complete an individualized satisfactory academic progress plan, tailored to their academic needs, and must meet periodically with an academic advisor to monitor their progress. The school also makes BARBRI study materials available to all students across all years of study and allows them to create a personalized study plan that continues after graduation.

Rule 4.160 (C): Governance. The law school must be governed, organized, and administered so as to provide a sound educational program. (Guidelines 3.1-3.2)

The law school is governed and organized to provide a sound educational program.

The law school is organized and operates as a non-profit, California public benefit corporation. In 2010, it sought and received Committee approval to affiliate with TCS Education System (TCS), a non-profit network of higher education institutions—each with its own board, leadership team, accreditation, mission and organization. TCS is an Illinois 501(c)3 non-profit organization as well as a 509(a)3 Type II Supporting Organization, which is a nonprofit entity that carries out its exempt purposes by supporting other nonprofit organizations. TCS’s Supported Organizations and affiliates include The Chicago School of Professional Psychology, Pacific Oaks College & Children’s School, Saybrook University and Dallas Nursing Institute. SBVCL’s

governance model includes a dual board structure comprised of a Fiduciary Council (10 members) and Board of Trustees (13 members). SBVCL's Board of Trustees oversees all of its strategic, academic and operational affairs, and delegates daily oversight and management to its President. The SBVCL Board meets at least three times per year and has established various committees to assist in its oversight duties. The Fiduciary Council, required to meet only once annually, ensures that SBVCL meets all material thresholds in alignment with corporate functions. SBVCL also supports governance through alumni, faculty and staff, each with a distinct engagement forum (the Alumni Council, Faculty Council, and ED Council for staff).

The executive function of leading and managing the law school is carried out by President Matt Nehmer, Ph.D., who reports to the SBVCL Board of Trustees. Reporting to President Nehmer, Dean Jackie Gardina serves as chief academic officer and oversees all academic aspects of the Colleges. TCS provides ongoing consultation and direct support in the key areas of institutional research, information technology, instructional design, human resources and benefit management, enrollment management, marketing, financial planning and analysis, program assessment, global engagement, and legal affairs and compliance.

Finally, members of the SBVCL faculty (both full-time and adjunct) are very active in its governance and academic affairs. The law school utilizes a Faculty Council, which meets at least three times a year. Comprised of core (full-time) faculty and experienced adjunct faculty who have taught for at least three years, the Council oversees the work of four standing committees: Academic Standards and Admissions; Curriculum and Assessment; Hiring and Retention; and Faculty Development. Together, with the Dean acting as an ex-officio member of each committee, the Council exercises broad discretion and authority over many key issues relating to the law school, including its admissions, academic and grading standards, curriculum development, faculty recruitment and development and student discipline and academic disqualifications.

Rule 4.160(D): Dean and Faculty. The law school must have at each campus, including any approved branch campus, a competent dean, a qualified administrator, an adequate administrative staff and a competent faculty that devote adequate time to administration, instruction, and student counseling. (Guidelines 4.1-4.10)

SBVCL administration and faculty comply with Rule 4.106(D) and related Guidelines.

Hired in 2016, Dean Gardina graduated magna cum laude from Boston College Law School. After graduation, she clerked for Chief Justice William G. Young of the United States Federal District Court for the District of Massachusetts and Judge Levin Campbell of the First Circuit Court of Appeals. She then worked at Choate, Hall, and Stewart in the commercial litigation department. Before joining SBVCL, Dean Gardina was the Associate Dean of Academic Affairs and a Professor of Law at Vermont Law School (VLS) where she taught for twelve years. She has also taught as a Visiting Professor at several other law schools, including University of Oregon School of Law, University of Denver Sturm School of Law, and Santa Clara University School of Law. Dean Gardina has taught Civil Procedure, Administrative Law, Bankruptcy, Litigation Process, and American Legal Systems. Dean Gardina also operates as the full-time administrator of SBVCL. Based upon her professional and academic credentials, Dean Gardina is well qualified to be both the Dean and the full-time administrator pursuant to Guidelines 4.1(A) and 4.1(B).

Many members of the faculty have taught at SBVCL for over a decade. At the time of the inspection, the faculty included two full-time professors, two part-time professors (core professors) acting as academic counselors, and thirty-four additional part-time, adjunct professors. Eleven of the adjunct professors are SBVCL graduates. The two full-time professors, Andrea Funk and Craig Smith, have various administrative

duties in addition to teaching. Professor Funk is the Director of the Hybrid J.D. Program and Online Learning, while Professor Smith is responsible for internship programs and other duties related to the fixed facility J.D. program.

In two meetings, one at each campus, the Team had the opportunity to meet over twenty-five of the adjunct faculty members. They were engaged and educated about the ongoing operations of the school and felt they had a voice in the academic program. Many were thoroughly engaged in the assessment protocols and open to trying various new digital opportunities for case books and enhanced classroom experiences. Their dedication to the school and students was readily apparent. The Faculty Manual clearly sets forth the expectations of faculty and resources available to faculty.

As provided by Guideline 4.2, the law school has adopted a policy that encourages faculty involvement in the academic policy making process. The school has delegated primary responsibility for the academic standards (including grading and student disqualification) and curriculum to the faculty. The Faculty Council is responsible for all issues relating to the academic programs at each campus, as well as overseeing each of the faculty standing committees. Standing committees include: The Academic Standards and Admissions Committee, the Curriculum and Assessment Committee, Faculty Development Committee, and the Hiring and Retention Committee.

The law school meets the compliance requirements as to the quality of its faculty and student/faculty ratios required by Guidelines 4.4 and 4.5. With 30 current professors teaching 200 students in the fixed facility program, the school maintains a student/faculty ratio of approximately 7 to 1, with comparable ratios planned for the Hybrid J.D. program.

As required by Guideline 4.6, all faculty members are expected to improve their teaching skills and stay current in the area of law that they teach. The school counsels individual professors and conducts workshops and other events to help faculty better understand the teaching of legal scholarship, working with adult learners, and utilization of digital resources in teaching.

As required by Guidelines 4.7 and 4.8, the law school has adopted a compliant, multi-faceted policy of faculty evaluation. The school reported that it regularly conducts faculty peer evaluations. However, during the year of transition to a new Dean, no peer evaluations took place. An extended visitation schedule has now been put in place to ensure that reviews will take place on schedule in the future, and reviews took place on time for the 2017-2018 Annual year and they are on schedule for the 2018-2019 Annual Year, with plans to schedule them proactively in future years as well. The Faculty Manual offers a detailed description of the criteria and forms used to evaluate each faculty member's teaching skills, course organization, examinations and assignments and grading practices. Student evaluations of the faculty are solicited using online technology so students may express their opinions as to both the quality of instruction and course content.

Finally, consistent with Guideline 4.9, the law school has adopted and maintains a detailed academic freedom policy to ensure professors have broad discretion regarding how and what they teach, what they say in class and their choice of research topics.

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

The school maintains a quantitatively and qualitatively sound program of legal education pursuant to Rule 4.160(E) and Guidelines 6.1-6.14.

The Juris Doctor degree program of legal education offered by SBVCL consists of a part-time curriculum taught either during evening classes or, for the Hybrid J.D. students, online classes plus weekend residencies four times each semester. All students must complete at least 84 semester units and have a minimum, cumulative grade point average (GPA) of 2.0 or better to graduate. Consistent with Guideline 6.5(I), classes are taught over two 15-week semesters and a ten-week summer session. Students may begin their studies in the fall or in the spring. For the traditional programs, the J.D. curriculum requires that students complete a minimum of 1,260 clock hours of instruction over no fewer than 120 weeks, exceeding the minimum requirement of 1200 hours required by Guideline 6.5(A). Classes at both campuses are taught from 6:30 p.m. through 9:30 p.m. for three nights a week. Classes at the Ventura campus are held on Monday, Wednesday and Thursday evenings, while in Santa Barbara classes are held on Monday, Tuesday and Thursday evenings.

The Hybrid J.D. program also satisfies the clock hour requirement through a combination of different engagement modalities. Hybrid J.D. students may earn credit hours toward the required 1,200 hours of verified “academic engagement” as defined and required by Guideline 6.5(A) via distance learning technology through any combination of the following: (1) participating in a synchronous class session; (2) viewing and listening to videotaped classes or lectures; (3) participating in a live or video-taped webinar prepared and offered by the faculty of the law school; (4) participating in any synchronous or asynchronous academic discussion assigned in any class and monitored by a faculty member; (5) taking an examination, quiz or timed writing assignment; (6) completing an interactive tutorial or computer-assisted instruction (7) conducting legal research assigned as part of the curriculum in any class; and (8) participating in any portion of an approved clinical or experiential class or activity offered through distance-learning technology. Students have assignments across all of the online courses to ensure that they have engaged with the material. Over the course of the Hybrid J.D. program, students are onsite at the fixed facility campus for approximately 400 hours, and they complete the remaining 860 hours of verified academic engagement in the virtual classroom as outlined above.

Under Guideline 6.5(B), the law school enforces a compliant class attendance policy that requires students to attend at least 80% of all scheduled classes held in each course to receive credit. In an effort to encourage not only timely attendance but also meaningful class preparation, students are also informed that they may be marked absent, even if they are present in class, if they appear sufficiently unprepared or unable to answer questions such that their professor deems their “non-participation” worthy of being marked absent from class. Hybrid J.D. student participation is tracked through a learning management system which monitors all use of various online platforms for a course, as well as live attendance during class residencies and timely submission of weekly assignments.

The curriculum for all J.D. programs complies with Guideline 6.7 by offering courses in all subjects tested on the California Bar Examination, including a class in Professional Responsibility. All mandatory courses require a casebook. The Team reviewed several current course syllabi. The syllabi reflected appropriate texts and learning pace. Instructors are required to seek prior approval of syllabi from the Professors Funk and Smith. As a result of this policy, all syllabi reviewed were found to be consistently formatted and comprehensive and, thus, compliant with Guideline 6.5(K).

Traditional students must complete at least eight units in legal research and writing classes, including Legal Analysis, Legal Writing and Advanced Legal Writing. Advanced Research and Writing is an elective for traditional students. Hybrid J.D. students have an intensive first semester focused on analytical, writing, and research skills. They have an additional required writing course, as well as writing assignments distributed throughout the substantive curriculum and during their weekend residencies, as well as a Capstone course at the end of the program. The fixed facility program includes a more traditional writing assignment related to a doctrinal case.

Pursuant to Guideline 1.8, which allows California-accredited law schools to offer and grant academic credit for bar examination review and test preparation courses, SBVCL requires that all students take a Bar Studies Course in the fall of their fourth year of study. The course focuses on the analytical, writing and organizational skills needed to prepare for taking the California Bar Examination. Students earn three units on a pass/fail basis for this course. The law school also gives students access to all of BARBRI's online and hard copy materials as soon as they begin to study bar-tested subjects. Students also take a BARBRI designed diagnostic "bar exam" in their third year to alert them as to their strengths and weaknesses in basic bar examination knowledge and skills at a point when they can still remedy any problems well in advance of taking the bar examination.

Pursuant to Guidelines 6.6 and 6.9, SBVCL requires its students to earn academic clinical credit working at an approved legal internship. As a graduation requirement, students must also earn at least one unit of internship credit working on a *pro bono* matter or in a government agency. As described in detail in the Catalog, the law school has adopted rules and requirements relating to the approval of students' legal internships and the supervision and reporting requirements that are required by Guidelines 6.6(A) – 6.6(D) and 6.9 (D) and (E).

SBVCL offers traditional students (and graduates within three years of graduating) the opportunity to earn Certificates of Concentration in specific areas of law, which include Business Law, Criminal Law, Family Law or Estate Planning. To do so, the students must complete eight units of elective courses that qualify in the area of law chosen. Hybrid J.D. students can choose a focus area though that program does not have formal Certificates of Concentration.

As permitted by Guideline 7.11, the law school will allow traditional fixed facility students to take a limited number of online elective classes that are offered in the Hybrid J.D. program, up to twelve units. Each course is offered and credit is given in a manner that is consistent with the requirements set out in Guideline 7.11(E).

When final examinations are administered, students must be prepared to take an examination on any subject administered that semester; they do not learn the topic that will be tested at a particular sitting until they access the first examination question. Thus, students must be prepared for any course topic they took that semester. The Team reviewed a sample of final examinations given over the past two years at both campuses. All examinations reviewed were well-drafted and comprehensive and a fair test of the legal issues covered in each respective course. Where appropriate, professors include as part of the examination a multiple-choice format section, similar to that found in the Multistate Bar Examination portion of the California Bar Examination. Since the Hybrid J.D. program had just begun in September 2019, no final examinations were available from that program. It is planned that final examinations will take place on campus, and examinations may share questions with the fixed facility classes.

The Team also reviewed a sample of students' final examination answers submitted in classes offered in all four years of the SBVCL curriculum. The examination answers received appropriate grades, reflecting the level of mastery needed for success on the Bar Examination. Professors provided specific feedback as to student performance in issue spotting, legal knowledge, and other specific areas designed to enhance student learning outcomes.

Over two evenings, the Team members observed first-year and upper division classes taught at each campus. All professors appeared well-prepared and engaged, and each offered sound classroom instruction. Most professors used variants of a traditional Socratic-style of teaching, striking different balances between student questioning and lecture and summarization. Student participation was good in almost all classes. The single exception was a first-year class where students who had a final examination the next evening appeared less engaged.

Consistent with Guideline 7.4(A), SBVCL offers a significant amount of academic support. Each campus has a dedicated academic advisor as does the Hybrid J.D. program. Academic Advisors work with students to help them develop effective strategies for briefing cases, outlining substantive law topics, taking law school essay exams, and deconstructing multiple-choice questions. Students on academic probation are required to meet with the advisor regularly. Both advisors work with students on probation to help them identify strategies for improving their study and exam-taking skills. In 2018, every student who was placed on academic probation developed an "Individualized Satisfactory Academic Progress" (ISAP) Plan. This new ISAP process is intended to help students take ownership of their continued success in law school.

Rule 4.160(F): Competency Training. The law school must require that each student enrolled in its Juris Doctor Degree program satisfactorily complete a minimum of six semester units of course work designed to teach practice-based skills and competency training. Such competency training must teach and develop those skills needed by a licensed attorney to practice law in an ethical and competent manner. (Guideline 6.9)

The programs at SBVCL exceed the minimum requirement for competency training.

The school's fixed facility program requires students to complete at least twelve units of practice skills courses. The school offers a wide variety of simulated and real-world experiential courses. The Hybrid J.D. program requires 15 units of skills classes, having more required courses than the fixed facility program and fewer slots to take electives.

In addition to the required writing and advocacy courses, SBVCL also offers over twenty additional elective courses including Statutory Interpretation, Trial Evidence, Interviewing and Counselling, Law Practice Management, and Writs and Appeals.

Students are required to participate in a least one unit of *pro bono* work, and may earn up to six units via *pro bono* work. Students may work on assignments in public law offices, with judges, or with other organizations engaged in full-time legal activity.

Certifications are offered in various specialties requiring specific practical coursework. In the traditional program, certification requirements combine a course of study with both substantive and skills classes; in the Hybrid J.D. program, the certification courses all focus wholly on Lawyering Skills and include Litigation, Transactions, Practical Skills, and Professional Development and Leadership.

Rule 4.160(G): Scholastic Standards. The law school must maintain sound scholastic standards and must as soon as possible identify and disqualify those students who lack the capability to satisfactorily complete the law school's J.D. degree program. (Guidelines 7.1 – 7.11)

The law school has adopted sound scholastic standards and grading policies to ensure academic integrity.

The General Catalog and the Faculty Handbook provide a detailed description of the law school's grading policies and guidelines. The law school uses a letter grading system in most courses (A-F) with each grade given a corresponding numerical value, e.g. A= 4.0, A- = 3.7, B+ = 3.3, B=3.0, etc. The Catalog provides students with a very detailed explanation of how their examination letter grades are calculated and then converted into weighted numeric equivalents and then how their grade point averages are calculated. All examinations are graded anonymously.

As to SBVCL's grading standards, the Catalog also provides students and faculty with detailed definitions of specific grade designations ("B+/B/B- very good to good performance") and both the Catalog and the Faculty Manual offer specific guidelines as to how examination answers are to be graded, such as what constitutes a "good answer" ("all or most issues were spotted, rules were generally correct, and analyses were relevant"). The Catalog also offers students an explanation as to how "pass/fail" courses are graded.

While the law school does not have a mandatory grade curve, the Faculty Manual advises that faculty members are "expected to follow established grade ranges except in extraordinary circumstances." Grades are reviewed prior to posting, and a professor may be asked to reread exams or realign a grade curve. The primary reasons for grading in this manner are to achieve consistent grading among all instructors on both campuses and to avoid grade inflation. There are two sets of such guidelines, one for grades issued in first-year classes and another for classes offered in the second through fourth year of the SBVCL curriculum. Under the first-year guidelines, 0-5% of students were expected to earn an A/A-; 10-15% a B+/B/B-; 60% or more students were expected to earn a C+/C; 15-20% a C- and 0-5% D+/D/D-/F. The ranges for upper division classes were more flexible, and the Manual noted that few upper division students are expected to perform below a C-, but advises that students should receive the appropriate grades.

The law school has grade comparison charts and graphs. The grades given to all students in each year of classes taught are well-correlated. They demonstrate the school tracks the grading performance of its faculty and correlates those numbers with performance on the Bar examination. In compliance with Guideline 6.14, and consistent with the grade ranges found in the Faculty Manual, a significant majority of all grades given to SBVCL students (particularly in first-year classes) are in the B- to C- range. There are relatively few grades in the A-B+ range. It appears that instructors on both campuses grade the same cohorts of students with great consistency and without any evidence of grade inflation. In general, the better a student does in law school the greater the likelihood of that student passing the Bar.

As required by Guideline 7.2, the General Catalog provides students with a written policy to define “academic standing, academic disqualification, advancement in good standing and probation, retention, and the requirements for graduation.” To achieve and maintain good standing, a student must have a minimum GPA of 2.0 to be advanced to the next year of study.

All students are evaluated once annually, at the end of the Spring semester. First year students who begin in the Fall are evaluated based upon grades received during the Fall and Spring semesters. Spring start students are evaluated based solely upon grades received in the Spring.

Students who fail to achieve the minimum cumulative GPA at the end of the regular academic year are deemed not to be making Satisfactory Academic Progress (SAP). Students who fail to achieve SAP may petition the Academic Standards and Admissions Committee (ASAC) to be placed on probation. Petitions are considered anonymously by ASAC. ASAC may include additional conditions to the probation, other than just achieving SAP by the end of the next academic year. Any decision of ASAC is final. Students granted probation must create an Individualized Satisfactory Academic Progress plan (ISAP) and their progress in satisfying the plan is supported and monitored by their academic advisor. Failure to meet SAP or any additional probationary conditions imposed by ASAC will result in academic dismissal at the end of the next academic year. The school has a compliant policy on course repetition and no student receives duplicate credit for a repeated course.

Academically deficient students may also petition the ASAC for readmission on academic probation. They must set forth why they should be readmitted, provide an official LSAT score report (not otherwise required by the school), and file the petition within 30 days of the start of the semester in which the applicant seeks readmission. The ASAC decision on such petitions is final.

Review of ASAC minutes and student files reveals that the Committee considers petitions with consistency. The school identifies and excludes those students who do not demonstrate the ability to complete their legal studies in a satisfactory manner. The law school’s average attrition rate over the last three years is 21%.

Rule 4.160(H): Admissions. The law school must maintain a sound admissions policy. The law school must not admit any student who is obviously unqualified or who does not appear to have a reasonable prospect of completing the degree program. (Guidelines 5.1 – 5.8)

SBVCL has a sound admissions policy and acts in accordance with that policy.

The SBVCL website provides a comprehensive description of its admissions requirements and application process. Both the hardcopy and online application forms comply with Guideline 5.4 since they request whether an applicant has ever studied at another law school and, if so, whether or not they left in good standing. As noted on its application webpage, SBVCL admits each type of student permitted under the Guidelines, “regular,” “special” and “transfer,” including those who may have been academically disqualified from other law schools. In practice, few special students are admitted and few students transfer into the school.

In an effort to make its program of legal education accessible to as many qualified candidates as possible, and to achieve and maintain diverse enrollment, the law school has adopted and applies a “holistic” approach to its admissions standards and process. This policy stresses that applicants are assessed not only on their

undergraduate education and grade point average (and in some cases their Law School Admissions Test score), but on the strength of their personal statements, their work and life experiences, and their references. Students applying to the Hybrid J.D. program must also be interviewed prior to admission. In a change of policy from the last site visit, all admissions decisions have been delegated by the Faculty Council to the Academic Standards and Admission Committee (ASAC) rather than allowing the Director of Admissions to make some decisions in particular cases. The Chair of ASAC and the Dean personally review all applications, while the ASAC makes the final decisions.

The law school will occasionally admit special student applicants. Only three such students were admitted since the last inspection, one of whom was admitted as a transfer student in good standing. For those admitted as special students, the law school observes the admission requirements set out in Guideline 5.5, including admitting only those with acceptable CLEP examination scores, and those students are required to pass the First-Year Law Students' Examination to stay enrolled and graduate.

Similarly, the law school will, consistent with the admission requirements found in Guideline 5.6, admit those who were academically disqualified from a prior law school, or otherwise departed while not in good standing. Any such applicant must earn an LSAT score at or above the 50th percentile prior to admission. Students from other law schools must meet the same requirements as SBVCL students who were disqualified and seek readmission. Such admissions or readmissions are rare.

Pursuant to Guideline 5.3, the law school has and enforces the requirement that all applicants admitted who enroll must submit either their official undergraduate transcripts within 45 days of the start of the academic term in which they enrolled. The student files audited showed that all contained the proper transcripts. Because all transcripts are kept only digitally it is recommended that each transcript digital file reflect the date sent or received to more readily validate compliance with the 45-day rule. Subsequent to the inspection, the school reported that they will add a handwritten date on the transcripts going forward.

In recent years, the school has maintained a relatively steady enrollment, and it has kept its admissions standards constant. Interestingly, almost every applicant admitted actually enrolled. In addition, the Hybrid J.D. program which began in September 2018 had a new cohort of students enter in January 2019.

Rule 4.160(I): Multiple Locations. Accreditation is granted to a law school as an institution. If a law school receives approval to open a branch campus or a satellite campus, the branch or satellite campus must be operated in compliance the Standards and Guidelines, subject to all site specific operational requirements and any waivers approved by the Committee. (Guidelines 15.1-15.4)

The school operates each campus compliantly under the Rules and Guidelines for Accredited Law Schools.

SBVCL has operated since 1978 as a single institution with two campuses, each operating with policies in place to comply with all applicable federal, state, and local laws and regulations. The law school's facilities are located in California; the Ventura campus is designated as the primary administrative office and access that campus houses the required physical records. Unlike other schools with multiple locations, SBVCL is a union of two separate schools. While it operates administratively as a single institution, the school continues to report to the State Bar certain aspects of its operation separately for each campus. After an evaluation period, guidelines will be created to allow reporting related to the Hybrid J.D. program as well.

Governance of both locations is unified and carried out by a single Board of Trustees and one Dean. All academic and operational policies and procedures are identical at both campuses; the law school publishes and uses shared General Catalog, Faculty Manual and Employee Handbook and the two campuses are integrated into SBVCL's financial planning and affairs. Administration office hours are identical at both campuses. The Hybrid program shares these resources as well.

Each campus provides a similar array of administrative and educational services for its students. Most administrative personnel divide their time between the two campuses. The Dean and Executive Director maintain offices on both campuses. The Registrar/Assistant Dean maintains offices in Ventura, but will also visit the Santa Barbara campus. The Santa Barbara campus also employs an Assistant Registrar. The financial aid officer and librarian regularly divide their time between each campus. Each campus is separately home to a full-time faculty member, a Student Services Coordinator, and an Academic Advisor. The Information Technology Officer provides support for both campuses and there is also a Help Desk available to provide technical support to Hybrid students. Finance, Human Resources and Marketing services are all provided by TCS and housed in Chicago, Illinois.

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

SBVCL maintains a compliant library at each campus. Hybrid students have access to online resources as well as the campus library, and they may access the campus library while at onsite intensive weekend classes even if they do not otherwise live close by.

Each campus has an onsite library containing all current, hard copy legal authorities required by Guideline 8.4, as well as additional legal authorities.

As required by Guideline 8.7, the law school also maintains subscriptions to Westlaw and OnLaw, the CEB service for California specific practice, fulfilling all electronic access requirements. Each library offers students reasonable access as required by Guideline 8.3(A) with hours open on most weekdays from 9:30 a.m. until 6:30 p.m., Fridays from 10:00 a.m. until 2:30 p.m. and on Saturdays and Sundays from 10:00 a.m. until 4:00 p.m. Each library is quiet, well-lit, and offers sufficient seating, tables, computer terminal, and office equipment for students to perform legal research.

As required by Guideline 8.5, all SBVCL students receive instruction in legal research using both hard copy and online legal resources. SBVCL requires its students to complete a comprehensive program of legal writing and research classes, including Legal Analysis, Legal Writing and Advanced Legal Writing. Each law library and all of its legal resources and records is maintained and updated by a part-time librarian who splits her hours between the Santa Barbara and Ventura campuses.

Rule 4.160(K): Physical Resources. The law school must have physical resources and an infrastructure adequate for its programs and operations.

The classroom facilities and technology resources located at each campus were found to be sufficient to support SBVCL's program of legal education, its current and future student enrollment, all of its full-time and adjunct faculty and administrative staff.

The Santa Barbara campus is housed in a leased 8,000 square-foot, one-story commercial building in

downtown Santa Barbara built specifically for the law school. It has the exclusive use of space for its classrooms, library, a student lounge and administrative offices. The building has four well-appointed classrooms. The largest room has seating capacity for 64 students and it may be used as a mock courtroom with a built-in judge's bench and witness stand. The other classrooms seat between 40-50 students. The building currently has several offices, some exclusive use for senior administrators and full-time faculty and other spaced shared by staff.

The Ventura campus is housed in a significantly larger structure, a 20,000 square-foot building with two floors. It contains six classrooms that offer seating for between 24 and 86 students, a library with seating capacity of 24 students and an additional five seats with access to computer terminals, as well as offices for the Dean, Registrar, Director of Admissions and other administrative support staff.

SBVCL has maintained and upgraded its technology infrastructure since the last site visit by upgrading computers, WiFi, and digital televisions in the classrooms. The IT Helpdesk was reorganized with new staff, new online tools, more training, and a wider range of support. The school's learning management system for online classes, Canvas, has also been in place for five years, with technical support available around the clock.

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

SBVCL has adequate present and anticipated financial resources to support its programs and operations in compliance with Rule 4.160(L) and Guidelines 10.1 through 10.3. The school provided audited financial reports and projections to support its compliance.

The school anticipates a small operational surplus this year after four years of modest deficits, which were the result of the costs invested in earning WASC accreditation and launching the Hybrid program. Now that those initial investments are complete, the school projects small surpluses for the next three years. The school also maintained a healthy reserve, up almost 18% over the last two years. Reserve funds were sufficient to cover the modest operational deficits, ensuring that SBVCL students' continuing education was not imperiled by such deficits. The school is also enhancing its fundraising efforts with the help of the Alumni Council and the school requires its Board of Trustees to donate or solicit donations.

At the time of the last site visit the school had instituted a "level pay" tuition policy, ensuring that students' tuition would stay at the same level as the year they enrolled. Now, however, the school reserves the option to adjust tuition each year to maintain fiscal integrity.

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

SBVCL was in substantial compliance with recordkeeping requirements, and it has since achieved full compliance. At the time of the inspection, some files were incomplete, most often because of incomplete scanning of older hard copy files. Subsequent to the inspection, SBVCL remedied all discovered deficits and instituted policies to ensure ongoing compliance.

The law school is fully integrated into the TCS computer network and most of its records are created and maintained as digital files secured by TCS. To ensure security, electronic documents on the network, as well as student information contained in the Student Information System, are backed up using the Microsoft DPM

software platform, a hard drive backup system that maintains snapshot copies of file changes and full archival copies on a regular basis. The physical disk systems used for backup and the Student Information System reside in an environmentally controlled data center in Elk Grove Village, Illinois. Should primary source digital documents be destroyed (such as in a fire or other catastrophic event), duplicate records can be reproduced within than two business days. All paper records are stored onsite in fireproof filing cabinets in secured office space. Whenever possible, paper copies are scanned and maintained in digital format as well as hard copy.

Student applications, admitted student records, enrolled student records and transcripts are kept digitally. A sizable number of hard copy files were printed out at the request of the Team to be reviewed during the site visit. The Team found all records to be complete and compliant with the Guidelines 11.1(A)-(D). All files appropriately contained undergraduate transcripts. However, digital transcript copies do not necessarily reflect the date received by SBVCL. Given the importance of complying with the requirement that all such transcripts must be received within 45 days of the start of the term under Guideline 5.3, (see also Rule 4.25 and Business and Professions Code section 6060(c)(1)), the school was asked to create a way to validate the date the transcript was received, and the school agreed to add the date as it is digitizing some older complete files as well as all student transcripts. Subsequent to the inspection, the school began affixing date of receipt to the transcripts.

All course records as well as examinations and grade tabulations are also maintained digitally. The school printed out selected copies of examinations and student answers and grade tabulation sheets for the Team. All were complete.

Because TCS provides Human Resources and Financial services to the school, some records, such as administrative personnel records and student financial records are stored with TCS, though accessible on an as needed basis by SBVCL.

Faculty personnel records were incomplete in varying degrees. The files are now kept digitally. While appropriate subfiles consistent with the Guidelines existed for each faculty member, some digital subfiles were empty. Most notably law school transcripts, records of all courses taught, and evaluations were missing or sparse. Part of the problems stemmed from not moving over all information in old hard copy files, or storage of information in another location. Since the visit the school has updated the files where possible, and has requested the remaining missing information.

Faculty Council and subcommittee minutes, along with Board and subcommittee minutes have been updated since the visit and now appear complete. The school has also created new protocols to ensure that all correspondence from the Committee and WASC are maintained.

Rule 4.160(N): Minimum, Cumulative Bar Examination Pass Rate. (Guidelines 12.1 – 12.2)

SBVCL has a compliant minimum, cumulative Bar passage rate of 58.9%, which is higher than the required 40% cumulative pass rate. (Guideline 12.1)

The school is taking several steps to help its students perform well on the Bar Examination. For example, the school added BARBRI formative assessments in Contracts, Torts, and Real Property, a Bar diagnostic exam, and an Extended Bar Review Course for student use. The school also requires students to take Bar Studies in the fall semester of their final year. Until Fall 2017, SBVCL faculty created the course from commercially available Bar preparation material, but SBVCL now uses BARBRI's Extended Bar Review material.

In July 2017, SBVCL sent two faculty to a BARBRI training to learn the pedagogical theory and the course material. In Fall 2017, SBVCL introduced the new course material into Bar Studies.

In Spring 2017, SBVCL administered the first Bar diagnostic examination to students in their third year. Students took a 120 multiple-choice question exam testing for Knowledge, Reading Comprehension, Analysis, and Application over four subjects. Students each received a personalized report comparing their scores to a target score. The school also received a cohort report that was used by Bar Studies faculty to continue to improve that course.

Rule 4.160 (O): Equal Opportunity and Non-Discrimination. Consistent with sound educational policy and these rules, the law school operates in accordance with policies and procedures that comply with the Constitutions and applicable laws of both the United States and the State of California. (Guideline 14.1)

SBVCL has adopted and enforces a non-discrimination policy in both its admissions and employment. The Catalog states that the law school “prohibits discrimination against its employees, students, and applicants based on race, gender, religion, age, national ancestry or origin, sexual orientation, disability, marital status, sources of income or impermissible reason.” It also seeks to prohibit all forms of unlawful harassment, including sexual harassment, and it bars retaliation against those who assert claims of harassment against the law school, its administration or a faculty member.

SBVCL has a relatively diverse student body. As shown in the November 2018 Annual Report, the Santa Barbara campus enrollment figures show 44 percent of the students are male and 56 percent are female; the Ventura campus has very similar numbers (45 percent male and 55 percent female). As for ethnicity, 34 percent of the students in Santa Barbara identify Hispanic while 38 percent of Ventura students identify as Hispanic. SBVCL continues its efforts to diversify the faculty. In 2013, 91 percent of the faculty self-identified as white, while in 2018 that figure was 75 percent. The school’s strategic plan includes a goal to increase the diversity of its faculty.

Rule 4.160 (P): Compliance with Committee requirements. The law school must demonstrate its compliance with these rules by submitting required reports and otherwise complying with the rules. (Guideline 11.1 (O))

SBVCL has timely submitted all Annual Compliance Reports as well as the Annual Academic Program Report. All other required submissions and responses to requests by the State Bar have been timely addressed by the school.

Pursuant to Guidelines 13.1-13.4, SBVCL offers an online Masters of Legal Studies (M.L.S.) degree. The school sought and received acquiescence of the Committee in 2011 to offer the degree. Materials associated with the degree make it clear that graduates do not qualify to sit for the Bar Examination as set forth in Guideline 13.3. The school in its written and digital information also makes clear that the State Bar and Committee of Bar Examiners do not “approve” or oversee the program, but rather merely acquiesce. Review of the budget shows the M.L.S. program does not act as a burden on the overall operation of SBVCL and staff and faculty time does not appear negatively affected.

CONCLUSION AND RECOMMENDATION

The Team recommends that the Committee receive and file this Periodic Inspection Report, that it approve the Team's recommended and suggested actions as noted above, that it continue the accreditation of The Santa Barbara and Ventura Colleges of Law and that the next periodic accreditation inspection be scheduled in the Fall of 2023, unless an earlier visitation is deemed necessary.



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Natalie Leonard, Principal Analyst
The State Bar of California
Office of Admissions
180 Howard St.
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April 15, 2019

Dear Ms. Leonard:

I am writing in response to the March 15, 2019, Santa Barbara and Ventura Colleges of Law (COL) Periodic Inspection Report (Report). I want to thank the Visitation Team, Sally Perring, Dolores Heisinger, and Dean Sandy Brooks. I appreciated their genuine interest in the school's programs and the professionalism with which they performed their work. I recognize the time and effort it took to prepare for and participate in the site inspection but I also recognize that the school and our students benefitted greatly from the process.

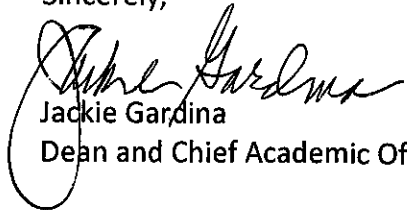
COL accepts the findings and recommendations laid out in the Report. As noted, we immediately addressed the Recommended, Mandatory Action, and allowed the Visitation Team to inspect the updated files electronically after the site visit.

I do want to ensure that the Committee of Bar Examiners (CBE) understands the relationship between the COL and TCS Education System (TCS), a matter discussed in the Report under Rule 4.160(C).

COL is organized and operates as a non-profit, California public benefit corporation. In 2010, it sought and received Committee approval to affiliate with TCS, a non-profit network of higher education institutions—each with its own board, leadership team, accreditation, mission and organization. TCS is an Illinois 501(c)3 non-profit organization as well as a 509(a)3 Type II Supporting Organization, which is a nonprofit entity that carries out its exempt purposes by supporting other nonprofit organizations. TCS's Supported Organizations and affiliates include The Chicago School of Professional Psychology, Pacific Oaks College & Children's School, Saybrook University and Dallas Nursing Institute. COL's Board of Trustees oversees all of its strategic, academic and operational affairs, and delegates daily oversight and management to its President. The COL Board meets at least three times per year and has established various committees to assist in its oversight duties. COL also supports governance through alumni, faculty and staff, each with a distinct engagement forum (the Alumni Council, Faculty Council, and President's Council for staff). COL is also independently accredited by the WASC Senior College and University Commission.

I look forward to providing a status report to the CBE about the first year of the hybrid J.D. program in fall 2019.

Sincerely,


Jackie Gardina
Dean and Chief Academic Officer