



The State Bar of California

OPEN SESSION

AGENDA ITEM O-409

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 Major Change Request Adding a New Full-Time JD Program – San Francisco Law School

EXECUTIVE SUMMARY

San Francisco Law School (SFLS) seeks Committee of Bar Examiners (CBE) approval of a Major Change Request to offer a full-time JD program at its Emeryville campus starting this fall. The school seeks to offer this program in order to assist students who wish to transfer from John F. Kennedy University School of Law because that school is closing, and the students wish to complete their studies in a fixed facility JD program near their homes.

BACKGROUND

A law school must submit a major change request seeking the CBE's prior approval when the law school "seeks to institute [or make permanent] a new division" or "offer[] any new program in law study." (Rule 4.165(A), (E)) The request must not only describe the change requested, but also "must explain in detail any effect the change might have on the law school's compliance with the rules." (Rules 4.164, 4.165) Accredited law schools must seek advance approval before offering a new division such as a full-time program.

The CBE should evaluate a school's major change request to determine whether it complies with the Rules and Guidelines for Accredited Law Schools, as well as to determine the effect that each request may have on the school's overall compliance. The CBE may grant the request, grant the request with conditions, or deny the request.

Here, SFLS is an accredited, fixed facility law school offering a JD degree through its campuses in Emeryville and San Diego. Each campus offers a part-time evening JD program over four years, comprised largely of fixed facility classes and a few online classes as well.

The school was approached by ten students from John F. Kennedy University School of Law in Emeryville because these students were seeking a fixed facility school where they could finish their JD degree, and San Francisco Law School is the only other accredited law school program in the East Bay area. John F. Kennedy University School of Law will be closing at the end of this year, discontinuing its fixed facility JD program, and transferring its online JD program to Northcentral University. While all students at that school were offered the opportunity to transfer to the online JD program, some students prefer to continue their study in a fixed facility classroom program.

The full-time program would be based at the Emeryville campus and would begin by offering classes to second-year and third-year full-time students. Full-time students would take combination of classes during the evening along with part-time students as often as possible and additional classes during the day. This structure limits the number of incremental classes that the school will need to add during each term, helping the school to keep tuition affordable.

The school seeks approval to continue the full-time program and begin a first-year cohort in fall 2021.

The overall requirements for graduation would be the same for both full-time and part-time students, except that full time students would take a compressed schedule.

The school provided a detailed application to demonstrate that the full-time program will operate in compliance with the accredited rules and guidelines. With that said, the school is facing a number of competing priorities which need to be accomplished in order for the school to maintain its accreditation. This raises concern as to the school's capacity to implement further initiatives.

DISCUSSION

There are two elements to evaluating a major change request.

The first element involves analyzing the compliance of the particular item requested. Here, the school demonstrates compliance in detail by reviewing how the program complies with each element of Rule 4.160, focused on requirements of accredited law schools. Moreover, the program will use the same building blocks as the part-time program, simply rearranged to a full-time format. To further conserve resources, the school will have full-time students attend classes along with part-time students, to limit the number of additional class sessions that must be added each semester just for the full-time students.

The second element involves understanding how the proposed change will affect the overall compliance of the school. Here, that is a more complicated question, as the school is facing two significant challenges.

The school is undergoing its periodic inspection now and the Committee is likely to receive the report in October 2020. The school has received a draft of the report and, on July 27, 2020, requested sixty days to gather evidence to clarify certain points of the inspection and document progress as to the changes it is making as a result of the team's visit. One of the issues identified is the overall level of administrative capacity at the school to provide adequate services and avoid material errors. Since the inspection, the school has added a full-time registrar and an additional full-time faculty member who teaches three classes and also advises students. It is unclear whether these hires are sufficient to support the addition of a full-time program, and a more full discussion with the full inspection report available may be warranted.

The school is also facing a compliance issue as to its minimum, cumulative five-year bar passage rate (MPR). The school's 2020 MPR of 36.0 percent is below the 40 percent minimum required for accredited law schools, and this will be a discussion under separate cover today. The school's MPR has been on a downward trajectory in recent years, as SFLS reported an MPR of 46.2 percent in 2018 and 41.7 in 2019.

Given the issues of resource constraint and noncompliant bar passage rate, it is difficult to conclude that the addition of a new program will not distract from these key issues.

In addition, if the school is not able to raise its MPR to a compliant level within an acceptable time frame, and the school transitions to registered, unaccredited status, it would need to end this proposed full-time JD program, as registered, unaccredited law schools are only permitted to offer part-time programs.

On the other hand, the school is adding a program for the purpose of assisting students who wish to attend a fixed-facility law school near their home and do not have another similar alternative in the area. Ultimately, once starting the full-time program, the school seeks permission to continue it and to expand recruitment beyond this initial cohort of transfer students.

A reasonable interim course of action could be to focus and limit the CBE's approval, allowing SFLS to create a temporary full-time program that would allow the school to teach out the current cohort of students transferring from John F. Kennedy University School of Law over the next two years.

Then, later, as the school's compliance can be better assessed through review of the inspection results, subsequent progress, and plans related to increasing the MPR, the school can resubmit. This compromise also allows the school to train its new personnel and demonstrate whether it has sufficient capacity to operate its current programs and add an additional full-time program.

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 CBE receives and files San Francisco Law School's application for major changes to create a full-time fixed facility JD program. It is further recommended that the Committee grant the request in part, and deny it in part. It is recommended that the CBE approve the school's plan to offer a full-time program to those students transferring from John F. Kennedy University Law School, allowing a teach out plan for these students close to where they live now that their original school is closing.

It is recommended that the Committee deny the school's plan to offer a general full-time program to allow the school to focus on the changes identified on a preliminary basis as part of the most recent inspection as well the school's minimum, cumulative bar passage rate. This not only allows the school to focus on its key priorities needed to maintain accreditation, but also protect students, who would need to discontinue their education in a full-time program if the school's accreditation should lapse.

PROPOSED MOTION

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

MOVE, that the Committee of Bar Examiners receives and files San Francisco Law Schools' request for major change to add a full-time online program. Further move that the request be granted in part and denied in part. The request is granted to allow the school to offer a full-time program as a teach-out option for those students transferring from John F. Kennedy School of Law because that school is closing. The request is denied in part, as permission is not yet granted to add a permanent full-time JD program, in order to allow the school to focus its efforts on retaining accreditation, and protecting students in the event that the school's accreditation lapses and it is required to end any full-time program.

ATTACHMENT(S) LIST

- A.** San Francisco Law School Application for Major Change – Add Full-Time Program



SAN FRANCISCO LAW SCHOOL
ALLIANT INTERNATIONAL UNIVERSITY
1475 66th Street, Suite 104, Emeryville, CA 94608
415-955-2162

July 27, 2020

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

Dear Committee Members,

San Francisco Law School is requesting the approval of an accredited fulltime program.

SFLS is also requesting the CBE grant a waiver of the 90 day rule due to the unique situation that John F. Kennedy College of Law (JFKU) students face with the closure of the on ground campus. A number of JFKU students wish to continue their law school experience at an on ground campus. SFLS offers that experience at its Emeryville campus.

The proposed full-time program will be integrated with, and an extension of, the existing part-time program. SFLS is submitting this notice and request for approval to assure compliance. Therefore, in this submittal, SFLS has addressed the major guidelines.

SFLS' request demonstrates SFLS and its parent, Alliant International University, are committed to the success of our students and to being fully compliant with the State Bar Guidelines as the school moves forward with the full-time program.

For instance, in June 2020 SFLS hired a new Registrar, Karen McCray. Ms. McCray has over 12 years Registrar experience with various educational institutions. This has allowed SFLS to refocus record keeping and ensure a better student experience. Having a fulltime Registrar will also allow Dean Weimer to focus more time on his Administrative duties.

SFLS has also hired a new faculty member, Katherine Alfieri. Prof. Alfieri came to SFLS as an adjunct professor over a year ago. She will be located in Emeryville as a core faculty member and will be teaching 2-3 courses each semester, as well as advising students.

By upgrading and modernizing the Registrar position and hiring another faculty member, the resources that were not available to SFLS are now available. These changes will also allow SFLS to better leverage the clerical support through AIU's San Diego headquarters. SFLS has the capacity to successfully administer the full-time program.

SFLS has also instigated greater improvements in giving feedback to our students including requiring professors to include more mid-term exams followed by timely feedback, weekly MBE type quizzes and additional writing assignments. Professors are also required to now include a grading rubrics, along with a grading matrix that they use when grading exams. These documents are made available to students to allow for more focused feedback in a more timely manner. This ensures students are getting more timely, focused help as they progress through law school.

Finally, SFLS has also increased the resources available for Bar Exam preparation for all alumni. This includes weekly workshops on various exam taking tactics, reviewing of topical materials, MBE strategies and review, practice essay review and feedback sessions, and one-on-one tutoring for those who request it.

As mentioned above, San Francisco Law School and its parent, Alliant International University, are committed to the success of our students and to being fully compliant with the State Bar Rules as it expands its offerings with a full-time program.

We look forward to working closely with the State Bar of California to ensure a successful expansion and continued compliance of our law school programs.

Sincerely,

Timothy P. Weimer

Timothy P. Weimer, Dean
San Francisco Law School

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SAN FRANCISCO LAW SCHOOL
ALLIANT INTERNATIONAL UNIVERSITY

MAJOR CHANGE SUBMITTAL 2020

Full-time Program

TABLE OF CONTENTS

I.	Overview.....	1
	A. Overview	1
	1. Major Change Proposal	1
	2. Major Change Requirements	1
	B. Initial Date of Offering.....	2
	C. Format and Duration of Proposed Program	2
	D. Student Population	2
	E. Expansion of the Law Program	2
II.	Accreditation Relevant to the Major Change.....	3
	A. Committee of Bar Examiners Accreditation.....	3
	B. WASC Accreditation	3
III.	Evaluation of the New Program	4
	A. Consistency with the SFLS Mission	4
	B. WASC Objectives.....	6
	C. Accredited Law School Rules	6
	1. Lawful Operation	6
	2. Integrity	6
	3. Governance	7
	4. Dean and Faculty	7
	5. Educational Program	7
	6. Scholastic Standards.....	8
	7. Admissions	9
	8. Library	10
	9. Physical Resources	10
	10. Financial Resources	11
	11. Records and Reports	11
	12. Equal Opportunity and Non-Discrimination.....	11
IV.	Summary	11

I. Overview

A. Overview

1. Major Change Proposal

San Francisco Law School is making this Request of Major Change to the Committee of Bar Examiners (CBE/Committee). Our proposal is to initiate a Juris Doctorate (JD), full-time program. San Francisco Law School (SFLS) currently has a part-time evening program accredited by the Committee of Bar Examiners and the Western Association of Schools and Colleges (WASC) as a school of Alliant International University (AIU).

2. Major Change Requirements

The submittal, by a California Accredited Law School, for approval of a major change is governed by *Accredited Law School Rules* 4.105, 4.164 and 4.165. These Rules provide that the institution of a new division, either part-time or full-time, is a major change of which the law school must notify and obtain approval at least 90 days prior to making the change.

SFLS is requesting the CBE allow a waiver of the 90 day rule due to the unique situation that JFKU student face with the closure of their on ground campus. A number of JFKU students wish to continue their law school experience at an on ground law school. SFLS offers that experience for these students.

Accredited Law School Rules

Rule 4.105 Definitions

(J) A "major change" is one of the changes specified in rule 4.165.

Rule 4.164 Prior Approval of Major Changes. An accredited law school contemplating a major change must notify the Committee and obtain its approval at least 90 days before making the change. The notice must explain in detail any effect the change might have on the law school's compliance with the rules and be submitted with the fees specified in the Schedule of Charges and Deadlines. The Committee may then require submission of additional information or an inspection.

As mentioned above, SFLS is requesting the CBE allow a waiver of the 90 day rule due to the unique situation that JFKU student face with the closure of their on ground campus. A number of JFKU students wish to continue their law school experience at an on ground law school. SFLS offers that experience for these students.

Rule 4.165 Major Changes.

The following are major changes:

- (A) **Instituting a new division either part-time or full-time**, or changing from a part-time to a full-time program, or from a full-time to a part-time *program (emphasis added)*

The proposed full-time program will be integrated with, and an extension of, the existing part-time program. SFLS is submitting this notice and request for approval to assure compliance.

B. Initial Date of Offering

The initial date of offering of the new program is expected to start, upon approval by the Committee of Bar Examiners, at the start of the Fall Session 2020 for existing students and students transferring from John F. Kennedy University College of Law (JFKU) at the Emeryville campus. If the cohort is large enough, the new program will be offered to new students Fall 2021.

C. Format and Duration of Proposed Program

The new, full-time legal program is anticipated to be ongoing and permanent. The current JD program is a four year, part-time program. Currently, classes are offered on campus and via distance learning platforms, primarily in an evening format. Some elective courses are offered on the weekends.

The full-time program will utilize both day and evening classes. Existing evening classes will not be restricted. Both day and evening course offerings will be available to full-time students and part-time evening students.

D. Student Population

The majority of the students at San Francisco Law School are expected to continue to be made up of working professionals taking a part-time curriculum. The new student population is expected to comprise those who are seeking a three year legal program, and some part-time students who elect to accelerate their completion of law school. The initial phase of the full-time program will be offered to assist JFKU transfer students in completing their law degree in the three years originally planned upon entering JFKU. The rest of the program will be phased-in, as it will be of little benefit to students entering their third and fourth years.

E. Expansion of the Law Program

San Francisco Law School has had a part-time, evening program for over 100 years. SFLS was established at time when evening education was novel, and evening law schools did not yet exist in the western United States. For many years, San Francisco Law School was the only evening law program in the Bay Area.

Since its earliest days, SFLS's JD program was on the leading edge of outreach to women and students of diversity. It continues to be committed to serving

underserved populations - whether by diversity or socioeconomic status - who in large numbers, upon graduating, work in the public interest sector and return to their communities. Not surprisingly, about half of the SFLS students are diversity students. Many are the first in their family to enter a graduate program and first to have graduated from college.

A full-time program is expected to be a well-received expansion of the current program. It will allow San Francisco Law School to make an orderly expansion of its student population and to better serve those students who have the opportunity to accelerate their education. The program is part of a planned expansion of SFLS that will help bring additional resources – including full-time faculty – to the School.

San Francisco Law School has already hired a new core faculty member for its Emeryville campus to support the expansion. SFLS's other faculty (fulltime and adjunct) support this new program and feel that the expanded opportunities for both students and faculty will strengthen the law school.

San Francisco Law School does not stand alone in its new endeavors. It also has the support of, and expertise from Alliant University's other graduate schools (Business, Education, Forensic Studies and Psychology) - all of which have expertise in full-time graduate programs. Alliant serves more than 5,000 students in six California cities and three international locations. Its robust administrative infrastructure can easily accommodate an additional program and modest expansion of SFLS.

II. Accreditation Relevant to the Major Change

A. Committee of Bar Examiners Accreditation

San Francisco Law School has been accredited by the Committee of Bar Examiners since accreditation started in 1937. It is the longest-standing accredited law school in California.

Last fall, San Francisco Law School submitted its *Self-Study* to the Committee in anticipation of the visit from the Periodic Review team. SFLS welcomed the team and is confident it demonstrated improvements in compliance with CBE Guidelines.

B. WASC Accreditation

In 2009, this Committee and WASC approved the merger of San Francisco Law School and Alliant. The United States Department of Education (DOE) approval followed in the Spring of 2010, and the merger was completed on July 1, 2010.

In Spring 2011, Alliant completed its WASC reaccreditation process and the University has been reaccredited for the last nine years. A reaccreditation with WASC was in the process when COVID 19 interrupted daily business routines. The completion of the reaccreditation is expected to take place in September 2020 (dates still to be determined). Attached, as **Exhibit 1**, is a copy of the

WASC Commission Letter.

San Francisco Law School has made significant strides in the years since the merger and has strived to come into full compliance with both WASC standards and the practices of Alliant. San Francisco Law School has established a Faculty Council to strengthen academic governance, including peer review of instructors.

As a condition of its approval of the merger, WASC requires that San Francisco Law School appoint one or more full-time faculty members. Scott Pearce currently serves as the full-time faculty member and works at the San Diego branch campus location.

The expansion to a full-time program is one means of working to develop a richer teaching and learning environment. One of the strengths of SFLS – and of all California accredited law schools – is its talented faculty made up of practitioners. By adding additional full-time faculty to the School, we will enhance the continuity and cohesion of the overall program while continuing the rich tradition of engaging instructors from the local legal community.

III. Evaluation of the New Program

A. Consistency with the SFLS Mission

The historical mission of San Francisco Law School has been to provide the opportunity for a quality legal education to underserved populations. For over 100 years, this mission was accomplished through a part-time, evening program focused predominately on working adults in the local area.

Now, however, to truly serve our current student population, a program that is held exclusively in the evening is not sufficient to accommodate the needs of a growing number of applicants and students. Due to the economic impacts of COVID-19 many students are no longer working full-time, nor are they all working traditional hours in day jobs. Some do not work at all. Many students have the ability and desire to take a greater number of units. Their goals are either to graduate earlier or to have a greater amount of time to concentrate on bar skills and bar examination review programs. Students without jobs want to finish law school in three years in order to move more quickly to employment and to reduce the opportunity cost of time spent in school.

Consistent with the practices of both ABA approved and other accredited law schools, there are instances where a student is allowed to retake a course. A full-time program will allow SFLS to better address the needs of these students, although limited in number, whose progress towards graduation would otherwise be delayed by a full year.

Affordability and diversity have been hall marks of education at San Francisco Law School. There is a need for an affordable full-time program like the one that San Francisco Law School is proposing. The tuitions for the adjacent full-time programs in San Francisco are approximately *double* the cost of attending SFLS.

(The following figures are tuition *only* and do not include any other fees, university required insurance, nor living expenses.)

- Golden Gate University - offers both a full-time and a part-time program. Full-time tuition is \$51,500 per year.
- Hastings College of Law - offers only a full-time program. Full-time tuition is \$45,758 a year.
- University of San Francisco School of Law - offers both a full-time and a part-time program. Full-time tuition is \$51,650 a year.

In contrast, a full-time program at San Francisco Law School would be only \$22,540 a year at tuition rates set for 2020-2021. With the closing of John F. Kennedy University College of Law's on ground campus, the program being proposed by SFLS is the type of legal education alternative that is currently missing, yet vitally needed, in our locale.

SFLS is committed to training students of color and those from disadvantaged backgrounds. True to the nature of our Accredited Law Schools, although the number of enrolled students is small, SFLS has higher proportions of students of diversity compared to most other law schools, both locally and state wide. As a school of Alliant, this historic commitment to student diversity has been enhanced. According to recently published reports based on Federal databases, Alliant ranks 12th in the nation in the number of doctorate degrees awarded to minorities.

The chart below from the 2006 Report and Recommendation of Diversity Pipeline Task Force by the State Bar of California based on 2000 U.S. Census data indicates that attorneys in practice do not mirror the race/ethnicity of the populations. SFLS and Alliant remain committed to educating diverse communities through education, scholarship, multicultural competence and community engagement, as part of its populations. SFLS and Alliant remain committed to educating diverse communities through education, scholarship, multicultural competence and community engagement, as part of its mission and vision.

Attorneys by Race/Ethnicity in California's Largest Counties				
County	White	Hispanic	Black	Asian
San Francisco residents	43.6%	14.1%	7.8%	30.8%
San Francisco attorneys	81.3%	3.9%	3.0%	9.1%
Los Angeles County residents	31.1%	44.6%	9.8%	11.9%
Los Angeles County attorneys	79.8%	6.6%	4.5%	6.8%
Santa Clara County residents	44.2%	24.0%	2.8%	25.6%
Santa Clara County attorneys	80.3%	5.5%	2.7%	8.6%
Fresno County residents	39.7%	44.0%	5.0%	8.0%
Fresno County attorneys	85.5%	7.4%	3.4%	1.2%
County	White	Hispanic	Black	Asian

San Diego County residents	66.5%	26.7%	5.7%	8.9%
San Diego County attorneys	87.1%	6.6%	1.5%	3.0%
Sacramento County residents	57.8%	16.0%	10.0%	11.0%
Sacramento County attorneys	86.6%	4.6%	1.9%	4.8%
Alameda County residents	40.9%	19.0%	14.9%	20.4%
Alameda County attorneys	78.9%	3.3%	7.4%	8.0%

Source: 2000 US Census Data

Diversity and Opportunity are highly valued at SFLS and Alliant. It is common for SFLS to achieve almost 50% diversity each year. SFLS/Alliant have a proven track record of support for equal opportunity and strong non-discrimination policies and practices.

B. WASC Objectives

The merger with Alliant and the resulting participation in WASC accreditation has created some new expectations for SFLS. The requirement of at least some full-time faculty members has already been mentioned. In addition, SFLS will be increasingly required to show that it is providing a robust educational environment for its students—one that goes beyond merely delivering a minimal curriculum. A full-time program will enhance the entire environment and culture of SFLS, and allow for the reinvigoration of such co-curricular activities as clinical field work, Moot Court competitions and Bar Review. A full-time program will help assure the "critical mass" of students and faculty required to sustain these kinds of activities.

C. Accredited Law School Rules

In November 2019, San Francisco Law School completed its most recent Self Study, which was submitted prior to a site visit. SFLS welcomed the visiting team in January and February 2020. With the new program, SFLS will remain fully compliant with the Accredited Law School *Rules* and the regulations under the *Guidelines*.

1. Lawful Operation

Alliant International University is an educational institution. AIU/San Francisco Law School is in compliance with all laws and regulations. Expansion to a full-time program will have no effect upon the lawful operation of San Francisco Law School.

2. Integrity

As the oldest evening law school in the Western United States, San Francisco Law School has a long history and practice of integrity, diversity, and inclusion. Although not as old, Alliant's record is stellar. It has consistently been praised as one of the most diverse doctoral programs in the nation. Nothing in the expansion of legal curriculum to include a full-

time program will affect SFLS's commitment to the highest standards of integrity, scholarship and opportunity.

3. Governance

The establishment of a full-time program at San Francisco Law School will not alter the existing Board of Trustees, Board of Visitors, Faculty Council, or the key employees of San Francisco Law School.

4. Dean and Faculty

A full-time program at San Francisco Law School will not affect the Dean of San Francisco Law School. The Dean will continue to be in charge of both the full-time and the part-time programs, as is typical in law schools with both types of programs.

The faculty is a very important consideration of an expanded program. With the new program the quality of the instructors is expected to remain at its current high standards and to continue to advance, over time, with the enrichment added by new full-time faculty.

SFLS has hired a new core faculty member to facilitate the increased need of support for the new students transferring from JFKU. The new core faculty member will be located in Emeryville and is expected to teach 2-3 courses each semester, along with advising students.

SFLS current faculty members have already expressed interest in participating in the full-time program, teaching such courses as Legal Research, Contracts, Real Property, Evidence, Torts, Professional Responsibility, and various elective courses.

Additionally, with the contraction of programs at other local law schools, talented adjunct faculty members are looking for opportunities to teach. It is quite common for faculty in the Bay Area to teach concurrently at more than one law school.

Another asset of San Francisco Law School is the existing faculty of the other Alliant doctoral programs in the schools of Education, Forensic Studies, Psychology and Business. Several Alliant faculty members hold dual doctorates - one of which is a JD. SFLS is working with the other Alliant programs to create and develop strong interdisciplinary, doctoral level courses, such as witness interview, interrogation and examination.

The San Francisco Law School Faculty Council, which is responsible for faculty peer evaluations, will continue in its current role and is expected to take an expanded role with the law school as enrollment and the number of full-time faculty grow.

5. Educational Program

The sum and substance of this major change is to first allow students transferring from JFKU to complete their Juris Doctorate within the three year time period they planned on when they started their legal studies. Second, it will also allow current, part-time students to take more than 10 units per semester. Other than that, the expansion of the existing part-time law school program to include the ability to attend full-time does not entail any additional rules or regulations than are already in force.

For example:

- Both programs will, continue to follow a semester format.
- All courses will be 15 hours/unit with 50 minute hours, with only one hour per unit devoted to examination.
- No credit is allowed for any course where the student has not attended a minimum of 80% of class hours.
- All students, full-time or part-time, will be subject to the academic and disciplinary regulations set out in the Student Handbook - with the exception that the handbook will be revised to add a schedule of courses/ curriculum for a full-time program.
- The curriculum for both the full-time and part-time program will include all substantive subjects taught on the California Bar Exam, as well as Professional Responsibility and Legal Research. Attached as **Exhibit 2** is a Sample Curriculum for the full-time program.

Historically, the curriculum at San Francisco Law School has been organized in a rational sequence to present a balanced and comprehensive course of study. A variety of elective courses are offered each semester. Trial and appellate advocacy skills courses are currently required at San Francisco Law School. Other practical courses are offered as tutorials and/or as electives as warranted. Most courses include the development of professional skill and responsibility as integral objectives of the course

As an accredited law school, many courses are mandated, and it makes no difference whether the program is a full-time or a part-time program. Therefore the required courses will not be affected. However, it is fully anticipated that the full-time program will allow a greater diversity of electives, clinics and internships.

6. Scholastic Standards

The scholastic standards for the full-time program will not change. The San Francisco Law School Student Handbook will apply to both full-time and part-time students. All students must complete 87 units in order to graduate. Bar skills courses, although required for graduation, are offered on a credit/no credit basis. Typically, all students receive summative

examinations for midterms and finals in courses required by the CBE.

Academic Standing, Disqualification, Advancement and Graduation policies are clearly stated in the Student Handbook and are applied uniformly and fairly. Students who have received a notice of disqualification may petition the faculty governed Academic Standards Committee for relief.

While purely clerical errors may be corrected by the Administration, all requests for a grade change must go the Academic Standards Committee (SFLS' Grade Review Committee) for approval.

Thus, based upon the standards set forth in the SFLS Student Handbook there will be no change in Academic Standing/Academic Disqualification procedures, Discipline Proceedings, Examination procedures or grading procedures. Upon approval, the SFLS Student Handbook will be revised to reflect the new schedule of courses/ curriculum for the full-time program.

As part of its Self-Study, San Francisco Law School submitted its Academic Assessment Plan (See attached **Exhibit 3**). SFLS will continue to stress learning assessments of its students and alignment of its learning outcomes with individual courses. The existing matrix will initially encompass both programs, although it is expected that the matrix will expand as the course offerings, including additional clinics/practicums, expand in a full-time program.

As these exhibits demonstrate, San Francisco Law School is committed to increasing learning assessment modalities and the evaluation of student learning. Concurrently, SFLS is dedicated to improving the writing and skills of its students so that they will be more competitive on the California Bar Exam.

Recently, as a further expansion of the academic achievement program, San Francisco Law School has initiated a diagnostic English composition examination. Designed and evaluated by the Alliant Education School, this examination will not only assess writing skills but will also highlight areas of concentration for the Alliant education PhD candidates who will teach English grammar and composition skills classes for our law students.

An expansion to a full-time legal program will not adversely impact on the Academic Support Services being offered at San Francisco Law School. Greater flexibility of academic support opportunities has already started and the increase in personnel will easily accommodate students from the full-time program, as well as allow for future growth to meet enrollment demands.

7. Admissions

The admissions policy at San Francisco Law School will not be diluted by a full-time program. SFLS maintains a sound admissions policy that is

consistent with its mission and complies with the pre-legal education requirements contained in §6060(c) of the Business and Professions Code, Title 4, Division 1 of the Rules of the State Bar of California (Admissions Rules), the Accredited Law School Guidelines, and the published policies of the Committee of Bar Examiners

All applicants for admission to San Francisco Law School are evaluated to ensure that their undergraduate and pre legal education meets the appropriate standards. All admitted students are required to demonstrate that they have a reasonable prospect of completing the juris doctorate program.

Special students, those without an undergraduate AA or other college degree, rarely apply to San Francisco Law School and almost never enroll. There are no current special students, and none are expected for either a full-time or the existing part-time program.

8. Library

With the new library regulations, SFLS does not need a library waiver. The library at San Francisco Law School is underutilized. The University's Head Librarian, Scott Zimmer, is both a JD and a library specialist. He is in the process of undertaking a review of available resources and will make recommendations regarding the trend of future library acquisitions. SFLS has every confidence that this faculty member is capable of assisting in the maintenance of an effective library for a full-time program.

9. Physical Resources

As part of Alliant International University San Francisco Law School shares a campus with AIU's other programs at both the Emeryville and San Diego locations. ADA regulations have been met at both campuses including elevators and modernizing bathrooms and classroom doors. The buildings are well maintained. There are multiple classrooms, a library, a student lounge and staff kitchen, and offices at both campuses. There is ample parking at both campuses.

The addition of a full-time legal program will not tax the classroom space at either campus.

The administration at San Francisco Law School is in an ideal position to service an expanded legal program.

- There are sufficient employees to staff the needs of a full-time and part-time program;
- Staff hours are Monday – Friday and on Saturdays as needed;
- Available technology is appropriate and sufficient to facilitate the maintenance of all required records;

- Student technology resources are equally available day or evening; and
- SFLS administrative functions are integrated with and supported by the AIU infrastructure.

10. Financial Resources

San Francisco Law School has always maintained a conservative financial position regarding for both expenditures and investments. This is consistent with its previous status and AIU's status. SFLS finances are now fully integrated into AIU's, which has an annual operating budget in excess of \$80 million and a track record of strong financial management.

Both Alliant and the SFLS Board of Visitors, a law program advisory group, have approved the use of restricted SFLS resources directed to increasing both opportunity and enrollment at SFLS. From the merger, SFLS has substantial assets at its disposal to benefit its programs, both existing and new. No expanding programs such as Academic Support and Bar Skills will be affected negatively.

11. Records

The student file information and record maintenance needed for a full-time program will be absorbed easily by existing systems. AIU/SFLS has the full university computer system and numerous support personnel to assist with these record functions.

12. Equal Opportunity and Non-Discrimination

Diversity and Opportunity are highly valued at SFLS and Alliant. SFLS/AIU have a proven track record of opportunity and do not tolerate bias or discrimination. While small, SFLS has higher proportions of students of diversity compared to most other law schools, both locally and statewide.

I V. Summary

San Francisco Law School requests approval from the Committee of its major change submittal to expand its existing degree granting program to include a full-time program. This approval is within the authority granted to the Committee under the Accredited Law School Rules, Rule 4.164.

The requirements of the new program are identical to the existing program - other than the number of units a student is allowed to take in a semester - and the part- time program has been in existence for over 100 years.

There are no known impediments to the successful launch of a full-time legal program at this time. The major change will not adversely impact the organization, structure or operation of San Francisco Law School's existing program. SFLS has adequate physical resources to accommodate the needs of additional students and the resources to add the additional faculty needed to support this program. The existing professional staff at SFLS and Alliant can easily administer the new program.

The new program will include all of the Academic Support activities and the Bar Skills initiatives that have been started and increased at SFLS over the years - since accredited law schools were allowed to include these types of courses in the curriculum. The full-time students will have a comprehensive Orientation program, will have access to Westlaw's computer assisted learning tutorials, access to Westlaw's TWEN and will be enrolled in the BarBri program, just like their part-time counterparts. The new full-time cohorts will also be entitled to the benefits of the Bar Review course scholarships that will continue this year for our fourth year graduates.

Today's legal students are asking for greater flexibility in their legal programs while retaining affordability. San Francisco Law School is highly qualified and well-situated to respond to those needs.

San Francisco Law School respectfully requests that the Committee consider the proposed major change at its earliest convenience. San Francisco Law School would like to advertise and launch this program upon the Committee's approval.

San Francisco Law School Academic Schedule **Sample Fulltime Program**

Schedule May Change at Any Time

First Year Courses

Fall	Units	Spring	Units	Summer	Units
Torts 1 (3 CR)	3	Torts 2 (3 CR)	1	-	
Contracts 1	3	Contracts 2	3		
Criminal Law	3				
Civil Procedure 1 (3 CR)	2	Civil Procedure 2 (3 CR)	2		
Leg. Reas. and Writing		Legal Methods (3 CR)		- Success Skills	1
- Leg. Writ. 2	3			- Leg. Writ. 1	2
Total Units	14	Total Units	6	Total Units	3

Second Year Courses

Fall	Units	Spring	Units	Summer	Units
Criminal Procedure	3	Prof. Responsibility	2		
Constitutional Law 1	3	Constitutional Law 2	3	Moot Court	2
Real Property 1	3	Real Property 2	3	MBE 1	1
Legal Research 1	2	Legal Research 2	2	Community Property	2
Wills & Trusts 1	2	Wills and Trusts 2	2		
Total Units	13	Total Units	12	Total Units	5

Third Year Courses

Fall	Units	Spring	Units	Summer	Units
Adv. Legal Reasoning 1	2	Adv. Legal Reas. 2	2		
Trial Practice	3	MBE Bar Skills	2		
Remedies	3	Adv. Legal Writing	3		
UCC	2				
Evidence	5	Corporations	4		
Total Units	15	Total Units	11	Total Units	

Program Requirements

Electives: 7 Credits Needed
Total Credits for J.D. = 87