



The State Bar of California

OPEN SESSION

AGENDA ITEM O-401

APRIL 2021

COMMITTEE OF BAR EXAMINERS

DATE: April 23, 2021

TO: Members, Committee of Bar Examiners

FROM: Natalie Leonard, Principal Program Analyst

SUBJECT: Periodic Inspection Report of Humphreys University Drivon School of Law

EXECUTIVE SUMMARY

This agenda item presents the report of the periodic inspection of Humphreys University Drivon School of Law (Attachment A) conducted on November 4-6, 2020 and recommends that the law school's accreditation be continued, and its next inspection set for fall 2025

BACKGROUND

Accredited law schools are inspected for compliance with the Rules for Accredited Law Schools (rules) and Guidelines for Accredited Law School Rules (guidelines) every five years. (Rule 4.162)

The law school was last inspected by the Committee in November 2013 and was found to be compliant with the Committee's Rules and Guidelines for Accredited Law Schools. In recent years, the law school has had turnover in the dean position that resulted in difficulty scheduling a periodic inspection. That change is now complete, but the law school is advised to plan ahead to expect a timely inspection in the future.

The inspection was conducted on November 4-6, 2020 by the team of Heather Georgakis, educational consultant to the State Bar along with Committee member Jim Efting. Together they concluded that the law school has demonstrated compliance with the accredited law school rules, except as noted in the team's recommendations below. The law school's dean wrote via email on March 23, 2021 to advise that they accept the report without objection.

Drivon School of Law (Drivon) is an academic department of Humphreys University (Humphreys), an independent, nonprofit institution founded in 1896 as Humphreys College. In addition to being accredited by the Committee, Humphreys has been accredited by the Western Association of Schools and Colleges Senior College and University Commission (WASC)

since 1992. In 2020, Humphreys enrolled 324 undergraduate and 97 graduate students at campuses in both Stockton and Modesto, California.

Drivon was added in 1951 at the Stockton campus to offer a Juris Doctor (JD) degree and the Committee first accredited the law school in 1983.

Drivon offers a part-time evening law program that leads to the JD degree and eligibility to take the California bar exam. As of fall 2020, total enrollment was 89 JD students. Almost all courses were taught on campus until current pandemic circumstances required that class sessions be moved online. The mission of the JD program is to “provide the opportunity for a legal education for students with varying backgrounds and experiences.”

Since June 2020, the school has been overseen by Dean Matthew Reynolds, a graduate of UCLA Law School and licensee of the State Bar of California. As of fall 2020, the faculty included Dean Reynolds, who works full-time, and twelve part-time instructors. All faculty members are graduates of law schools approved by the American Bar Association or accredited by the Committee. Of the thirteen faculty members, all are licensed to practice law in at least one jurisdiction, including twelve who are State Bar licensees.

The academic year includes three twelve-week quarters; an optional summer quarter is also offered. To graduate, students must complete 120 quarter units including ninety-six quarter units of required courses and twenty-four units of elective courses.

DISCUSSION

Drivon has undergone a leadership change in recent years. After the prior dean concluded his service, interim Dean Robert Humphreys led the law school, and Dean Matthew Reynolds was named to lead the school in June 2020. Dean Reynolds previously served in the law school’s administration, and, as a result, was able to adjust quickly to his new role. This level of transition, however, may explain the need for the school to update the documentation of its policies as noted in the team’s recommendations.

The law school was well-prepared for this inspection and was able to address all questions posed by the inspection team. The law school submitted a detailed Self-study in advance of the inspection.

Due to the University’s conservative financial policies, the law school has been able to weather the changes due to the pandemic. It was also able to transition to temporary online class delivery successfully.

The inspection team recommends that the Committee find Humphreys University Drivon School of Law to be compliant with the Accredited Law School Rules and Guidelines for Accredited Law School Rules after a review of the curriculum, learning platform, admissions, scholastic standards, faculty, legal research resources, facilities, records, Dean, administrators, and faculty.

The team proposes that the Committee of Bar Examiners (Committee) adopt the ten mandatory recommendations and three additional recommendations listed below:

1. **Guidelines 2.3(D)-(E):** The law school must make all disclosures as required by the guidelines.
2. **Guideline 2.6:** The law school must adopt, implement, and publish a compliant written student discipline policy.
3. **Guideline 2.7(C):** The law school must adopt, publish, and implement a written policy on procedures used to authenticate student work.
4. **Guideline 2.7 (E):** The law school must adopt, publish, and implement a compliant written policy on review of exam questions, including multiple-choice and similar questions.
5. **Guideline 2.7(G):** The law school must adopt, implement, and publish a compliant grade review policy.
6. **Guideline 5.4:** The law school must amend its application form to ask each applicant to address prior law school attendance and standing.
7. **Guidelines 6.6 and 6.9:** The law school must revise the Catalog to provide a complete statement of all policies applicable to internships.
8. **Guidelines 2.3 and 6.8:** The law school must revise the Catalog to state that not all elective courses are offered each year.
9. **Guideline 6.11:** The law school must state in the Law Employee Handbook that final exams must be given in all courses except those requiring substantial written work.
10. **Guideline 11.1(D)(4):** The law school must revise its procedures to ensure that transcripts prepared by the school for transfer students comply with all requirements of the guideline.

Additional Recommendations to Enhance Compliance

The inspection team suggests that the school takes the following actions to further enhance compliance:

1. **Pursuant to Guideline 4.6,** it is suggested that the school evaluate opportunities for providing additional faculty development.
2. **Pursuant to Guidelines 4.7 and 4.8,** it is suggested that the school update the Law Employee Handbook to reflect the current faculty evaluation process.

- 3. Pursuant to Guideline 14.1,** it is suggested that the law school make reasonable efforts to promote diversity and inclusion in faculty recruitment, development, and retention.

It is important to note that while the law school's MPR increased from 41.9 percent in 2019 to 46 percent in 2020, the law school's MPR remains close to the minimum value of 40 percent, so the law school is encouraged to continue to review its systems and take affirmative steps to ensure that it maintains a compliant MPR, which is critical to maintaining overall compliance.

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 receive and file the periodic inspection report of Humphreys University Drivon School of Law, adopt its recommendations, and direct the law school to complete all recommendations listed and provide documentation of their completion in the law school's 2021 Annual Report. It is also recommended that the law school's accreditation be continued, and its next inspection set for fall 2025.

PROPOSED MOTION

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

MOVE, that the Periodic Inspection Report of Humphreys University Drivon School of Law be received and filed; that the inspection team's recommendations be adopted; that the law school be directed to complete those recommendations and document their completion in the law school's 2021 Annual Report; that the accreditation of Humphreys University Drivon School of Law be continued; and that its next periodic inspection be set for fall 2025, unless an earlier visitation is deemed necessary by the Committee.

ATTACHMENTS LIST

- A.** 2020 Periodic Inspection Report for Humphreys University Drivon School of Law



The State Bar of California

HUMPHREYS UNIVERSITY DRIVON SCHOOL OF LAW

Periodic Inspection

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

November 4-6, 2020

Visitation team:

James Efting, Member
Committee of Bar Examiners

Kevin Marshall, Dean and Professor
University of LaVerne College of Law

Heather Georgakis
Educational Consultant

**REPORT ON PERIODIC INSPECTION OF
HUMPHREYS UNIVERSITY, DRIVON SCHOOL OF LAW
6650 Inglewood Avenue, Stockton, CA 95207**

EXECUTIVE SUMMARY AND RECOMMENDATIONS

Introduction

A periodic inspection of the Humphreys University Drivon School of Law was conducted from November 4 through November 6, 2020 pursuant to Rule 4.162(A) of the Accredited Law School Rules (Rules) by a State Bar inspection team (team) consisting of James Efting, Member, Committee of Bar Examiners (Committee), Kevin Marshall, Dean and Professor of University of LaVerne College of Law, and Heather Georgakis, Educational Consultant and team leader.

The school was last inspected by the Committee in November 2013 and was found to be compliant with the Committee's Rules (Rules) and Guidelines for Accredited Law Schools (Guidelines).

Drivon School of Law (Drivon) is an academic department of Humphreys University (Humphreys), an independent, nonprofit institution founded in 1896 as Humphreys College. Since 1992, Humphreys has been accredited by the regional accreditor now known as the Western Association of Schools and Colleges Senior College and University Commission (WASC) and recognized by the United States Department of Education. In 2020, Humphreys enrolled 324 undergraduate and 97 graduate students at campuses in Stockton and Modesto, California.

Drivon was added in 1951 at the Stockton campus to offer a Juris Doctor (JD) degree and the Committee accredited the school in 1983. The school was last inspected by the Committee in November 2013 and was found to be compliant with the Committee's Rules and Guidelines for Accredited Law Schools. Except as noted, this inspection report addresses only the JD program.

As a part of the University, the law school is also accredited by WASC and eligible Drivon students may participate in federal financial aid programs as a result.

Drivon offers a part-time evening law program that leads to the JD degree and eligibility to take the California bar exam. As of fall 2020, total enrollment was 89 JD students. Almost all courses were taught on campus until current pandemic circumstances required that class sessions be moved online. The mission of the JD program is to "provide the opportunity for a legal education for students with varying backgrounds and experiences."

Since June 2020, the school has been overseen by Dean Matthew Reynolds, a graduate of UCLA Law School and licensee of the State Bar of California (State Bar). As of fall 2020, the faculty included Dean Reynolds, who works full-time, and twelve part-time instructors. All faculty members are graduates of law schools approved by the American Bar Association or accredited by the Committee. Of the thirteen faculty members, all are licensed to practice law in at least one jurisdiction, including twelve who are State Bar licensees.

The academic year includes three twelve-week quarters; an optional summer quarter is also offered. To graduate, students must complete 120 quarter units including ninety-six quarter units of required courses and twenty-four units of elective courses. The required curriculum includes all subjects tested on the California bar exam, as well as practical skills courses. Clinical and internship opportunities are available except as limited by current pandemic circumstances.

Of the 89 students enrolled in fall 2020, about 57 percent were women. The largest ethnic or racial groups are Caucasian (44 percent) and Latinx (39 percent).

Total program tuition is about \$67,800 based on current per-unit tuition of \$565; in addition, students pay a graduate fee of \$100.

An accredited school must maintain a minimum cumulative pass rate (MPR) on the California Bar Examination of at least forty percent among its graduates who take the examination. (Guideline 12.1) The law school's 2019 MPR was 41.9 percent, while its most recent 2020 MPR increased to 46.0 percent.

The inspection team found Humphreys University Drivon School of Law to be compliant with the Accredited Law School Rules and Guidelines for Accredited Law School Rules after a review of the curriculum, learning platform, admissions, scholastic standards, faculty, legal research resources, facilities, records, Dean, administrators, and faculty.

Recommended Action by the Committee

The team recommends that the Committee receive and file this Periodic Inspection Report, approve the inspection team's recommended and suggested actions, continue the accreditation of Drivon School of Law, and schedule the next periodic inspection for the fall of 2025 unless it deems an earlier visitation necessary.

Recommended, Mandatory Actions

1. Guidelines 2.3(D)-(E): The law school must make all disclosures as required by the guidelines.
2. Guideline 2.6: The law school must adopt, implement, and publish a compliant written student discipline policy.
3. Guideline 2.7(C): The law school must adopt, publish, and implement a written policy on procedures used to authenticate student work.
4. Guideline 2.7 (E): The law school must adopt, publish, and implement a compliant written policy on review of exam questions, including multiple-choice and similar questions.
5. Guideline 2.7(G): The law school must adopt, implement, and publish a compliant grade review policy.
6. Guideline 5.4: The law school must amend its application form to ask each applicant to address prior law school attendance and standing.

7. Guidelines 6.6 and 6.9: The law school must revise the Catalog to provide a complete statement of all policies applicable to internships.
8. Guidelines 2.3 and 6.8: The law school must revise the Catalog to state that not all elective courses are offered each year.
9. Guideline 6.11: The law school must state in the Law Employee Handbook that final exams must be given in all courses except those requiring substantial written work.
10. Guideline 11.1(D)(4): The law school must revise its procedures to ensure that transcripts prepared by the school for transfer students comply with all requirements of the guideline.

Recommended Suggestions for Enhanced Compliance

1. Pursuant to Guideline 4.6, it is suggested that the school evaluate opportunities for providing additional faculty development.
2. Pursuant to Guidelines 4.7 and 4.8, it is suggested that the school update the Law Employee Handbook to reflect the current faculty evaluation process.
3. Pursuant to Guideline 14.1, it is suggested that the law school make reasonable efforts to promote diversity and inclusion in faculty recruitment, development, and retention.

Submission of Self-Study

Drivon submitted a self-study to assist the team in its assessment of the school's compliance with the Rules and Guidelines. Dean Reynolds and his staff responded to requests for additional information, and the information they provided was considered when drafting this report.

Conduct of Site Visit

Because the inspection occurred during the COVID-19 pandemic, Drivon was given the choice to delay the inspection or to undergo a remote visit based on the same standards as an in-person inspection visit. The school selected a remote visit and meetings were held by Zoom videoconference.

The team met with Dean Matthew Reynolds, Registrar Wendy Campigli, faculty committee members, adjunct instructors, and law students. Meetings were also held with University personnel, including President Bob Humphreys, Jr., Associate Dean and Library Director Donna Roberts, several trustees, and University employees responsible for student services and information technology. To conclude the site visit, the team discussed their observations in an exit interview with Dean Reynolds.

Some events took place outside the remote visit. Team members reviewed the law school's learning management platform, took a virtual tour of Humphreys, and observed a sample of online class sessions. A representative sampling of records was inspected, including applicant and student files; course syllabi, course materials, and attendance records; exams, assignments, and student answers;

and administrative files. At the Consultant's request, the law school invited current students to send comments about the school to the Consultant via email, but no comments were received.

SPECIFIC FINDINGS AS TO THE COMMITTEE'S RULES AND GUIDELINES

Below are the inspection team's findings, conclusions, and recommendations as to the school's compliance with the Rules for Accredited Law Schools and Guidelines for Accredited Law School Rules.

Rule 4.160(A): Lawful Operation. The law school must operate in compliance with all applicable federal, state, and local laws and regulations. (Guideline 1.6)

Drivon appears to comply with applicable federal, state, and local laws.

The school is an academic department of Humphreys University, a WASC-accredited higher learning institution. Humphreys is incorporated in California as a non-profit public benefit corporation, tax-exempt under United States Internal Revenue Code section 501(c)(3), and in good standing with the California Secretary of State. The City of Stockton has issued a current business license to Humphreys for its Stockton campus where Drivon is located.

Sound policies and procedures are in place with respect to the Americans with Disabilities Act and similar laws. Humphreys' campuses are ADA-compliant and medical records are protected against improper disclosure pursuant to the Health Insurance Portability and Accountability Act (HIPAA). Drivon students are counseled that accommodations granted at the school may differ from those granted by the State Bar.

The Drivon Catalog describes students' privacy rights under Family Educational Rights and Privacy Act (FERPA) and policies are in place comply with FERPA requirements. Disclosure to third parties is properly restricted, students are informed of their right to prevent disclosure of private information, and digital student records are properly secured.

As noted below, policies prohibiting discrimination are published in the Catalog, as are policies regarding alcohol and drug use. Humphreys maintains an acceptable student loan default rate and appears to comply with federal financial aid regulations.

Finally, Drivon is compliant with California Business and Professions Code section 6061.7 requiring schools regulated by the Committee to post a report with certain statistics about the school's programs. The report was properly updated and posted in early 2021 as required by the statute, though it must be relocated to the proper place on the website as noted below.

Rule 4.160(B): Integrity. The law school must demonstrate integrity in all of its programs, operations, and other affairs. (Guidelines 2.1 – 2.10; Bus. & Prof. Code Section 6061.7(a) and Section 6061.7(c))

As required by Guideline 2.1, the school appears to be honest and forthright in its dealings although certain policy changes are recommended.

The relevant portions of Humphreys' website and Drivon's publications provide current, consistent information about the school's accreditation status, academic programs, faculty, and services. The Catalog, available through the website, generally states school policies clearly. Drivon employs adequate staff and faculty to deliver programs and services as promised, whether directly at the law school or through the University.

Financial affairs are conducted with integrity. Tuition and fees are accurately described in the Schedule of Tuition and Fees, available on the website. Humphreys provides adequate guidance for financial aid matters and appears to comply with United States Department of Education (DOE) requirements. Financial assets are effectively managed. Refund policies and practices are clear and compliant with Guideline 2.2(B) requirements. Students may withdraw from Drivon through the sixth week of a twelve-week quarter with a 50 percent refund.

To bring itself into compliance with disclosure requirements of Guidelines 2.3(D)(1)-(3) and (E) and 13.3, the school must relocate and add disclosures. Guideline 2.3 requires a school to publish three separate disclosures "on a discrete page readily accessible to the public found on the law school's website entitled "Accreditation" or "on its Accreditation webpage." These disclosures pertain to limits on out-of-state bar licensing requirements, bar exam pass rates, and statistics required by the Business and Professions Code (the section 6061.7 form). (Guideline 2.3(D)(1)-(3))

Neither Humphreys nor Drivon has a discrete Accreditation webpage and the required disclosures are not accessible. All three are located under a general menu option, "About", on a page entitled "Our Story." There, the section 6061.7 form is linked under the heading "SB 1281 Compliance Form." Finally, under Guideline 2.3(E)(2), the reference to Humphreys' WASC accreditation in connection with Drivon should also state that Drivon's degree-granting authority is based on its status with the Committee.

As noted, Humphreys is incorporated in California as a non-profit public benefit corporation and is tax-exempt under the United States Internal Revenue Code. (Guideline 2.4(A))

Consistent with Guideline 2.5, no individuals receive incentive compensation for the recruitment, admission, or registration of any students at Humphreys or Drivon.

Under Guideline 2.6, Drivon must have a student discipline policy that meets specific provisions as to sanctions, notice, hearings, and a final decision. Drivon's policy, stated in the Catalog, includes a short list of acts that trigger dismissal and refers to "orderly procedures of the University" by which misconduct will be handled. Although the Humphreys Catalog details additional types of misconduct, it does not meet guideline requirements. To bring itself into full compliance, Drivon must publish a policy consistent with Guideline 2.6.

The Catalog clearly communicates academic requirements. Academic good standing requires a cumulative grade point average (GPA) of at least 70. A student who does not make satisfactory academic progress is dismissed unless the Retention Committee permits advancement on probation with an approved academic plan. A student who fails to achieve a cumulative GPA of 70 within three quarters is dismissed. To graduate, a student must complete at least 120 quarter units, of which sixty

must be completed at Drivon; have a cumulative GPA of at least 70, with a GPA of at least 70 in the fourth year; and satisfy attendance and financial requirements. (Guideline 2.7(A))

Most required courses are graded on a numerical scale with five increments ranging from “Outstanding” (90-100) to “Failure” (below 64). Grades between 70 and 79 are “Satisfactory.” Pass/Fail grading is used in elective subjects and three required writing and analysis courses. The Catalog gives notice that written exams are graded anonymously. (Guideline 2.7(A)(5))

Course repetition policies comply with Guideline 2.7(A)(3), as detailed below.

As stated in the Law Employee Handbook, instructors are expected to prepare course syllabi to inform students about assignments, exam dates, and the basis for course grades. (Guideline 2.7(B))

To bring itself into full compliance with Guideline 2.7(C), Drivon must adopt, publish, and implement a written policy on procedures used to authenticate student work of all types. Current authentication efforts include requiring students to show photo identification before receiving documents and, during exams, providing room proctors and ensuring that students are randomly seated. Due to the pandemic, during the spring and summer terms of 2020, students took final exams at home without remote proctoring software. In fall 2020, ExamSoft remote proctoring software was used.

Students are informed of their grades promptly through Moodle (Guideline 2.7(D)) and may then pick up their essay answers or, during the pandemic, receive them by email. Drivon is not required to release multiple-choice and similar questions but must allow students to compare their answer sheets to the key, pursuant to Guideline 2.7(E).

Grade review procedures must be revised to clearly inform students of the availability of grade review and the limited grounds upon which grade review may be sought. (Guideline 2.7(G))

Appropriate policies and procedures are in place to protect the confidentiality of student information, communications, and records, including health records. Reasonable security and backup protocols are used to secure the school’s computer systems, communications systems, and records against risk of corruption or destruction. (Guidelines 2.8 and 2.9)

Drivon provides a range of student services, experiences, and activities appropriate for a school with a part-time JD program. These are described on the website and in the Catalog, and include career development services, academic support, legal clinics and internships, and moot court. (Guideline 2.10)

Rule 4.160 (C): Governance. The law school must be governed, organized, and administered so as to provide a sound educational program. (Guidelines 3.1-3.3; 4.1-4.2)

The law school is effectively governed.

Humphreys University is governed by a fifteen-member Board of Trustees. The Board meets three times a year and includes members with expertise in a range of pursuits, including higher education,

finance, human resources, charitable organizations, and law. The current chair, Ronald Guntert, Jr., is a business owner.

Since 2015, Humphreys has been led by Robert G. Humphreys, Jr., the great-grandson of Humphreys' founder. He followed Robert G. Humphreys, Sr., who remains on the Board. Between October 2019 and June 2020, the President also served as Interim Dean of the school. He holds a bachelor's degree in mathematics and economics, an MBA, and a PhD in Education. Between 2003 and 2015, he served as Dean of Instruction and then as Provost and Academic Vice-President.

A review of Board minutes confirmed that the Board is appropriately engaged in strategic planning and oversight, including approval of budgets. Matters of day-to-day management have been delegated to the administration and the Board appears to respect the role of the faculty as to academic matters. The law school and its needs are regularly discussed during Board meetings and sufficient authority has been delegated to Dean Reynolds to allow management of the school in compliance with the Committee's requirements. (Guideline 3.2)

The school's Steering Committee serves as an advisory board to the Dean. (Guideline 3.3)

Rule 4.160(D): Dean and Faculty. The law school must have at each campus, including any approved branch campus, a competent dean, a qualified administrator, an adequate administrative staff, and a competent faculty that devote adequate time to administration, instruction, and student counseling. (Guidelines 4.1 – 4.9)

The Drivon administration and faculty meet the requirements of Rule 4.106(D) and related guidelines.

Dean Matthew Reynolds is Drivon's chief academic and administrative officer. His primary responsibility is to oversee the academic program. He also manages the law library's holdings, develops student support services, and handles the recruitment, hiring, and evaluation of instructors. As a faculty member, the Dean may also teach a limited number of courses.

As a State Bar licensee and UCLA law graduate, Dean Reynolds is qualified to be the school's administrator. (Guideline 4.1(B)) He was appointed in June 2020 to succeed the prior dean who served for fifteen years, and President Humphreys, who served briefly as Interim Dean. The Dean works full time. He reports to the President and represents Drivon to the Board of Trustees.

In law practice, Dean Reynolds handled employment litigation for local firms. He joined Drivon as an adjunct instructor in 2010 and held several positions over the next eight years, including full-time professor and Associate Dean. Before becoming Dean, he was a research attorney for the Alameda Superior Court. Based upon his professional and academic credentials, Dean Reynolds is qualified for his role. (Guidelines 4.1(A)-(B))

Registrar Wendy Campigli, an 18-year employee, works full-time to maintain the school's records, handle student certifications, and oversee compliance with policies and external regulations. To remain informed about standards in her profession, Ms. Campigli participates in national

organizations and attends registrars' meetings held by State Bar staff. She also serves as Drivon's admissions counselor with the support of an admissions assistant.

All other operational support is provided to Drivon by Humphreys, including services related to business and financial matters, human resources, information technology, and student services.

Personnel interviewed during the visit appeared to perform their duties competently and collegially, and to be knowledgeable about the Committee's requirements.

As reported in fall 2020, the faculty included Dean McReynolds and twelve part-time instructors. Seven faculty members are graduates of law schools approved by the American Bar Association and six are graduates of accredited law schools. Twelve of the thirteen instructors are State Bar licensees, while one is licensed to practice law in another state. (Guideline 4.5)

Instructors are expected to participate in curriculum development and assessment, according to the Law Employee Handbook and do so mainly by participation on faculty committees. Committees include current and former faculty members appointed by the Dean and may also include the Dean and registrar. The Steering Committee, created to guide the dean search, now advises the Dean on curriculum and policy matters. The Admissions Committee reviews applications and admissions standards, the Retention Committee decides probation and disqualification petitions, and the WASC Assessment Committee evaluates learning outcomes and handles faculty evaluation. Ad hoc panels are appointed to handle student grievances, including grade challenges. (Guideline 2.7(F))

Drivon has enough instructors to maintain a sound program. As reflected in the 2021 Business and Professions Code section 6061.7 disclosure form, class sizes average about eleven students in most required subjects, and about thirty-one students in first-year courses. Dean Reynolds stated during the visit that one of Drivon's goals will be to limit enrollment to fewer than twenty-five students per course. The ratio of instructors to students was 1:7 in fall 2020. (Guideline 4.3)

Faculty course loads and counseling duties comply with Guideline 4.4. Instructors rarely teach more than one course per quarter and have enough time to fulfill their teaching and other duties, such as counseling students and grading exam and assignment papers.

Although Drivon expects instructors to develop their teaching skills and substantive knowledge, support for faculty development has been limited. Regular faculty meetings have been reinstituted by Dean Reynolds, in part to facilitate faculty development. It is suggested that the school should evaluate other opportunities for providing faculty development. (Guideline 4.6)

Faculty evaluations are conducted as required by Guidelines 4.7 and 4.8. The process is overseen by the WASC Assessment Committee. Each instructor is observed in the classroom, generally by two instructors, then the instructor's course materials, exams, and student evaluations are reviewed. A six-page Peer Evaluation Form, reflecting ratings and comments, is provided to the school and the instructor. It is suggested that the school update the Law Employee Handbook to reflect the current faculty evaluation process.

Pursuant to a University-wide policy, faculty academic freedom is protected. (Guideline 4.10)

Rule 4.160(E): Educational Program. The law school must maintain a sound program of legal education. (Guidelines 1.8, 6.1 – 6.14)

The law school offers a compliant educational program except as noted.

Drivon offers a four-year, part-time, 120-quarter-unit JD program. Until the current pandemic, most courses were taught through class sessions held on campus four nights per week, from 6:40 to 9:30 pm. Since mid-March 2020, all courses have been taught online temporarily pursuant to a waiver passed by the Committee of Bar Examiners that applies to all fixed facility accredited and unaccredited law schools. Students are required to attend synchronous class sessions by Zoom videoconference; these class sessions are not recorded. Starting in summer 2021, class sessions will be held on Monday, Wednesday, and Friday to avoid back-to-back class nights.

The academic year consists of three twelve-week quarters. Most students also choose to attend at least two summer quarters to take specific courses. Students may begin their law studies in October, January, or July; those who enter in January or July eventually join an October-start cohort to complete the curriculum. Students must complete their studies within seventy-two months under the law school's policies.

To earn a JD degree, students at an accredited school must complete at least 1,200 hours of tracked, or "verified" academic engagement (VAE) over no fewer than 120 quarter units. (Guideline 6.5(A)) Students who complete Drivon's 120-quarter-unit curriculum earn exactly 1,200 hours. Each unit of credit represents ten hours of verified engagement ($120 \times 10 = 1,200$) and thirty hours of untracked homework and preparation.

Guideline 6.5(B) permits VAE to be earned by attendance in a physical classroom, participation in distance learning, or a combination of such modalities. For in-person and synchronous online courses, the school tracks VAE through its attendance policies. In compliance with Guideline 6.5(C), students are required to attend at least 80 percent of the class sessions in each course; attendance is recorded nightly and failure to attend is grounds for course withdrawal.

Before the pandemic, some courses were given in a hybrid format, combining asynchronous distance learning with in-person instruction. Drivon should, for courses with academic engagement activities that are not verifiable by current attendance procedures, adopt, publish, and implement policies and procedures that require, and permit verification of, student participation in those activities. Current attendance procedures, for example, do not track time spent in asynchronous activities such as completing assignments or posting to discussion boards. (Guidelines 6.5 and 7.11)

Student course load policies comply with Guideline 6.5(F) and (J). Except as permitted under special circumstances, students must be enrolled in from six units to nine units each quarter.

Drivon course materials include recognized texts, informative syllabi, and appropriate instructional formats. (Guideline 6.5(K)-(M)) Class sizes are reasonable. (Guideline 6.5(N))

Upper-level students may earn up to twelve units of experiential credit by participating in clinical programs and internships, though these activities are temporarily unavailable due to the pandemic. (Guideline 6.6) Each unit requires at least forty hours of work. The school operates two clinics in which students assist with family law and expungement matters under faculty supervision. A third clinic, operated at Drivon by the local bar association, handles small claims matters.

Internships may be completed in nonprofit organizations, public agencies, or private practices. Some students become certified under the State Bar's Certified Law Student Program to assist public defenders in the local court's restorative justice program, Collaborative Courts. The law school's internship practices were found to be consistent with Guidelines 6.6 and 6.9. However, to comply more fully with those guidelines, the school should publish its internship policies and procedures in the Catalog. After the inspection, Dean Reynolds stated that those revisions would be made.

The curriculum is compliant with Guidelines 6.7 and 6.8. Students take ninety-six units of required coursework, including all subjects tested on the bar exam, Introduction to Law, Legal Research and Writing, Advanced Legal Writing, and twelve units of practical skills training. Required courses are logically sequenced and offered at least annually; some first-year courses are given more often.

Students also take twenty-four elective units. The Catalog lists many choices, such as Family Law and Income Tax, but should state that not all elective courses are offered each year. (Guidelines 2.3 and 6.8)

Students have opportunities to interact with the faculty and each other, as noted. (Guideline 6.10)

Exam and grading policies are addressed in the Catalog and Law Employee Handbook (Handbook). Midterm exams are given in about 50 percent of Drivon's courses, at the instructor's discretion. In compliance with Guideline 6.11, Drivon requires that final exams be given in all courses except those requiring substantial written work; this requirement should be stated in the Handbook. Before the pandemic, final exams were proctored on campus, but exams are now administered online with ExamSoft remote proctoring software. (Guidelines 6.11-6.14)

Final exams are two hours in length and usually consist of essay questions. At the instructor's election, a multiple-choice section may be substituted for one essay. Instructors draft their own questions and submit them to the Dean's Office for review by the Dean for content, quality, and consistency. The school does not permit exams to be recycled.

Numerous final exams and assignments were reviewed. Most materials were well-drafted and presented a fair test of the issues or skills being covered, although a few essay questions appeared to raise more issues than could be addressed reasonably within the allotted time. Generally, feedback to students on exam answers was adequate and, in some cases, above average. Drivon's faculty members receive constructive comments about their exams as part of faculty evaluation process; the school might consider evaluating the quality of exam feedback as part of that process.

Guideline 6.14 requires written grading standards that ensure "accuracy, validity, reliability, and consistency." The Law Employee Handbook describes the level of performance signified by each

grade range, with 70-79 being “Satisfactory,” but does not provide other guidance about how grades are to be assigned.

The Dean reviews all grades and discusses any inconsistencies with instructors. Grade distribution and correlation reports submitted with Drivon’s Annual Reports reflect a substantial degree of consistency in grading practices, with expected subject-matter and cohort-level differences. Grade inflation is not found. A reasonable proportion of grades are awarded in or below the “Satisfactory” range. Such discipline is particularly significant among first-year instructors, who serve an important gatekeeping function. (Guideline 6.14)

During the four academic years completed prior to the inspection, Drivon dismissed about twelve students per year; although most dismissals occurred during or immediately after the first year, each year at least two upper-level students were dismissed, typically at the end of an academic year in which they were on probationary status.

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

The JD program fulfills the practical skills training requirements of Rule 4.160(F) and Guideline 6.9.

Drivon requires students to take twelve quarter units of practical skills training, three units more than the nine units required by Rule 4.160(F). Students take Legal Research and Writing (three units), Advanced Legal Writing (three units), and six units in courses designated by Drivon as Professional Training Program (PTP) courses.

Guideline 6.9 requires that students who have entered Drivon in recent years must be given the option to take additional skills courses. For example, students entering in 2020-2021 must be able to take twenty-two and one-half quarter-units of training. Drivon exceeds Guideline 6.9 mandates by offering a total of twenty-six units of training, including twelve required units and fourteen elective units. Students may elect to take additional training because they must complete twenty-four elective units to graduate.

Skills training electives include three-unit courses in Civil Trial Practice, Criminal Trial Practice, and Moot Court, and one-unit seminars in the Business of Law and Collaborative Courts. Drivon also offers clinics and internships; these may be taken in one-unit increments, up to a combined limit of twelve units. (Guideline 6.8)

The law school has indicated, in Catalog course descriptions, which elective courses qualify as skills training. According to Dean Reynolds, the next revision of the Catalog will provide that information for additional required courses that qualify as skills training, either in whole or in part. (Guideline 6.9 (A)(3))

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

Drivon has established sound scholastic standards which allow the school to promptly identify and dismiss students who lack the capacity to complete the JD program. (Guideline 7.1)

Policies are clearly stated in the Catalog with respect to academic standing, disqualification, advancement in good standing and on probation, and requirements for graduation. (Guideline 7.2) Faculty are informed about these policies in the Law Employee Handbook and in orientation materials given to new instructors. Students are notified of course-specific policies in course syllabi.

As noted, for most required courses Drivon uses a numerical grading system with increments that range from "Outstanding" (90-100) to "Failure" (below 64). Academic good standing, which requires a cumulative GPA of at least 70, is evaluated at least once each year. (Guideline 7.4)

Probation policies are reasonable. A student with a cumulative GPA below good standing is dismissed unless the Retention Committee grants permission to advance on probation, based on a holistic review of the student's reasons for performing poorly and apparent potential to achieve good standing. Dismissal results when a probationary student fails to follow the academic plan imposed by the committee or fails to achieve good standing after three quarters on probation.

Drivon recently evaluated the success of students allowed to advance on probation. Having found that many such students did not ultimately succeed, the school and its faculty committees are now reviewing advancement decisions in a more stringent and consistent manner. (Guideline 7.3)

To assist all students, but particularly those on probation, the law school offers some forms of academic support. Academic success skills are addressed in the first course, Introduction to Law. Students are encouraged to seek counseling from their instructors and to attend events sponsored by Drivon, including writing and bar preparation seminars. Generally, the Dean meets with each student every other quarter; as needed, he also provides academic counseling. Finally, students also have access to a database of past exams, with model answers or rubrics. (Guideline 7.3)

Few students are required to take the First-Year Law Students' Examination but Drivon's policies and practices are compliant with applicable requirements. (Guidelines 7.5 and 7.6)

Course repetition policies comply with Guidelines 7.7 and 7.8. Duplicate credit is not awarded for repeating the same or substantially the same course. Students who fail a required course must repeat it. In some cases, students may be allowed to retake a course, but they may not do so solely to improve a grade of 69 or above. When a course is repeated, the new grade will replace the previous grade in the cumulative GPA calculation.

The school has established sound grading policies and practices. All courses include final exams or substantial written assignments and about 50 percent of courses include midterm exams. Faculty members are evaluated, in part, on the quality of their exams and, with few exceptions, return their

grades promptly. Students usually receive exam feedback from their instructors, including standardized rubrics, model answers, and individualized comments. (Guideline 7.9)

The Dean regularly reviews grades for conformity to the school's norms and correlation of grades among faculty teaching the same students. Data provided with the Self-study show a reasonable correlation of grades over time, with acceptable variance among instructors and courses. In a recent Five-Year Correlation Analysis, the school found a clear relationship between higher GPAs at graduation and success on the bar examination. (Guideline 7.9)

As noted above, most exam questions were found to be well-drafted and to fairly assess the legal issues or skills being addressed. Student papers appeared to be graded realistically and equitably and adequate feedback was given on most exams. (Guideline 7.9)

The school has met the record-keeping requirements of Guideline 7.10.

Since mid-March 2020, Drivon has offered its courses synchronously by videoconference under the Committee's general waiver related to the circumstances surrounding the pandemic. Therefore, the law school has been able to verify academic engagement as required by Guidelines 6.5 and 7.11 through course attendance. The dean mentioned that the law school may add some asynchronous electives in the future. If those courses include academic engagement activities that are not verifiable by current attendance procedures, the law school will need to take steps to create and implement a policy to verify student participation to ensure compliance with Guidelines 6.5 and 7.11 for those activities before launching those courses.

The school has a compliant policy on enrollment as a visitor, as required by Guideline 7.2.

Rule 4.160(H): Admissions. The law school must maintain a sound admissions policy. The law school must not admit any student who is obviously unqualified or who does not appear to have a reasonable prospect of completing the degree program. (Guidelines 5.1-5.9)

Admissions policies at Drivon are sound and effectively administered except as noted.

Drivon admits applicants in all categories permitted by the guidelines, although it rarely accepts special students, those who do not have at least sixty semester units of college credit. Applicants with prior law school experience may apply as transfer students with advance standing or as first-year students under the Committee's start-over policy.

Admissions requirements and procedures are explained on the website and in the Catalog. Students must submit an application form, fee, letter of recommendation, LSAT score, and official transcripts of prior academic work. According to Dean Reynolds, future applicants will be required to submit a writing sample. (Guideline 5.4)

With respect to the application form, to comply fully with Guideline 5.4, Drivon should amend its application form to ask every applicant the questions required by the guideline about prior law school experience and standing, not just those who expressly seek advanced standing.

Applicants who meet all pre-legal education and documentation requirements, as determined by Registrar Wendy Campigli, are considered for admission. The Admissions Committee consisting of three faculty members and Ms. Campigli, meets to decide each application, considering factors such as academic achievement, LSAT scores, references, life experiences, and personal qualities such as motivation and maturity.

Drivon seeks to admit students with undergraduate GPAs of 3.0 or higher and LSAT scores at or above the 25th percentile, although it does admit those with lower academic profiles. For first-year students, the 75th, 50th, and 25th percentile undergraduate GPAs were 3.5, 3.1, and 2.2, while the 75th, 50th, and 25th percentile LSAT scores were 59, 33, and 22, respectively.

Effective processes are in place at Drivon to ensure that certain official transcripts are maintained in student files (Guideline 11.1(B) and (C)) and that, if official transcripts showing a student's qualification for law study based on pre-legal education are not on file within forty-five days of the start of a student's first term, the student must be dismissed. (Guideline 5.3).

Drivon admits some students who have been academically disqualified from prior law studies. (Guideline 5.6) Students who seek admission within two years of dismissal must show that their poor performance was the result of a traumatic event or serious hardship that has been resolved; they may qualify for advanced standing. Those who seek admission more than two years after dismissal are usually required to obtain the Committee's approval to begin law school again.

All previously disqualified students are placed on probation with an academic plan; those who fail to meet their plan conditions are dismissed and cannot petition to return.

In awarding credit to transfer students, Drivon adheres to the requirements of Guidelines 5.7 and 5.8. Only fifty-seven of the 120 quarter units required for graduation may be transferred.

Rule 4.160(I): Multiple Locations. Accreditation is granted to a law school as an institution. If a law school receives approval to open a branch campus or a satellite campus, the branch or satellite campus must be operated in compliance with the Standards and Guidelines, subject to all site specific operational requirements and any waivers approved by the Committee. The new campus must be in substantial compliance with the Standards and all operational requirements no less than one month prior to the start of classes, and in full compliance within two years. The Dean of the law school will certify the substantial compliance of each new branch or satellite campus, by a letter to the Committee, no later than 30 days prior to the start of classes. If a law school conducts seminars or classes other than at its principal facility, satellite or branch campuses, the seminars and classes must be conducted in compliance with the Standards, except the Library Standard. (Guidelines 15.1-15.4)

This section is not applicable because Drivon operates in only one location, Stockton, California.

Rule 4.160(J) – Library. The law school must maintain a library consistent with the minimum requirements set by the Committee. (Guidelines 8.1 – 8.6)

All library content and operational requirements are met.

Drivon's law library is located within Humphreys' library, a modern, spacious facility adjacent to the school. The library includes tables and individual carrels for studying, as well as several break-out rooms for group or private study. Multiple computers provide access to the internet and to the library's electronic library resources.

Typically, the library is open Monday through Thursday from 8 am to 10 pm, Friday from 8 am to 5 pm, and Saturday from 9 am to 3 pm. Under pandemic restrictions, hours are more limited and safety measures have been imposed, including user limits and mask requirements.

The library is managed by Donna Roberts, Humphreys' Associate Dean for Academic Administration and Director of the Library and Learning Center. Dr. Roberts oversees the library staff, ordering of resources, and tutoring and support services. Drivon students are eligible to use all library services, including tutors for writing and database searching. A law student is employed part-time to provide specialized research assistance.

Drivon provides access to all library materials mandated by Guideline 8.2, primarily through the school's Westlaw subscription. A few required resources are available only in hard copy. Although the print collection is being reduced gradually to provide more space for computer and study facilities, the school plans to maintain and update some hard copy resources, including the United States Supreme Court and California reports, Rutter guides, and Witkin texts.

Students and faculty members receive individual Westlaw passwords; students have access to the service throughout their law studies. Research assistance is available around the clock from Westlaw's Reference Attorneys and within reasonable response times from the professional staff at the library. In addition to Westlaw, Drivon students have access to a wide range of electronic resources through Humphreys' library, including EBSCO, a research database that offers law-related materials such as Criminal Justice Abstracts. (Guidelines 8.1 and 8.5)

As required by Guideline 8.3 and reflected in the course syllabus, research instruction is provided in both electronic and print-based legal research in Legal Research, a first-year course. Records of library expenditures are properly maintained. (Guideline 8.6)

Rule 4.160 (K) - Physical Resources. The law school must have physical resources and an infrastructure adequate for its programs and operations. (Guidelines 9.1-9.3)

Drivon has adequate physical resources and infrastructure to support the JD program.

The school's administrative offices are situated in the library building of the University's eight-acre main campus in Stockton. Constructed in 2004 as part of a major campus renovation, the building originally housed Drivon's offices, separate undergraduate and law libraries, and the Joe Carcione

Courtroom, a large space that doubles as a classroom. In 2019, both libraries were consolidated and now the combined space is used by all University students.

Adequate office space is available for the exclusive use of Drivon's administrative staff and adjunct faculty. The school has primary use of the courtroom but otherwise shares classroom space with other programs. Drivon classes are regularly scheduled for specific classrooms adjacent to one another and within reasonable proximity to the administrative offices, which promotes a strong sense of connection within the law school community. (Guideline 9.2)

Humphreys' facilities are spacious, modern, and well appointed. Wireless internet access is available throughout campus and almost all classrooms are equipped with smart-screen technology to facilitate classroom presentations. A computer lab with twenty-five stations provides students with internet access and free printing, and stations are available in the library.

Drivon's technology infrastructure is current, secure, and adequate to institutional needs. Humphreys uses several reputable platforms for student services and instruction. Populi, a student information system (SIS), gives students online access to their transcripts, degree audits, registration, financial accounts, and financial aid information online. Moodle, a learning management system (LMS), is used to deliver Humphreys' online courses, including Drivon courses now held online. A third-party provider is responsible for access, storage requirements, uptime, and maintenance of the Moodle platform. Zoom, a videoconference application, is used for Drivon's synchronous class sessions. (Guidelines 9.1 and 9.2)

In compliance with Guideline 9.3, Humphreys has allocated sufficient resources and developed adequate procedures to promptly address technology-related problems in the delivery of the JD program. Experienced, well-trained personnel are available to ensure that platforms and equipment operate smoothly during Drivon's class sessions. Service outages occur rarely, but they are closely monitored and resolved quickly. Administrators have access to Drivon student records, files, and materials through Humphreys' software platforms. Access to these platforms is appropriately restricted by several protocols based on roles. As required by Guideline 9.1, authorized personnel can produce all school data at the Stockton campus.

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

As a part of Humphreys University, the school has adequate present and anticipated financial resources to comply with Rule 4.160(L) and related guidelines. Audited financial statements for Humphreys, and the school's budget and projections, were submitted for review.

Over the past five years, Humphreys' declining enrollments have resulted in deficits ranging from 2 to 14 percent of revenue. Finances have always been closely tied to the unemployment rate in Humphreys' market area of San Joaquin County and have cycled predictably over the decades. Now, however, several trends have converged to create a challenging environment.

In recent years, the law school has attempted to keep tuition increases to a minimum for a number of reasons. Humphreys indicates that it maintains "a focus on reserves, a strong balance sheet, and

budgetary restraint,” and that its reserves were replenished during the most recent surplus period of 2008-2013 to a level sufficient to address the current circumstances. Financial statements submitted with the Self-study show Humphreys has substantial assets that appears to be sufficient to maintain the JD program.

Humphreys projects that several strategies have combined to put the University overall back on the path to profitability, including cost reductions achieved in part by outsourcing some non-academic administrative functions, more efficient utilization of campus facilities to generate income, and introduction of new programs outside of the law school. Deficits and cash outflows have been reduced and a surplus is anticipated for fiscal year 2020-2021.

The financial impact of the COVID-19 pandemic was uncertain at the time of the inspection. Enrollment in fall 2020 was in line with Humphreys’ expectations, and it has been increasing for the last two years. According to President Humphreys, the transition to online courses in mid-March was smooth and Humphreys did not experience student withdrawals.

The law school covers its own expenses and, on a direct cost basis, generates a surplus. Current tuition is \$565 per quarter unit and total tuition for the 120-unit JD program is \$67,800; books are estimated to cost about \$2,000 per year. Tuition increases have been slowed in the last five years; the most recent increase took place about two years ago and another increase will occur in July 2021, of \$5 per unit. Humphreys aspires to increase enrollment in the JD program to about one hundred students and to add an online JD option.

Humphreys’ graduate division, separate from the law school, offers a forty-unit Master of Legal Studies (MLS) degree program to a small number of students. MLS students take some of their courses at Drivon but the impact of their attendance is insignificant. Further, the MLS program allows the University to retain as students some former Drivon students who were unwilling or unable to complete the JD curriculum.

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

Drivon complies with the record-keeping requirements of Guideline 11.1 for the most part.

Registrar Wendy Campigli has primary responsibility for maintaining the school’s records. An eighteen-year University employee, she works full time at the school.

Records for the last twenty years are maintained in Populi, the school’s student information system and system of record for documents such as registration materials, grades, and transcripts. Plans to digitize older records, now maintained in locked storage files in the law school’s administrative office, are underway.

Access to hard copy files is controlled by Ms. Campigli while digital files are password-protected, accessible only by authorized personnel, and backed up pursuant to the University’s standard data integrity policies. Adequate security and backup systems are in place to protect the records against corruption or loss.

A sample review of digital documents confirmed that Drivon has complied with most recording-keeping requirements of Guideline 11.1. Among the records reviewed were applicant files and admissions records (Guidelines 11.1(A)-(B)); student files and transcripts (Guidelines 11.1(C)-(D)); class records, exams, student responses, and grade tabulations (Guidelines 11.1(E)-(F)); and administrative and faculty files. (Guideline 11.1(G) and (H))

With respect to transcripts of transfer students, the school should revise its procedures to comply more fully with Guideline 11.1(D)(4), which requires that Drivon's transcripts for transfer students must contain specific information about the transfer credit allowed, including the courses taken and grades received for law study at other institutions.

The team also reviewed, and found to be in order, a sample of other records required by Guidelines 11.1(I) through 11.1(O), including faculty meeting minutes, Board of Trustees minutes, the 2019 and 2020 Annual Reports, and correspondence between the school and the Committee.

Rule 4.160(N): Minimum, Cumulative Bar Pass Rate. The law school must maintain a minimum, cumulative bar examination pass rate as determined and used by the Committee in the evaluation of the qualitative soundness of a law school's program of legal education. The minimum, cumulative bar examination pass rate for a law school with one or more branch campus is to be calculated and reported as the combined rate of all such campuses. (Guidelines 12.1 – 12.2)

An accredited school must maintain a minimum cumulative five-year bar exam pass rate (MPR) of at least 40 percent among its graduates who take the examination. (Guideline 12.1) Drivon has complied with the guideline, having achieved MPR's of 45.6 (2018), 41.0 (2019) and, most recently 46.0 (2020). Though the law school's MPR's have been compliant, they have been close to the minimum value for several years, and the law school is encouraged to take steps to increase its MPR.

Rule 4.160(O): Equal Opportunity and Non-Discrimination. Consistent with sound educational policy and these rules, a law school must operate in accordance with policies and procedures that comply with the Constitutions and all applicable laws of both the United States and the State of California to provide both equality of opportunity and to prohibit unlawful discrimination. (Guideline 14.1)

The University and the law school have adopted and implemented sound policies with respect to equal opportunity and non-discrimination. (Guideline 14.1) As stated in the Catalog:

Humphreys University does not discriminate on the basis of sex, race, color, religion, ancestry, national origin, disability, medical condition, marital status, or sexual orientation in the administration of its educational programs, admission policies, personnel matters, financial aid programs, and other such university-administered programs and activities.

Humphreys University welcomes to its student body, faculty, administration, staff, and persons from diverse backgrounds and believes that the educational process is thereby enriched. The University consciously strives to create a climate wherein all students, faculty, administrators, and staff gain an awareness that comes from learning about and understanding the unique values and characteristics of cultures different from their own.

The Drivon student body is diverse. According to the 2020 Annual Report, of the 89 students enrolled in the JD program, about 57 percent were women and 43 percent were men. Students self-identified as belonging to racial or ethnic groups as follows: African American, 9 percent; Latinx, 39 percent; Asian, 6 percent; or Native Hawaiian or other Pacific Islander, 1 percent; Native American, 1 percent; and Caucasian, 44 percent.

Compared to the student body, the faculty is less diverse. Of the instructors reported in the 2020 Annual Report, 87 percent were white; 65 percent were white men and 22 percent were white women. The remaining 13 percent of faculty members were Latinx men. The law school is encouraged to promote diversity and inclusion in faculty recruitment, development, and retention.

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

Drivon has timely submitted all Annual Reports and all other required submissions and responses to requests by the State Bar have been timely addressed by the school.

CONCLUSION AND RECOMMENDATION

The team recommends that the Committee receive and file this Periodic Inspection Report, approve the team's recommended and suggested actions, continue the accreditation of the Drivon School of Law, and schedule its next periodic inspection in the fall of 2025, unless an earlier visitation is deemed necessary by the Committee. The law school should provide an update on its progress toward the recommendations noted as part of its 2021 Annual Report.