



The State Bar *of California*

OPEN SESSION AGENDA ITEM JANUARY 2020 COMMITTEE OF BAR EXAMINERS ITEM O-401

DATE: January 31, 2020

TO: Members, Committee of Bar Examiners

FROM: Natalie Leonard, Principal Program Analyst

SUBJECT: Approval of Report on Irvine University College of Law Inspection Report

BACKGROUND

Irvine University College of Law (IUCOL) was inspected on April 17, 2018 by State Bar consultant Heather Georgakis. The Committee of Bar Examiners (Committee) accepted the periodic inspection report of Irvine University College of Law (IUCOL) at its meeting on December 7, 2018 and continued the school's registration for five years. As part of the approval, the Committee required the school to address twelve mandatory recommendations and suggested that the school address four additional recommendations. The Committee further requested a response as to the school's progress.

The recommendations centered on the need for the school to clarify and publish its policies and disclosures generally, and to update or codify several policies. The school has done so and has issued a revised Catalog as well, as detailed in its attached progress reports dated April 11, 2019 and November 19 2019. (Attachment A) The catalog was provided on January 7, 2020.

IUCOL is a registered, unaccredited fixed-facility law school headquartered in Cerritos, California and organized as a for-profit corporation. During the inspection, the school was led by Interim Dean N. Edward Trent; as of August 2018, George Leal assumed the role of Dean. The law school offers a fixed-facility four-year J.D. degree program and a current enrollment of 32 J.D. students.

DISCUSSION

The school has now addressed all mandatory and suggested recommendations included in the inspection report, according to the attached progress report filed by the Dean. (Attachment A) The school responded timely with an interim progress report dated April 11, 2019 providing an

action plan for each of the mandatory and suggested recommendations, with finalization contemplated after discussion with the faculty and the school's governing body, culminating in a full update of the school's catalog. The school's most recent letter confirms the creation, clarification or implementation of all policies noted, and the catalog was also completed recently.

The school has invested significant effort in clarifying and publishing its policies, and making them newly available in an enhanced electronic format. It undertook this work during an exceptionally busy year in which other advances were also made, including updating a summer class session taught by the Dean to prepare students for the start of their law study. The mandatory recommendations highlighted in the report were as follows:

1. To comply with Guideline 1.9, it is recommended that IUCOL revise its Catalog to fully state its ADA policy and procedures to request accommodations.
2. To comply with Guideline 2.3(D)(4), it is recommended that IUCOL review and, as necessary, revise all published references to the law school's registration status to include all language required by the guideline.
3. To comply with Guideline 2.3(D)(2) and Business and Professions Code section 6061.7, it is recommended that IUCOL correct the required Information Report Form to accurately state LSAT scores.
4. To comply with Guideline 2.8, it is recommended that IUCOL adopt, publish and implement a written student discipline policy that meets all requirements of Guideline 2.8; the policy should be published in the Catalog or referenced there and otherwise made available for ready reference by students.
5. To comply with Guideline 2.9(A) and 2.9(B), it is recommended that IUCOL adopt, publish and implement a clear and consistent written policy as to academic standards applicable to students on probation; the policy should be published in the Catalog or referenced there and otherwise made available for ready reference by students.
6. To comply with Guideline 2.9(D), it is recommended that IUCOL review and revise its written policy on authentication of student work to address procedures for authenticating written assignments completed outside of class such as, for example, the use of commonly-available software for detection of plagiarism.
7. To comply with Guidelines 2.9(G) and 2.9(H) it is recommended that IUCOL review and revise its written policy to provide that requests for grade review are to be decided by a faculty committee; the policy should be published in the Catalog or referenced there and otherwise made available for ready reference by students.
8. To comply with Guidelines 4.8 and 4.9, it is recommended that IUCOL adopt and implement a written faculty evaluation policy as required by the Guidelines, and that the policy be published in the Faculty Handbook.
9. To comply with Guideline 5.3(A)(1), it is recommended that IUCOL review, revise and republish its attendance policies and practices to conform them to the requirement that students must attend no less than 80% of the scheduled class sessions for each course to receive course credit, to eliminate the current practice of allowing make-up classes to substitute for scheduled class sessions to fulfill the 80% requirement, and to ensure that attendance records are maintained accurately.

10. To comply with Guideline 5.24, it is recommended that IUCOL adopt and implement a written policy on course repetition that addresses all requirements of the Guideline, and that the policy should be published in the Catalog or referenced there and otherwise made readily accessible to students.
11. To comply with Guideline 5.31, it is recommended that IUCOL amend its application to ask about a former law student's good standing at a prior law school.
12. To comply with Guideline 5.35, it is recommended that IUCOL adopt and implement a written policy on the award of transfer credit for credit earned at another law school as limited by the Guideline, and that the policy be published in the Catalog or otherwise made readily accessible to students and prospective students.

The recommendations suggested by the report were as follows.

1. Pursuant to Guideline 4.7, IUCOL should address in the Faculty Handbook the duty of faculty members to continually improve their teaching skills and substantive expertise.
2. Pursuant to Guideline 5.17 and 5.25, IUCOL should continue to monitor grading practices to control grade inflation, particularly given the potential for inflation created by the recent elimination of plus/minus grading.
3. Pursuant to Guidelines 5.14, 5.16, and 5.17, IUCOL and its faculty should review all grading and examination policies and procedures to assess what changes, if any, might enable IUCOL to more effectively measure student ability and knowledge, more realistically evaluate student performance, and enhance the value of examinations as an educational tool, as required by the Guidelines.
4. Pursuant to Guideline 5.26, IUCOL should clarify, in publications setting forth its admissions policy, whether and under what circumstances an LSAT score is required.

Staff reviewed the school's new catalog issued in January to confirm that all mandatory and suggested recommendations that involved the catalog were addressed.

RECOMMENDATION

Staff recommends that Irvine University College of Law's progress report be received and filed, noting that the school has addressed all mandatory and suggested actions.

PROPOSED MOTION

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

Move that the Irvine University College of Law's progress reports related to inspection recommendations be received and filed in satisfaction of the school's obligation and agreement to address all mandatory and suggested recommendations identified in its most recent Periodic Inspection Report.

Attachment A: Progress Reports from Irvine University College of Law dated April 11, 2019 & November 19, 2019



November 19, 2019

Via Email

Natalie Leonard, Esq.
Principal Program Analyst, Office of Admissions
The State Bar of California
180 Howard St., 9th Floor
San Francisco, California 94105

Re: Final Progress Report on Mandatory Recommendations re Periodic Inspection

Dear Ms. Leonard:

As a follow up to my Progress Report dated April 11, in response to your request for clarification of a few of the law school's policies and procedures subject to the recommended mandatory actions noted in the Periodic Inspection Report, I am pleased to forward, by means of electronic attachment, the newly revised 2019-2020 Catalog and Student Handbook.

With your review of the revised Catalog and Student Handbook, please note the following, specific policies as referenced to each of the following mandatory recommendations as adopted by the Committee:

- No.4: Student Discipline (Guideline 2.8), see p. 35;
- No. 5: Academic Standards re Academic Probation (Guidelines 2.9(A), 2.9(B)), see p. 32
- No. 6: Authenticity of Student Work (Guidelines 2.9(D)), see p. 35
- No. 7: Grade review and Appeals (Guideline 2.9(G), 2.9(H), see p. 30;
- No. 8: Faculty Evaluations (Guidelines 4.8, 4.9), see p.6 of April 11th Status Report;
- No.9: Attendance (Guideline 5.3(A)(1), see p. 33;
- No. 10 Course Repetition (Guideline 5.24), see p. 31;
- No. 12. Transfer Credit (Guideline 5.35), see p. 31.

Finally, given our prior discussion regarding the law school's compliance with the Americans with Disabilities Act (which was not subject to a mandatory recommendation), please see the newly revised policy and procedures governing student requests for reasonable accommodations regarding physical access, class participation or testing accommodations on page 36.

A number of the revised policies were provided to the law school's faculty and discussed at a recent meeting of the faculty. Based upon that review and discussion, which was welcome, a few changes were made by the faculty and incorporated into the final version of the Catalog.

Based upon our revised Catalog and Student Hand Book, when read in conjunction with my Progress Report of April 11 I sincerely hope that both you and the Committee will come to the conclusion that the law school has made now fully addressed all recommendations (both

Natalie Leonard, Esq.
Principal Analyst, Office of Admissions
November 19, 2019
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mandatory and suggested) as made in the Inspection Report and then later adopted, As dean, I can say without hesitation that the need to address each of these issues and then take the necessary appropriate work has resulted in making the IUCOL program both fully compliant but also stronger and more responsive to our students' needs and expectation.

For that, I am grateful and again want to thank both you, Ms. Georgakis and the Committee for the opportunity to improve what we do as a law school and to be better able to provide an even better opportunity for our students and graduates to fulfill their dreams of joining California's legal profession as licensed attorneys. If you or the Committee have any additional questions or comments, I will look forward to address each when the Inspection Report and the progress report is submitted are considered at an upcoming meeting.

Sincerely,

George Leal

Dean, Irvine University College of Law

cc: Dean Emeritus Edward Trent



IRVINE
UNIVERSITY
COLLEGE OF LAW

April 11, 2019

Via Email and U.S.P.S.

Natalie Leonard, Esq.
Principal Program Analyst
The State Bar of California, Office of Admissions
180 Howard Street, 9th Floor
San Francisco, California 94105

Re: Progress Report on Mandatory/ Suggested Recommendations re Periodic Inspection

Dear Ms. Leonard:

On behalf of the law school, and in response to the action taken by the Committee of Bar Examiners (CBE) at its meeting on December 7, 2018, I am pleased to forward the following progress report regarding its efforts to address each of "the mandatory and suggested actions" found in the Committee's Periodic Inspection Report. As required, this report is being submitted within 120 days of your letter of December 18, 2018 confirming the Committee's action.

To assist your review of this report, each of the amended policies and procedures discussed below numerically track the recommendations as were listed in your Committee agenda memorandum of November 29, and as each was later adopted by the Committee. The narrative below discusses each such recommendation and all efforts taken by the law school to date to correct, revise and adopt each policy and procedure found to be technically noncompliant.

As noted below, both the ownership of the law school and I appreciate the opportunity to make all such necessary changes as we continue to work to improve our program of legal education.

Status of Recommended Mandatory Actions:

1. Guideline 1.9: Revised policy and procedures to request ADA accommodations:

The following revised policy regarding the Americans with Disabilities Act will be published in the 2019-2020 Irvine University College of Law (IUCOL) Student Catalog:

ADA – The Americans with Disabilities Act (ADA):

The ADA requires that the law school to provide, upon a properly documented request, reasonable classroom and testing accommodations for any student with a physical, medical or

learning disability. To comply with this law, the law school has adopted the following policy and will employ the following procedures for a student who makes a request for an accommodation.

PROCEDURES TO REQUEST ACCOMODATIONS UNDER THE ADA

- A. An enrolled student seeking an accommodation of any kind due to a covered disability must submit a written request confirming the nature of their disability, as supported by sufficient documentation from an appropriate medical professional, to the Student Services department. Each such request will then be submitted to the Dean for a review leading to either acceptance or rejection of the accommodation being requested.
 - B. Consistent with the requirements of ADA, the law school will provide reasonable accommodations to each students with a properly documented permanent or temporary disability which substantially limits their life activities, including their legal education. The law school may also, when deemed appropriate by the Dean, provide a student with an accommodation for a condition that may not be among those legally recognized by the ADA as a "disability," such as pregnancy.
 - C. The Dean has full and final discretion whether to grant or reject any requested classroom or testing accommodation. For those requests which are granted, a student may be given, either individually or in combination, any of the following accommodations:
 - 1: An extension of the amount of time provided to take examinations;
 - 2: Being permitted to take an examination in a private or semi-private room;
 - 3: The use of a typist, reader or technology to assist in reading and/or writing;
 - 4: Appropriate access and seating in classrooms and/or during examinations.
 - D. Should any accommodation approved by the Dean is deemed by the student to be inadequate, a student may request additional consideration of their request and the Dean may then request additional documentation in support from the student's medical professional.
 - E. A copy of these procedures will be given to each student who seeks an accommodation during the law school application process prior to commencement of classes in the first semester of legal studies.
2. Guideline 2.3(D)(4): Published disclosures required by this Guideline:

The law school is currently not accredited nor approved by any entity or agency and it makes no such claim in any of its materials, written or electronic. As required, the law school does state that its degree-granting authority and its students' ability to qualify to take the California Bar Examination and obtain admission to the practice of law in California is based on its registration as an unaccredited law school with the Committee of Bar Examiners.

3. Guideline 2.3(D) (2): Revised Information Report to provide accurate LSAT scores:

The law school does not require applicants to take and report a score on the LSAT to be admitted. As a result, there is insufficient data to calculate and report such data accurately. Moreover, as provided by the Information Form at paragraph 1(e), no such data is required.

4. Guideline 2.8: Revised student discipline policy:

Pursuant to the requirements of Guideline 2.8, the following policy governing student discipline will be published by law school in its 2019-2020 Catalog:

STUDENT CONDUCT AND DISCIPLINE

All students enrolled in IUCOL are preparing to become ethical and competent attorneys. The law school seeks to maintain an educational environment conducive to learning. Accordingly, all students are expected to behave while on campus in an ethical and professional manner and to treat the entire law school community, fellow students, faculty and administrators with mutual dignity and respect through appropriate conduct.

To achieve these goals, and as an express condition of their continuing enrollment, all students agree to abide by the following policy: The law school does not tolerate, and a student will be subject to discipline, for engaging in any of the following behaviors: cheating or engaging in any form of academic dishonesty including plagiarism or the use of any unauthorized legal resource (hard copy or electronic), lying or any false representation (including in any materials submitted to gain admission) as to the authenticity of any work product or examination answer; engaging in indecent, vulgar, belligerent, threatening or disrespectful behavior; attending class under the influence of drugs (prescribed, legal or illegal) or alcohol; the use of profane or obscene language; the theft or defacement of any law school property; any act of vandalism; engaging in any action or the use of language that may be reasonably construed as any form of unlawful harassment or discrimination, or the unauthorized use of the law school's property, computers or online academic resources.

Any student found to have engaged in any of the above-described acts or express prohibitions shall be subject to the following non-academic discipline:

1. A verbal or written reprimand that may be placed in the student's file;
2. Cancellation of an examination answer(s), assignment, course grade or credit;
3. Suspension from class enrollment or, where deemed appropriate, expulsion.
4. Being reported, at the Dean's discretion, to the Committee of Bar Examiner for the purpose of its determination of the student's moral character to practice law.

In the event there is a good faith factual basis to believe that a student may be subject to any type of discipline as described above, the following procedures shall apply to determine whether any such discipline will be imposed: a) A student will receive written notice, signed by the Dean, that provides a fair and sufficiently detailed description of the

act or behavior that exposes them to potential discipline; b) a student will have an opportunity to meet with the Dean to discuss any claim made against them in a good faith and mutual effort to resolve the matter confidentially, including the voluntary imposition of appropriate discipline; c) should no such meeting take place, or if one is held and no agreement is made, a student will be given the opportunity to have a hearing before a panel of two disinterested faculty members or administrators and at least one current student chosen by the Dean to render a final decision; d) at their own expense, a student will have the right to legal counsel and will be able to call and examine witnesses; e) after a hearing, a student will receive a written determination of any discipline imposed, including a statement of the facts and conclusions supporting, such discipline.

5. Guidelines 2.9 (A), 2.9(B): Revised standards re academic good standing and probation:

Pursuant to each of the above-cited Guidelines, the following policy governing academic good standing and probation will be published by the law school in its 2019-2020 Catalog:

ACADEMIC GOOD STANDING AND PROBATION

The law school's faculty is instructed to grade all students in a rigorous, objective and fair manner to ensure that all who receive a passing grade in each class they complete possess adequate understanding of the subject matter being taught. The law school seeks to apply academic standards that prepare students to pass the California Bar Examination.

To achieve that goal, students must be required to be in good academic good standing to graduate. To achieve academic good standing, a student must maintain a cumulative grade point average (CGPA) of 2.0 on a 4.0 scale. Any student who, after completing any semester of classes, has a CGPA below 2.0 will automatically be placed on academic probation for the following semester. A student placed on academic probation must then attain a CGPA of 2.0 by the end of the following semester to be removed from academic probation. If they fail to attain a CGPA of good standing at the end of a second semester of probation, they will be dismissed unless they earn a CGPA of at least 1.8. In that event, they will be permitted to enroll in one additional semester to attain good standing. If, however, at the end of that third semester in which they have been placed on academic probation a student does not have a CGPA of 2.0 for all classes completed, they will be academically disqualified and dismissed from the law school.

Students who are academically disqualified after completing IUCOL's entire First Year curriculum will be eligible to take the First Year Law Students' Examination (FYLSX) only if they have earned a passing grade of at least a D in each class taken and, in doing so, have earned sufficient academic credit to be found qualified to take the FYLSX. After being academically dismissed, a student may be eligible to re-enroll, and be granted all credit to which they are entitled, only if and when they pass the FYLSX.

6. Guideline 2.9 (D): New policy to confirm the authenticity of student work product.

Pursuant to the above-cited Guideline, the following policy governing academic integrity and student work product will be published by the law school in its 2019-2020 Catalog:

ACADEMIC INTEGRITY AND STUDENT WORK PRODUCT AUTHENTICITY

To ensure the academic integrity of its program of legal education, the law school has adopted and enforces a policy designed to ensure that students are graded and evaluated solely upon their own academic and intellectual effort and abilities. To achieve that goal, students are required to answer all examination questions and to prepare and submit all out-of-class written work assignments ("homework") without the assistance of any other person or the use of any unauthorized academic resource, written or electronic.

In submitting any examination answer with their own identification number, or in submitting any written work product with their name, a student warrants that the each such answer and *all* such work product is solely their own and was prepared and submitted in accordance with this policy. To enforce this policy, the law school may question the authenticity of any examination answer or written work assignment submitted by any student if objective good cause exists to believe it is not authentic.

Any student found to have violated this policy through the use of any means including, but not limited to cheating, plagiarism, use of any unauthorized resource or assistance or the use of a false identity shall be subject to non-academic discipline including receiving a failing grade, the loss or credit in the class in which such conduct took place or, upon sufficient evidence, dismissal and disqualification from the law school.

7. Guidelines 2.9(G), 2.9(H): Revised policy regarding requests for the review of grades.

Pursuant to each of the above-cited Guidelines, the following policy governing procedures relating to grade appeals will be published in the law school in its 2019-2020 Catalog:

GRADE REVIEW COMMITTEE AND PROCEDURES

It is the policy of the law school to ensure that its faculty grade all students in a fair and objective manner. To achieve and maintain such fairness, whenever a student has a good faith belief that an examination score or course grade they received was due to subjective unfairness, a grading error or was not consistent with the grading information provided in a course syllabus or the law school's published grading scale, they may appeal any such grade in accordance with the following procedures:

- a) The student must first submit to the Dean a written narrative statement to explain why they believe the grade they received was due to any subjective unfairness or error, or was inconsistent with the grading information provided in their course syllabus. The narrative statement must identify the class and grade in issue and must discuss all credible and objective evidence in support of their claim. The Dean will review the

statement and, at the student's discretion, will schedule a meeting with the student and the Professor who issued the grade being appealed. The purpose of such a meeting is to offer the student an opportunity to discuss with their Professor the basis on which the grade was issued and, following said discussion, decide to whether to pursue their appeal.

- b) Following any such meeting, or if no meeting is requested or held, the Dean will convene a meeting of the law school's Grade Review Committee to review, consider and determine whether the grade appeal has merit and whether the grade in issue should be raised, lowered or maintained as the grade issued by the Professor. The Grade Review Committee shall be comprised of two faculty members appointed by the Dean. The Committee will consider the appeal based solely upon the student's narrative statement and any written response or narrative provided by the Professor who issued the grade. There is no right to a hearing and the Committee's decision is non-appealable and final.

8. Guidelines 4.9, 4.9: Revised policy regarding faculty evaluations.

Pursuant to each of the above-cited Guidelines, the following policy governing faculty evaluations will be published by the law school in its 2019-2020 Catalog:

EVALUATION OF PROFESSORS

To verify the academic effectiveness of their classroom teaching, each member of the faculty is evaluated on a regular basis according with the following schedule: All new Professors during their first year of teaching; all other Professors, once every two years.

All such evaluations will be conducted by the Dean or, at his or her discretion, by current or former members of the faculty, a Dean or a current member of the faculty of another law school or a licensed attorney with experience teaching law. Each evaluation will include no less than one classroom visit and a review of the Professor's syllabus and examinations. A Professor will also be subject to student evaluations at the conclusion of each class they teach.

In the evaluation of each Professor's teaching acumen and effectiveness, the following factors will be considered: their knowledge of and professional expertise in the subject matter they are teaching; their ability to convey the subject matter being taught; their ability to create and maintain engagement with their students; their use of technology and online academic resources to teach the subject matter; and the quality, content and academic rigor of their examinations.

Following each such evaluation, the evaluator will prepare a written summary of their impressions, findings and suggestions of the Professor's teaching abilities; said summary will be reviewed by the Dean and then given to the Professor for their review and response, if any, to the evaluator's findings and suggestions. A meeting between the Professor and the Dean to discuss the evaluation is optional, while the evaluation will be placed in the Professor's personnel file.

9. Guideline 5 (A)(!): Revised classroom attendance policy and procedures.

Pursuant to the above-cited Guideline, the following policy governing minimum classroom attendance and record keeping will be published by the law school in its 2019-2020 Catalog:

CLASSROOM ATTENDANCE AND CLASS SCHEDULING

To earn a *Juris Doctor* Degree, in addition to other academic requirements, a student must complete a curriculum of study of no less than 270 hours of classroom attendance a year for at least four years, with a year defined as any consecutive 12 month period. To meet this requirement and earn credit for each class in which they enroll, a student must maintain regular and punctual attendance of no less than 80% of all scheduled classroom hours, and they must attend class sufficiently prepared to learn such that, at a Professor's discretion, they may be marked absent due to their objective lack of class preparation.

Under this policy, any student who misses more than three classes during a 15-week semester, two classes during a 10-week semester or one class in a five-week course, is subject to automatic withdrawal and will not be granted credit for any such course.

Classroom attendance is recorded for each class session and the attendance records of all class sessions is submitted to and maintained by the office of the law school's Registrar.

A class session will be cancelled only in the event of an excused absence by a Professor. When a class is cancelled, it will be rescheduled as soon thereafter as is possible.

10. Guideline 5.24: Revised course repetition policy.

Pursuant to the above-cited Guideline, the following policy governing course repetition will be published by the law school in its 2019-2020 Catalog:

COURSE REPITION AND ITS EFFECT ON GRADE POINT AVERAGES

The law school will not grant duplicate academic credit if a student completes a course, or a substantially similar course, more than once. Students who eam a failing grade in any required course must repeat and complete the course and earn a passing grade before credit for the course taken a second time is granted; their passing grade will be used to compute their grade point average and in determining their status as to academic good standing. A student who fails any required course a second time is subject to academic disqualification regardless of their overall academic standing.

A student who withdraws from an elective course prior to the final examination will not receive any credit and a "W" will appear on their transcripts. A student may re-enroll in the class and, if a passing grade is earned, will receive credit for the class.

11. Guideline 5.31: Amended application regarding prior standing at another law school.

The law school's application (hard copy and electronic) has been amended, as required by Guideline 5.31, and now requires all applicants to list the name and location of any other law school they previously attended, the dates of their attendance and to answer the question: "Did you leave the Law School in Good Standing?" If they answer in the negative, the applicant is required to provide the details of why they did not leave their prior law school in good standing.

As such, the IUCOL application form is now fully compliant with Guideline 5.31.

12. Guideline 5.35: Policy regarding the award of transfer credit earned at another law school.

Pursuant to each of the above-cited Guideline, the following new policy governing the award of transfer credit earned by students at another law school will be published in the law school's 2019-2020 Catalog:

THE AWARD OF TRANSFER CREDIT FROM ANOTHER LAW SCHOOL

The law school may award transfer credit to a student who is admitted to and enrolled at IUCOL who earned credit at another law school pursuant to these requirements:

A. For a student who completed their first year of law study and were advanced to their second year at a law school accredited by the Committee of Bar Examiners or approved by the American Bar Association, full credit will be given for all whole courses completed where a passing grade was earned. For students who did not advance into their second year, no credit for any classes completed will be granted, even if a passing grade was earned, unless the student passes the First Year Law Students' Examination.

B. For students who attended and completed their first year of study, or completed any class in the second or third year of study at any law school registered by the Committee of Bar Examiners, no credit for any such study will be granted, even if a passing grade was earned in any individual class, unless and until the student passes the First Year Law Students' Examination. If that event, transfer credit may be granted for only those classes completed in the students' first year of study at their prior law school.

C. Under the restrictions above, transfer credit may be granted only for whole courses completed not more than twenty-seven (27) months prior to the date the student begins study at IUCOL, except such credit will be given, whenever earned, to a student who has passed the First Year Law Students Examination. Upon the sole discretion of the Dean, where a student has evidence that due to an illness or their military service the credit they earned at another law school was granted more than 27 months prior to their admission to IUCOL, transfer credit may be granted. If granted, the Dean shall provide a written explanation of the basis for such credit to be granted and said explanation shall be placed in the student's file. All transfer credit granted under this section is discretionary.

- D. For students who were academically disqualified from their prior law school, transfer credit may be granted for only those courses that the student completed with a grade above passing, i.e. a letter grade of "C" or its numerical equivalent. For students who are admitted to IUCOL after passing the FYLSX, credit for Torts, Contracts or Criminal Law may be granted even if they did not receive a passing grade in each.
- E. Transfer credit will be granted for any course to which a student is entitled to such credit only as to the same number of units of credit as the course is offered at IUCOL.

Status of Recommended Suggested Actions:

1. Guideline 4.7: Duty of faculty members to improve their teaching skills:

At a meeting of the current faculty held on March 30¹ h, a discussion took place during which this requirement was discussed so individual members are all aware of their responsibility to improve their teaching skills and keep current with their respective professional expertise. All members of the faculty are licensed attorneys who are actively engaged in the practice of law and, as such, each completes all necessary continuing legal education. Within the next six months, the law school plans on holding a weekend workshop for all current faculty to help all develop more effective teaching skills.

2. Guidelines 5.17 and 5.25: Duty to monitor grading practices:

At the same faculty meeting, an extensive discussion was held relating to the law school's current grading scale used and the range of grades issued in all classes taught over the past academic year. This discussion included a review of the grades the law school reported in its 2018 Annual Compliance Report which confirmed that the current grading curve was too high and needed to be adjusted to better reflect our students' collective ability to pass the First Year Law Students' Examination.

Based upon this discussion, the faculty is now committed to grade in a manner that results in fewer grades above Band to issue more grades of B- through C than previously given.

3. Guidelines 5.14, 5.16 and 5.17: An evaluation of IUCOL's academic standards.

As recommended, the law school has started a comprehensive review of its grading and examination policies and its academic standards in an effort to assess more effectively how such policies and standards may be strengthen in order to provide both a better assessment of our students' abilities and to prepare them to have a better chance of passing both the First Year Law Students Examination and the California Bar Examination in the hope that the passage rates for both examinations improve steadily.

This review is expected to take several months and will culminate with a fully revised Student Catalog in which it is anticipated new academic standards, including a new grading scale, will be adopted. In the meantime, the faculty has been requested to incorporate newly-acquired online academic resources (CALI) to both enhance their class

curricula and as a tool to help their students to review for final examinations so that their final examinations are more rigorous.

4. Guideline 5.26: Use of an LSAT score in IUCOL admissions policy:

As noted above, IUCOL does not currently require that an applicant take and report a score on the LSAT in order to be admitted. All law school materials that do not accurately reflect this admission policy will be revised accordingly.

Based upon the narrative and description of each new policy and procedure to be adopted with the issuance of IUCOL's 2019-2020 Catalog (which will be published by start of the upcoming summer semester on May 11th), I hope that the Committee finds that IUCOL has taken, and will continue to take, all necessary efforts to correct each issue of technical non-compliance found and discussed in the Periodic Inspection Report prepared by Committee consultant Heather Georgakis. If you or the Committee have any questions or comments about any of the policies and procedures to be adopted, please let me know if any additional information is needed.

Finally, given the fair, objective and very comprehensive nature of Ms. Georgakis' inspection report, resulting in each of its mandatory and suggested recommendations, I again wish to thank the Committee, its staff and Ms. Georgakis for giving me, as the relatively new Dean of the law school, the best possible means to help me improve and strengthen our program of legal education with the goal of providing our students an ever more meaningful opportunity to become licensed California attorneys. A very worthy goal I know we collectively share.

Sincerely,

George Leal

Dean, Irvine University College of

Law

cc: Dean Emeritus Edward Trent