



# The State Bar *of California*

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## **OPEN SESSION**

### **AGENDA ITEM O-404**

**AUGUST 2020**

### **COMMITTEE OF BAR EXAMINERS**

**DATE:** August 21, 2020

**TO:** Members, Committee of Bar Examiners

**FROM:** Natalie Leonard, Principal Program Analyst

**SUBJECT:** Action on Application for Registration as an Unaccredited Law School - Pacific Coast University School of Law

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## **EXECUTIVE SUMMARY**

Pacific Coast University School of Law (PCU) requests that the Committee of Bar Examiners (CBE) approve its application to register as an unaccredited, fixed facility law school. (Attachment A)

If the CBE finds that the school appears to have established compliance with the Rules and Guidelines for Unaccredited Law Schools, then staff recommends that the CBE approve the school's application for registration for a period of two years so long as compliance is maintained and set an inspection to be conducted as soon as practicable in 2021 to further verify compliance.

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## **BACKGROUND**

When a law school applies for registration as an unaccredited school, it submits an application demonstrating how the school intends to comply with the rules and guidelines, along with the appropriate fee. (Rule 4.221(A)) The school also agrees to allow the CBE to make any inspection it deems necessary. (4.221(B))

Should the CBE find that the application demonstrates compliance with the operational factors enumerated in Rules 4.241 and 4.242, the CBE may register the law school for at least two

years and confer JD degree granting authority consistent with the rules and guidelines, subject to any conditions it deems appropriate, such as annual inspections. (Rule 4.223(C))

If the school does not appear to establish compliance, the CBE may take one of four actions: 1) seek further information; 2) advise the school to withdraw its application; 3) require an inspection if the school refuses to withdraw its application upon Committee recommendation; or 4) deny the application. (4.223(B)-(E))

PCU was founded in 1927 and operated as an unaccredited law school until transitioning to accredited status in 2010. The CBE terminated the school's accreditation effective August 20, 2020 because the school had been out of compliance for an extended period of years with the accredited rule requiring that accredited schools maintain a minimum, cumulative five-year bar exam passage rate of at least 40 percent. Unlike accredited schools, unaccredited schools are not required to maintain a minimum bar exam pass rate, though they are required to report their pass rates publicly.

The school had its last complete inspection in 2016, and would have been due for a periodic inspection in 2021. The school underwent a limited-purpose inspection in October 2019 focused solely on the school's plans to improve its bar pass rate.

PCU has applied to operate as a registered, unaccredited fixed facility law school and is prepared to offer classes starting as early as September 14, 2020 if the CBE approves its application.

## **DISCUSSION**

PCU submitted a complete application for registration as an unaccredited law school, addressing all aspects of registration and responding promptly and fully to all questions.

Staff reviewed the attached application in detail and key points are summarized here. In summarizing its plan, the school described that "PCU has determined that it is in the best interests of our current and future students to retain all of the standards and policies that were developed for the accredited program, where such is not in violation of the rules and guidelines for Registered Unaccredited Law Schools."

The school agrees to take steps to meet all CBE requirements, including filing compliant annual reports and undergoing any conditions that the CBE may impose, including inspection.

## **THE SCHOOL WILL USE ITS CURRENT FRAMEWORK TO ENSURE HONESTY, INTEGRITY, EQUITY, AND EFFECTIVE GOVERNANCE**

The school described its infrastructure for ensuring lawful operation, integrity of operations, non-discrimination, and governance. (Rules 4.240 (A), (B), (C), (K), (L), (M)) The school is a non-profit entity with 501(c)3 status, properly registered and licensed. PCU's finances are managed in accordance with established principles under the direction of the Treasurer and Acting Chief Financial Officer, with some duties delegated to an outside Chief Financial Officer, and

operations reviewed by an outside CPA firm annually. The school is governed by a Board of three to seven members, and led by the Interim Dean, the Hon. Barbara McDaniel, a retired court commissioner.

The school's budget projects a decline in enrollment due to the pandemic, the change in accreditation status, and a tightening of admissions standards; the school believes it will have adequate resources to operate with the tuition funds projected. (Rule 4.240 (K))

The school asserts it will continue to maintain accurate records. The school reorganized duties to allow the registrar to focus solely on the duties of that office, rather than also assisting with financial matters. (Rule 4.240(L))

The school has a non-discrimination policy and maintains a diverse student body and faculty, as well as a policy designed to provide effective accommodations to qualified students. (Rule 4.240 (M))

#### **THE SCHOOL HAS HIRED A COMPLIANT DEAN AND FACULTY**

The school's dean will be Barbara McDaniel, a retired court commissioner and attorney licensed in California. (Rule 4.240 (D)) As required by the guideline, she is a licensed attorney and graduate of a Western State Law School, an ABA approved school. Because she has retired from service as a court commissions, she can, as the law school's administrator, "devote adequate time to the administration of law school affairs and limit [her] outside professional activities so they do not interfere with the performance of regular duties, including counseling and interchange with students, faculty members, and colleagues." A search for a permanent dean is underway. She is in the process of hiring a new staff of administrators.

The school will retain its current faculty.

#### **THE SCHOOL'S PROPOSED FIXED FACILITY JD EDUCATION PROGRAM APPEARS TO BE A COMPLIANT, ENHANCED VERSION OF ITS PRIOR PROGRAM**

A registered, fixed facility school must offer a sound program of legal education that includes at least 270 hours of classroom instruction per year. (Guideline 5.3) Pacific Coast's planned program includes 315 hours of classroom instruction per year, conducted in three sessions of eleven weeks per year. (Rule 4.240 (E)) As mentioned above, the school does not intend to relax any of its requirements, and will, in fact, enhance many requirements, noting that "PCU is proceeding with a wide variety of initiatives and changes in order to both increase the Bar Pass Rate and maximize the student experience while at PCU." The application details a list of over 40 enhancements to school policies, curriculum and student support including an intensive writing and analysis program for fourth-year students, "an ever-increasing amount of online CBX preparation material," and student working groups focused on analyzing and preparing essays in an engaging manner that may include "contests, tie-breakers and other motivations."

Until the COVID-19 crisis subsides, the school plans to teach classes synchronously via Zoom, as it has been since spring 2020. When conditions allow, the school will transition first to a hybrid format, and later return to the school's preferred fixed facility classroom format.

The school will maintain its competency training options and enhance its writing skills programs, exceeding the requirement that registered schools provide at least six units of competency training. (Rule 4.240 (F))

The school will adjust its admissions and student success policies in a manner that it hopes will improve licensing outcomes for its graduates. The school will implement a compliant admissions program requiring students to establish that they have the time and capacity to devote to the rigorous part-time study of law. (Rule 4.240 (H)) The school has also updated its outreach and disclosures to reflect its intent to operate as an unaccredited law school.

Once admitted, the students will have access to the enhanced programming versus prior years, including increased support services through academic advising, a dedicated registrar, formalized study groups, mentor pairings, and alumni visits, as well as an enhanced writing curriculum. (Rule 4.240 (G))

#### **THE SCHOOL WILL MAINTAIN ITS PHYSICAL FACILITIES AND STUDENT SERVICES, WHILE SEEKING A WAIVER TO UPDATE ITS LIBRARY**

The school's library contains the required library items, but some hard copy books will need to be updated. (Rule 4.240(I)) As part of its application, the school is requesting a temporary waiver to provide electronic access to students while the hard copy updates are ordered and received over the course of this school year. (Rule 4.240(I)) The school had recently stopped updating its hard copy editions when it transitioned to an electronic library, which is an option available only to accredited schools. Unaccredited, fixed facility law schools are subject to different requirements, however, and certain hard copy volumes are required. (Guidelines 6.2, 6.4) The school is in the process of making the required purchases, enumerated in its application, and has requested one year to come into compliance, given the challenges of ordering the volumes during the pandemic while students are studying remotely.

The school will also maintain its building, including library facilities, so they are available for use when in-person classes are practical. Until then, the school has been conducting remote education with adequate technical capacity. (Rule 4.240(J))

#### **FISCAL/PERSONNEL IMPACT**

None

#### **AMENDMENTS TO RULES OF THE STATE BAR**

None

## **AMENDMENTS TO BOARD OF TRUSTEES POLICY MANUAL**

None

## **STRATEGIC PLAN GOALS & OBJECTIVES**

Goal: None - core business operations

## **RECOMMENDATIONS**

It is recommended that the Committee of Bar Examiners register Pacific Coast University as an unaccredited, fixed facility law school and provide degree granting authority consistent with that status, subject to the findings of an inspection to be conducted as soon as practicable in 2021. It is further recommended that the CBE grant the school a temporary waiver that will allow the school one year to fully update its hard copy library holdings.

## **PROPOSED MOTION**

Should the Committee of Bar Examiners agree with staff recommendations, the following motion should be made:

**MOVE**, that the application of Pacific Coast University School of Law seeking registration and degree granting authority as an unaccredited, fixed facility law school be received and filed; and that the application be granted effective immediately for two years, subject to the school's agreement to undergo an inspection as soon as practical in 2021; and that the school be granted a waiver to take up to one year to fully update its hard copy library, with evidence of compliance to be submitted as part of the school's 2021 Annual Report.

## **ATTACHMENT(S) LIST**

- A. Application of Pacific Coast University for Registration as an Unaccredited, Fixed Facility Law School



# The State Bar of California

OFFICE OF ADMISSIONS

## APPLICATION FOR REGISTRATION AS A CALIFORNIA UNACCREDITED LAW SCHOOL

### SCHOOL

Indicate the type of law school you are seeking to register (check only one):

☒ Fixed-Facility (classroom)      ☐ Distance-Learning (online)      ☐ Correspondence (mail)

Name: Pacific Coast University, School of Law  
Street Address: 1650 Ximeno Ave. Ste.300  
City, State, Zip: Long Beach, CA 90804  
Phone Number: 562-961-8200  
Website Address: www.pculaw.org

The law school is established as (check one):      ☐ For-Profit      ☒ Not-For-Profit  
Type of Entity:

### PRINCIPAL CONTACT FOR THIS APPLICATION

Name: F. Miguel Valenti  
Street Address: 1650 Ximeno Ave. Ste.300  
City, State, Zip: Long Beach, CA 90804  
Phone Number: 562-961-8200  
Website Address: www.pculaw.org

### PRIMARY ADMINISTRATIVE OFFICE OF THE LAW SCHOOL

Name: Sonia Gomez  
Street Address: 1650 Ximeno Ave. Ste.300  
City, State, Zip: Long Beach, CA 90804  
Phone Number: 562-961-8200  
Website Address: www.pculaw.org

**ADMINISTRATIVE CONTACT, IF DIFFERENT FROM PRINCIPAL CONTACT ABOVE**

Name: Teresa Berry  
Street Address: 1650 Ximeno Ave. Ste.300  
City, State, Zip: Long Beach, CA 90804  
Phone Number: 562-961-9200  
Website Address: [www.pculaw.org](http://www.pculaw.org)

**OWNER(S), SHAREHOLDER(S) AND/OR PARTNER(S) CONTACT INFORMATION**

Add additional sheets if needed to include all owners or partners.

Name:  
Street Address:  
City, State, Zip:  
Phone Number:  
Website Address:

Name:  
Street Address:  
City, State, Zip:  
Phone Number:  
Website Address:

Name:  
Street Address:  
City, State, Zip:  
Phone Number:  
Website Address:

Name:  
Street Address:  
City, State, Zip:  
Phone Number:  
Website Address:

Name:  
Street Address:  
City, State, Zip:  
Phone Number:  
Website Address:

## FILING INSTRUCTIONS

Send one electronic copy of the application and all attachments to [admissions@calbar.ca.gov](mailto:admissions@calbar.ca.gov) and also mail a hard copy of the application, payment page, and fee to:

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

## ACKNOWLEDGEMENT AND AGREEMENT

*I hereby declare that I am authorized to sign on behalf of the school applying for registration as an unaccredited law school. The school understands that there are additional costs associated with the registration of a school as set forth in the list of charges and deadlines and that failure to pay these fees timely may result in delay, denial, or termination of registration. The school further agrees that additional information may be requested by the State Bar in connection with this application in order for consideration of the application to proceed. The school understands that the State Bar operates subject to the California Public Record Act, and all documents submitted to the State Bar or created by the State Bar become public documents unless they are within an exception to that Act.*

*The school understands that this is an application for registration as an unaccredited law school and all students attending the law school will be required to take and pass the First Year Law Students' Examination in accordance with the Rules and Guidelines for Unaccredited Law Schools as part of the process of completing their JD degrees.*

*The school agrees not to solicit applications or otherwise present itself to the public or students until it has earned registration.*

*I hereby declare under penalty of perjury under the laws of the State of California that the information provided in this application for registration of an unaccredited law school is true and correct.*

## SIGNATURE OF AUTHORIZED REPRESENTATIVE

Signature:



Print Name:

F. Miguel Valenti

Title:

Executive Director

Phone Number:

562-961-8200

Email Address:

valenti.miguel@yahoo.com



**1. Provide a written narrative explaining the history, mission, and goals of the law school. What evidence-based measures will be utilized to help the school evaluate whether it is meeting its mission and goals? State Bar Rule 4.240; Guideline 2.1.**

Pacific Coast University, School of Law has been in existence since 1927. It operated as an unaccredited school until 2010 when it attained California Accredited Law School status. That status was voted by the CBE to be terminated due to failure to maintaining the MPR (minimum pass rate) on the Bar Exam. P.C.U. will continue to uphold its mission of providing a quality legal education at an affordable cost for those who otherwise would not be able to attend.

**2. Who or what business entity owns the law school? List the type of entity and attach the formation document and any business license(s) required to operate in the State of California. Guideline 2.4.**

Pacific Coast University, School of Law is a 503 (c)(1) not for profit University. (attach a copy of business license and our not for profit paperwork.

**3. Provide a copy of the law school's proposed balance sheet and budget for the first three years of operation, including source of funds, and capitalization of the ownership entity. Also include the percentage of the budget that is expected to be covered by tuition and fees for each of the first three years. Guidelines 8.1-8.3.**

\*See attachment 3a

**4. Provide a written narrative explaining how the school will maintain adequate resources to fulfill its educational goals, including sustainable operation of the school, payment of all fees owed to the State Bar, and sufficient reserves to sustain the school through fluctuations in available resources, market changes, faculty changes, and other changes in circumstances that can be reasonably anticipated. State Bar Rule 4.240(K); Guideline 2.2.**

The Administration has designed and implemented internal controls over the accounting function primarily in relation to cash, revenue and expense control in accordance with accounting principles generally accepted in the United States. The Treasurer of the board oversees the accounting function and is the Acting Chief Financial Officer. Financial reports are reviewed by a CPA firm annually.

Pacific Coast University, School of Law has made arrangements to outsource some of its financial and accounting functions to an outside Chief Financial Officer.

**5. Describe the governance structure of the law school. State Bar Rule 4.240(C).**

The Governance Structure of Pacific Coast University, School of Law is comprised of Dean and a Board of directors comprised of no less than (3) and no more than (7) members which includes the officers President, Secretary and Treasurer.

The Dean is in charge of all day to day functions of the law school and all educational activities. The duties include but are not limited to discipline, general order and welfare of the staff and students. As Dean, the performance of his/her duties is subject to advice and authorization of the Board of Directors.

The President presides over all the board meetings and sets the agenda for each. As President he/she/they have the general powers and duties of management of the board.

The Secretary is responsible for the keeping of the minutes of all board meetings proceedings and actions. The secretary provides notice of all meeting to its members and is responsible for the maintenance and accuracy of Board minutes.

The Treasurer keeps and maintains or causes to be maintained accurate accounting of the school's finances. The Treasurer sends or causes to be sent financial statements and reports as required by law, manages the deposits and oversees the presentation and review of annual financial reports as directed by the board.

**\*See attachment 5a and 5b**

**6. Does the law school ownership entity engage in any other business or mission, educational or otherwise? If so, please explain the nature of the other business. (Guideline 2.2(A).)**

No

**7. Does the law school ownership entity have any formal or informal relationship with any other business entities, educational or otherwise? If so, please list the other business entities and explain the nature of the relationship. (Guideline 2.2(A).)**

No

**8. Does the law school ownership entity currently hold or plan to seek accreditation or registration with any other accreditation or registration entities, such as the Bureau of Private Post-Secondary Education or a regional or national accreditor? If so, please list the accreditation or registration entities and the dates of accreditation or registration. (State Bar Rules 4.240(B) and 4.240(E); Guideline 2.1.)**

No

**9. Provide a statement of the methods of instruction to be used by the law school. Provide a specific statement regarding how faculty will instruct students and how the law school will provide students with academic counseling. Describe the composition and experience of the team designing, maintaining, executing, and evaluating the instruction. (State Bar Rules 4.240(D) and 4.240(E); Guidelines 4.1-4.11.)**

Pacific Coast University, School of Law uses the socratic method of teaching law in the classroom. P.C.U. uses traditional case books and horn books along with appropriate codes. P.C.U. tests in the traditional manner of one-hour bar style essays and multistates in multistate tested areas. The law school provides a drop-in lab for students needing more assistance or counseling. The Dean and academic advisor also meet with students who do not pass any exam with at least 70% or higher. The students are counseled and given follow up material to improve their grades.

The team designing, maintaining, executing and evaluation instruction consists of the Dean, Academic Advisors, professors in that area of law and the senior faculty advisor. All exams are reviewed prior to examination and calibration after the exams are administered.

**10. Describe the contents of the proposed JD curriculum, including total credits, required classes, electives and schedules. Explain how the proposed curriculum meets all requirements dictated by statute, rule or guideline, including specified competency and skills training and requirements. Describe the composition and experience of the team designing, maintaining, executing and evaluating the instructional methods. (State Bar Rule 4.240(E); Guidelines 5.1-5.36.)**

Pacific Coast University, School of Law operates on a quarter basis with classes starting in September and ending in May. Classes are held on Monday, Wednesday and Friday nights from 6:30 PM to 10:00 PM. The quarters are ten weeks plus a final exam week for a total of 33 weeks. This translates into 315 instructional hours per year.

Pacific Coast University, School of Law's first year courses are Criminal Law 2 quarters, Contracts 3 quarters, Torts 3 quarters, Fundamentals of Legal Writing 1 quarter.

Second year courses are Business Association 2 quarters, Civil Procedure Practicum 1 quarter, Evidence 2 quarters, Alternative Dispute Resolution 1 quarter, Civil Procedure 3 quarters.

Third year are Wills and Trust 2 quarters, Community Property 1 quarter, Constitutional Law 3 quarters, Real Property 3 quarters.

Fourth year classes are Professional Responsibility 1 quarter, Professional Writing 1 quarter, Remedies 1 quarter, Advance Legal Reasoning and Substantive Review 2 quarters, Trial Techniques 1 quarter, Criminal Procedure 2 quarters, Pleading and Practice 1 quarter.

**11. If the law school intends to deliver any or all of its curriculum via technology-based instruction methods, provide a detailed statement explaining the methods, technology and software to be used and the extent to which they will involve verified interaction between instructors and students, as well as describing how the school will authenticate a student's work as their own. Describe the school's experience with this technology, as well as how it will be deployed and supported. (State Bar Rule 4.240(E); Guidelines 5.1-5.36.)**

Pacific Coast University School of Law has temporarily switched to online learning as a result of COVID – 19, following State of California Guidelines regarding Stay-at-Home orders and

closure of school physical plants. PCU primarily uses the Zoom platform, in accordance with the preponderance of institutions of higher learning and graduate/professional programs. Our faculty has made the changeover smoothly, for the most part, and students have responded well to learning in a digital environment. We have been and are continuing to provide basic and advanced training to faculty, as required or desired, in order to help them more effectively navigate this new (to some) method of content delivery.

As for exams and grading, PCU currently uses ExamSoft and Examplify for testing purposes. We can report no significant issues with the process thus far. In order to ensure their authenticity, students must log in to Zoom on their smart phones, focusing the camera's phone upon themselves. Each exam is fully proctored and the proctor will first verify the student's identity remotely. Said proctor then watches the student for the entirety of the exam period via Zoom. We administer both essay exams and MBEs remotely, and these will shut down when programmed to do so if there are any irregularities in the student's test taking. If a student is disconnected from Zoom, the test is shut down to ensure fair test taking procedures for all students. PCU currently intends to return to classroom learning as soon as State guidelines and common sense allow. We may begin with hybrid classes (part Zoom, part live in-person), depending upon State, County and City of Long Beach guidance in such matters.

**12. Provide a written description of the law school's physical or electronic resources and assets of the school that will be used in the educational process, distinguishing items owned from items leased. (State Bar Rules 4.240(I) and 4.240(J); Guidelines 6.1-7.2.)**

Pacific Coast University, School of Law has an extensive library, but we have gone to an electronic library. Students and faculty have 24 -hour a day access to Lexis Nexis. Students also have access to Barbri and Barbri Amp as part of the student package. The school also has an account with CEB where students and faculty can access all legal forms and with the limited library. The school has several computers available for student use.

**13. Provide the date classes are proposed to start. Please be aware that applications should not be solicited or accepted until a school earns registration from the State Bar of California and no specific start date is guaranteed. (State Bar Rule 4.221.)**

Assuming status as a Registered Non-Accredited Law School has proceeded in a timely fashion, PCU intends to start the 2020-2021 school year on Monday, September 14, 2020 with a prior required Orientation occurring on the evenings of September 9-11, either live in-person or via Zoom depending upon State guidance regarding COVID-19. Should more time be required to secure PCU status with CBE, we would have the option of postponing our start date until September 21, 2020, with the required Orientation taking place September 23-25, 2020. We would then shift the Winter and Spring holidays accordingly, so as not to lose any instruction hours.

**14. Provide the proposed tuition and fees for the entire J.D. degree. (Guideline 2.2.)**

Pacific Coast University School of Law has a base tuition of \$8,500, regardless of class year. In addition, there is a \$1,500 combined fee charged to all students in all classes to cover all non-tuition-related costs. For 4L students, an additional graduation fee of \$500 is required to cover the costs of the graduation ceremony and events surrounding graduation.

**15. What is the projected class size? Describe the law schools admissions or recruitment strategy or mission. (State Bar Rule 4.241(A)(7).)**

Pacific Coast University School of Law is intending to have a First Year (1L) class of approximately 40 students. That is the goal towards which the school has been working. However, as a result of COVID-19 and PCU's recent change in status from an Accredited Law School to a Registered Non-Accredited Law School, still in process, nothing is certain, so the number is approximate at this point in time. Our recruitment efforts will be greatly expanded during the coming year, but currently, for this upcoming 1L class, we advertised on the Internet and locally within the City of Long Beach and the County of Los Angeles. PCU is active in local Chambers of Commerce and other civic organizations, partly in order to benefit its recruitment program. PCU seeks to attract students who are otherwise underserved. This includes those non-traditional students who already have careers and/or work during the day, but have always wanted to study the law, those for whom a Juris Doctor would be an advantageous credential in their chosen career outside the law, and those for whom law school has always seemed out of reach. We view our recruitment mission as a way to serve the underserved.

**16. Explain how the law school will comply with its disclosure requirements to accurately and affirmatively describe the opportunities and limitations associated with attending an unaccredited law school to its students, the public and prospective students in all communications including required disclosures. (State Bar Rule 4.241; Guideline 2.3(D).)**

Pacific Coast University, School of Law has existed for 93 years. Out of those we were unaccredited for 83 years. We feel that the First Year Bar Exam is an opportunity for our students to really decide whether this is the career choice for them and to expose them as to what to anticipate.

**17. Explain how the law school will communicate to its students and prospective students that they will be required to pass the First Year Law Students' Examination after their first year and within a specified time frame in order to earn credit for the first year of law study and proceed to future years of law study prior to becoming eligible to take the California Bar Examination and how it will prepare its students to pass both the First-Year Law Students' Examination and the Bar Examination. (State Bar Rule 4.241; Guideline 2.3(D).)**

At the present time, Pacific Coast University School of Law (PCU) is not accredited by the California Bar Association (see Below). All 2020-2021 First Year Law Students (1L) at PCU are required to pass the California First Year Law Students Examination (FYLSE) following completion of their first year of law school. This examination will cover three subjects, all taught in depth during 1L: Contracts, Criminal Law and Torts. First Year Law Students will not be able to receive credit for any law study until they have passed this examination. Passage must be achieved within the first three administrations of the examination after the applicant becomes eligible. If the student does not pass, no credit will be awarded for legal studies. If the student passes subsequent to the three administration benchmark, credit will only be given for the first year of law study.

The FYLSE Exam is a single day exam, consisting of four essay questions and one hundred multiple-choice questions. Four hours are allotted for completing the essay questions and three hours are allotted for the multiple-choice questions. The FYLSE is given in June and October of each year.

### **Frequently Asked Questions:**

**Q: When can a student take the FYLSE?**

**A:** After the student has completed the first year of law school in May. The student will take the June FYLSE. June results are generally given in mid-August, while October results are generally given in mid-December. If a student passes, they can then register for the 2nd year of law school in August.

**Q: If I take courses without passing the FYLSE, will I get credit for those courses? Will I be able to transfer those units to another law school?**

**A:** Students that do *not* pass the FYLSE will not receive credit for course units taken in the first and second years of law school. The units will not be transferrable to other law schools. Students who pass the FYLSE after the three administration benchmark will only receive credit for the first year of law study.

**Q: Is there anything else a student must do to proceed with their legal education?**

**A:** Those who are enrolled in our law degree program must register as students with the State Bar of California. Registration requires the completion of a form found on the State Bar's official website: [www.calbar.ca.gov](http://www.calbar.ca.gov)

**18. Provide a roster setting forth the names of the Dean, administrators, the registrar, members of the governing body, and each person who is expected to teach during the first year of classes including:**

**a. full name**

**b. pre-law education, including schools attended, degree(s) conferred and date(s)**

**c. law school education, including schools attended, degree(s) conferred and date(s)**

**d. jurisdiction(s) in which licensed to practice law and current status of all licenses**

**e. experience teaching in any discipline and**

**f. present employment**

**(State Bar Rule 4.240(D); Guideline 4.6.)**

**Roster (on next page)**

## **First Year Professors**

### Steven Carlson- Legal Writing

Professor Carlson earned his Bachelor of Arts Degree in Spring 1989 from California State University Long Beach. He earned his Juris Doctor Degree on May 31, 1993 from Western State University College of Law. He has an active Bar card and practices the law in California. Professor Carlson has taught at our school for six years and is currently teaching Legal Writing.

### Harriet Hawkins- Criminal Law

Professor Hawkins earned her Bachelor of Arts Degree in June 1983 from Stanford University. She earned her Juris Doctor Degree in May 1986 from University of California, Hastings. She has an active Bar card and practices the law in California. Professor Hawkins has taught at our school for five years and is currently teaching Criminal Law.

### Robert Kasamatsu- Torts

Professor Kasamatsu earned his Bachelor of Science Degree in 1985 from University of California. He earned his Juris Doctor Degree and graduated with distinction in 2004 from Pacific Coast University, School of Law. He has an active Bar card and practices the law in California. Professor Kasamatsu has taught at our school for 4 years and is currently teaching Torts.

### Peter Lee- Contracts

Professor Lee earned his Bachelor of Science Degree in 1976 at California State University Long Beach. He earned his Juris Doctor Degree in 1993 at Pacific Coast University, School of Law. He has an active Bar card and practices the law in California. Professor Lee has taught at our school for 15 years and is currently teaching Contracts. He also serves as the Faculty Liaison for PCU's Student Body Association (SBA).

## **Administration**

### Interim Dean - Barbara McDaniel

The Honorable Barbara McDaniel earned her B.S. Degree in Political Science from City University of New York. Her Juris Doctor Degree is from Western State-College of Law. She was a deputy in the law offices of the Alternate Public Defenders Office from 1994 to 2015. In 2015 she was elected to the position of Los Angeles Superior Court Commissioner. She retired from the Los Angeles Superior Court in 2019. She has taught Evidence at PCU since 2007.

### Executive Director – F. Miguel Valenti

Executive Director, F. Miguel Valenti joins the PCU family with a varied and rich background in academia and administration, as well as business, fundraising, and of course, legal experience.

He received his Bachelor and Juris Doctor degree from Yale College and Yale Law School and was formerly a member of the New York State Bar. He has taught at several universities including Arizona State University, Quinnipiac University and Otis College of Art and Design, where he founded, designed, and developed academic programs. His involvement with the arts, ethics, and entrepreneurship will bring about fresh ideas and concepts to the future of PCU. Through Miguel's expertise, experience, and leadership, PCU's goals and mission will be to map out a thorough review and renewal of the programs, curriculum, administration, student satisfaction and bar passage rates.

#### Dean of Students

TBA

#### Registrar - Teresa Berry

Registrar, Teresa Berry earned her Bachelor of Science in Business Administration from California State University, Los Angeles, Magna Cum Laude. She has worked for PCU for the past 5 years as Assistant Registrar and recently promoted to Registrar.

#### Director of Marketing and Community Relations – Sonia Gomez

Sonia Gomez has an extensive background in business management and development. She joined Pacific Coast University, School of Law in 2013. Prior to joining PCU, she owned her own business and has been an active business professional in the Long Beach Community. Has certificate training at Notre Dame- USHCC Non-Profit Management and Long Beach City College. She was appointed Regional Hispanic Chamber of Commerce- Chairwomen from 2011-2014. Through the Regional Hispanic Institute, she was the Mentoring Internship Program Director, for California State University Long Beach. She has also served on the Downtown Long Beach Associates as a board Member.

#### **19. Provide a copy of the law school's proposed written disclosure statement to students, as required by California Business and Professions Code Section 6061, Unaccredited Law School Rule 4.241, and Guideline 2.3(E).**

#### **STUDENT DISCLOSURE STATEMENT**

Pacific Coast University School of Law opened its doors in 1927. For approximately 75 years it existed as a Registered Non-Accredited Law School in the State of California. In 2010, the California Committee of Bar Examiners (CBE) granted the school Accreditation. From 2010 until 2020, the school has existed as a Registered and Accredited Law School. In late fall, 2019, the school was notified that the CBE intended to revoke the school's accreditation as a result of the school's not being in compliance with the Minimum Bar Pass Rate Rule promulgated in 2017. On June 22, 2020, PCU was officially notified that its Accreditation had been revoked and, consequently, its ability to grant degrees as an Accredited Law School had been revoked as well, effective as of August 20, 2020. PCU has applied to become, once again, a Registered Law



School pursuant to the Rules and Regulations of the CBE. In the case that this application is accepted and Registration approved by CBE, the school will continue its educational activities without pause. As a result of being a non-accredited school, first year students will be required to take the First Year Law Students Examination (FYLSE) at the conclusion of their first year of law school education at PCU. For further information on other limitations and on the status of PCU's application to the CBE, please see the school website at [www.pculaw.org](http://www.pculaw.org). In addition, we will be sending updates as we get them from the CBE.

At the present time, Pacific Coast University School of Law (PCU) is not accredited by the California Bar Association (see Below). All 2020-2021 First Year Law Students (1L) at PCU are required to pass the California First Year Law Students Examination (FYLSE) following completion of their first year of law school. This examination will cover three subjects, all taught in depth during 1L: Contracts, Criminal Law and Torts. First Year Law Students will not be able to receive credit for any law study until they have passed this examination. Passage must be achieved within the first three administrations of the examination after the applicant becomes eligible. If the student does not pass, no credit will be awarded for legal studies. If the student passes subsequent to the three administration benchmark, credit will only be given for the first year of law study.

The FYLSE Exam is a single day exam, consisting of four essay questions and one hundred multiple-choice questions. Four hours are allotted for completing the essay questions and three hours are allotted for the multiple-choice questions. The FYLSE is given in June and October of each year.

### **Frequently Asked Questions:**

**Q: When can a student take the FYLSE?**

**A:** After the student has completed the first year of law school in May. The student will take the June FYLSE. June results are generally given in mid-August, while October results are generally given in mid-December. If a student passes, they can then register for the 2nd year of law school in August.

**Q: If I take courses without passing the FYLSE, will I get credit for those courses? Will I be able to transfer those units to another law school?**

**A:** Students that do *not* pass the FYLSE will not receive credit for course units taken in the first and second years of law school. The units will not be transferrable to other law schools. Students who pass the FYLSE after the three administration benchmark will only receive credit for the first year of law study.

**Q: Is there anything else a student must do to proceed with their legal education?**

**A:** Those who are enrolled in our law degree program must register as students with the State Bar of California. Registration requires the completion of a form found on the State Bar's official website: [www.calbar.ca.gov](http://www.calbar.ca.gov)

PCU campus occupies over 8300 square feet of the Comerica Bank building in the Belmont Shore section of Long Beach. The space comprises classrooms, a law library, student facilities, meeting space and administrative offices. Each classroom is well equipped with electronic and audio visual equipment for use during instruction. The law library contains an array of resources for all class levels of PCU to use in furthering their education. Ample free parking, restaurants and other amenities abound within walking distance of the campus.

Campus space is being allocated in such a way as to make proper social distancing, as well as any needed distance learning as seamless as possible for our students. PCU is following and will continue to follow all State of California and City of Long Beach advice concerning preventing the spread of the Coronavirus. Decisions regarding live, in-person class resumption will be made in accordance with these rules, regulations and guidance. PCU will be updating our students, faculty and administrators frequently, as needed, in order to keep everyone informed as to the steps PCU is taking to ensure their safety.

### **PCU's Bar Examination Pass Rate**

Currently, PCU is diligently working towards raising its overall California Bar Exam Pass Rate. Our pass rates for the past five years are specifically detailed, both on the PCU webpage and on the CBE webpage. Statistics for previous bar exam results, including historical data for individual law schools in California, can also be [found here](#).

The administration of PCU believes that the addition of the FYLSE or so-called “Baby Bar” will be very helpful to our First Year students, both as an immediate educational goal and as a long-term planning tool for the actual Bar Exam, taken at the completion of Law School. It will allow students to assess their progress under actual bar exam conditions, albeit within a more limited scope. It will allow them to test not only their intrinsic knowledge of the law, ability to spot legal issues and writing ability, but their study habits and time allocation as well.

### **Practicing Law in Other Jurisdictions**

Most states, other than California, may require a degree from an American Bar Association accredited school or approval from an examining committee as a prerequisite to taking that state's bar examination.

Pacific Coast University, School of Law is not seeking accreditation from the American Bar Association.

Study at, or graduation from, this law school may not qualify a student to take the bar examination or be admitted to practice law in jurisdictions other than California. A student who

intends to seek admission to practice law outside of California should contact the admitting authority in that jurisdiction for information regarding its education and admission requirements.

### **Eligibility to Sit for the Bar Exam in Other Jurisdictions**

[The Comprehensive Guide to Bar Admission Requirements](#), a publication by the National Conference of Bar Examiners and the ABA Section of Legal Education and Admission to the Bar, provides detailed information on bar admissions requirements in all jurisdictions.

### **PCU Law Library**

PCU provides an extensive law library. In order to improve access for our students, the school has, in the past several years, converted to a largely electronic, online library. Students and faculty have twenty-four hour per day access to Lexis/Nexis, as well as access to CEB for forms and additional resources. The school provides computer terminals for student use on a limited basis.

### **PCU Faculty**

PCU faculty is both talented and diverse, drawn from the ranks of local practicing attorneys and judges. They bring practical experience to the classroom and provide a top-quality legal education in a very realistic atmosphere. Practice is not an afterthought, or a concern for the distant future, but remains central to our student training. Our faculty have graduated from a variety of top law schools, including Georgetown, Hastings, UC Irvine, Loyola, Cal State, Southwestern, Yale and others. Most are admitted to practice in the State of California. For details and information on individual faculty, please see the PCU website at [www.pculaw.org](http://www.pculaw.org) or the school's course catalog.

### **Attrition Rates\***

(Students who matriculate but do not move on to the next year's class for whatever reason)

During the period 2015-2020, the student attrition rate has been as follows:

2015-2016 2016-2017 2017-2018 2018-2019 2019-2020

1L-2L: approx. 20% 1L-2L: approx. 35% 1L-2L: approx. 35% 1L-2L: approx. 30% 1L-2L: approx.?

2L-3L: approx. 10% 2L-3L: approx. 20% 2L-3L: approx. 00% 2L-3L: approx. 15% 2L-3L: approx.?

3L-4L: approx. 1% 3L-4L: approx. 15% 3L-4L: approx. 09% 3L-4L: approx. 00% 3L-4L: approx.?

### **Student/Faculty Ratio**

PCU has been and remains dedicated to keeping class size small in order to promote the maximum interaction between students and faculty and allow for as much individual attention and instruction as possible. Class size is currently capped to maximize this goal.

During the period 2015-2020, the faculty/student ratio has been as follows:

Faculty Member to 1L Students: between 1/17 – 1/24, with the 2019-2020 year at 1/17.

Faculty Member to 2L Students: between 1/9 – 1/22, with the 2019-2020 ratio at 1/15.

Faculty Member to 3L Students: between 1/8 – 1/19, with the 2019-2020 ratio at 1/8.

Faculty Member to 4L Students: between 1/12 – 1/20, with the 2019-2020 ratio 1/15.

For further information, please see the PCU website at <http://www.pculaw.org>.

**20. Explain the proposed admissions standards at the school. Because the school may be targeting non-traditional students or students with competing attentions, what steps will the school take to create a framework for success for enrolled students? (Guideline 9.1.)**

Before beginning the study of law, a Juris Doctor Degree Regular Student must meet the following criteria:

- A. have earned an *Associate of Arts* or *Associate of Science* Degree or higher from a qualified institution; or,
- B. have completed at least two (2) years of college work.\* \*\*
  - \* Two (2) years of college work is equivalent to a minimum of sixty (60) semester or ninety (90) quarter units of college credit in academic courses.
  - \*\* A 2.0 grade point average or higher is required on all subjects undertaken and substantive content must be at least equal to that required for graduation from the institution attended.

Applicants whose pre-law studies do not satisfy the requirements above are classified as Juris Doctor Degree Special Students and may be admitted only in exceptional cases. The requirements to qualify for admittance as a Special Student are as follows:

- A. have completed three (3) CLEP general examinations with a score of fifty (50) or better to qualify for pre-legal education with the State Bar of California; and,
  - 1. have completed English Composition (with or without essay); and,
  - 2. have completed two (2) examinations from the following subjects:
    - Humanities
    - College Mathematics
    - Natural Sciences
    - Social Sciences and History

Generally, Pacific Coast University, School of Law limits admission of special students to entering the first year of law study.

**21. Explain the safeguards the law school has established against financial fraud and other financial improprieties. Will the school employ a Chief Financial Officer? (Guidelines 2.1, 2.2)**

The Pacific Coast University, School of Law conducts its financial affairs honestly and in a forthright manner. The University uses a system of checks and balances to ensure no one person has control over all parts of any financial transactions. The handling of students tuition payments and recording are separated from the person making the deposits. The person who creates payable checks is not authorized to sign checks. Purchasing functions are separated from

the payables function. Month end closing procedures are processed by an independent contract accountant.

At the beginning of each academic year a budget is created and approved by the Board of Regents. Quarterly internal reports are provided to the board for review of actual expenditures verses budget. PCU has their financial records reviewed by an outside CPA firm annually as well as have the firm prepare the required tax returns.

The University has a written Refund Policy that is fair and reasonable. Refunds are provided as appropriate, in strict accordance with our written policy.

**22. Provide a copy of the law school's policy on academic freedom. (Guideline 4.10)**

As an educational institution Pacific Coast University, School of Law, is committed to maintaining an intellectual and academic environment, in which its faculty members, students and staff are safe, can be trusted and count on others to be trustworthy, and receive and extend to others respect as human persons. Indeed, mutual respect among Faculty members, students and staff is an essential ingredient in the educational process, and the greatest care must be taken that is not, in any way, be eroded.

**23. Complete and submit the attached library requirements worksheet demonstrating compliance with the requirements of California Rule of Court 9.30(b)(6) and Guideline 6.2 of the Guidelines for Unaccredited Law School Rules. (State Bar Rules 4.240(l); Guideline 6.2.)**

**\*See attachment 23a**

# Appendix

Application for Registration as a California Unaccredited Law School



**SCHOOL OF LAW**

*Founded 1927*

Pacific Coast University School of Law

1650 Ximeno Ave. STE.300

Long Beach, CA 90804

[pculawschool@pculaw.org](mailto:pculawschool@pculaw.org)

562.961.8200



# **PACIFIC COAST UNIVERSITY, SCHOOL OF LAW**

**"SCHOOL OF THE PEOPLE"**

## **Board of Directors**

### **Pacific Coast University School of Law**

As of May 22, 2020, Andrea Lua has been removed as a Board Member of PCU School of Law. No other changes to the Board of Directors are expected or contemplated as we transition to a Registered Unaccredited School.

#### **There are currently six (6) members of the PCU School of Law Board of Directors:**

Name: Carlson, Steven F.  
Licensee, State Bar of California  
Email: [scarlson@carlsonjohnsonlaw.co](mailto:scarlson@carlsonjohnsonlaw.co)  
Tel: 714.289.9818

Name: Carmona, Maren L.  
Licensee, State Bar of California  
Email: [marnie84@yahoo.com](mailto:marnie84@yahoo.com)  
Tel: 562.492.9312

Name: Chin, Nana  
Licensee, State Bar of California  
Email: [chinnana@hotmail.com](mailto:chinnana@hotmail.com)  
Tel: 847.452.3696

Name: El-Farra, Johan A.  
Licensee, State Bar of California  
Email: [jel-farra@pubdef.lacounty.gov](mailto:jel-farra@pubdef.lacounty.gov)  
Tel: 714.306.1361

Name: McDaniel, Barbara J. - Chair / Secretary  
Licensee, State Bar of California  
Email: [harlemgrl@aol.com](mailto:harlemgrl@aol.com)  
Tel: 213.952.0994

Name: Castro Twomey, Kristine -Treasurer  
Licensee, State Bar of California  
Email: [kris2mey@yahoo.com](mailto:kris2mey@yahoo.com)  
Tel: 424.757.3125

**Will the school be largely keeping the policies developed for the accredited program in these areas? If not, please summarize the planned changes:**

*General Note:*

*PCU has determined that it is in the best interests of our current and future students to retain all of the standards and policies that were developed for the accredited program, where such is not in violation of the rules and guidelines for Registered Unaccredited Law Schools.*

*The administration has taken this opportunity to rethink each policy in order to ensure that each offers sufficient transparency and clarity, and that each represents so-called best practices. The policies have not been materially altered – rather, they have been updated, clarified and the language has been re-drafted for the sake of clarity.*

*In order to put these policies on record for CBE, the new language for each of these policies has been included in this **Appendix I to Pacific Coast University School of Law's Application for Registration**, dated as of June 25, 2020, submitted to CBE on said date.*

#### **Equal Opportunity and Nondiscrimination Policies (Rule 4.240 (M))**

Pacific Coast University School of Law (PCU) **shall not seek to make any substantive changes** to our Equal Opportunity and Nondiscrimination Policies, as defined by Rule 4.240(M). As an institution, PCU is absolutely committed to Equal Opportunity, Nondiscrimination, Diversity and Social Justice. With our change in leadership this summer, the school has re-affirmed our commitment. PCU policy (with updated language that makes cosmetic, but not substantive changes) states:

##### ***Equal Opportunity and Nondiscrimination Policy***

Pacific Coast University School of Law has a long tradition of promoting diversity and equal opportunity, beginning with the school's founding in 1927. PCU has always served a vital mission for the people of the State of California. This mission cannot be accomplished without the talent, dedication and skill of the people who teach and learn about the law. Each of us who are part of the educational program at PCU bears a fundamental obligation to ensure that our students, instructors, co-workers and staff are provided a respectful, supportive environment that allows each person to excel. Our commitment to equal employment and educational opportunity is the cornerstone of our effort. No student, instructor or staff member is denied equal opportunity on the basis of sex, race, color, ancestry, religious creed, national origin, disability, medical condition, age, marital status, political affiliation, sexual orientation or veteran status. PCU is committed to eliminating any and all barriers to equal opportunity, and to being a welcoming institution where no one is dismissed, forgotten or denied a chance to excel or to contribute."

#### **Physical Resources and Student Services (Guideline 2.12)**

##### ***Physical Resources***

PCU expanded its student and educational facilities as it was applying for Accreditation in 2009. Classroom space, library space, and a student lounge with vending facilities, not to mention free parking was all expanded to meet the new conditions of Accreditation and to build out the new space the school occupies in the Comerica Bank Building in the Belmont Shore area of the City of Long Beach. PCU has no intention of reducing its physical facilities. In fact, we are in early talks to take on more space for



future expansion of our programs when such becomes possible, assuming successful Registration. We have turned the PCU Law Library into both an extensive, well-stocked law library (both hard copy volumes and online resources), and an ideal place to study or hold small discussion groups or study group meetings, when the pandemic may permit.

In addition, the following is our published Student Services / Activities Policy, as recently confirmed, updated and expanded:

### ***Student Services / Activities***

Pacific Coast University School of Law (PCU) works to constantly provide opportunities for our students to interact with their classmates, students from different class levels, our faculty, staff and administration, including the senior administration. The school also firmly believes in connecting our students with members of the local legal and business communities, and so PCU sponsors at least one major event each quarter, when circumstances permit. These events include but are not limited to: Back to School Picnic (Fall); Holiday Mixer (Winter); Gala for Scholarship fundraising and distribution (Spring); and Presentation of the Graduating Class to the Legal Community (Summer).

PCU Administrators and members of the Board of Directors cultivate, maintain and encourage involvement in the local Barristers and Affinity Bar Associations. Students attending PCU are thus presented with opportunities to secure mentors and relationships with practitioners in their targeted areas of practice. We are in the process of expanding the subject matter areas and career paths presented to our students through our events. We will be advancing a guest series and a speaker series involving members of the entertainment and information industries, as well as representatives of other disciplines, such as the technology sector, real estate and medicine over time and as circumstances permit.

Academic Counseling is provided individually for each student. Each 1L student is scheduled to meet with the Dean at the beginning of their career at PCU, as well as following each round of midterms/exams to discuss academic improvement and to develop appropriate strategies. Upper class student progress is monitored after every exam, with underperforming students required to meet with the Dean. Appointments or drop-ins are welcomed, in person when feasible, online at present, for students to meet with the Dean to address individual, personal academic counseling needs. In addition, instructors in charge of the Academic Support Lab are available during lab hours, or by appointment, to meet student academic counseling needs.

### **Student Discipline (Guideline 2.8)**

Academic Performance Standards\*

Academic Probation Policy\*

Academic Disqualification Policy\*

\*Please note that these policies are included on the PCU website (currently under re-construction to reflect loss of Accreditation), in the Student Handbook and in the Faculty/Employee Handbook (both currently being updated).

### ***Student Disciplinary Policy – Non-Academic***

Fairness and objective judgement are key to PCU's disciplinary policies. These policies are to be reviewed periodically and measured against standards of justice, fairness and impartial application. Careful records are kept (both in files and electronically) for review of each disciplinary incident or procedure.

Should a disciplinary situation arise (excepting academic probation, disqualification, or financial/tuition matters, all covered elsewhere in PCU policy), the student shall be provided with a written notice of the charge(s) being brought. If the student chooses, that student may request a hearing. Said hearing will be convened by the Dean in timely fashion, with a panel comprised of faculty and administration with no interest in the matter involved. When warranted, in the view of the Administration, one or more students may also serve on the panel. During this hearing, the student may have an advisor or counsel present, and may call witnesses, within reason. These must be disclosed to the Administration prior to the hearing itself. Following the conclusion of the hearing, the student is entitled to receive, in a timely fashion, a written final determination. This determination must contain a statement of the facts in the matter, the panel's conclusions and a detailed explanation of any sanctions imposed on the student.

### ***Academic Performance Standards***

Minimum Level of Performance - Juris Doctor (J.D. Degree) candidates must fulfill, at minimum, the following requirements:

1. Student must earn one hundred forty-four (144) quarter units (successful completion of four (4) academic years; and,
2. Student must maintain a cumulative grade point average (GPA) of not less than seventy-five (75%) percent ('C' average).

### ***Academic Probation Policy***

A student is placed on Academic Probation under two distinct conditions. First, any student whose cumulative grade point average falls below 75/100 ('C' average) is placed on Academic Probation, and the student is notified immediately upon the finalizing of grades. Second, any student who, in any single course, receives a grade between 74/100 and 70/100 is placed on Academic Probation. A student on Academic Probation shall have one (1) grading period in which to improve their cumulative grade point average to at least a 75/100 or higher, or, in the case of a single course, to improve their grade in the course in question to a 75/100 or higher. Students on Academic Probation will be required to register, attend, and successfully complete Academic Support Lab, as assigned by the Dean, to clear their Academic Probation. Failure to clear Academic Probation within one (1) grading period shall result in the student being dismissed from PCU. Should a student receive a grade of 69 or below in any single course, they will be deemed to have failed that course.

### ***Academic Disqualification***

Any First Year student who fails one of their required courses shall be dismissed from Pacific Coast University School of Law and will not be able to sit for the First Year Law Students Examination (FYLSX). Any upper-class student who fails two (2) courses will be academically disqualified and dismissed from PCU.

## **Grading and Grade Appeal Policies (Guidelines 2.9, 5.17-5.20)**

### ***Reconsideration of Examination Scores or Grades***

#### **Calibration of Examinations**

Grade integrity is of paramount importance at PCU. Students need to rely on instructor feedback and assessment of their mastery of the material tested. Inversely, instructors deserve the freedom to objectively grade students as they deem appropriate, within the bounds of policies set by the university, and deserve to have those assessments respected. The State Bar of California and all other interested parties are entitled to respect the integrity and accuracy of grades awarded at PCU. To that end, PCU has enacted the following policies:

PCU classes are graded on a numerical basis, according to a standard grading scale, applied consistently. In this way, students are able to pinpoint their mastery of their various subjects. The school currently has several courses graded on a Pass/Fail basis. However, these courses will be converting to a numerical grading scale beginning during the Fall of 2020. PCU rules and policies governing issues such as request for re-consideration of a grade or exam score, course repetition and academic disqualification are discussed below.

Following each Midterm or Final exam administration, instructors shall be given two (2) weeks to complete the grading of all essays and the return to the administrative offices of all exams and grade sheets. The Registrar of PCU has, as a primary responsibility, the chairing of calibration meetings for each exam administered. Following the instructor's grading of exams, each exam will be reviewed and subject to calibration by the calibration committee/faculty. The Committee includes fellow instructors of the students' particular class year. Following calibration, exams are recorded, scanned, then returned to students. Each exam returned will be accompanied by a written rubric identifying the issues and point value assigned by the examining instructor and the points earned.

#### ***Request for Exam Grade Review***

Students may make an appointment, within ten (10) business days of receipt of any graded exam, in order to address areas in question with the Registrar.

#### ***Request for Reconsideration***

Following this appointment with the Registrar, a student may request that the calibration committee address any points still in question, and issue a written report, including a reconsideration of the grade awarded, if appropriate. This request by the student must be in writing, must be delivered within five (5) business days of the appointment with the Registrar, and must specify the particular questions and concerns at issue.

### **Faculty policies (Guidelines 4.1-4.10)**

#### ***Faculty Policy - Instructor Evaluation Program***

PCU instructors are expected to work diligently to improve both their working knowledge of their subject areas and their teaching techniques. At PCU, instructors must constantly hone both their knowledge and their skills. The PCU Faculty/Employee Handbook (currently being updated) spells out specifically the instructor's responsibility in this regard. Each faculty member will be required to have a monthly meeting with the Dean in order to discuss classroom teaching, outstanding issues, support and any difficulties or special circumstances. PCU will provide all materials reasonably required for its Faculty to succeed, including classroom support, outside training, workshops, and other opportunities to improve teaching skills and subject mastery. Providing a top quality legal education in a safe environment is the number one priority of Pacific Coast University School of Law. The performance of instructors in the classroom, in the drafting and grading of exams and special projects, and in individual interactions with students, is monitored closely and evaluated periodically to insure maximum effectiveness. The PCU 'Instructor Evaluation Program' consists of several parts:

1. evaluation of an instructor's performance by the Dean and the Academic Standards Advisor; and,
2. evaluation of each instructor through peer review; and,
3. evaluation of the instructor and the course of study through student evaluations carried out at the conclusion of each class.

#### ***Evaluation of Instructor's performance by the Dean:***

Each instructor shall be evaluated twice (2x) per year at the beginning of the second and third quarters. These evaluations allow the Dean to become acquainted with the instructional style and abilities of each instructor. Evaluations may include suggestions for improvement, as well as commendations for specific strengths. The instructor may also provide feedback to the Dean concerning the 'Instructor Evaluation Program' and develop a dialogue with the Dean. The results of Pacific Coast University's 'Instructor Evaluation Program' are used by the Academic Standards Advisor and the Dean to validate the quality of legal instruction and to implement improvements where necessary.

***Student feedback on instructor performance and course of study:***

Each student is given an opportunity to provide written feedback on their instructor's performance, the course of study, and the support provided to them by the school at the conclusion of each course.

**Record Keeping and Student Privacy (Guidelines 2.10, 5.31, Guideline 9.1)**

***Record and Reports***

Records maintained by Pacific Coast University School of Law meet the requirements of Guideline 9.1 and fall into two general categories. The first is the organizational records of the University, such as accounting and financial, personnel records, minutes of meetings, and contracts. Accounting and financial records are backed up daily using an off-site provider. Personnel and faculty records are stored in fireproof locked cabinets in the Accounting office. Paper copies and scanned documents are kept for all contracts, minutes, and reports.

The second category pertains to prospective students, current students, and alumni. Prospective student and current student files (physical) are kept in fireproof, locked filing cabinets in the Registrar's office. Recent graduate student records are also kept in these cabinets until they can be scanned and verified. Paper copies are kept for approximately one (1) year before they are destroyed. Student and student prospect information is entered into our record keeping program, Roll Call. All qualification, demographic, ethnographic, tuition, attendance and grade information is entered and maintained in Roll Call. PCU's Roll Call system also produces invoices, grade cards and transcripts. The Roll Call data base is part of the daily off-site back-up and recovery plan. Hard copies of grading sheets and attendance records are maintained in binders in locked file cabinets after the data is recorded in Roll Call. At the end of each academic year, these records are scanned and verified. The paper version is maintained for two (2) years before being destroyed. These records are part of the daily off-site and recovery plan.

**Competency Training (Rule 4.240(F); Guideline 5.12)**

Pacific Coast University School of Law currently offers several classes during its four-year program that teach practical skills of legal research, drafting of legal documents, legal writing, trial techniques, and legal professional skills. PCU intends to add other such courses in the near future, as resources permit.

***Fundamentals of Legal Writing, Research and Review for FYLSX:*** An overview for first year students of legal information sources, legal citation, and legal research methodologies, including internet-based legal research. Students receive instruction in writing legal documents appropriate for IL students. In addition, students practice legal writing and MBE multistate questions for the FYLSX.

***Second Year Legal Writing:*** Students receive instruction in writing legal documents appropriate for second year law students.

**Third Year Legal Writing:** Students receive instruction in writing legal documents appropriate for third year law students.

**Fourth Year Professional Writing Intensive:** Students receive instruction in professional writing appropriate for fourth year students, as well as intensive essay writing practice for the Bar Examination.

**Pleading and Practice:** An overview of lawyering skills, emphasizing the day-to-day practical skills required to integrate facts and the law, to present coherent and cogent legal arguments, and to plan appropriate courses of action.

**Professional Responsibility:** The history and organization of the legal profession, ethical rules, and philosophy which govern the practice of law.

**Trial Techniques and Advocacy:** By means of a moot court, students participate in a review of preliminary motions, preparation for trial, selection and jury voir dire, examination of witnesses, and trial procedures.

**Speakers' Series:** PCU intends to introduce students to a wider range of voices from the practice of law and the employment of law school skills in the pursuit of alternative careers. Speakers will be drawn from practitioners, as well as noted experts in various fields.

### **Policy on Course Repetition (giving credit only once) (Guideline 5.24)**

#### ***Course Repetition Policy***

A non-First Year student, whether or not in good academic standing, may be allowed to repeat any course in which the student receives a grade of below seventy (70%) percent. Only the grade received upon repetition of the course shall be included in the calculation of a student's grade point average. Students may only repeat a maximum of two (2) courses during their studies at PCU.

#### ***Petition for Approval to Repeat a Course***

A student shall only be permitted to repeat a course if the student submits a written petition to the Dean, and the Dean approves that petition, outlining:

1. why the student received the grade of below 70% in the course; and,
2. if appropriate, what has changed in the student's personal or professional life that would preclude a repeat of the same failing academic performance; and,
3. why the student believes they will have a better grasp of the course material during a repeated course section.

The Dean, or a designee, shall review the petition and verify that the student has fully outlined the issues, as noted above, does not exceed the number of repeated courses allowed, and should be capable of meeting the performance requirements of the course upon retaking it. Students may not repeat a course in which they receive a passing grade, nor may a student repeat any course more than once.

#### ***Special Circumstances Appeal***

While students may not repeat a course in which they receive a passing grade, the Dean, or a designee, may, under specific conditions, permit the repetition of a course for which a grade of 'C' or better has been received. These conditions include:

1. when the student's previous grade is, at least in significant part, the result of extenuating circumstances. Extenuating circumstances, for purposes of this policy, are defined as verified cases of accident, illness or other circumstances beyond the control of the student; or,

2. when, in the judgement of the administration, a student should repeat a course because there has been a significant lapse of time since the student previously took the course; or,
3. when it is necessary to meet a legally mandated training requirement as a condition of continued paid or volunteer employment, to be assessed and determined by the Administration.

*Guideline 5.20, Evaluation of Students for Advancement and Retention, specifies the intervals at which a student is to be evaluated in order to determine their academic standing. PCU currently evaluates each student at the conclusion of each grading period, whether that grading period represents a midterm, a final exam, or, in some cases, a project-based assignment. Each student is then re-evaluated by the Dean and/or the Dean of Students at the conclusion of each academic quarter. Should it be determined that intervention is required for a student performing at a substandard level, said intervention shall be determined as soon as practicable (generally within five (5) working days of the grading period upon which the determination is based), and the student shall be so notified. Student retention and advancement thus has several off-ramps during any given academic period. Should such be necessary, the range of actions taken in intervention is detailed elsewhere – Reconsideration, Academic Probation, and Disqualification. In addition, as PCU transitions from an accredited to a registered unaccredited law school, an additional off-ramp is offered by the taking of the First-Year Law Students Exam (FYLSX). Students who fail to pass the FYLSX within the required three administrations of the exam dated from eligibility therefore, shall be immediately disqualified from PCU's Juris Doctor program.*

*Guideline 5.25, Criteria for Evaluating Quality of Examinations and Accuracy and Reliability of Grading, specifies certain criteria for determining whether a law school is fairly administering quality exams and providing constant, reliable grading for its students. PCU grading methodology is represented in detail elsewhere in this Appendix. The school's instructors are drawn from the ranks of accomplished legal professionals currently working in the community. Exams are created and honed based upon long precedent and the current state of knowledge in each discipline. The use of Examsoft provides a very controlled system for determining student areas of competence, as well as problem areas that need to be addressed. In addition, all PCU exams are calibrated by a second instructor prior to the determination of grades. As PCU transitions to a registered unaccredited law school, the school shall institute additional exam and grade tracking methodologies, in order to carefully correlate and track the success of First-Year courses in Torts, Contracts, Criminal Law and Legal Analysis and Writing with student success/failure of the First-Year Law Students Examination. PCU shall also be carefully tracking grading policies as between various faculty members, and the Dean shall intervene should a material discrepancy in grading emerge at any point.*

## **Library requirements in California Rules of Court 9.30 and Guidelines 6.2 and 6.4**

PCU has remained in compliance with the rules, regulations and guidelines for Accredited Law Schools since PCU received its Accreditation in 2010. We have now reviewed our library's holdings as of our application for Registration and our intended new status as Unaccredited. Unfortunately, for whatever reason, the rules and regulations require a number of volumes we were not required to carry in hard copy during Accreditation. Upon analysis, we have determined that we need the following hard copy volumes:

*The following items are not in PCU's Library*

Items 1-4 are the listed items on the State Bar's library requirement worksheet for unaccredited law schools.

### 1. Published Reports of the decisions of California

- California Reports: Hard Copy current through 7/3/2018. Lexis Advance Subscription gives our students complete access to the California Reports.
- California Appellate Reports: Hard Copy current through 7/26/18. Lexis Advance Subscription give our students complete access to the California Appellate Reports.
- A Citor for California Cases and Statues with Case Name Citor: Lexis Advance Subscription provides our students with complete access to Shepard's.

### 2. Digest or Encyclopedia (one of three: McKinney, West, or California Jurisprudence)

- West's California Digest Volume 1-50, 1850-1950 – not in the library and not in print. Lexis Advance Subscription provides our students with complete access to California Digest.
- West's California Digest, 2d Volumes 1-50, 1950 to date. Our Hard Copy library is current through July 2016 and we have volumes 1-56A. Lexis Advance Subscription provides our student's with what we do not have in the library.

### 3. An Annotated set of California Codes

- West's Annotated California Codes Hard Copy are current through 8/26/19. Lexis Advance Subscription provides our student's access to what we do not have in the library.

### 4. Texts or Treatise

- The newest available additions are to be purchased in August 2020.

## **Waiver Request**

PCU hereby requests a waiver in order for us to have the time, during the COVID-19 pandemic - when all content will likely be delivered online through at least the fall - of obtaining the missing volumes for our library (as specified herein) for the upcoming academic year. We were not required to have hard copies of these volumes when PCU was an accredited law school, and therefore, PCU stopped receiving updates, as everything was available electronically. We will now go back and obtain all of the required volumes, but we will need time to obtain them all.

During an academic year in which at least the fall is likely to be online exclusively, providing electronic access to materials for our students through Lexis/Nexis has been judged to be of paramount importance for PCU, and we have this covered. Each student has 24/7 access to Lexis/Nexis and to CEB. However, in order to obtain the hard copy volume updates we ceased receiving when they were no longer required under the Accreditation rules, we need to first locate and then purchase the books. However, at least one series of West (1850-1950) is long out of print and may take some time to locate. Together with the significant outlay of resources to purchase inventory, this logistical difficulty during COVID-19 necessitates that we request a waiver for the 2020-2021 school year. We need time to plan and allocate for these acquisitions, and to physically locate the volumes we need.



**PACIFIC COAST UNIVERSITY, SCHOOL OF LAW**  
**“SCHOOL OF THE PEOPLE”**

*F. Miguel Valenti, Dean*

**LIBRARY INVENTORY AND INDEX**

**JUNE 2020**

**I. Decisions of the United States Supreme Court:**

**West’s Supreme Court Reporter (Unofficial)**

Bound Volumes	1-130 volumes, 2009
Interim Edition	130B -137B, 2016

**II. Decisions of the California Supreme Court:**

**A. California Reports (Official)**

1 <sup>st</sup> Series	1-220 volumes, 1934
2 <sup>nd</sup> Series	1-71 volumes, 1969
3 <sup>rd</sup> Series	1-54 volumes, 1991
4 <sup>th</sup> Series	1-63 volumes, 2016
5 <sup>th</sup> Series	1-35 volumes, 2017

**B. West’s California Reporter (Unofficial)**

1 <sup>st</sup> Series	1-286 volumes, 1991
2 <sup>nd</sup> Series	1-135 volumes, 2003
3 <sup>rd</sup> Series	1-232 volumes, 2018



### **III. Decisions of the California Appellate Courts**

#### **A. California Appellate Reports (Official)**

1 <sup>st</sup> Series	1-140 volumes, 1934
2 <sup>nd</sup> Series	1-276 volumes, 1969
3 <sup>rd</sup> Series	1-235 volumes, 1991
4 <sup>th</sup> Series	1-248 volumes, 2016
5 <sup>th</sup> Series	1-11 volumes, 2017

### **IV. American Law Reports: (ALR's)**

4 <sup>th</sup> Series	1-90 volumes, 1991
5 <sup>th</sup> Series	1-125 volumes, 2005
6 <sup>th</sup> Series	1-104 volumes, 201
7 <sup>th</sup> Series	1-10 volumes, 2016
ALR Digest	1-20 Supplement 2015

### **V. American law Reports, Federal: (ALRFED)**

1 <sup>st</sup> Series	1-200 volumes, 2005
2 <sup>nd</sup> Series	1-94 volumes 2015
3 <sup>rd</sup> Series	1-10 volumes, 2016

**VI. West's Annotated California Codes**

Constitution	1-3
Business & Professions	1-5D
Civil	1-12D
Civil Procedure	1-21A
Court Rules	1-23, Part 4
Commercial	1-23D
Corporations	1-25A
Education	1-28B, Part 4
Elections	1-29
Evidence	1-29B, Part 5
Family	1-29H
Financial	1-30D
Fish & Game	1-31A, Part 2
Food & Agriculture	1-31F
Government	1-37B
Harbors & Navigation	1-38
Health & Safety	1-41H, Part 2
Insurance	1-43C
Labor	1-45
Military & Veterans	1-46A
Penal Code	1-51D, Part 4
Probate	1-54A, Part 2
Public Contract	1-54D
Public Resources	1-56E
Public Utilities	1-58C
Revenue & Taxation	1-62A
Streets & Highway	1-64
Unemployment	1-65A, Part 2
Vehicle	1-67B
Water	1-72B
Welfare & Institutions	1-78A
Index A-Z	6 volumes, 2019

**VII. West's California Session Laws**

(2006 – 2015) 29 volumes

**VIII. Corpus Juris Secundum** 34 volumes

1, 7, 8, 14A, 15B, 18, 28, 29, 41, 44, 45, 48A,  
52, 55, 59A, 64 64A, 65, 65A, 67, 68, 70, 73B,  
74, 78, 79, 79A, 80, 81A, 84, 85, 89, 92A, 97

**IX. Words and Phrases** 1-46A, 2008

**X. West's California Digest**

2<sup>nd</sup> Series

1-56A, 2016

**XI. Treatises – Witkin**

- |                              |                    |
|------------------------------|--------------------|
| A. Summary of California Law | 1-18 volumes, 2019 |
| B. California Procedure      | 1-10 volumes, 2019 |
| C. California Criminal Law   | 1-7 volumes, 2019  |
| D. California Evidence       | 1-4 volumes, 2019  |

**XII. Shepard's California Citations**

Case Edition	1-18 volumes, 2009
Supplements	1-4, 2012-2016

Statute Edition	1-9 volumes, 2009
Supplements	1-4, 2009-2012
Supplements	1-3, 2009-2013

Annual Cumulative Supplement	1, 2014
	8, 2016

**A. West's California Judicial Council Forms**      1-4 volumes, 2016

**B. California Jury Instructions**

Civil Jury Instructions	2 volumes, 2016
Criminal Jury Instructions	2 volumes, 2016
California Jury Instructions (BAJI)	2 volumes, 2016
California Jury Instructions (CALJIC)	2 volumes, 2016

**Online Resources**

- Lexis Advance Subscription
- CEB
- Barbri

**LIBRARY REQUIREMENTS WORKSHEET****GUIDELINE 6.2 OF THE GUIDELINES FOR UNACCREDITED LAW SCHOOL RULES**

6.2 Library Requirements. Registered unaccredited law schools must comply with the following library requirements as set forth in California Rule of Court 9.30 and the *Rules Regulating Admission to Practice Law in California*. Please establish that the school has all required resources listed in CRC 9.30 including the following:

<b>Fixed-Facility Law School Requirement</b>	<b>Hard Bound</b>	<b>Electronic</b>	<b>Indicate Hard Bound, Electronic or Both</b>
The published reports of the decisions of California Courts, with advance sheets and citator (all of which must be current and complete)	X	Optional	Both
A digest or encyclopedia of California law (all of which must be current and complete)	X	Optional	Both
An annotated set of California codes (all of which must be current and complete)	X	Optional	Both
A current, standard text or treatise for each course or subject in the curriculum of the law school for which such a text or treatise is available.	X	-	See List

<b>Correspondence and Distance-Learning Law School Requirement</b>	<b>Hard Bound</b>	<b>Electronic</b>	<b>Indicate Hard Bound, Electronic or Both</b>
The published reports of the decisions of California Courts, with advance sheets and citator (all of which must be current and complete)	Optional	X	
A digest or encyclopedia of California law (all of which must be current and complete)	Optional	X	
An annotated set of California codes (all of which must be current and complete)	Optional	X	
A current, standard text or treatise for each course or subject in the curriculum of the law school for which such a text or treatise is available.	X	-	
NOTE: The hardbound edition must be available at the law school's primary administrative office			

## LIBRARY REQUIREMENTS WORKSHEET FOR CALIFORNIA UNACCREDITED LAW SCHOOLS

See Rule 9.30 of the California Rules of Court and Guideline 6.2 of the *Guidelines for Unaccredited Law School Rules*.

<b>Published Reports of the decisions of California (one of the three reporting systems):</b>	<b>Yes</b>	<b>No</b>	<b>Indicate Hard Copy, Electronic, or Both</b>
California Reports, Volumes 1 to 220	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Both
California Reports, 2d, Volumes 1 to 71	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Both
California Reports, 3d, Volumes 1 to 54	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Both
California Reports, 4th, Volumes 1 to Date	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Both
California Appellate Reports, Volumes 1 to 140	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Both
California Appellate Reports, 2d, Volumes 1 to 276	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Both
California Appellate Reports, 3d, Volumes 1 to 235	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Both
California Appellate Reports, 4th, Volumes 1 to Date	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Both
<b>OR</b>			
West Reporting System, Pacific Reporter, Volumes 1 to 300	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
West Reporting System, Pacific Reporter, 2d, Volumes 1 to 999	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
West Reporting System, Pacific Reporter, 3d, Volumes 1 to Date	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>OR</b>			
West's California Reporter, Volume 1 to Date (Reprints of California Cases from Pacific Reporter, 1 <sup>st</sup> , 2 <sup>nd</sup> and 3 <sup>rd</sup> )	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Both
<b>PLUS (regardless of reporting system used)</b>			
A citator for California Cases and Statutes with Case Name Citator (required in addition to the provided reporting system)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Electronic

<b>Digest or Encyclopedia (one of the three: McKinney, West, or California Jurisprudence):</b>	<b>Yes</b>	<b>No</b>	<b>Pocket Supplement Date</b>	<b>Indicate Hard Copy, Electronic, or Both</b>
McKinney's California Digest	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
McKinney's California Digest of Cases in California Reports, 3d Series	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
West's California Digest Volume 1-50, 1850-1950	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
West's California Digest, 2d Volumes 1-50, 1950 to Date	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2016	Both
California Jurisprudence, Third, Volumes 1-66 plus indexes	<input type="checkbox"/>	<input checked="" type="checkbox"/>		

<b>Codes (one of the two)</b>	<b>Yes</b>	<b>No</b>	<b>Pocket Supplement Date</b>	<b>Indicate Hard Copy, Electronic, or Both</b>
Deering's California Codes	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
West's Annotated California Codes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2017	Both

<b>Texts or Treatises: (Insert name of author and date and number of edition).</b> Add other texts or treatises, as applicable, for each course or subject in the curriculum of the law school for which such a text or treatise is available.			
Subject	Author	Date	Edition
Business Associations			
Civil Procedure			
Community Property			
Constitutional Law			
Contracts			
Criminal Law			
Evidence			
Professional Responsibility			
Real Property			
Remedies			
Torts			
Trusts			
Wills and Succession			

**See Booklist attached:**

## Pacific Coast University School of Law TEXT BOOK LIST

Subject	Author	Date	Edition
Business Associations	Klein, Ramseyer, and Bainbridge	2016	4th - TBA
Business Associations	Hazen and Marcham	2016	4th
Business Associations	Alan R. Palmiter	2015	8th
Civil Procedure	Friedenthal, Miller, Sexton and Hershkoff	2013	11th
Civil Procedure	Friedenthal, FRCP Supplement	2018	11th
Civil Procedure	Siegel	2012	5th
Community Property	J. Carrillo	2017	11th
Constitutional Law	Chemerinksy	2017	5th
Contracts	Calamari & Perillo	2018	7th
Criminal Law	Dripps	2017	13th
Criminal Procedure	Kamisar	2019	15th
Evidence	Park	2012	12th
Professional Responsibility	Martyn & Fox	2018	4th
Professional Responsibility	Martyn	2019 -20	2019 -20
Real Property	Cribbet, Johnson, Findley, Smith	2008	9th
Remedies	Laycock	2019	5th
Torts	Prosser, Wade, and Schwartz's	2019	13th
Wills and Trusts	Wendel	2017	-
Wills and Trusts	French	2019	7th
Legal Research	Sloan	2018	7th
Trial Techniques	Mauet	2017	10th
Alternate Dispute Resolution	Fisher & Ury	2011	3rd
Alternate Dispute Resolution	Rau	2006	3rd

**The Committee may ask whether the other programs described at the hearing will still be implemented in support of bar passage, and it would be helpful to share that information.**

PCU is proceeding with a wide variety of initiatives and changes in order to both increase the Bar Pass Rate and maximize the student experience while at PCU. Some of these include the following:

1. PCU will be hiring new personnel to better serve PCU students. These will include, over time, a Dean of Students, a Chief Financial Officer and an Associate Dean of Career Counseling, as well as a Director of Bar Examination Preparation. We have already removed all additional duties from the PCU Registrar so that she will be able to devote her time exclusively to the Registrar position.
2. PCU is currently tightening admissions standards for new applicants. The school intends to be more competitive moving forward, and less flexible on admitting students who might not be able to manage the time or the curriculum, for whatever reason. Selecting the best students will put us down the road to having a solid MPR and a strong class of graduates.
3. PCU is publishing a more explicit version of our Attendance Policy. Every student will be required to sign it. No deviations from the policy will be allowed, barring extreme or unique circumstances, to be determined by the Faculty member and the Dean. PCU has had no serious attendance issues to speak of, but we intend to make a strong statement in any case, through reprinting and general discussion of this policy. Any student who fails to adhere to the policy will be cited, as they have been. Repeat violations of the eighty (80%) percent rule will result in the student being asked by the Dean to withdraw from PCU.
4. Every enrolled student shall meet with the Dean at the start (enrollment), in the middle (midterms), and at the end (finals) of each term.
5. PCU will be increasing the amount and quality of career counseling available to students.
6. PCU has provided small childcare grants to free up our students so that they can put in the time required to study for the CBX. We have had some success with this program to date, and we intend to expand it for our graduating classes.
7. Each matriculating student shall be assigned a faculty mentor, whom that student will need to meet with, at the very least, at the start of each term.
8. Each matriculating student shall be assigned an alumni mentor, whom that student will need to meet with, at the very least, at the start of each term. Representing success in getting through law school and starting or continuing a career, this alumni mentor shall help keep the student focused on the importance of excelling in law school and planning ahead for career.
9. PCU will be assigning each interested alumnus who has not yet passed the CBX an alumni mentor. In addition, the school can provide off campus tutoring should such be desired.
10. PCU currently holds a bar review session on campus for those who did not pass the CBX on previous attempts. Instructors are in attendance to help students with particular problem areas.
11. PCU intends to provide MBE practice periods prior to the start of most class periods. This shall serve to focus and expand exam review.
12. Students will be asked to form 'working groups,' Each group will be assigned a CBX essay-type question, and group members will need to work out the answers collectively, acting as a check one to another and creating a means for peer-to-peer learning. The group will then have to verbally present their answer to the class and respond to questions. As this practice becomes more embedded in PCU culture, contests, tie-breakers and other motivations will be introduced.



13. The use of Examsoft for PCU examinations allows instructors to more clearly visualize particular student deficiencies and help in the explanation and review of all exam questions. PCU now uses Examsoft for all of its examination administration.
14. To whatever extent possible, PCU will provide an ever-increasing amount of online CBX preparation material. We intend to institute a “Bar Blog” for hints, tips and stories, in addition to announcements and tricky problems to solve. We will also include reputable study materials and ideas as appropriate.
15. PCU is instituting a short workshop concerning the psychology and physical stress of test-taking. This workshop will address issues from test anxiety to time management, from clarity of ideas to personal preparedness. The workshop will not be discipline specific, but rather, will address how a test as grueling as CBX can best be approached.
16. PCU is currently working to create a broader spectrum of elective courses. These include classes in subjects such as Intellectual Property, Entertainment & Sports Law, Legal Issues in Technology, Real Estate, Law in Medicine and the like. These electives will serve to increase student interest, widen horizons and offer alternative career ideas.
17. PCU is working to develop a broader spectrum of internship, externship and clinical programs.
18. PCU intends to expand Pro Bono opportunities for its students.
19. PCU intends to launch a ‘Return Program’ for our alumni. This is somewhat in line with the program Cal Northern has instituted of a “5 Year Return.” The intent is to bring alums back for courses updating their skills, as well as a refresher in professional responsibility. We are working on the design of this program now and will present it to Bar Association at the appropriate time.
20. PCU would like to increase involvement with local and state-wide Bar Associations for the benefit of our students.
21. PCU has already begun to embark on a program of forming strategic alliances with local lawyers and law firms, businesses and not-for-profit organizations for the benefit of our students and their future careers.
22. PCU intends to change the way the 4L schedule is structured. Students, during the fall of their fourth year, are largely focused on Bar Exam stress. It is difficult to attain maximum performance in the practicum, preparatory and advanced courses PCU offers. PCU intends to use this opportunity to institute an Intensive Analysis and Writing program for 4Ls, which will greatly aid in Bar Exam passage. Portions of the traditional fall curriculum will be shifted, to whatever degree possible under the regulations of CBE, to the summer session prior to the start of 4L. Certain of the practicum and advanced courses would therefore be completed by the start of the fall, freeing up time and concentration for our new Intensive Writing Workshop for 4L and Bar Preparation. We are working to determine the logistics of making this happen.

**Finally, assuming accreditation is granted, then retained students in your program will be treated as transfer students from accredited schools, and the school will need to have a plan to document the courses that were taken while the school was accredited versus those taken while the school was registered. (Guideline 5.2) Will the school have an infrastructure in place to handle this change and keep students informed?**

The Committee of Bar Examiners of the State of California has seen fit to revoke Pacific Coast University’s Accreditation as a result of sub-standard Bar Examination pass rates. PCU has applied to return to the status it held for some 80+ years, from its founding in 1927 until 2010 when it became an Accredited Law School - that of a Registered Un-Accredited Law School. PCU is now required to ‘transfer’ all credits earned by our current students from PCU Accredited to PCU Registered, assuming

the application to return to Registered Un-Accredited status is approved. PCU has developed an internal system that will allow the school to seamlessly transfer credits earned while the school was Accredited to PCU as Registered and Un-Accredited. Students have all been notified that this process will be undertaken as soon as the application for Registration has been approved. Everything will be in place by the start of the new term this fall quarter. *Current and prospective students have been notified by the school about the loss of Accreditation. The specifics of the internal transfer of credits shall be communicated to all students once the Registration Application of PCU is approved or rejected.*