



The State Bar *of California*

OPEN SESSION AGENDA ITEM JANUARY 2020 COMMITTEE OF BAR EXAMINERS ITEM O-403

DATE: January 31, 2020

TO: Members, Committee of Bar Examiners

FROM: Natalie Leonard, Principal Program Analyst

SUBJECT: Action on Notice of Intent to Terminate Accreditation Pursuant to Rule 4.171(D) – Pacific Coast University

BACKGROUND

It is recommended that the Committee of Bar Examiners (Committee) issue a notice of intent to terminate the accreditation of Pacific Coast University School of Law (PCUSOL) for noncompliance with Rule 4.160(N). This rule requires that all accredited law schools maintain a Minimum, Cumulative [Five-Year] Bar Passage Rate of at least forty percent, when calculated according to the formula described in Guideline 12.1. The school has not been in compliance with this Rule since schools first reported its Minimum, Cumulative Bar Passage Rate (MPR) in 2015, despite implementing a range of strategies to improve it. The school's MPR is unlikely to rise in 2020 based on the leading indicator of its pass rate on the July 2019 California Bar Examination (CBX) of five out of sixty-three students, or about eight percent on the July 2019.

When a school is issued a Notice of Noncompliance, the Committee follows the process set forth in Rule 4.170 et. seq. that is designed to allow the Committee to determine whether the noncompliance has been cured, merits probation while the school progresses toward a cure, or warrants termination of accreditation.

The Noncompliance process consists of four steps. First, the Committee issues a Notice of Noncompliance stating the reasons for the noncompliance. (Rule 4.170(A)) Second, the school must file a response "demonstrating that it . . . is in compliance with these rules." (Rule 4.170 (B)(1)) Third, if the response is unsatisfactory in demonstrating that the school is in compliance with the Rules, "the Committee must schedule an inspection . . . within sixty days of its consideration of the matter." (Rule 4.170(B)(2)) Fourth, "[a]fter considering the [Inspection] Report, the Committee will provide the provisionally accredited law school or accredited law school with a written notice" that either advises the school that "the accredited law school is in

compliance with these rules,” or that it “is not in compliance with these rules for specific reasons that warrant probation or termination of accreditation” (Rules 4.171(B), 4.171(D)) If the Committee finds continued noncompliance, it should choose termination in most cases. Probation is only appropriate “[i]f the Committee decides that an accredited law school or any approved branch or satellite campus has not complied with these rules, but has made progress toward compliance.” (Rule 4.172(B)) If the Committee decides that termination of accreditation is appropriate, then after the January 31 meeting, a notice of intent to terminate accreditation will be transmitted to the school.

The Committee executed the first step of the process by issuing Notices of Noncompliance and Continued Noncompliance in 2015 (28.2 percent MPR), 2018 (26.4 percent MPR), and 2019 (26.6 percent MPR). Internal State Bar calculations confirmed that the school’s MPR was below the forty percent requirement in 2016 and 2017 as well.

The school filed response plans after each reporting period noted above, but the school’s MPR remains well below the minimum required forty percent value. The school’s most recent response is attached. (Attachment A)

Therefore, because the school could not establish that it was in Compliance, the Committee proceeded to the next step of the process and ordered a telephonic inspection.

The State Bar conducted that telephonic inspection on October 22, 2019. (Attachment B) A three-member Inspection Team composed of Committee Member and Chair of the Operations and Management Subcommittee Alex Chan, and staff members Natalie Leonard and Ron Pi, conducted the inspection, while Educational Standards Subcommittee Chair Alex Lawrence was present as an observer. On behalf of the school, Dean Andrea Lua and Registrar Maren Carmona attended.

DISCUSSION

Termination of accreditation is the appropriate remedy for noncompliance unless “the Committee decides that an accredited law school . . . has not complied with these rules, but has made progress toward compliance,” in which case, “the Committee may place the law school on probation for a specified time.” (Rule 4.172 (B))

The school has been steadily increasing the preparatory materials available to students and alumni since Dean Lua’s arrival in 2015. The school’s program includes more feedback and practice throughout the J.D. program, additional academic support, and creative solutions, such as grants for time off and childcare to study for the CBX. The school is launching a new initiative in 2020 with ExamSoft that it believes will allow the school to provide more targeted feedback more frequently.

With that said, however, PCUSOL is due to report its next MPR calculation on July 1, 2020. The 2020 MPR will delete the oldest two Bar results from the 2019 calculation and add the results of the July 2019 CBX and the February 2020 CBX. Because only five of the sixty-three PCUSOL

graduates who took the July 2019 CBX passed, the school's 2020 MPR is unlikely to rise next year.

Though the efforts taken are substantial, the school has not shown material improvement in the MPR value that would warrant probation. Therefore, it is recommended that the Committee issue a notice to the school indicating that it intends to terminate the school's accreditation for failure to comply with Rule 4.160(N) and Guideline 12.1.

If the Committee agrees, the next step would be to provide the school with a notice of its intent to terminate accreditation. The school would have fifteen days from the date of issuance of the Notice to request a hearing at which it would have the burden of establishing that its MPR is compliant or rising at a rate sufficient to warrant probation. In the alternative, if the school wishes to continue to operate in California, it may apply for registration as an unaccredited law school using the standard process and making the changes necessary to comply with the Unaccredited Law School Rules and accompanying Guidelines. Should the school elect to apply for registration as an unaccredited law school, it is hoped that the school will continue its efforts to measure and improve students' preparation to become licensed attorneys in California.

RECOMMENDATION

It is recommended that the Committee issue a Notice of Intent to terminate the accreditation of Pacific Coast University School of Law and advise the school of its intended action.

PROPOSED MOTION

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

Move that the school's most recent response to its continuing Notice of Noncompliance, as well as the inspection report summarizing the telephonic inspection with the school on October 22, 2019 be received and filed; that the Committee find the school to be in a continued state of noncompliance warranting termination of accreditation; and that Pacific Coast University School of Law receive a Notice of the Committee's Intent to Terminate its Accreditation based on the school's noncompliance with Rule 4.160(N) and Guideline 12.1.



PACIFIC COAST UNIVERSITY, SCHOOL OF LAW

"SCHOOL OF THE PEOPLE"

Andrea L. Lua, Dean

October 9, 2019

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

Attention: Natalie Leonard, Principal Program Analyst

RE: Telephonic Inspection on October 22, 2019 1:00 p.m.-2:00 p.m. Regarding Notice of Noncompliance Minimum, Cumulative Bar Passage Rate

Dear Esteemed Committee Members:

The initial response to the Notice of Noncompliance Minimum, Cumulative Bar Passage Rate (MPR) outlined in detail all of the administrative, programmatic, community, and outreach efforts Pacific Coast University, School of Law (PCU) had employed up to October 13, 2018 to remedy this situation. Following the response, the school has implemented new programs to further assist current students with attaining the skills necessary to elevate the MPR moving forward to be in compliance. In response to the request for evidence based solutions and a timeline to reach compliance with the MPR, I have endeavored to provide additional data to support the results of the programs already in place so that their effectiveness toward attaining the mandated MPR can be examined during the telephonic inspection. I thank you in advance for allowing PCU to present a supplement to the response as I believe it is evidence of our success in moving toward compliance.

New Programs

PCU employs Examplify, the electronic exam administration program which Examsoft provides to the State Bar of California for the General Bar Examination. Immediately following submission of the MPR non-compliance response in October 2018, the Dean of Students, Maren Carmona and Assistant Registrar/IT Administrator Teresa Berry, attended a three day seminar provided by Examsoft to reveal the other aspects of Examplify which PCU and other law schools, including ABA law schools, which would enable the schools to obtain more meaningful data from exams. Further, the newly available enhanced product is suited to both formative and summative assessments which enable students and professors to target concepts which need greater attention for students to grasp. Following Board approval, PCU acquired the augmented Examplify suite and began implementation to elevate the educational program PCU provides.

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Examplify is a web based platform which allows for administration and professors to create exams, attach rubrics to each individual exam for grading, make available those rubrics with the exams for calibration, provide clear data across any given cohort in relation to concepts well understood and in relation to those poorly understood across the cohort. In creating the exams and rubrics within the system, a greater understanding and appreciation for the summative aspects of exams is possible. In addition, professors have been included in the process of tagging the concepts which the MBE's administered with their exams to discern the quality and fairness of questions. Further, the data gleaned from the tagged MBE's provides students and professors with the areas which need further study for individual students and entire cohorts. The fusion of these capabilities within a single platform, which is continuing to be developed, has provided PCU professors and students to laser in on successes and deficiencies. In addition, the use of a web based platform has greatly increased the turn-around time for exam grading and calibration. This in turn allows students and professors to address problematic concepts closer in time to the exam, and thus correct any deficiencies closer in time as well.

The augmented version of Examplify was employed in a limited scope with Midterms and Finals administered at the conclusion of Winter Quarter. As anticipated, there were a few problems with student and professor use of the new aspects of Examplify. However, the clarity of exam to rubric grading is powerful for both students and professors. Viewing side-by-side of exam and rubric seems to have revealed most clearly to students the errors or omissions within their exams.

Professors across cohorts teaching different subjects are also able to view exams through Examplify. This is particularly powerful for professors teaching 1L and 1L Lab. The formation of a solid understanding and use of the IRAC method is cemented in the 1L. Individual student problems across courses or in individual subjects allows professors of substantive courses to co-ordinate with each other and with either the 1L Lab professors or the Academic Support professors.

In summation of the potential of Examplify, the ability to retrieve and to use meaningful data to improve our students and our professors is powerful. At this juncture, there is no ability to extract any data to the point of it providing an evidence-based solution that is proven because none of these students are Bar candidates, yet. However, that capability will be available within the year. This program is also within the educational mandates which will track educational strategies and outcomes which the ABA will be requiring of ABA accredited institutions.

Outcomes of Retroactive Actions for Graduates within the MPR Sample

The transition from the three-day Bar Exam to the two-day Bar Exam factored heavily into the choice to allocate a portion of PCU reserves to provide the maximum effect on the MPR. The last remaining cohort of students admitted to PCU while the FYSLX was required, August 2013

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graduates, were not part of this outreach effort. Further, all of the remaining four Bar Candidates from this cohort ceased taking the Bar Exam in July 2016.

Immediately following the Site Visit of April 2016, the MBE Bootcamp was created and offered initially to those Bar Candidates within the group of students who attended PCU following receipt of full CBE accreditation in 2010. In addition, those initially invited were pre-screened to have the recognized 2.75 or higher cumulative GPA which the Self-Study for the site visit uncovered as revelatory of Bar passage. This group included May 2014, August 2014, May 2015, and August 2015 graduates (Attachment A). For purposes of full evaluation for an entire MPR reporting period, the data has been updated to include Bar results for the July 2018 and February 2019 Bar Exam. Each graduating class will be handled individually, because the PCU curriculum is pre-set for all four years, and each academic and calendar year contains two distinct classes, Track I (May graduates) and Track II (August graduates).

There are 25 graduate takers within the May 2014 cohort. Nine of these 25 takers have passed the Bar Exam amounting to a 36% passage rate for this cohort. One more passer would make the class as a whole compliant with the MPR. Three of the remaining takers took the Bar only twice, of which two no longer reside in California. Further, these two have not taken the Bar since February 2015. According to recent Bar studies the only common factor among Bar passers is cumulative GPA. Of these two, one had a cumulative GPA of 2.94, the other had a 2.72. The PCU indicator of passage is a 2.75 which is predictive of passage within 3 attempts. It is reasonable to assume that at least one, if not both of these candidates could have made this cohort compliant.

Of the nine takers from the August 2014 cohort, four have passed the Bar exam, which translates to a 44% passage rate. Of the remaining five takers, two took the Bar exam only one time, with one of these falling within the PCU passage within 3 tries GPA with a 2.75. An additional taker, only took the Bar twice. None of these three have attempted the Bar since July 2015.

The most problematic years of graduates within the five-year period for measurement of the MPR are the classes of June 2015, August 2015, May 2016 and August 2016. The statistics for passing the Bar for these groups respectively are 24% with 9 of 38 takers passing; 33% with 2 of 6 takers passing; 6% with 1 of 18 takers passing; and 26.3% with 5 of 19 takers. These are graduates which we are saddled with that are from the prior Dean's period of stewardship immediately following full accreditation. To assist these graduates, we have performed many actions to assist their passage of the Bar Exam. PCU provided and offered a free multi-state Boot Camp prior to the July 2016, February 2017, and July 2018 which ran from 8 to 12 weeks. The professors that created this program remained available 24 hours during the Boot Camp for those participating. PCU negotiated an institutionally discounted price for alumni with Barbri as part of our contract for current students. We have conducted many outreach events with recent

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Bar Passers speaking on their tactics which proved successful. Every strategy which could remediate these pass rates has been employed.

It is important to note that within the May 2015 class group of 38 takers, ten have attempted the Bar Exam two or fewer times. Nine of these takers have not attempted the Exam after July 2016. Of the ten, there are three that have only attempted the Exam one time. Of the August 2015 total of six takers, one has attempted once, one has attempted twice. The graduate that attempted twice is fully-employed, but gave birth to an autistic child her fourth year of law school, whose needs have pre-empted her from taking the exam since July 2016. The most problematic group is the graduating class of May 2016. Seven of the eighteen takers within this group have attempted two or fewer times. As they have five more attempts within their cohort, we will continue to develop strategies to assist them in passing on future attempts. However, these students began law school at the depths of the Great Recession, anticipated changing careers, but elected to remain within their occupations as the economy improved. At this point, a Juris Doctor degree is an asset, but taking the Bar and entering the legal profession is no longer on their first priority. Attempts to induce them to take the Bar another time have been not very successful.

At this point, attention should be focused on graduates who graduated following many of the changes outlined above. Graduates within the May 2017 class have a five out of thirteen takers passing for a 38.5% passage rate. The remaining takers within this cohort have six more attempts within their ten reported attempts to pass. The August 2017 graduates have had three attempts to take the Bar. Within that time frame four of eleven takers have passed for a 36.3% passage rate. Of the seven remaining of the eleven takers, three of the eleven have taken the exam only once. Graduates of the May 2018 class have a three of twelve takers evidencing a 25% pass rate in two full attempts. Within the August 2018 graduating class, with only one attempt, two of seven takers have passed for a 29% passage rate. Although these results are not determinative, there is evidence here that within the officially recognized time each of these three graduating classes should meet or exceed the 40% MPR, transforming the overall reported MPR as the cohort shifts to include only classes graduating post 2016 Site Visit changes.

The significant changes following the site visit appear to be bearing fruit in the passage rates for May 2017, August 2017, and May . These groups have benefitted from the raising of passage for a course from 60 to 70; development and imposition of Academic Support Lab for those in the 70 to 73 zone in any course with close monitoring; access to Barbri and instruction on how to maximize the tools it provides; change in the Advanced Legal Reasoning course during the 4L to consist of one quarter of writing development and one quarter of intense instruction on MBE analysis taught by the creator of the MBE Boot Camp. Beginning with the classes of 2018, PCU implemented an MBE skills demonstration for credit in this course.

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PCU is not solely reliant upon Barbri, however the access and ability to monitor students use and performance is key to changing the current and future trends. Employing use of their materials by professors is producing data which we can use to improve our program. The ability to monitor students attainment of the quantitative accomplishment during their Bar Review time allows for frank and honest discussions with the Dean and students regarding their projected success or failure. We are striving to help Bar candidates realistically assess their preparation. Barbri data indicates that completers of 70% of their program is statistically related to Bar passage.

The most recent data available from the Bar studies which revealed the three friction points which are linked to not passing the Bar Exam: taking the Exam more than once, dependent care responsibilities, and lack of time to devote solely to study are encompassed within the efforts outlined above and those to be tackled moving forward. With those in the position of first time taker, we are aggressively informing students of their likelihood of passage coupled with resources and counselling to develop long-term study plans (included within this group is the use of Barbri's early bird/long-term review program) to defeat this friction point. The other two are friction points particularly related to the demographic of PCU students. PCU has made its students and graduates aware of these friction points. At present, we are seeking a grant to implement a pilot program to provide promising candidates with stipends to overcome the other friction points during Bar Review.

Although the above is not an exhaustive exploration of the ongoing efforts PCU is expending to improve its program and most importantly compliance with the MPR. Recognition of the reasons which defeat students has helped define the problems to target. Recovery and use of data to assess our successes and opportunities is an ongoing process. Our aim is to replicate the current pass rate for the May 2017 class of five passers of thirteen takers or 38.5% within four potential attempts. The following graduating class of August 2017 seems to be on the same trajectory with three of eleven passers for a 27.2% pass rate with three attempts. In depth analysis as offered above has provided targets and strategies to employ. However, with eight separate cohorts across a five year period encompasses different challenges. PCU remains committed to changing and to improving regardless of the MPR. Our mission requires that we provide an affordable, quality legal education. We continue to pursue this above all things.

Sincerely,

Andrea L. Lua
Dean

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June '14 Graduates

#	Jul-14	Feb-15	Jul-15	Feb-16	Jul- '16	Feb- '17	Jul-17	Feb-18	Jul-18	Feb-19
1	1	1	1	1	1	1	1	0	0	0
2	1	0	1	0	0	1	0	1	0	1
3	1	1	1	0	0	0	0	0	0	0
4	0	0	0	0	0	0	0	0	0	0
5	0	1	1	1	1	0	1	1	P	n/a
6	1	1	1	0	0	0	0	0	1	0
7	0	0	0	0	0	0	0	0	0	0
8	0	0	1	0	0	1	1	0	0	0
9	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
10	1	0	1	1	1	P	n/a	n/a	n/a	n/a
11	1	1	1	0	1	1	1	1	1	1
12	0	0	0	0	0	0	0	0	0	0
13	1	1	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
14	1	0	1	0	1	0	1	0	0	0
15	1	1	1	0	1	1	1	1	1	P
16	1	1	0	0	0	0	0	0	0	0
17	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
18	0	0	0	0	0	0	0	0	0	0
19	1	1	1	1	0	1	P	n/a	n/a	n/a
20	1	1	1	1	0	1	1	1	1	1
21	0	1	1	1	1	0	1	1	1	0
22	1	0	1	0	0	0	1	0	0	0
23	1	1	0	0	0	0	0	0	0	0
24	0	0	0	0	0	0	0	0	0	0
25	1	1	1	1	1	1	1	1	1	1
26	1	1	1	1	P	n/a	n/a	n/a	n/a	n/a
27	1	1	1	1	1	1	P	n/a	n/a	n/a
28	0	1	0	0	0	0	1	0	0	0
29	0	0	1	0	0	0	1	0	1	0
30	0	0	0	1	0	1	1	1	0	0

Passers 9
 Takers 25
 Pass Rate 36%
 One More Passer = 40%

August '14 Graduates

#	Feb-15	Jul-15	Feb-16	Jul- '16	Feb- '17	Jul-17	Feb-18	Jul-18	Feb-19	Jul-19
1	1	0	0	0	0	0	0	0	0	
2	1	0	0	1	0	0	1	0	0	
3	1	1	0	1	1	0	1	0	P	n/a
4	0	0	0	1	0	P	n/a	n/a	n/a	n/a
5	1	1	1	1	P	n/a	n/a	n/a	n/a	n/a
6	1	1	0	0	0	0	0	0	0	
7	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
8	0	0	0	0	0	0	0	0	0	
9	1	0	0	0	0	0	0	0	0	
10	1	1	0	1	0	1	0	0	0	
11	0	0	0	0	0	0	0	0	0	
12	0	0	0	0	0	0	0	0	0	

Passers 4
 Takers 9
 Pass Rate 44%

June '15 Graduates

#	Jul-15	Feb-16	Jul-16	Feb-17	Jul-17	Feb-18	Jul-18	Feb-19	Jul-19	Feb-20
1	1	1	1	1	0	1	0	0		
2	1	0	1	1	0	1	0	1		
3	0	0	0	0	0	0	0	0		
4	1	1	1	1	1	1	1	1		
5	1	0	1	0	0	0	0	0		
6	1	0	1	0	0	0	0	0		
7	1	1	1	0	1	1	0	0		
8	0	1	1	0	0	1	0	0		
9	1	0	1	0	1	1	0	1		
10	0	1	0	0	1	0	0	0		
11	1	0	0	0	0	1	0	0		
12	1	1	1	0	0	0	0	0		
13	1	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
14	1	0	0	1	1	0	1	0		
15	1	0	1	0	P	n/a	n/a	n/a	n/a	n/a
16	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
17	1	0	0	0	0	0	1	1		
18	0	0	0	0	0	0	0	0		
19	0	1	0	0	0	0	0	0		
20	1	1	1	P	n/a	n/a	n/a	n/a	n/a	n/a
21	1	0	1	0	1	0	0	0		
22	1	0	0	1	1	0	0	0		
23	0	1	1	0	1	0	1	0		
24	1	1	0	0	1	1	1	0		
25	1	1	1	1	1	0	1	0		
26	1	0	0	1	0	P	n/a	n/a	n/a	n/a
27	0	0	0	0	0	0	0	0		
28	1	0	0	0	0	1	0	0		
29	0	0	0	0	0	0	0	0		
30	1	1	0	0	0	0	0	0		
31	1	0	0	0	1	0	1	0		
32	1	1	1	1	0	0	0	0		
33	1	0	0	0	0	1	1	0		
34	1	1	1	1	1	1	1	0		
35	1	0	1	0	0	0	0	0		
36	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
37	1	1	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
38	1	0	0	0	0	0	0	0		
39	1	0	0	0	0	0	0	0		
40	1	0	1	0	1	1	0	0		
41	1	0	0	0	1	0	P	n/a	n/a	n/a
42	0	0	0	0	0	0	0	0		
43	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Passers 9
 Takers 38
 Pass Rate 24%

August '15 Graduates

#	Feb-16	Jul-16	Feb-17	Jul-17	Feb-18	Jul-18	Feb-19	Jul-19	Feb-20	Jul-20
1	0	0	0	0	0	0	0			
2	0	0	0	0	1	0	0			
3	0	0	0	0	0	0	0			
4	1	1	1	P	n/a	n/a	n/a	n/a	n/a	n/a
5	1	1	0	1	0	1	0			
6	0	0	0	0	0	0	0			
7	1	1	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
8	0	0	0	0	0	0	0			
9	0	0	0	0	0	0	0			
10	0	0	0	0	0	0	0			
11	1	1	0	0	0	0	0			
12	1	1	1	1	1	0	0			
13	0	0	0	0	0	0	0			

Passers 2
 Takers 6
 Pass Rate 33%

Track 1 May 2016 Graduates

#	Jul-16	Feb-17	Jul-17	Feb-18	Jul-18	Feb-19	Jul-19	Feb-20	Jul-20	Feb-21
1	0	1	0	1	1	0				
2	1	0	0	0	0	1				
3	0	0	0	0	0	0				
4	1	1	1	1	1	0				
5	0	0	0	0	1	0				
6	1	1	0	0	0	1				
7	1	1	1	1	1	0				
8	1	1	0	1	0	0				
9	0	0	0	0	0	0				
10	0	0	1	1	1	1				
11	0	0	0	0	0	0				
12	0	1	0	0	1	1				
13	0	0	0	0	0	0				
14	0	0	1	0	0	0				
15	1	1	1	0	1	1				
16	0	0	0	0	0	0				
17	0	0	1	1	0	0				
18	0	0	0	1	0	1				
19	1	1	1	1	1	1				
20	1	1	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
21	1	1	0	1	1	1				
22	1	0	1	0	0	0				
23	1	1	1	1	1	0				

Passers 1
 Takers 18
 Pass Rate 6%

Track 2 - August 2016

#	Feb-17	Jul-17	Feb-18	Jul-18	Feb-19	Jul-19	Feb-20	Jul-20	Feb-21	Jul-21
1	1	1	0	0	0					
2	1	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
3	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
4	0	0	0	1	0					
5	0	1	1	1	1					
6	0	0	0	1	0					
7	0	0	0	0	0					
8	1	0	1	1	0					
9	1	0	1	1	0					
10	0	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
11	1	0	0	0	0					
12	0	0	0	1	0					
13	1	1	1	1	0					
14	0	0	0	0	0					
15	0	0	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
16	1	1	0	0	0					
17	0	0	1	0	1					
18	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
19	0	0	0	0	0					
20	0	0	0	0	0					
21	0	1	0	0	0					
22	1	0	0	1	0					
23	0	1	0	0	0					

Passers 5
 Takers 19
 Pass Rate 26.3%

Track 1 May 2017 - Graduates

#	Jul-17	Feb-18	Jul-18	Feb-19	Jul-19	Feb-20	Jul-20	Feb-21	Jul-21	Feb-22
1	1	1	1	P	n/a	n/a	n/a	n/a	n/a	n/a
2	0	0	1	1						
3	0	0	0	0						
4	0	1	1	P	n/a	n/a	n/a	n/a	n/a	n/a
5	0	1	1	1						
6	1	1	1	1						
7	1	0	0	0						
8	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
9	0	1	0	1						
10	1	1	1	1						
11	0	1	0	0						
12	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
13	1	0	0	0						
14	1	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Passers 5
 Takers 13
 Pass Rate 38.5%

Track 2 August 2017

#	Feb-18	Jul-18	Feb-19	Jul-19	Feb-20	Jul-20	Feb-21	Jul-21	Feb-22	Jul-22
1	1	1	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
2	1	0	0							
3	1	0	1							
4	1	1	1							
5	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
6	0	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
7	0	1	0							
8	1	1	1							
9	1	0	0							
10	0	1	1							
11	0	0	0							
12	0	1	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a
13	0	0	0							

Passers 4
 Takers 11
 Pass Rate 36.3%

Track 1 May 2018

#	Jul-18	Feb-19	Jul-19	Feb-20	Jul-20	Feb-21	Jul-21	Feb-22	Jul-22	Feb-23
1	1	0								
2	1	1								
3	0	0								
4	1	1								
5	0	1								
6	1	0								
7	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
8	0	1								
9	1	0								
10	1	1								
11	1	1								
12	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
13	1	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
14	0	0								
15	1	0								
16	1	0								

Passers 3
 Takers 12
 Pass Rate 25.0%

Track 2 August 2018

#	Feb-19	Jul-19	Feb-20	Jul-20	Feb-21	Jul-21	Feb-22	Jul-22	Feb-23	Jul-23
1	1									
2	0									
3	1									
4	1									
5	0									
6	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
7	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
8	1									
9	1									
10	0									

Passers 2
 Takers 7
 Pass Rate 29.0%



The State Bar of California

Pacific Coast University School of Law

Inspection Report Related to Notice of Non-Compliance with Rule 4.165(N) and Guideline 12.1 (Minimum, Cumulative Bar Pass Rate)

Inspection conducted
Pursuant to Rule 4.170 of the
Accredited Law School Rules on:

October 22, 2019

Inspection Team:

Alex Chan, Member
Committee of Bar Examiners

Natalie Leonard
Ron Pi
The State Bar of California

Observer:
Alex Lawrence,
Committee of Bar Examiners

REPORT ON THE INSPECTION OF PACIFIC COAST UNIVERSITY SCHOOL OF LAW, 1650 Ximeno Ave #300, Long Beach, CA 90804

EXECUTIVE SUMMARY AND RECOMMENDATIONS

Introduction

Pacific Coast University School of Law (PCUSOL) is a non-profit law school founded in 1927. The school was a registered law school for until it earned accreditation in 2010.

As an accredited law school, the school must maintain five year, minimum, cumulative California Bar Examination (CBX) pass rate (MPR) of forty percent amongst its J.D. graduates who choose to take the examination. (Rule 4.160(N); Guideline 12.1) Students who do not take the CBX are not included in the calculation. PCUSOL has reported the following MPR figures: 28.2 percent (2015); 26.4 percent (2018); 26.6 percent (2019).

Based on these findings, the Committee of Bar Examiners (Committee) issued a Notice of Noncompliance to the school, asking the school to respond and directing a that telephonic inspection be scheduled to gather further information.

This report summarizes the conversation that occurred during that telephonic inspection conducted on October 22, 2019.

The State Bar Inspection Team (Team) was composed of Committee Member and Chair of the Operations and Management Subcommittee Alex Chan, and staff members Natalie Leonard and Ron Pi, while Educational Standards Subcommittee Chair Alex Lawrence was present as an observer

Dean Andrea Lua and Registrar Maren Carmona were present to discuss PCUSOL's plan to establish compliance with the MPR requirement by 2023.

Scope of Inspection Report

When the Committee issues a Notice of Noncompliance, the school responds to the notice. (4.170(B)) If compliance is not established, the Committee schedules and inspection, as was done here. (4.170(B)(2)) The Committee directed that the inspection be conducted telephonically because the school's physical facility was not at issue.

Prior to the call, the school's MPR values were verified, so the call focused on the steps that the information that the school chose to share regarding its plan to achieve compliance with Rule 4.160(N) and Guideline 12.1.

This Inspection Report summarizes the telephonic inspection, and the conclusions drawn include not only the telephonic recommendation, but also the schools' written filings related to the Notice of Noncompliance.

The State Bar Team began the call by discussing the purpose of the meeting. The school was allowed to set the agenda and decide what to discuss for the remainder of the call. The school also responded to all questions from the State Bar Team. At the conclusion of the call, the school took five minutes to provide a closing statement. One hour was scheduled for the call, and the call concluded after one hour.

Summary of the Telephonic Inspection

This summary represents the point of view of the school as expressed by the school.

Dean Lua accepted her post in 2015 and the initiatives described in this report were largely instituted since her arrival when prior initiatives did not raise the school's MPR.

Initially after the school reported a noncompliant MPR in 2015, academic support was added in the form of associate student fellows who worked available part-time and participation was optional unless a student was formally on probation. The State Bar Inspection Periodic Inspection Team that visited the school in 2016 suggested that more formalized bar preparation and evaluation might be helpful for the school.

The current Dean has launched several initiatives since her arrival in 2015 and the school is about to launch several more, organized here by functional area.

In the area of Admissions, the school is engaging in aggressive recruitment of candidates with strong credentials. The school analyzed the source of referrals for students and compared source versus academic success, with the most successful students coming from alumni referrals. The school now hosts quarterly alumni outreach events to foster alumni referrals. The school also recruits at local colleges and affinity bar associations, and also tracks contacts with its website. The most recent enrolled classes have higher overall LSAT scores and GPA's than in prior years.

The minimum GPA required for good standing was also raised based on evidence that those with GPA's below the new good standing level were less likely to pass the CBX. Therefore, raising the GPA required for good standing sent an important message to students. The school has metrics and tracking in place to create, execute and evaluate the strategy.

The curriculum is a set curriculum for all students. It has been enhanced to include an Advanced Legal Reasoning course to develop the legal reasoning skills required to address CBX questions, including identifying crossover issues and improving writing clarity. The school has identified a

need to incorporate more multiple-choice question practice and will be doing so with the ExamSoft Rubrics platform starting in 2020. In addition, since the 2016-2017 academic year, students attend a required lab that starts from the first week of class to help students assess their progress. A new Pleading and Practice course is now taken in the fourth year and designed to be a capstone course that reviews and integrates materials and prepares students to succeed on the CBX's performance test. The school aims to return grades quickly.

The amount of academic support has also increased significantly. Now, students can access academic support seven days per week and the program is delivered largely one-on-one using a consistent process. The eight students most recently in a formal program improved academically.

Students preparing for the CBX use a structured program, and administrators can see progress. If a student is not completing their assignments or progressing academically, the school reaches out to provide support and the Dean may reach out to them directly to provide encouragement.

A grant from the Camilla Chandler Family Foundation funds time off for study and childcare just before the CBX.

The school is providing academic support and tracking for alumni who have not yet passed the CBX. Alumni can access to the same preparation resources and professors that are available to current students to prepare for success on the CBX.

The school is also connecting with the larger educational community to research best practices taking place at other schools.

The school believes that the implementation of the ExamSoft Rubrics function this year will allow it to better measure students' writing and multiple-choice progress throughout their education. The school's examination questions have been entered and the program will be implemented soon. There are at least 1000 multiple-choice practice questions in the database.

The school appeared to have metrics in place related to each initiative discussed, as well as a plan to act on those metrics in real time with students, and to evaluate results overall to determine whether future change is needed. One such leading indicator that the school tracks closely is the first-time CBX pass rate.

The school hopes to collect more detailed data more often when it implements ExamSoft's Rubrics storing, grading and analysis tool in 2020.

The school estimates that compliance could be achieved as early as the July 1, 2023 MPR Compliance Reporting Date once these initiatives are implemented.

CONCLUSION AND RECOMMENDATION

Because it is clear that the school is not in compliance with Rule 4.160(N) and Guideline 12.1, the Committee will need to determine whether probation or termination of accreditation is appropriate.

In spite of these initiatives, the school remains out of compliance since 2015 and expects to be out of compliance at least until 2023 according to the school's projections or beyond. The school's July 2019 CBX results show that five out of sixty-three students passed the examination, or approximately eight percent of takers. These figures suggest that the school's MPR will not increase significantly in 2020.

The school appears to have been responsive to the situation, trying a number of initiatives over the years, though the school was not able to return to compliance. In the most recent one to two school years, the school has begun to take specific steps with metrics that can be evaluated throughout a student's career and more metrics are slated to be available in the coming year, and these efforts are to be commended. It is hoped that the school will continue to take steps to improve its graduates' results on the CBX.