



The State Bar *of California*

**OPEN AGENDA
AGENDA ITEM O-100
AUGUST 2021
COMMITTEE OF BAR EXAMINERS**

OPEN SESSION MINUTES

THE COMMITTEE OF BAR EXAMINERS
OF
THE STATE BAR OF CALIFORNIA

June 18, 2021

Zoom Meeting
State Bar of California Offices

A zoom meeting of the Committee of Bar Examiners of The State Bar of California convened in open session at 9:00 a.m., Friday, June 18, 2021, Chair Esther P. Lin presiding. Officers and members present were: Chair Esther P. Lin, Vice-Chair Alexander C. Lawrence, Jr., James A. Bolton, Ph.D., Robert S. Brody, Michael Cao, M.D., James H. Efting, Kareem Gongora, Dolores Heisinger, Judge James E. Herman, Michael A. Iseri, Larry Kaplan, Paul A. Kramer, Bethany J. Peak, Vincent Reyes, Judge Shelly Torrealba, David A. Torres, and Don Ajené Wilcoxson, Members. Member David Torres joined the meeting at 9:40 a.m. and Chair Esther Lin left the meeting at 1:00 p.m. State Bar staff members in attendance were: Donna Hershkowitz, Executive Director/Chief of Programs; Amy C. Nuñez, Director III, Admissions; Audrey Ching, Assistant Director, Admissions, Lisa Cummins, Program Manager III, Examinations, Christina Doell, Program Manager I, Examination Grading; Tammy Campbell, Program Manager I, Operations and Management; Tara Clark, Program Manager I, Moral Character; Natalie Leonard, Principal Program Analyst, Educational Standards; Kim Wong, Administrative Supervisor, Admissions; Caroline Holmes, Attorney II, General Counsel; Jean Krasilnikoff, Attorney III, General Counsel; David Lane, Attorney, Moral Character; and Devan McFarland, Sr. Administrative Assistant, Admissions. The open session portion was concluded at approximately 11:11 a.m. The meeting went into closed session at approximately 11:12 a.m. The closed session concluded at 1:36 p.m. The meeting went back into open session at approximately 1:36 p.m. The meeting adjourned at 1:44 p.m.

PUBLIC COMMENTS

The Committee of Bar Examiners received 54 written public comments and 1 public

comment pertaining to the Provisional Licensure Program, and 2 public comments pertaining to the Approval of Proposed Sanction to the Chapter 6 Decisional Matrix (Attachment O-301).

APRIL 23-24, 2021 COMMITTEE OF BAR EXAMINERS
PUBLIC MEETING MINUTES

It was moved, seconded and duly carried that the minutes taken during the public session of the meeting on April 23 and 24, 2021, be approved.

Moved by Cao, seconded by Heisinger.

The motion passed. Roll call vote:

Bolton – yes

Cao – yes

Chan – yes

Efting – yes

Gongora – yes

Heisinger – yes

Judge Herman – yes

Iseri – yes

Kaplan – abstain

Kramer – yes

Lawrence – yes

Peak – yes

Reyes – yes

Judge Torrealba – yes

Wilcoxson – yes

APRIL 2021 STATISTICAL INDICATORS

It was by common consent agreed that the April 2021 Key Indicators for the Office of Admissions/Committee of Bar Examiners be received and filed.

SCHEDULE FOR AUGUST 20, 2021 COMMITTEE MEETING

It was by common consent agreed that the schedule for the August 20, 2021 Meeting, which will be held via a Zoom webinar, be received and filed.

EXAMINATIONS

TRAINING ON THE PHASED GRADING SYSTEM FOR
THE CALIFORNIA BAR EXAMINATION

It was by common consent agreed that the Committee's appreciation be extended to Lisa Cummins for her training on the Phased Grading System for the California Bar Examination.

REPORT TO THE SUPREME COURT ON
THE FEBRUARY 2021 CALIFORNIA BAR EXAMINATION

It was moved, seconded and duly carried that the Report to the Supreme Court on the February 2021 California Bar Examination be approved and submitted to the California Supreme Court.

Moved by Efting, seconded by Kramer.

The motion passed. Roll call vote:

Bolton – yes

Cao – yes

Chan – yes

Efting – yes

Gongora – yes

Heisinger – yes

Judge Herman – yes

Iseri – yes

Kaplan – yes

Kramer – yes

Lawrence – yes

Reyes – yes

Judge Torrealba – yes

Torres – yes

Wilcoxson – yes

REPORT ON 2020 – 2021 EXAMINATIONS GOALS

It was moved, seconded and duly carried that the report on 2020 – 2021 Examinations goals be approved.

Moved by Gongora, seconded by Cao.

The motion passed. Roll call vote:

Bolton – yes

Cao – yes

Chan – yes

Efting – yes

Gongora – yes

Heisinger – yes

Judge Herman – yes

Iseri – yes

Kaplan – yes

Kramer – yes

Lawrence – yes

Reyes – yes

Judge Torrealba – yes

Torres – yes

Wilcoxson – yes

OPERATIONS AND MANAGEMENT

REPORT ON THE FEBRUARY 2021 CALIFORNIA BAR EXAMINATION COST-ANALYSIS

It was moved, seconded and duly carried that the February 2021 California Bar Examination Cost Analysis be received and filed.

Moved by Torres, seconded by Reyes.

The motion passed. Roll call vote:

Bolton – yes

Cao – yes

Chan – yes

Efting – yes

Gongora – yes

Heisinger – yes

Judge Herman – yes

Iseri – yes

Kaplan – yes

Kramer – yes

Lawrence – yes

Reyes – yes

Judge Torrealba – yes

Torres – yes

Wilcoxson – yes

APPROVAL OF ADDITION OF PROPOSED SANCTION TO THE CHAPTER 6 DECISIONAL MATRIX

It was moved, seconded and duly carried that the Committee of Bar Examiners approve and adopt the revision to the Administrative Hearing Outcomes Decisional Matrix for use to assist in decision making for staff determinations, administrative hearings and appeals to the Committee of Bar Examiners, pursuant to Chapter 6 of the Admissions Rules, when an applicant's laptop does not meet the Minimum System Requirements.

Moved by Efting, seconded by Heisinger.

The motion passed. Roll call vote:

Bolton – yes

Cao – yes

Chan – yes

Efting – yes

Gongora – no

Heisinger – yes

Iseri – yes

Kaplan – yes

Kramer – yes

Lawrence – yes
Peak – yes
Reyes – yes
Judge Torrealba – yes
Torres – yes
Wilcoxson – yes

APPROVAL OF PROPOSED REVISION TO THE GUIDELINES FOR
FOREIGN-EDUCATED GENERAL APPLICANTS WITH A FIRST DEGREE IN LAW

It was moved, seconded and duly carried that the Committee of Bar Examiners approved and adopted the revision to the Guidelines, effective June 18, 2021, and applicable to courses taken before or after this date, for Applicants with a Foreign Law Degree for Admission to Practice Law, as set forth below.

**Proposed Revision to the Guidelines for Foreign-Educated General
Applicants with a First Degree in Law**

- A. Been awarded a Master of Law degree (LLM) based on a minimum of 20 semester or equivalent units of legal education. That education shall include no fewer than a total of 12 semester or equivalent units with a minimum of one course in four separate subjects tested on the California Bar Examination. One of the four courses must be Professional Responsibility that covers the ABA Model Rules of Professional Conduct, and leading federal and state case law on the subject: or
- B. Successfully completed 20 semester or equivalent units of legal education, in a Master of Law degree (LLM) program. That education shall include no fewer than a total of 12 semester or equivalent units with a minimum of one course in four separate subjects tested on the California Bar Examination. One of the four courses must be Professional Responsibility that covers the ABA Model Rules of Professional Conduct and leading federal and state case law on the subject.
- C. Prior to June 18, 2021, this Guideline required that foreign-educated applicants complete a Professional Responsibility course that included California-specific professional conduct rules in addition to the ABA Model Rules. That requirement was removed in June, 2021. Professional Responsibility courses taken prior to June 18, 2021 which did not meet the prior standard but do meet the above standards, may be used to satisfy the above requirements.

Moved by Torres, seconded by Kramer.

The motion passed. Roll call vote:

Bolton – yes
Cao – yes
Efiting – yes
Gongora – yes
Heisinger – yes

Judge Herman – yes
Iseri – yes
Kaplan – yes
Kramer – yes
Lawrence – yes
Peak – yes
Reyes – yes
Torres – yes
Wilcoxson – yes

REPORT ON 2020 – 2021 OPERATIONS AND MANAGEMENT GOALS

It was moved, seconded and duly carried that the report on 2020 – 2021 Operations and Management goals be approved.

Moved by Cao, seconded by Heisinger.

The motion passed. Roll call vote:

Bolton – yes
Cao – yes
Efting – yes
Gongora – yes
Heisinger – yes
Judge Herman – yes
Iseri – yes
Kaplan – yes
Kramer – yes
Lawrence – yes
Peak – yes
Reyes – yes
Torres – yes
Wilcoxson – yes

EDUCATIONAL STANDARDS

APPROVAL OF MAJOR CHANGE REQUEST – ADDITION OF HYBRID JD – LINCOLN LAW SCHOOL OF SACRAMENTO

It was moved, seconded and duly carried that Lincoln Law School of Sacramento's Request for a Major Change adding a hybrid JD program as set forth in Attachment A be received and filed; that the request be granted effective January 2022; and that the following progress reports be required to be filed with the Committee: 1) a letter confirming the start date of the program and initial enrollment within 30 days of the beginning or advising the Committee by February 1, 2022 of any delay in the program's launch; and 2) a progress report regarding the hybrid JD program's enrollment and performance, as compared to the law school's classroom program, be included with the law school's Annual Reports each year until the law school is inspected again.

Moved by Gongora, seconded by Torres.

The motion passed. Roll call vote:

Bolton – yes

Cao – yes

Chan – yes

Efting – yes

Gongora – yes

Heisinger – yes

Judge Herman – yes

Iseri – yes

Kramer – yes

Lawrence – yes

Peak – yes

Reyes – yes

Torres – yes

Wilcoxson – yes

PROGRESS REPORT REGARDING PERIODIC INSPECTION RECOMMENDATIONS –
SAN FRANCISCO LAW SCHOOL

It was moved, seconded and duly carried that the May 15, 2021, progress report of San Francisco Law School as set forth in Attachments A and B be received and filed.

Moved by Lawrence, seconded by Reyes.

The motion passed. Roll call vote:

Bolton – yes

Cao – yes

Efting – yes

Gongora – yes

Heisinger – yes

Judge Herman – yes

Iseri – yes

Kramer – yes

Lawrence – yes

Peak – yes

Reyes – yes

Torres – yes

Wilcoxson – yes

PROGRESS REPORT REGARDING PERIODIC INSPECTION RECOMMENDATIONS –
PEOPLES COLLEGE OF LAW

It was moved, seconded and duly carried that the Peoples College of Law Updated November 2020 Progress Report on Compliance with Recommendations in State Bar Inspection Report of 2020, as amended on May 28, 2021 and set forth in Attachment A, be received and filed.

Moved by Reyes, seconded by Torres.

The motion passed. Roll call vote:

Bolton – yes

Cao – yes

Efting – yes

Gongora – yes

Heisinger – yes

Judge Herman – yes

Iseri – yes

Kramer – yes

Lawrence – yes

Peak – yes

Reyes – yes

Torres – yes

Wilcoxson – yes

REPORT ON ADMINISTRATIVE UPDATES AT ACCREDITED AND UNACCREDITED LAW SCHOOLS

The Committee received the report on administrative updates at accredited and unaccredited law schools, including the following information: San Francisco International University had moved its headquarters from South San Francisco to One Sansome Street, Suite 3554, San Francisco, but that the law school must still provide the required major change motion to the Committee and receive approval to operate from this location; Peoples College of Law appointed Rebecca Hirsch as Registrar; appreciation for the waiver extension to teach online and accounts of positive experiences with online classes, including improved attendance; and that the next waiver-use update from fixed-facility law schools is due August 15, 2021.

REPORT ON 2020 – 2021 EDUCATIONAL STANDARDS GOALS

It was moved, seconded and duly carried that the report on 2020 – 2021 Educational Standards goals be approved.

Moved by Lawrence, seconded by Cao.

The motion passed. Roll call vote:

Bolton – yes

Cao – yes

Efting – yes

Gongora – yes

Heisinger – yes

Judge Herman – yes

Iseri – yes

Kaplan – yes

Kramer – yes

Lawrence – yes
Peak – yes
Reyes – yes
Judge Torrealba – yes
Torres – yes
Wilcoxson – yes

MORAL CHARACTER

REPORT ON 2020 – 2021 MORAL CHARACTER GOALS

It was moved, seconded and duly carried that the report on 2020 – 2021 Moral Character goals be approved.

Moved by Torres, seconded by Gongora.

The motion passed. Roll call vote:

Bolton – yes
Cao – yes
Chan – yes
Efting – yes
Gongora – yes
Heisinger – yes
Judge Herman – yes
Iseri – yes
Kaplan – yes
Kramer – yes
Lawrence – yes
Peak – yes
Reyes – yes
Judge Torrealba – yes
Torres – yes
Wilcoxson – yes

ADJOURNMENT

Having concluded all the business scheduled for consideration during the open and closed sessions of the meeting, the meeting was adjourned at 1:44 p.m., Friday, June 18, 2021.

**Lincoln Law School
Major Change Request
Hybrid Juris Doctor Modality**

INTRODUCTION

Lincoln Law School (LLS) seeks approval as required under Rule 4.164 Prior approval of major changes and Rule 4.165 Major Changes to offer a hybrid Juris Doctor (J.D.) modality of study beginning in Spring 2022. This timeline reflects LLS's need to secure approval from its regional accreditor, the Western Association of Senior College and University Commission (WSCUC) subsequent to Committee of Bar Examiners approval. LLS is not seeking to make changes to its current fixed facility J.D. program.

BACKGROUND

LLS is a long-standing law school with over 50 years of documented success in providing a high-quality, yet moderately priced opportunity to study for a law degree and the California bar examination. The typical LLS student is balancing multiple responsibilities outside of their law studies that may include raising children, caring for dependents, and working full-time jobs. Proudly, approximately half of the student body comprises students from historically underrepresented groups. LLS maintains a cumulative bar passage rate of 59.83% and claims more than 1,000 graduates who have been admitted to the California Bar. Central to LLS's success is its distinguished faculty of lawyers and judges from the Sacramento legal community who bring practical, up-to-date instruction to the LLS learning experience, keeping students abreast of the constantly changing legal landscape.

To summarize the rationale for this proposed change: The online modality will further LLS's goal of supporting non-traditional law school students in pursuit of their J.D. by lowering barriers to access and persistence. The online modality will expand such access and flexibility without compromising academic rigor. Furthermore, the expanded modality offerings will provide LLS with long-term enrollment levels necessary to ensure institutional sustainability.

DESIGN AND REVIEW

Developing the online modality was a campus-wide initiative. After the initial assessment of feasibility by the leadership team was completed, the results were shared with the Board of Directors. With the approval of that body, the leadership team convened a faculty review committee composed of members from the Senior Faculty Review and Assessment Committees. LLS also contracted an instructional design expert, Dr. LeeAnn Stone, to lead administrative and faculty teams through the process of redesigning the current J.D. program. The goal of the redesign was to create a hybrid modality that would retain the same academic rigor of the existing program while also meeting Academic Engagement and Attendance (Guideline 6.5), Distance-Education Credit (Guidelines 7.11), and the distance education standards set forth by the Western Association of Senior College and University Commission (WASCU). In the process of ensuring the online modality would meet standards, administrative teams conducted reviews of policy and procedures to ensure the LLS experience for online students and faculty

will be equitable. This process culminated in a modality change presentation to the Board of Directors. (Addendum § A)

PROGRAM OVERVIEW

The hybrid J.D. modality comprises a combination of online and onsite learning activities that parallel the existing 86-unit J.D. program (Guideline 6.5[A] & [M]). 76 units are required courses and the remaining 10 units are student-selected electives. The curriculum of the hybrid modality and graduation requirements mirror exactly those of the onsite program, as do the student-level, course-level, and program-level learning objectives. As such, graduates will demonstrate competency in the areas identified by the California Bar in becoming effective and ethical members of the legal profession, consistent with an entry-level practitioner. The first two years of study prepare students for more advanced law classes while developing their skills in communication, organization, and articulation. Courses in the third and fourth years continue to develop and refine the students' expertise in interpreting and applying legal theories (*Guideline 6.7*).

A. PROGRAM DELIVERY

The LLS hybrid modality is structured as 75% online and 25% on-ground. The online components are asynchronous and the on-ground requirements are face-to-face class meetings scheduled on a monthly basis. This equates to once-a-month weekend meetings for the typical 16-week course. Six-week, 2-unit summer courses involve one end-of-term full weekend. One-unit elective courses will be taught fully online. This percentage was based on maximizing the flexibility and affordances of online learning while maintaining the benefits of the onsite experience. It represents a general pattern that has a proven record of success for working adults for more than two decades among general graduate programs.(e.g. [Pepperdine University](#), [The Fletcher School](#), [The University of Florida](#)).

Students first meet most of the faculty even before they begin classes in a first-year orientation. Additionally, every hybrid course meets onsite at the end of the first week of instruction, giving students and faculty an opportunity to calibrate expectations, form study groups, and further cohere as a cohort.

To ensure consistency, all sections of a given course-- whether fixed-facility or hybrid-- will employ the same text, curriculum standards, and exam policies. Final exams and any other key assignments mapped to program learning outcomes will also be the same across both modalities for examination and grading calibration, and ongoing program evaluation and improvement purposes.

LLS offers—and requires—a variety of practical skills courses as a part of its curriculum. ***Students are required to complete 15 units of practical skills courses, which include the following:***

- Advanced Legal Research and Writing (2 units)
- Advanced Professional Responsibility (2 units)
- Applied Legal Reasoning (3 units)

- Legal Analysis (3 units)
- Moot Court (2 units)
- Trial Advocacy (3 units).

The School also offers a variety of *practical skills elective courses* which include the following:

- Alternative Dispute Resolution/Negotiations (1 or 2 units)
- Civil Law Pleading and Practice (2 units)
- Criminal Law Pleading and Practice (2 units)
- Law Practice Management (1 unit)
- Statutory Construction and Legislative Intent (1 or 2 units)
- Street Law (2 units)
- Taking and Defending Depositions (1 unit)

The School also encourages its students to acquire practical experience in the legal field by performing legal duties under the supervision of an attorney. Generally, third- and fourth-year students are eligible for Legal Internship units. Second-year students and students on academic probation must receive approval from the dean before registering for these units. A maximum of four units of elective credit is allowed on a credit/no credit basis.

LLS has long (even pre-Covid) notified students of internship opportunities electronically, and students are always free to obtain internships independently through other avenues. As such, students taking the program in the online modality will have the same access to those taking on-ground courses.

B. ACADEMIC ENGAGEMENT

While each course has its own unique needs, the standard structure of online academic engagement activities will include four primary components: Input (reading, viewing, listening); Processing (identifying, discussing, debating, etc. new “inputted” concepts and content); Self-assessment (formative assessment of new content with robust feedback on responses); Engagement (student output based on application of new content knowledge; whether face-to-face or online, involves substantive student-to-student and instructor-to-student interaction).

It is important to highlight that online legal study does not lessen the required level of commitment and engagement from the student. The fixed-facility J.D. program requires a student to spend minimally 2-3 hours preparation per week for each unit carried by a given course, and an additional hour of class attendance for each unit (e.g. 6-9 hours of prep for a 3-unit course with 3 hours of class meeting

time). These requirements apply equally to the hybrid J.D. modality¹. The difference is in how the attendance hours are validated.

The components of the lessons delivered through the Populi learning management system (LMS) have been explicitly designed to include formative self-assessment and weekly processing and engagement assignments that involve regular, effective communication activities. Students are required to complete these active-learning assignments and activities to qualify for “attendance”. Students receive both holistic and individual feedback on these activities from their instructor. In many assignment cases, required student-to-student interaction also provides peer feedback and supports the development of a community of inquiry within the cohort.

While the curriculum, sequencing of courses, SLOs and PLOs, key assignments and final exams are the same across the two modalities, the hybrid design presents several significant distinctions intended to further support student success. These differences include:

A consistent pattern of the four “learning stages” (input, process, assess, apply) is applied weekly within a course and across all courses in this modality.

Required weekly self-assessments that formatively build students mastery of introduced content while providing learners with additional practice with Bar-style questions. Students do not receive credit for completing these self-assessments until they have reached a score of 85% or higher.

Multiple weekly due dates (typically mid- and end-week) for discussion posts to ensure regular, sustained student engagement with the content and with peers.

The asynchronous, online modality affords (and validates) that *all* students actively participate in every assignment. The time constraints of fixed-facility instruction (non-technology-enhanced) does not provide similar affordances.

C. HYBRID MODALITY CURRICULUM MAPPING

Overview

As a new *modality* (versus a new *program*), the course offerings, sequencing, and graduation requirements for the proposed hybrid delivery option are *identical* to the current, long-sanctioned and accredited LLS program. Both the current and proposed modalities meet or exceed the California Bar requirements as illustrated in the following tables.

¹ Rice University. *How Much Should We Assign? Estimating Out of Class Workload*. Course Workload Estimator. <https://cte.rice.edu/blogarchive/2016/07/11/workload>

Table 1: LLS Curriculum Mapping to Minimum CA Bar Requirements

| | CA Bar | LLS On Ground | LLS Hybrid |
|---|---------------|--|--|
| Min instructional hours 6.5 (A) | 1200 | 1290 | 1290 |
| Minimum semester units 6.5 (A) | 80 | 86 ¹ | 86 ² |
| Minimum semester unit requirement (hours) 6.5 (A) | 45 | 48 | 48 |
| Definition of 1 hour of instruction 6.5 (D) (3) | 50 mins | 50 mins | 60 mins (for workload estimation purposes) |
| Required verified academic engagement (VAE) 6.5 (A) | 400 | 430 | >430 ³ |
| Form(s) of VAE 6.5 (B) | | On-ground classroom meetings 7.11 (C) (1) | Weekly submissions of assignments and exams, and weekend on-ground classroom sessions 7.11 (B) (1 & 4-7) 7.11 (C)(2) ² |
| Attendance 6.5 (C) | ≥80% | ≥80% | ≥80% |
| Form(s) of attendance validation | | Classroom presence | Instructor- and gradebook-validated submission of assignments and exams ² |

D. Verified Academic Engagement

The very nature of instructor-facilitated, student-engaged online learning generally ensures a greater level of validatable accountability in the learning process than does the traditional classroom instruction modality because a student cannot be “present” without submitting quantifiable output. In the LLS online modality, students are weekly required to account for their reading assignments through a “Process” assignment; “Self-Assess” through bar exam-type questions, cases or problems; and “Apply” by presenting briefs, analyzing problems, etc. Almost all (excluding students’ on-ground classroom sessions) student output is captured, documented, and in one or more of many forms (specific, holistic, peer) give and receive feedback, reflection, and assessment.

Calculating workload

Table 2 illustrates the distribution of hours of minimum required workload for the hybrid courses across the 16-week semester. The yellow columns (Weeks 1, 5, 9 and 13) are those in which students and faculty meet on-ground, on campus. Per

² 76 required; 10 elective

³ See Verified Academic Engagement narrative and Distribution of Workload by Unit below for details

Cal Bar guideline 6.5(A), each course unit requires a minimum of 3 hours of workload, with 1 of those hours involving verified academic engagement (33% of workload is verified). In an on-ground course, that verified academic engagement is accounted for by classroom attendance and the remaining 2 hours are typically accounted for through homework assignments (33% of workload is verified). In the LLS hybrid modality, 4 hours per semester for each credit unit is accounted for through class attendance, and the remaining 44 hours through validatable online activities and assignments. In other words, in the hybrid modality, 100% of the minimum required workload is verifiable and verified.

Table 2: Distribution of Workload by Units

| Week Units | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 |
|---------------|--------------------|----|----|----|--------------------|----|----|----|--------------------|----|----|----|--------------------|----|----|----|
| 3 Hours | F2F | OL | OL | OL | F2F | OL | OL | OL | F2F | OL | OL | OL | F2F | OL | OL | OL |
| | 3 F2F + 6 OL | 9 | 9 | 9 | 3 F2F + 6 OL | 9 | 9 | 9 | 3 F2F + 6 OL | 9 | 9 | 9 | 3 F2F + 6 OL | 9 | 9 | 9 |
| 2 Hours | F2F | OL | OL | OL | F2F | OL | OL | OL | F2F | OL | OL | OL | F2F | OL | OL | OL |
| | 2 F2F + 4 OL | 6 | 6 | 6 | 2 F2F + 4 OL | 6 | 6 | 6 | 2 F2F + 4 OL | 6 | 6 | 6 | 2 F2F + 4 OL | 6 | 6 | 6 |

Rice University's Center for Teaching Excellence first produced a [meta-analysis](#) of student reading and writing rates based on variables such as type/genre of document, page density, writing and reading purposes (scanning, understanding, applying), etc. From that research, they created a [course workload estimator](#), which has been further enhanced by the Center for Advancement of Teaching at Wake Forest University. It is this estimator that LLS typically employs to establish the LLS expectations of academic engagement in the online modality.

Example weekly course workload estimation

Table 3 provides an example of one of many forms of a weekly curriculum and how the associated workload is estimated. This sample represents selected examples for each of the four standard assignment categories: Read, Process, Self-Assess, and Apply. The range of assignment options for these categories, however, includes many options beyond these represented here.

Table 3: Sample 3-Unit Course Workload Estimation

| WEEK 2: Online | | | |
|---------------------------------------|---|----------------------|---|
| Assignment Group/Function | Assignment | Time Estimate | Time Calculations |
| Read/Input | Read pp. 25-77 | 3 hours | 30 pp @400 wpp @ 17 pp/hour Many new concepts; reading for understanding |
| Process | Discussion: Key Concept | 2 hours | .75 hours writing ½ page argument; no drafting 1.25 hours reading classmates' posts, adding to own outline and posting to discussion |
| Process Assignment Details | 1) Reference a key concept by quoting sentence, term, etc. and formally cite location in text. Describe in your own words the significance of this selection in the context of this week's reading. Alternatively , cite an item that you do not fully understand. Include the questions you have. 2) Review classmates' posts and create a study outline from all of the key points from the assigned reading. 3) Post your outline to DB before end of week. | | |
| Self Assess | Assignment submission: Chapter 2 Self-Assessment 44 questions | 1.6 hours | These quiz items are designed to generally reflect the types of questions students will encounter on the Bar exam. <i>LLS starts with the Bar's 33 questions per hour standard in calculating student engagement for this category of assignments and then adds another 20% to account for time to repeat the test to 85%</i> |
| Self Assess Assignment Details | These weekly self assessments provide students the opportunity to master new concepts, cases, processes, etc. introduced during the week in preparation for both the course summative assessment (typically a midterm & final exam) as well as provide practice for Bar-style questions. To get any credit for this assignment, students must accomplish a score of 85% or higher. They may re-take the quiz as many times as necessary to attain that score. Striving for a score of 100% each week will only serve to better ensure they have mastered the new content. | | |
| Apply | Discussion: Written presentation of a brief | 3+ hours | 1.5 hours write 1-page brief 1-page and post .5+ hours review selected classmates' posts 1+ hour write minimum 2 minimum ½ page responses to classmates' posts |
| Apply Assignment Details | Instructor-assign or student-select a case and write a brief in instructor-designated format. Review and comment on at least 2 briefs of cases other than students' own. | | |

E. FACULTY

The current LLS faculty consists of one full-time and 26 adjunct professors. This high part-time profile is by design to ensure the faculty body has the relevant professional experience to provide context for the substantive material they teach, and provides LLS students with the authentic, real-time application of the law. The Senior Faculty Review Committee endorses recruiting mostly new faculty to teach the online courses, recognizing that the online modality requires a different level of faculty engagement, time commitment, and expertise to ensure a quality student learning experience is maintained.

While there may be some overlap of instructors across the two modalities, it is anticipated that the online courses will be staffed with faculty hired specifically for their interest in and/or experience with online instruction. Current faculty have been extended the opportunity to teach online if they are so inclined; however, it is not expected that many will choose to teach in the online modality.

Online faculty will be oriented into LLS through a meeting with the Dean to discuss teaching practices, textbook selection, grading policies, and other topics of interest. This meeting is supplemented with a copy of the LLS Faculty Handbook. These are the same processes in place for onsite faculty members. All faculty members will be required to participate in Committee of Bar Examiners (CBE) exam answer calibration meetings that ensure bar examination grading is consistent. This is a change policy and will be applied to onsite faculty as well. Although voluntary, prior participation in CME meetings has been good and the change is not in reaction to a concern, but rather is intended to ensure continued quality and consistency of grading across both program forms. Online J.D. faculty will be required to attend the same conferences and faculty meetings as do the current on ground instructors. The expectation that they attend graduation ceremonies and participate in student activities such as mixers, spring dinner dance, faculty/student basketball games, and graduation dinner applies to all faculty, whether they teach online or on-ground.

Online J.D. faculty will also have full standing to participate in faculty committee actions as described in the LLS Faculty Handbook, including:

- The Senior Faculty Review Committee, primarily tasked with curriculum review and development, will comprise both on-ground and online faculty.
- The Assessment Committee, tasked with ongoing review and revision of student learning objectives and outcomes.

Hybrid faculty will have all the same access to and responsibilities for monitoring and assessing student progress as current on-ground instructors do. In both modalities, faculty are expected to work in collaboration with the LLS Registrar and Student Services to track student progress, and note and follow up with

students who are not performing in a manner that will ensure their successful completion of the course.

F. EXPECTED BENEFITS

First, the expansion of the JD program via online offerings will enable LLS to expand access to our J.D. program to a range of qualified candidates who may otherwise-- due to time commitments, learning differences, and other variables⁴ -- be unable to pursue such studies in current on-ground fashion.

Second, online J.D. offerings were increasing prior to the pandemic; the concomitant lockdown has provided a laboratory for highlighting some of the significant challenges that quickly constructed online learning has to offer.⁵ More importantly, though, it has also validated to many institutions and individuals (administrators, faculty and students), the long-term viability-- and indeed some of the unique benefits-- of well-designed online learning. The rise of hybrid and online programs from other law schools is creating an increasingly competitive marketplace that is no longer bound by geography.⁶ As this interest drives enrollments further, LLS anticipates needing to match its offerings to this modality to meet student demand and maintain long-term enrollment sustainability. Indeed, many current LLS students have indicated an interest in switching to an online option if provided.

A third benefit is in the potential of an online modality to *improve* upon the strengths of the current program and student outcomes through the application of best practices in learning theory leveraged through technology.⁷ Traditional J.D. courses consist primarily of lectures, reading, and summative testing. The LLS curriculum has been admirably successful with this approach as the following bar exam results demonstrate⁸:

- Cumulative pass rate: 59.83%
- October 2020 first-time taker pass rate: 59%
- October 2020 repeat takers pass rate: 35%
- July 2019 first-time taker pass rate: 32%
- July 2019 repeat takers pass rate: 25%

As detailed in section 4 below, through thoughtful revisioning of this approach for the online environment, students will reap the benefits of multiple formative

⁴ Rodriguez, Alicita. *Did Some Students Benefit from the Switch to Remote Learning?* Colorado University Denver, July 7, 2020, <https://news.ucdenver.edu/did-some-students-benefit-from-the-switch-to-remote-learning/>.

⁵ Organization for Economic Co-operation and Development. *OECD Policy Response to Coronavirus (COVID-19): The Potential of online learning for adults: Early lessons from the COVID-19 crisis*. OECD, July 24, 2020, <https://www.oecd.org/coronavirus/policy-responses/the-potential-of-online-learning-for-adults-early-lessons-from-the-covid-19-crisis-ee040002/>

⁶ Olson, Elizabeth. *Law Schools Are Going Online to reach New Students*. The New York Times, June 22, 2016. <https://www.nytimes.com/2016/06/23/education/law-schools-are-going-online-to-reach-new-students.html>

⁷ Kleiman, Glenn M. *We can make online learning a positive force in education*. EdSource, May 18, 2020, <https://edsource.org/2020/we-can-make-online-learning-a-positive-force-in-education/631852>.

⁸ The significant change between July 2019 and October 2020 is in part due to the changes the bar made to the cut score.

assessments, gain more time in the *application* of learned content, and receive more practice and feedback throughout all their courses in practical skills, including writing in particular.

PROGRAM DESIGN PROCESS

LLS contracted Dr. LeeAnn Stone to serve as the instructional design expert to guide both administration and faculty in developing the online modality in accordance with best practices for distance education and WASCU standards. Dr. Stone met regularly with administrative leadership regarding the overarching process to develop and implement the online modality. Dr. Stone also presented regularly to the faculty review team to provide expertise on utilizing a technology-leveraged/student-implemented approach rather than a technology-delivered approach. Additionally, she guided the faculty review team on connecting the standards of regular and substantive interaction amongst students and between faculty and students to the delivery components of an online modality. (Addendum § B)

IMPLEMENTATION

LLS plans to begin offering the hybrid elective course, Introduction to Legal Studies, beginning spring of 2022. To ensure the program grows strategically, LLS plans to roll out the full range of online options over a four-year period, as the first cohort proceeds through the program. The intent of this phased approach is to provide sufficient time, faculty and institutional development, and resources to ensure course design and delivery meets the highest standards of best practices in legal online instruction. The phased implementation also allows LLS to build out the hybrid J.D faculty team over time, ensuring each new faculty member is well oriented into the school, its student-centered andrological approach, and the LMS and technical components of course delivery.

LLS has reviewed recent and historical enrollment trends, applicant inquiries, and changes to the school's admission policies to forecast future enrollment projections. LLS conservatively anticipates a fall first-year enrollment cohort goal of 30 students will provide the critical mass necessary to support a robust communities of inquiry cohort, and to sustain the four-year roll out period. For the subsequent two years, 2023 and 2024, LLS conservatively projects a first-year fall cohort enrollment of 45 students.

COMPLIANCE WITH GUIDELINES

Division 1: General Provisions

LLS has reviewed its policies and procedures pertaining to Division 1 and determined no changes are necessary.

Division 2: Honesty and Integrity

LLS has reviewed its policies, procedures, and services pertaining to Division 2. Other than the guidelines noted below, no other changes are necessary.

2.10 Statement of Provided Student Services, Experience, and Activities; Adequate Support and Resources for Provided Services, and Activities.

LLS provides a wide array of student support services that are designed to support student achievement, student persistence, foster LLS's values of inclusion, respect for all people and their ideas, and create an environment where people may achieve their personal and professional goals. The addition of an online modality demands that LLS ensure those services be available to online students in a manner that ensures online students have access to services and that the mode of delivery of services is effective. As such LLS reviewed all student support services to meet its responsibility and ensure the student experience for all its students, onsite or online, is accessible and effective. The review process resulted in LLS' decision to add the West Academic Study Aid Collection to its support services thus offering students 24/7 accessibility to academic resources, student support, and career-based support resources. (Addendum § A, Section 8)

Students begin utilizing the Populi platform from the application stage of their journey with LLS. As they progress from applicant to enrolled student, their access within the system expands and course pages and resource links become accessible. Additionally, LLS provides training to students during first-year orientation to ensure students have knowledge of support services available and ability to access the supplemental resources links within Populi.

Division 3: Governance

LLS has reviewed its policies and procedures pertaining to Division 3 and determined no changes are necessary.

Division 4: Dean, Full-Time Administrator, and Faculty

LLS has reviewed its policies, procedures, and services pertaining to Division 4. Other than the guidelines noted below, no other changes are necessary.

4.1 Law School Dean; full-time Administrator; Registrar Duties.

(A): The current LLS faculty consists of one full-time Dean and 26 adjunct professors. This high part-time profile is by design to ensure the faculty body has the relevant professional experience to provide context for the substantive material they teach and provides LLS students with the authentic, real-time application of the law. Recognizing that the online modality requires a different level of faculty engagement, time commitment, and expertise to ensure a quality student learning experience is maintained, LLS is recruiting mostly new faculty to teach the hybrid courses. In the recruitment of hybrid faculty members, LLS will retain the same standards and processes for review of applicants as it has done successfully for 50 years with its onsite faculty. All faculty are required to be a member in good standing with the California state board or another state bar, holding a J.D. from an accredited institution. (Addendum § A, Section 7)

4.2 Faculty Participation in Formulation, implementation, and administration of Academic and Non-Academic Policies and Programs.

LLS has revised all policies pertaining to faculty participation and made the necessary changes to committee composition and policies to ensure hybrid faculty have equal standing within the institution.

Division 5: Admissions

LLS has reviewed its policies and procedures pertaining to Division 5 and determined no changes are necessary.

Division 6: Academics

LLS has reviewed its policies, procedures, and services pertaining to Division 6. Other than the guidelines noted below, no other changes are necessary.

6.5 (A) Minimum Requirements for the Juris Doctor; time Requirements for Completion of Course of Study.

The hybrid J.D. offered at LLS as designed complies with time requirements standards in both academic units and hours of verified academic engagement. (Addendum § A, Section 5)

6.5 (B) Academic Engagement

The design and efficacy planning for the hybrid J.D. modality includes an instructional structure that ensures course planning and implementation for online courses maintains appropriate levels of academic engagement and rigor. (Addendum § A, Section 5)

6.5 (C) Attendance

Current attendance policies include the hybrid J.D. modality. Attendance in these online courses is validated through participation in and completion of specified course assignments.

6.5 (D) Curriculum

The academic calendar at LLS will be the same for the hybrid J.D. modality. As LLS pursues eligibility to participate in Title IV Federal Financial Aid Programs, a uniform academic calendar eases administrative burden. LLS will continue to utilize a semester system with two academic semesters each year of 16 weeks in length and a summer term of 6 weeks.

Credit hour policy remains unchanged, and the instructional structure ensures online course components maintain appropriate levels of academic engagement and rigor.

6.5 (E-M)

LLS has reviewed its policies and procedures pertaining to Division 6.5 (E-M) and determined no changes are necessary.

6.5 (N) Class Size

It is the policy of LLS to limit the number of enrolled students to ensure teaching effectiveness. Consideration for class size includes the physical facilities, faculty loads, and interaction among students. LLS anticipates it may need to divide a hybrid class into multiple sections or groups not exceeding 30 students to allow for substantive student interaction with fellow classmates and the professor.

As mentioned earlier, to ensure consistency, all sections of a given course-- whether fixed-facility or hybrid-- will employ the same text, curriculum standards, exam policies. Final exams and any other key assignments mapped to program learning outcomes will also be the same

across both modalities to ensure consistency in examinations and grading and ongoing program evaluation and improvement.

Guideline 6.7 Content of Curriculum

The hybrid J.D. modality mirrors the current fixed facility J.D. program and thus meets the curriculum offerings, units per course, and graduation requirements as set forth in rule 4.160(E) and Guideline 6.7. (Addendum § A, Section 5)

Guideline 6.8 Balanced and Comprehensive Course of Study

The hybrid J.D. modality mirrors the current fixed facility J.D. modality and thus meets the curriculum offerings, units per course, and graduation requirements as set forth in rule 4.160(E) and Guideline 6.8. (Addendum § A, Section 5)

Guideline 6.9 Practical Skills

The hybrid J.D. modality mirrors the current fixed facility J.D. program and thus meets the curriculum offerings, units per course, and graduation requirements as set forth in rule 4.160(E) and Guideline 6.9. (Addendum § A, Section 5)

The School requires and offers a variety of practical skills courses, as a part of its curriculum. Students are required to complete 15 units of practical skills courses. The School also offers an additional 11-16 units of practical skills elective courses, including Legal Internships, which are optional. All 2- or more-unit hybrid courses will meet monthly for on-ground sessions. One-unit elective courses (with the exception of Legal Internships), will be administered fully online.

Guideline 6.10 Student Interaction

Regular and substantive interaction between faculty and students and amongst students is key to student persistence and achievement. LLS's approach to supporting and facilitating student engagement is built into the hybrid J.D. through policy, syllabi requirements, and standards for formative assessment (Addendum § A, Section 5). Furthermore, LLS has reviewed all student support services to ensure supportive interaction is also accessible and effective for hybrid students (Addendum § A, Section 8).

Guidelines 6.11 - 6.14 Examinations and Grading

LLS has long utilized ExamSoft to administer its examinations; this is the same software utilized to administer the October 2020 and February 2021 California Bar Examinations. When COVID-19 introduced the need to deliver proctored examinations remotely, the bar approved the additional use of ExamSoft's ExamID and ExamMonitor features.

Use of these features precipitated the establishment of several new administrative policies, coordinated by the Registrar. Students are required to complete an *Acknowledgment and Acceptance of Testing Conditions from and Release of Liability* and an *Acknowledgement & Acceptance of Testing Conditions* form prior to taking their exams each semester.

Once on-campus classes resume, LLS will continue the use of ExamSoft as per pre-COVID-19 policy, and with the current remote processes (ExamID and ExamMonitor with the Acknowledgment and Acceptance of Testing Conditions from and Release of Liability,

Acknowledgement & Acceptance of Testing Conditions form) for hybrid J.D. student examinations.

Division 7: Scholastic Standards

LLS has reviewed its policies and procedures pertaining to Division 7 and determined no changes are necessary.

Division 8: Library Requirements

LLS has reviewed its policies and procedures pertaining to Division 8 and determined no changes are necessary.

The School had previously maintained a hard copy and online library through Westlaw. However, in September 2019 it added the online library LexisNexis in addition to Westlaw.

Division 9: Physical Resources

LLS has reviewed its policies, procedures, and services pertaining to Division 9. Other than the guidelines noted below, no other changes are necessary.

9.1 Physical and Infrastructure Requirements

LLS will retain its physical presence in Sacramento, CA and utilize such facilities for administrative purposes as well as fixed facility instructional needs. The learning management system that will be utilized for the hybrid modality will be administered from the Sacramento location.

9.3 Instructional Equipment; Resources and Procedures to Address Technology-related Problems

After extensive review and consideration, it was determined that the current Populi platform, which provides LLS with a comprehensive and fully-integrated college management system, has the necessary functionality to support online course delivery. The course functionality within Populi supports the full range of learning objects and functionalities necessary to deliver a robust online course including lesson delivery, discussion boards, tests and assignments, embedded syllabi, in-course chat, and resource links. As Populi is currently widely used across LLS as both an LMS and an administrative management system, there is a high level of institutional comfort and knowledge with utilizing the platform. By building upon this institutional knowledge and familiarity, LLS will be able to meet the needs of online course offerings without the burden of a steep learning curve for faculty, staff, and administrators (Addendum § A, Section 10).

Division 10: Financial Resources

LLS has already invested in the technology, facilities, and library infrastructure to support our existing students, leaving few additional costs to be incurred by offering the J.D. in the hybrid modality. The primary additional costs are in course development, payroll expenses for the hybrid faculty members, and additional marketing expenditures. The current administrative staff has the capacity to support all back-office functions needed to support the modality expansion. Lincoln projects there is significant potential to increase revenue over the long term through the growth of this program.

LLS administration has performed an analysis of the anticipated revenues and expenses for the hybrid modality's initial years. The enrollment estimates utilized are very conservative and are derived from historical trends, applicant inquiries, and changes to admissions policies. Expenses, especially when compared to operations during the pandemic, are considerably lower. This is due to leveraging investments already made as well as the ability to plan for the transition.

Revenue projections assume a starting class of 30 which generates revenue sufficient to cover all *direct costs* in the first year, resulting in a *revenue neutral* start to the program. Projected enrollment growth is limited to 15 students in each subsequent year of the programs' initial budget. Even under this conservative approach to the growth of the program, it is anticipated that the program will generate net profit by the end of its 2nd year.

LLS has a robust cash reserve component that has been built over 50 years of operations. Should any unexpected costs arise, LLS has the resources and reserves to support arising needs the hybrid modality may require from its ongoing operations.

Division 11: Records and Reports

LLS has reviewed its policies and procedures pertaining to Division 11 and determined no changes are necessary.

Division 12: Minimum, Cumulative Bar Examination Pass Rate

LLS has reviewed its policies and procedures pertaining to Division 12 and determined no changes are necessary.

Reporting and tracking of passage rates will include disaggregated analysis between the modalities of study to support continuous improvement cycles and institutional effectiveness reviews.

Division 13: Awarding of Professional Degrees in Addition to the J.D. Degree

LLS does not award degrees other than the J.D.

Division 14: Equal Opportunity and Non-Discrimination

LLS remains committed to its policies and procedures to ensure equal opportunity and non-discrimination. All policies and procedures have been reviewed to ensure applicability to hybrid students and faculty.

Division 15: Opening and Operating a Branch or Satellite Campus

Not applicable at the current time. LLS does not operate, nor does it plan to operate, a branch or satellite campus.



Lincoln Law School of Sacramento Hybrid Juris Doctor Program Proposal

April, 2021

1 BACKGROUND AND RATIONALE

Lincoln Law School of Sacramento (LLS) seeks approval to add an online modality to its current Juris Doctor (J.D.) program. Two inextricable purposes-- expanding access and meeting students' interests-- drive this change. The typical LLS student is balancing multiple responsibilities outside of their law studies that may include raising children, caring for dependents, and working full-time jobs. Approximately half of the student body comprises individuals from historically underrepresented groups. LLS was founded on a mission of offering access to a high-quality, accessible law school to working adults in an era when night school was essentially the only viable option. Given the ubiquity of digital technologies, and the proven ways in which they can be leveraged to advance teaching and learning, an online program is now another viable option for LLS's student demographic. Prospective students know this and are seeking programs that offer this additional flexibility¹.

Once it became evident that an increasing number of potential students were interested in online options for completing their J.D., the LLS Administration began a market study to make an initial assessment as to the feasibility of such at LLS. This included a review of existing models of hybrid and online offerings, and research into best practices in online teaching and learning with a deeper dive into computer-assisted legal instruction. The goal was to discover models that ensured students acquired basic skills necessary for the successful practice of law and maintained a focus on preparing students for the bar exam.

As this document will detail, the addition of an online modality will provide LLS with several benefits. First, the expansion of the J.D. program via online offerings will enable LLS to expand access to our J.D. program to a range of qualified candidates who may otherwise-- due to time commitments, learning differences, and other variables²-- be unable to pursue such studies in current on-ground fashion.

Second, online J.D. offerings were building prior to the pandemic; the concomitant lockdown has provided a laboratory for highlighting some of the significant challenges that quickly-constructed online learning has to offer.³ More importantly, though, it has also validated to many institutions and individuals (administrators, faculty and students), the long-term viability-- and indeed some of the unique benefits-- of well-designed online learning. The rise of hybrid and online programs from other law schools is creating an increasingly competitive marketplace that is no longer bound by geography.⁴ The pandemic of the last year has advanced this shift further as schools have had to create viable ways to continue preparing their previously site-bound enrolled

¹ Inquiries and feedback from prospective students in recent years have demonstrated an interest in online options to provide additional flexibility in meeting their needs and helping support their law school persistence and completion.

² Rodriguez, Alicita. *Did Some Students Benefit from the Switch to Remote Learning?* Colorado University Denver, July 7, 2020, <https://news.ucdenver.edu/did-some-students-benefit-from-the-switch-to-remote-learning/>.

³ Organization for Economic Co-operation and Development. *OECD Policy Response to Coronavirus (COVID-19): The Potential of online learning for adults: Early lessons from the COVID-19 crisis*. OECD, July 24, 2020, <https://www.oecd.org/coronavirus/policy-responses/the-potential-of-online-learning-for-adults-early-lessons-from-the-covid-19-crisis-ee040002/>

⁴ Olson, Elizabeth. *Law Schools Are Going Online to reach New Students*. The New York Times, June 22, 2016. <https://www.nytimes.com/2016/06/23/education/law-schools-are-going-online-to-reach-new-students.html>

students.⁵ As this interest drives enrollments further, LLS anticipates needing to match its offerings to this modality to meet student demand and maintain long-term enrollment sustainability. Indeed, many current LLS students have indicated an interest in switching to an online option if provided.

A third benefit is in the potential of an online program to *improve* upon the strengths of the current program and student outcomes through the application of best practices in learning theory leveraged through technology.⁶ Traditional J.D. courses consist primarily of lectures, reading, and summative testing. The LLS curriculum has been admirably successful with this approach (exceeding the minimum bar pass rate)) across its 50+ years. As detailed in section 4 below, through thoughtful revisioning of this approach for the *online* environment, we anticipate students reaping additional benefits from multiple formative assessments and gaining more time in the *application* of learned content.

To summarize the rationale for this proposed change: The online modality will further LLS's goal of supporting non-traditional law school students in pursuit of their J.D. by lowering barriers to access and persistence. The online program will expand such access and flexibility without compromising academic rigor. Furthermore, the expanded modality offerings will provide LLS with long-term enrollment levels necessary to ensure institutional sustainability.

⁵ DiChello, Taylor. *Coronavirus conversion: Will online law school classes become a permanent change?* ABA For Law Students, March 26, 2020. <https://abaforlawstudents.com/2020/03/26/will-online-law-school-classes-become-a-permanent-change/>

⁶ Kleiman, Glenn M. *We can make online learning a positive force in education.* EdSource, May 18, 2020, <https://edsource.org/2020/we-can-make-online-learning-a-positive-force-in-education/631852>.

2 PROCESS

Overview

Developing the online program was a campus-wide initiative. After the initial assessment of feasibility was completed, the administrative team agreed to proceed, a faculty review committee composed of members from the Senior Faculty Review and Assessment Committees was formed, and an instructional design expert, Dr. LeeAnn Stone, was contracted to lead administrative and faculty teams through the process of adapting the current J.D. program to an online one that would retain academic rigor and meet distance education standards set forth by the Committee of Bar Examiners of the State Bar of California and the WASC Senior College and University Commission (WSCUC). In the process of ensuring the online modality would meet standards, administrative teams conducted reviews of policy and procedures to ensure the LLS experience for online students and faculty will be equitable. This initial feasibility research culminated in a presentation to the board of directors.

Timeline

In 2019 an idea and discussion between the Executive Director and Chief Executive Officer began in response to a noticeable increase in the number of prospective students inquiring about online or online offerings at LLS. This led to the administrative team undertaking a market study to form an initial feasibility assessment. The inquiry was shaped to determine how the emergence of online and online J.D. programs were influencing the marketplace currently served by LLS. The findings indicated increasing levels of competition within the market which could ultimately result in LLS facing competition from law schools beyond the geographic boundaries of its traditional service area.

The market analysis led to a deeper study of the delivery models being utilized by various law schools. In this process, the focus was on comparing the range of existing models with the current LLS model. The goal was to identify the options for programmatic delivery that would best align with the LLS mission, educational objectives, and institutional culture. It was concluded that a fully online modality would eliminate one of the differentiating qualities of the LLS experience, which is face-to-face interaction with a faculty body comprising working (and recently retired legal professionals such as judges, advocates, district attorneys, etc. Furthermore, multiple research studies have proven that *hybridizing* the online learning experience provides students the “best of both” (online and on-ground) learning experiences in terms of outcomes and retention.⁷ Thus, a curriculum comprising mostly online instruction combined with regular (later defined as monthly) on-campus meetings was deemed the instructional model that would best meet student’s needs, support enrollment sustainability, better ensure retention in an instructional mode that typically reports high attrition, and maintain foundational components of the LLS student experience.

⁷US Department of Education Office of Planning, Evaluation, and Policy Development. *Evaluation of Evidence-Based Practices in Online Learning: A Meta Analysis and Review of Online Learning Studies*, Washington, DC, 2009.

In January 2021, the faculty review committee team composed of James Schiavenza (Dean, Torts), Robert Gold (Criminal Law), Hon. Marcie Larson (Administrative Law and Real Property), Hon. Jill Talley (Remedies), William Wright (Constitutional Law), and Filomena Yeroshek (Professional Responsibility and Advanced Professional Responsibility) was convened. The idea of an online modality was presented by James Smolich (CEO) and Brittney Adkins-Neuman (Executive Director) along with reference materials of programs offered by competing institutions. The faculty review team was asked to provide feedback on how closely the proposed online program should mirror the onsite program and what an effective online program for LLS would look like.

At the same time, LLS contracted Dr. LeeAnn Stone to serve as the curriculum design expert to guide both administration and faculty in developing the online program modality in accordance with best practices for distance education, the Committee of Bar Examiners of the State Bar of California and WSCUC standards. Dr. Stone met regularly with administrative leadership regarding the overarching process to develop and implement the online development and the concomitant training, support, and other functions required to deliver a viable online option. Dr. Stone also presented regularly to the faculty review team to provide expertise on utilizing a technology-leveraged/student-implemented approach as opposed to a “canned” technology-delivered approach. Additionally, she guided the faculty review team on connecting the standards of regular and substantive interaction among students and between faculty and students in substantive, engaging, and meaningful ways that provide a parallel to the successful activities presented in the on-ground courses. Dr. Stone’s expertise provided a clear pathway for LLS’s professional, full time legal practitioners to deliver meaningful and effective learning and attain expected learning outcomes, through a student-centered, faculty-facilitated approach.

With fundamental planning questions such as program delivery and faculty utilization determined, the administrative team worked to develop planning for student services, technology infrastructure, and financial models as the final piece for online feasibility.

The resulting plan envisions using the current program as the foundation and leveraging instructional technology in the design of a parallel set of course options to further open access, advance LLS viability in an era where online offerings are rapidly growing, and potentially even improve student success.

3 DESIGN AND EFFICACY

LLS's online modality shares all the same curricular and programmatic foundations as the "parent" on-ground program, including course offerings, sequencing, admission by cohort, graduation requirements, key assignments, student learning objectives, and program learning objectives. Online course design adapts LLS's long-successful instructional approach (average 59.83% first-time bar passage rate) by leveraging the affordances of online learning technologies and strategies in a hybrid model.

Research has consistently suggested that the hybrid format combines the best features of both the classroom and online learning environments.⁸ By harnessing the multiple affordances of face-to-face, online resources, discussion forums, etc., hybrid online learning experiences extend the ability of the individual learner to work with, take in, process, and create meaning around the content across time, rather than forcing the bulk of it into short weekly class meetings.^{9 10 11} The online portion of the course creates greater opportunities for students and instructors to have more frequent and meaningful interaction throughout the course while extending writing practice. Additionally, the responsibilities students are held to in terms of their own learning and intellectual discourse with their classmates further contributes to their preparation for future professional responsibilities.

At the top of the hybrid program's design structure is a general androgogical framework that comprises four sequential sections:

- **Input:** Reading, viewing and/or listening content introducing the new content, concepts, terminology, etc. of the lesson.
- **Process:** An assignment- typically in post-first discussion forum form- in which students identify, discuss and/or debate the value, meaning, application, etc. of details from the Input assignment. Advances "regular effective contact" in the online environment.
- **Self Assess:** Formative assessments with rich feedback. Students receive credit for completion of these unlimited-attempt quizzes once they attain at least 85% correct, further ensuring their acquisition of the lesson's content and providing continuous testing practice in preparation for the Bar exam.
- **Application:** Whether online or face-to-face during the monthly on-site class sessions, this stage always involves regular, effective contact as students engage with the lesson

⁸ US Department of Education Office of Planning, Evaluation, and Policy Development, 2009.

⁹ Garnham, C., and Kaleta, R. (2002) *Introduction to hybrid courses. Teaching with Technology Today*, 8(6)
<http://www.uwsa.edu/ttt/articles/garnham.htm>

¹⁰ Garrison, D.R., and Vaughn, N.D. (2008). *Blended learning in higher education: Framework, principles, and guidelines*. San Francisco, CA: Jossey-Bass

¹¹ Merriam, S.B., Carafella, R.S., and Baumgartner, L.M. (2007). *Learning in adulthood: A comprehensive guide*, 3rd edition. San Francisco, CA: Jossey-Bass

materials by putting the learned content into legal application as appropriate to the course.

Courses are designed through the collaboration of a subject matter expert (typically internal to the institution such as a current or newly-hired instructor) with an instructional designer. As the modality is developed, the Dean is also involved at both the design and authorization phases, providing an element of the faculty and institutional development. The curriculum designer guides the process, not just of course design, but of faculty and institutional development in terms of the needs, requirements, and affordances of online program delivery. In the initial online program development, the Dean, Executive Director, and Instructional Designer make final course approval.

4 CURRICULUM AND DELIVERY

The LLS hybrid program is structured as 75% online and 25% on-ground. This equates to once-a-month weekend meetings for the typical 16-week course. Six-week, 2-unit summer courses involve one end-of-term full weekend. One-unit elective courses will be delivered in a fully online modality.

This percentage was based on maximizing the flexibility and affordances of online learning while maintaining the benefits of the onsite experience. It represents a general pattern that has a proven record of success for working adults for more than two decades among general graduate programs.(e.g. [Pepperdine University](#), [The Fletcher School](#), [The University of Florida](#)).

The curriculum of the hybrid program and graduation requirements mirror exactly those of the onsite program, as do the student-level, course-level and program-level learning objectives. The difference lies in the technology-leveraged structure of the learning process for the online program. Given the explicitly designed learning structure, inclusion of required formative self-assessment, and weekly processing and engagement assignments that involve regular, effective communities of inquiry communication activities, the institution anticipates potentially higher levels of student achievement in the hybrid program. Although there is not yet significant research on the topic, the thoughtful imposition and oversight of proven strategic learning strategies on hybrid and online programs (such as formative activities and assessment; instructor facilitation of student understanding vs. lecturing; and communities of inquiry) may do more in informing improvement of onsite courses than carry-over of onsite practices does to improve learning in online courses.^{12 13 14}

The hybrid J.D. will follow the same curriculum plan as the [current onsite J.D. program](#) listed in the LLS catalog. For quick reference courses are listed on the following page. Additionally, to ensure consistency, all sections of a given course—whether fixed-facility or hybrid—will employ the same text, curriculum standards, and exam policies. Final exams and any other key assignments mapped to program learning outcomes will also be the same across both modalities to ensure consistency in examinations, grading, and ongoing program evaluation and improvement.

¹² Rodgers, Michael L. & Talbut, Mary Harriet. *Can Online Teaching Improve Face to Face Instruction?* Posted on Tomorrow's Professor Postings, Stanford University. <https://tomprof.stanford.edu/posting/1321>

¹³ Scagnoli, Norma I., Buki, Lydia P., & Johnson, Scott D. *The Influence of Online Teaching on Face-to-Face Teaching Practices*. University of Illinois at Urbana Champagne. <https://files.eric.ed.gov/fulltext/EJ862351.pdf>

¹⁴ Andres, D'Nita. *The Effect of Online Teaching on Faculty After Returning to the Traditional Classroom*. University of West Georgia Distance Education Center, Online Journal of Distance Learning Administration, Volume XXI, Number 4, Winter 2018. <https://www.westga.edu/~distance/ojdl/winter214/andrewsgraham214.html>

First Year Electives

These electives are available only to students first enrolling in either spring or summer.

| Course | Units |
|-------------------------------|-------|
| Introduction to Legal Studies | 2 |
| Laws & the Judicial System | 2 |

First Year

| Course | Units |
|-----------------------------|-------|
| Contracts | 6 |
| Criminal Law | 4 |
| Legal Writing | 2 |
| Professional Responsibility | 2 |
| Torts | 6 |

Students take 2-4 units of elective courses during summer term.

Second Year

| Course | Units |
|--------------------|-------|
| Civil Procedure | 6 |
| Criminal Procedure | 4 |
| Legal Research | 2 |
| Real Property | 6 |

Students take Moot Court (2 units) and 2 units of elective courses during summer term.

Third Year

| Course | Units |
|-----------------------|-------|
| Community Property | 2 |
| Business Associations | 4 |
| Constitutional Law | 6 |
| Evidence | 6 |

Students take 2-4 units of elective courses during summer term.

Fourth Year

| Course | Units |
|--------------------------------------|-------|
| Advanced Professional Responsibility | 2 |
| Legal Analysis | 2 |
| Remedies | 4 |
| Applied Legal Reasoning/Semantics | 3 |
| Trial Advocacy | 3 |
| Trusts | 2 |
| Wills | 2 |

5 ACADEMIC ENGAGEMENT

The curriculum at LLS -- whether onsite or online-- is designed to offer students a strong foundation in a variety of legal principles. The first two years of study prepare students for more advanced law courses, while developing skills in communication, organization, and articulation. Courses in the third and fourth years continue to develop and refine the students' expertise in interpreting and applying legal theories.

Students may begin study at LLS in spring, summer, or fall. Students entering in either spring or summer enroll in specially selected electives and begin the full First-Year curriculum the following Fall Semester. The Spring and Summer elective courses are designed to introduce law study and provide an opportunity for students to develop legal background and study skills before entering the more rigorous full First-Year curriculum.

Graduation Requirements

Students are eligible for the degree of Juris Doctor (J.D.) when they have completed the following: 1. A minimum of 86 semester units in accordance with the LLS' prescribed curriculum; 2. A grade point average of 2.00 or better during their final academic year and have a cumulative grade point average of 2.00 or better; and 3. A petition for graduation in their final semester.

Required Courses

Students are typically required to take a minimum of 9 units in both Fall and Spring Semesters and typically take 2-4 units in Summer Semesters. A total of 86 units are required for graduation, including 76 units of required courses (listed in the previous section) and 10 units of elective courses.

Credit Hour Policy

LLS operates under a semester credit hour, or "semester unit" system for both on-site and online courses. The credit hour is the unit of instruction used to quantify intended student learning outcomes and a way of measuring the academic time to which a class is equivalent. It represents the number of hours per week a student will be in class. Fall and Spring Semesters are 16 weeks in length with each on-site course meeting once a week for 3 hours of attendance. Summer Semester is 6 weeks in length with courses meeting twice a week for 3 hours each class night. This policy conforms with Federal, State, and Accrediting Agency Guidelines for credit hours and applies to all courses.

In the hybrid courses, attendance is demonstrated and validated through active participation in online class assignments, which have been calibrated for time-on-task equivalencies.¹⁵ These equivalencies are based primarily on research by Rice University.¹⁶ The institution's LMS

¹⁵ The "Apply" assignment group will typically be tagged for validating attendance as it incorporates "regular, effective" interaction and has similar time and tasks requirements for both online and F2F meeting options. This may vary depending on the nature of the course.

¹⁶ Rice University Center for Teaching Excellence. *How Much Should We Assign? Estimating Out of Class Workload*, 2016. <https://cte.rice.edu/blogarchive/2016/07/11/workload>

system, Populi, provides readily accessible data and reports on student progress, readily available to instructors and designated administrators at any time. Such tracking is useful not just for verifying student attendance, but more importantly perhaps, for identifying bumps or roadblocks to individual students' success, and to facilitate helpful remediation and support.

A hybrid syllabus template provides the framework within which each course develops the four-stage learning process (input, process, assess & apply) and the Master Course Syllabus for each course designates the curricular specifics of time-and-workload distribution.

* This space intentionally left blank *

| WEEK 2: Online | | | |
|--------------------------------|---|---------------|---|
| Assignment Group/Function | Assignment | Time Estimate | Time Calculations |
| Read/Input | Read pp. 25-77 | 3 hours | 30 pp @400 wpp @ 17 pp/hour Many new concepts; reading for understanding |
| Process | Discussion: Key Concept | 2 hours | .75 hours writing ½ page argument; no drafting 1.25 hours reading classmates' posts, adding to own outline and posting to discussion |
| Process Assignment Details | 1) Reference a key concept by quoting sentence, term, etc. and formally cite location in text. Describe in your own words the significance of this selection in the context of this week's reading. Alternatively , cite an item that you do not fully understand. Include the questions you have. 2) Review classmates' posts and create a study outline from all of the key points from the assigned reading. 3) Post your outline to DB before end of week. | | |
| Self Assess | Assignment submission: Chapter 2 Self-Assessment 44 questions | 1.6 hours | These quiz items are designed to generally reflect the types of questions students will encounter on the Bar exam. <i>LLS starts with the Bar's 33 questions per hour standard in calculating student engagement for this category of assignments and then adds another 20% to account for time to repeat the test to 85%</i> |
| Self Assess Assignment Details | These weekly self assessments provide students the opportunity to master new concepts, cases, processes, etc. introduced during the week in preparation for both the course summative assessment (typically a midterm & final exam) as well as provide practice for Bar-style questions. To get any credit for this assignment, students must accomplish a score of 85% or higher. They may re-take the quiz as many times as necessary to attain that score. Striving for a score of 100% each week will only serve to better ensure they have mastered the new content. | | |
| Apply | Discussion: Written presentation of a brief | 3+ hours | 1.5 hours write 1-page brief 1-page and post .5+ hours review selected classmates' posts 1+ hour write minimum 2 minimum ½ page responses to classmates' posts |
| Apply Assignment Details | Instructor-assign or student-select a case and write a brief in instructor-designated format. Review and comment on at least 2 briefs of cases other than students' own. | | |

Attendance Policy

An absence from class participation for 3 consecutive weeks (20% of a 16-week course) without consultation with the instructor or administration will result in Administrative Disqualification.

Verified Academic Engagement

LLS has employed *ExamSoft* for delivery and management of all course assessments for many years. Remediations applied to augment exam invigilation during the current pandemic-driven emergency move to online instruction have proven secure, safe, and relatively problem -free for students. These remediations have been so successful, in fact, that once on-ground courses reconvene, exams will continue to be delivered remotely, providing an even field for comparing on-ground and online student exam outcomes.

Verification of academic engagement for other, lower stakes, non-summative assessments is much less challenging in a well-designed course that includes multiple low-stakes and formative assessments as in the LLS hybrid design. Assignments such as discussion forums involving processing, debating, confirming, etc. in multiple steps throughout the week, significantly reduce the opportunities for cheating.

And it is precisely these types of learning activities that ensure regular, effective and substantive interaction among students and instructors. Two of the four assignment groups (Process and Application) typically require meaningful student-to-student communication with instructor guidance and facilitation.

6 STUDENT LEARNING ASSESSMENT

The ultimate objective of the LLS J.D. program is to produce students who can pass the California bar exam and have attained the knowledge, skills, and values necessary to competently enter the practice of law. These outcomes are designed, measured, and tracked at the following levels:

- Institutional: [Program requirements](#) include the standard and necessary array of courses to provide students with the procedural knowledge, skills practice (writing, research, reasoning, oral communication) and values (professional and ethical responsibilities).
 - To measure the outcomes at the institutional level, program learning objectives are mapped to key assignments at their highest and most comprehensive level of performance and distributed across all 4 years of the curriculum.
 - Key assignments are all summative assessments represented by a range of formats (such as bench memo, final exam, mock trial, appellate brief, oral argument, and performance tests).
 - Key assignments are the same for on-ground and online courses and are an immutable component of the Master Course Outline for any course containing a mapped key assignment.
- Course level: Course-level student learning objectives are assessed by any of a variety of formative and summative assignments.
 - Course-level student learning objectives (SLOs) are mapped to their associated assessed assignment in their respective Master Course Outline.
 - Summative exams in the form of midterms and finals typically mimic bar exam question types and thus serve the dual purpose of validating student outcomes *and* providing ongoing practice and preparation for the bar exam.
 - Summative assignments mapped to course-level SLOs also may take the form of written briefs, research results, and oral presentations.
 - Formative assessments, such as weekly, multiple-attempt, rich-feedback quizzes provide students the opportunity to ensure competency and (like the summative exams), offers additional practice of bar exam-like question items.
 - Weekly discussion forums provide another form of formative assessment and may be mapped to course-level SLOs. Discussions provide students with the regular and effective student-to-student and student-instructor communication necessary to co-process new content and concepts with instructor facilitation.

To ensure continuous improvement, multiple (at least 3) course-level outcomes are tracked for *each* course *each* semester, and all program-level outcomes are tracked and documented at the end of each academic year. The achievement bar for both course- and program-level objectives is currently set at 75% of students achieving 80% or higher on the key indicators. The improvement process for objectives that do not meet these outcomes bars are as follows:

- The instructor and Dean meet to review the assignments mapped to the given “failed” objective and devise remediations for improvement. Such remediations may involve adjusting the assignment itself, improving instructions, providing additional preparatory assignments, etc. Remediations are implemented for the subsequent delivery of the course and re-assessed then.
- For program-level objectives, remediations may involve multiple courses; that is, augmenting preparatory materials in one course that provide students the foundation they need for success in the next.
- Records of SLO and PLO outcomes will be reported annually and longitudinally.

This is a more comprehensive plan than currently exists for the on-ground program and will be rolled out across those courses as well. Such tracking will provide further comparative data on the efficacy of the two program modalities (on-ground and online).

7 FACULTY

What Remains the Same

The current LLS faculty consists of one full-time and 26 adjunct professors. This high part-time profile is by design to ensure the faculty body has the relevant professional experience to provide context for the substantive material they teach, and provides LLS students with the authentic, real-time application of the law. The Senior Faculty Review Committee endorses recruiting mostly new faculty to teach the online courses, recognizing that the online modality requires a different level of faculty engagement, time commitment, and expertise to ensure a quality student learning experience is maintained.

In the recruitment of online faculty members, LLS will retain the same standards and processes for review of applicants as it has done successfully for 50-years with its onsite faculty. All faculty positions, other than the Dean, are part-time adjunct positions. All positions are defined in accordance with the needs and requirements of LLS and the intended course assignments for the faculty member. Regardless of course assignments, all faculty are required to be a member in good standing with the California state board or another state bar, holding a J.D. from an accredited institution.

Online faculty will be oriented into LLS through a meeting with the Dean to discuss teaching practices, textbook selection, grading policies, and other topics of interest. This meeting is supplemented with a copy of the LLS Faculty Handbook. These are the same processes in place for onsite faculty members. All faculty members will be required to participate in Committee of Bar Examiners (CBE) exam answer calibration meetings that ensure bar examination grading is consistent. This is a change policy and will be applied to onsite faculty as well. Although voluntary, prior participation in CME meetings has been good and the change is not in reaction to a concern, but rather is intended to ensure continued quality and consistency of grading across both program forms. Online J.D. faculty will be required to attend the same conferences and faculty meetings as do the current on ground instructors. The expectation that they attend graduation ceremonies and participate in student activities such as mixers, spring dinner dance, faculty/student basketball games, and graduation dinner applies to all faculty, whether they teach online or on-ground.

Online J.D. faculty will also have full standing to participate in faculty committee actions as described in the LLS Faculty Handbook, including:

- The Senior Faculty Review Committee, primarily tasked with curriculum review and development, will comprise both on-ground and online faculty.
- The Assessment Committee, tasked with ongoing review and revision of student learning objectives and outcomes.

LLS utilizes direct feedback from faculty, students, and institutional effectiveness assessment processes to identify areas for faculty development. These same practices will apply equally to online J.D. faculty per the policies currently in place for the onsite J.D. program.

What Differs

While there may be some overlap of instructors across the two modalities, it is anticipated that the online courses will be staffed with faculty hired specifically for their interest in and/or experience with online instruction. Current faculty have been extended the opportunity to teach online if they are so inclined; however, it is not expected that many will choose to teach in the online modality.

In any case, as part of their onboarding process, all faculty scheduled to teach online will receive orientation and training specific to the delivery and facilitation of online learning. This training includes elements such as (selected examples; not comprehensive):

- Course management: Using the Populi LMS system
 - Navigation
 - Communication
 - Gradebook
 - Where to find support
 - Where to send students for support
- The LLS online curricular structure: Theory and Best Practices
 - LLS's Input-Process-Assess-Apply model
 - Leveraging the cohort as a community of inquiry
 - The online instructor as facilitator
 - The purpose and practice of regular, substantive, and effective S2S and T2S interaction
 - The role of formative assessments in advancing student outcomes
- Continuous improvement: Student Learning Outcomes tracking and reporting
- Instructor time management
 - Discussion and feedback participation expectations
 - Response and feedback turn-around time expectations
 - Leveraging cohort communications

8 STUDENT SUPPORT SERVICES

LLS provides a wide array of services that are designed to support student achievement, student persistence, foster LLS's values of inclusion, respect for all people and their ideas, and create an environment where people may achieve their personal and professional goals. Many of these services have been provided or facilitated electronically even prior to the pandemic remediations; all have been converted since. In the list that follows, we outline how these services are made accessible and effective for all its students, on-ground or online.

Access to library, research, student support and other student success resources have been made easily available through a link in the student Populi portal. Additionally, LLS is adding 24/7 accessibility through the utilization of the West Academic Study Aids Collection, which provides access to academic resources, general student support, and career-based student resources.

Counseling and Tutoring

One-on-one academic counseling is serviced through appointment requests with LLS faculty, and an open-door policy maintained by the Dean. The same process applies for online counseling, tutoring, and office hours. Currently, on-ground students and instructors have the option of physical office meetings in addition to other meeting forms, including by phone, asynchronous (such as email) communication, and synchronous video (such as Zoom). The only difference for online students and faculty is their dependence on digital technologies for hosting these meetings. In either modality, students will reach out to their instructor, Dean, or other support personnel, to request a meeting. The process of doing such, and the instructor response time, is articulated in every course syllabus. On-ground instructors will typically establish office hours that wrap around their and their students' time on campus (before or after class). Online instructors have the option of designating blocks of available office hour availability and/or providing a "By appointment" option (also available to on-ground instructors).

Library Services

Library services were in the process of converting from site-based to online prior to the pandemic. They are now fully converted and thus fully available to both onsite and online students. Library services are supported by a qualified LLS employed librarian as well as additional remote services and resources including West Academic Study Aids Collection. Students have online access to all the law library materials as defined by The Committee of Bar Examiners (Guideline 8.2) and more.

Students with Disabilities

We do not know to what degree the online modality may increase enrollment by students requesting reasonable accommodations. In anticipation of such interest, and to ensure students feel comfortable self-advocating for support, LLS has implemented the following processes:

At the institutional level

- Information about disability services is communicated during enrollment and orientation processes for incoming students.
- Student Success Center/Student Services informational pages include a list of services and technology available to students.
- Designated accessibility coordinator.

At the course level

- Syllabi include the statement on how students can request accommodations.
- Instructors address course expectations in the syllabus
- Syllabi include detailed dates and assignment expectations.
- Assignments in Populi include detailed assignment directions.
- Uniform formatting and submission procedures are implemented for assignments throughout given courses and across the program.

Friday Review Program

As a remediation due to the pandemic, the Friday Review Program (FRP), which had previously been an on-ground activity, was converted to a remote one. Once students return to campus (anticipated Fall 2021), this program may revert to on-ground delivery; however, on-ground students will be polled to determine which format they prefer. An online version will remain in place for students in the online modality.

Study Groups

Study groups are formed directly between students or through student government organizations. Online program students will have both a dedicated digital student discussion forum in addition to the course-specific fora within the Populi platform. This will serve as a central communication hub for students to form study groups and other group interactions outside of individual course pages.

Additional Student Services

LLS provides a range of additional student support services including legal internships, judge mentorship, student organizations, career resources, and social events to help foster student success. Some services are available only to third- or fourth-year students, however, these services are available to students regardless of program of study modality.

9 QUALITY ASSURANCE

The Institutional Effectiveness Plan (IEP) LLS developed will include review and evaluation of the online J.D. program to ensure program effectiveness, continuous improvements, and alignment with the institutional mission. The assessment processes outlined in the IEP address learning outcomes at the course level, programmatic level, and institutional level. The IEP defines six main areas of focus:

1. Student Learning Outcomes
2. California Bar Examination Pass Rate
3. Student Satisfaction
4. Alumni Support
5. Employer Relations
6. Employee Satisfaction

Student learning assessment was covered in detail in section 6 and is viewed by LLS as a continuous process of collection, review, and use of information to improve student learning and development. The assessment cycle is a school-wide effort and involves the board of directors, students, faculty, staff, and committees.

The California bar passage rate is a fundamental indicator of program effectiveness as significant components of the curriculum are intended to prepare students for bar exam success. This is a key data point where analysis will disaggregate students by program modality, demographics, times attempted, and GPA. The current goals of 60% bar passage by 2022 and 75% blended bar passage by 2022 will apply to the online J.D. modality. This analysis is conducted annually and incorporates the review of retention rates, graduation rates, and supporting activities such as the Friday Review Program, utilization of counseling and mentorship programs, and student survey results.

Student surveys provide LLS with direct feedback from students regarding their educational experiences and the effectiveness of an individual course. Reporting functions in Populi allow LLS to review results at the school level and/or drill down to an individual course or faculty member. With the relatively small sample size of the LLS faculty and student body, the institution seeks to ensure student response rates are 65% or higher for the data results to be actionably meaningful.

Alumni support, employer relations, and employee satisfaction evaluations speak to the long-term effectiveness of LLS. As the online J.D. option will be rolled out over a four-year period, it will be at least 6 to 8 years before these measures of effectiveness and quality will be meaningful. At that time, it will be important to retain disaggregated analysis by program modality into future review processes.

10 INFRASTRUCTURE & TECHNOLOGY NEEDS

After extensive review and consideration, the current Populi platform which provides LLS with a comprehensive and fully-integrated college management system, has been deemed through careful analysis more than sufficient to support online course delivery. Populi supports the full range of learning objects and functionalities-- such as lesson delivery, discussion fora, tests and assignments, embedded syllabi, in-course chat, and resource links-- necessary to deliver a robust online course. Additionally, Populi manages the course data for student enrollment and grading feeds directly into transcript and GPA records.

The discussion boards and chat provide user-friendly, asynchronous forums within which students can maintain regular, substantive, and effective interaction with classmates and with their instructor. Discussion board assignments built around instructor-facilitated, student-to-student processing of content, comprise one of the key learning tools across all online courses in the proposed program. The lesson function provides clear weekly “chunking” of content to facilitate students’ progress through the courses. The functionality of in-platform tests, ranging from automatically graded multiple-choice to short answer, essay submission, and file uploads, provides for both formative and summative assessment as well as easily-delivered direct feedback to students. The platform also allows for ready integration of publisher-provided learning resources and assessments through external links.

The Populi platform is cloud-based and hosted by Populi. This scope of service reduces the burden on LLS internally to implement, manage, and maintain IT systems. Populi retains its servers in an SSAE Type II compliant data center that is secured by compartmentalized and biometric access controls in addition to infrastructure redundancies to secure power supply. Furthermore, Populi provides daily, weekly, and monthly backup data transmissions in a fully-encrypted cloud in real-time.

As Populi is currently widely used across LLS as both an LMS and a management system, there is a high level of institutional comfort and knowledge with utilizing the platform. By building upon this institutional knowledge and familiarity, LLS will be able to meet the needs of online course offerings without the burden of a steep learning curve for faculty, staff, and administrators.

Effectiveness of the Populi platform, specific to serving as the LMS, is measured by student utilization and engagement data; faculty and student feedback; overall student success in the course, and student progression towards completing their legal studies. All student learning objective assessment processes will utilize disaggregated reporting to analyze and compare student learning outcomes in each of the onsite and online modalities.

11 FINANCIAL

LLS has already invested in the technology, facilities, and library infrastructure to support existing students, leaving few additional costs to be incurred by offering the J.D. in the hybrid modality. The primary additional costs are course development, payroll expenses for the Hybrid faculty members, and additional marketing expenditures. The current administrative staff has the capacity to support all back-office functions needed to support the modality expansion.

LLS administration has performed an analysis of the anticipated revenues and expenses for the hybrid modality's initial years. The enrollment estimates utilized are very conservative and are derived from historical trends, applicant inquiries, and changes to admissions policies. Expenses, when compared to the historical brick and mortar operations are considerably lower in recognition of the cost savings the school realized during the pandemic without students on campus daily. This is due to leveraging investments already made as well as the ability to plan for the transition.

Revenue projections assume a starting class of 30 which generates revenue sufficient to cover all *direct costs* in the first year, resulting in a *revenue neutral* start to the program. Projected enrollment growth is limited to 15 students in each subsequent year of the programs' initial budget. Even under this conservative approach to the growth of the program, it is anticipated that the program will generate net profit by the end of its second year. Additionally, should the need arise, LLS can draw on its cash reserves to cover initial shortfalls.

DR. LEEANN STONE

CORE COMPETENCIES

- | | | |
|----------------------------|----------------------------|----------------------------|
| ◆ Higher Ed Administration | ◆ Program Development | ◆ Constituent Development |
| ◆ Student Success | ◆ Change Management | ◆ Evaluation & Assessment |
| ◆ Strategic Planning | ◆ Adult learning/Andragogy | ◆ Professional Development |
| ◆ Curriculum Development | ◆ Accreditation | ◆ Distance/Online Pedagogy |

CAREER HIGHLIGHTS

- ✓ Lead academic administrator in successful, first-time accreditation (ACCJC) bid for 2-year performing arts college
- ✓ Directed instructional redesign of 26-campus, 200+ course, 800+ faculty institution, program and course redesign and faculty training.
- ✓ Created Brandman University's signature, student-centered model of instruction, which remains the backbone of the program today.
- ✓ Initiated and managed Rosetta Stone's Custom division, creating learning and training materials for corporate and organizational clients.
- ✓ Advised, trained, and assessed University of Tennessee, Knoxville's transition to blended, task-based modes of instruction.
- ✓ President, International Association for Language Learning & Technology (IALLT).

PROFESSIONAL EXPERIENCE

Instructional Design Consultant, Rancho Santiago Community College District, 2017- Present (Contract)

Working with subject matter expert faculty to develop "model online courses" in Blackboard and Canvas towards the goal of fully online ["Pathways"](#) programs and California Virtual College online courses ([CVC-OEI](#)).

Instructional Design Consultant, City Colleges of Chicago, 2019- August 2020 (Contract)

Redesigned Adult Ed ESL program to hybrid mode of delivery; teacher training

Dean of Instruction, [The Young Americans College of the Performing Arts](#)), 2013-July 2020

Oversee faculty, curriculum, and the library; train faculty in best practices for instruction, assessment, and curriculum design across studio, classroom, and online modes. Serve as lead academic advisor in the institution's accreditation process. Partner with the President to establish, inculcate, and document a community of educational excellence.

Lead Instructional Designer, Cengage Learning, 2016-2017 (Part time)

Managed the instructional design of multiple parties (Cengage, third-party instructional design contracting company, and Excelsior College partner personnel) in the development of [Courxam programs](#), a new curriculum-supported, credit-by-exam product.

Head – Custom Curriculum, Rosetta Stone, 2013-2016

Established and managed the Custom Curriculum unit to respond to corporate learning needs. Built academic credibility of Rosetta Stone through national and international academic and governmental networks and developed teams from disparate national / international sources.

Associate Faculty – Online Educators Program, Saddleback College, 2010-2015

Inculcated best online teaching practices, establishing quality expectations for online teaching and learning. Introduced teachers to effective pedagogies, skills, and techniques for online teaching. Taught Certificate Program in Online Instruction, including "Effective Interaction for Online Courses," "Introduction to Online Teaching and Learning," "Teaching Models of Online Education," and "Technology for Online Instruction."

World Language Market Specialist, John Wiley & Sons, 2011-2013

Designed and deployed on-ground workshops to train instructors in effective implementation of technology resources. Trained sales representatives in use and sales of print- and technology-based products. Created online courses using a variety of learning management systems. Delivered synchronous online training via WebEx, Elluminate, and Adobe Connect.

Instructional Designer, Cengage Publishing, 2010-2011, 2013

Developed online and blended learning courses across the curriculum, including in accounting, humanities, education, business, cosmetology, pharmacy tech, history, law, and paralegal studies.

University Instructional Design Administrator, Brandman University, 2009-2010

Designed signature blended instruction model, which was implemented across the university system and remains the hallmark of the Brandman educational experience. Led intensive course redesign and faculty training.

World Language Specialist, Houghton Mifflin/Cengage Publishing, 2003-2009

Created the faculty development consultant role, a new function in the publishing industry (and a model since adopted by other publishers). Developed "Board of Consultants" series, a new editorial input that was also recognized as a value-add and implemented industry-wide. Built user-to-editorial bridges to inform product development.

Faculty Development, Foreign Services Institute

Designed and facilitated a program to train 500+ language instructors in the effective use of electronic teaching and learning resources. Published a manual of instructional practices.

Interim (Founding) Chair, Soka University

Established this new institution's language department. Recruited and hired full- and part-time faculty, provided advice on the design and installation of the Language Technology Center, and finalized the program curriculum.

Director – Humanities Instructional Resource Center and Language Learning Center, UC Irvine

Led analog-to-digital transition, broadening Center's capabilities to encompass multiple classroom and drop-in labs, media production facilities, and faculty development. Educated faculty and graduate students in applications of digital teaching tools.

EDUCATION AND TRAINING

Ed.D., Educational Technology and Leadership, Pepperdine University

Business Officer Training Course, University of California

Management Services Assessment Program, University of California

M.A., Art History (Emphasis in Pre-Columbian Art) UCLA

B.A., Art History, UC Irvine

B.A., Spanish (Emphasis in Linguistics), UC Irvine

PROFESSIONAL AND ORGANIZATIONAL LEADERSHIP

| | |
|------------|---|
| 2017-now | Institutional Review Board , CSU Fullerton |
| 2015-now | National Advisory Board , Center for Urban Language Teaching & Research (CULTR), Georgia State University |
| 2013-2015 | Chair, 50th Anniversary Committee, IALLT |
| 2011-2017 | Young Americans Academic Advisory Committee, Young Americans College of the Performing Arts |
| 2007- 2010 | IALLT Council, Publications Committee |
| 1999-2003 | Academic Coordinator, IALLT/ACTFL <i>Foreign Languages: Teaching with Technology</i> workshops |
| 1998-99 | President, UCI Staff Assembly |
| 1997-98 | Vice President, UCI Staff Assembly |
| 1997 | Interim IALL Board liaison to Regional Affiliates (now IALLT) |
| 1995-2002 | IALL Representative to the Japan Association for Language Education and Technology (LET) |
| 1994-95 | "Spreading the Word", American Council on Education/NEH grant project. |
| 1994 | "Computer-Assisted Instruction in the Japanese Classroom" Committee for Instructional Development (CID) grant project |
| 1993-95 | Past President/Elections Chair, IALL |
| 1992-94 | Minor Capital Improvement Grant, "School of Humanities Teaching Laboratory" renovation project |
| 1991-93 | President, IALL |
| 1991 | Conference Planning Committee, IALL '91, UCLA |
| 1990-99 | Languages Other Than English Task Force, UC Irvine |
| 1990-92 | IALL Conference Chair, Foreign Language Education and Technology (FLEAT II) Conference, August 4-7, 1992 |
| 1990 | Coordinator, Job Placement Center, AECT Annual Conference |
| 1989-91 | President-elect, IALL |
| 1989-91 | Editor, <i>IALL News Review</i> |
| 1989-90 | Professional Priorities Conference, ACTFL. Task force member |
| 1989 | Chair, Southern California Language Lab Directors' Consortium (now SWALLT) |

LEEANN STONE

| | |
|---------|--|
| 1988-91 | Chair, International Committee, IALL |
| 1988-89 | Task force member. National Initiative for Developing Voluntary Standards for Applications of Technology to the Teaching and Learning of Languages, CALICO , American Society for Testing and Materials, and the U.S. Department of Education. |
| 1988 | Co-founder, Southern California Language Lab Directors' Consortium |
| 1987-90 | Reviewer, <i>Journal of Educational Techniques and Technologies</i> (IALL) |
| 1987-88 | Computers in the Classroom Journal and Symposium Rep, CALICO |
| 1986-89 | Copyright Committee, AECT |

CONSULTANCIES- INSTRUCTIONAL AND FACILITIES DESIGN

Instructional Designer (April 2019- present)- City Colleges of Chicago. Developing a blended Advanced English and model for roll-out of a fully-blended (hybrid) ESL program.

Online Instructional Designer (2017-present) - Santa Ana College, CA Design and develop model online courses for OER integration, Pathways, and California Community Colleges (CCC) Online Education Initiative (OEI).

Lead Instructional Designer (2016-2017)- Cengage Learning. Managed multiple parties (Cengage, third-party instructional design contracting company, and Excelsior College partner personnel) in the development of Courxam programs, a new curriculum-supported, credit-by-exam product.

Instructional Designer (2010- 2011, 2013)- Cengage Learning. Online and in-class curriculum development in Law, Pharmacy Technician, English, HVAC, Cosmetology, Human Development, Diagnostic Coding, Developmental English, Composition, College Success, Beginning & Intermediate Algebra, and other disciplines. November

Program Assessor (2012, April)- University of Tennessee, Knoxville. Assess implementations of blended, task-based instruction across in institution's language programs.

Curriculum and instructional design consultant (2009)- University of Tennessee, Knoxville. Design strategies to transition language curriculum to blended task-based modes of instruction.

Learning Center Design Consultant (2009- 2010)- Irvine Valley College, Design, layout, specs and utilization of planned Language Learning Center.

Teacher technology training and curriculum design (2002-May 2003)- Foreign Services Institute, Washington, D.C.

Bilingual Exam - County of Orange Personnel Department Exceptional (1988-2002). Assessment development and design, coordination of evaluator training, testing and evaluation for all county employees seeking verification of bilingual Spanish skills.

Learning Center Design Consultant- Wittenberg University, Ohio. Design, layout, specs, and utilization of planned Language Learning Center.

Learning Center Design Consultant- Harvard-Westlake Schools, CA. Design, layout, specs, and utilization of Language Learning Center.

Learning Center Design Consultant- Santa Monica Community College, CA. Design, layout, specs and utilization of Language Learning Center.

Language Learning Center planning consultant- Mount San Antonio College, CA.

TEACHING

2009-14 **Online instructor**, Certificate Program in Online Instruction, Saddleback College (*Effective Interaction for Online Courses, Introduction to Online Teaching and Learning, Teaching Models of Online Education, Technology for Online Instruction*)

2001 **Online instructor**, *Leadership in Technology*, Masters Program in Educational Technology, Pepperdine University

1999 **Online Graduate Teaching Assistant**, *Leadership in Technology*, Masters Program in Educational Technology, Pepperdine University

1984-85 **Spanish instructor**, UC Irvine

1976-77 **EFL Instructor**, Mexico City

PUBLICATIONS

Stone, L (2017). The Challenge of Multi-Level Learners in the Classroom. Blog: <https://www.rosettastone.com/k12/resources/content/the-challenge-of-multi-level-learners-in-the-language-classroom/>

Stone, L. (2017). The Role of the Language Center in a Languages for Special Purposes (LSP) Future in *From Language Lab to Language Center and Beyond: The Past, Present, and Future of the Language Center*, F. Kronenberg, Ed. International Association for Language Learning and Technology.

Stone, L. & C. Wilson-Duffy (2009). *Task-Based III: Expanding the Range of Tasks through the Web*. International Association for Language Learning & Technology.

Stone, L. (2005). Practical Strategies for Online Language Teaching, Proceedings of SOCALLT 2005.

Stone, L. (2005). Not Just an Electronic Equivalent of a Print Workbook, *Proceedings of Digital Stream 2005*. March 2005. California State University, Monterey Bay.

Warschauer, M., M. Knobel & L. Stone (2004). Technology and Equity in Schooling: Deconstructing the Digital Divide. *Educational Policy*, Vol.18, No. 4. Thousand Oaks: Sage Publications.

Stone, L. (2004). The 'New Wave' for Technology Integration in California Schools. *Proceedings of Selected Research and Development Paper Presentations, Vol.2*. Association for Educational Communications and Technology.

Warschauer, Mark, Michele Knobel, and LeeAnn Stone (2004) "Technology and Equity in Schooling: Deconstructing the Digital Divide." *Educational Policy*, Vol. 18 No. 4 September 2004 562-588.

- Stone, L. (2003). Technology-enhanced learning modules for the classroom. Introduction to *Multimedia lab-based Activities* (Teacher Manual). Foreign Service Institute, U.S. Department of State, Washington, D.C.
- Stone, L. (2003). Beyond DHS: Continuing barriers to technology integration in selected California high schools. Unpublished doctoral dissertation, Pepperdine University.
- Stone, L. (2003). The many roles of the director: Selected strategies for Managing and leading the language center. In U. Lahaie (ed.) *The IALLT Lab Management Kit* (3rd ed.).
- Stone, L. (2003). Creating web-based lessons with TrackStar. In Y. Saito-Abbott, R. Donovan & T. F. Abbott (eds.) *Emerging Technologies in Teaching Language and Cultures*. San Diego: LARC Press.
- Knobel, M., Stone, L., & Warschauer, M. (2002). *Technology and Academic Preparation: A Comparative Study* (UCOP & UC-ACCORD research report). Berkeley: University of California Office of the President.
- Stone, L. (2001). Variations on a theme: Different centers for different needs. In M. Ledgerwood (ed.) *The IALL Lab Design Kit* (3rd ed.).
- Stone, L. (2001). New technologies. In *Teaching Foundations* [On-line]. Available: Houghton Mifflin Faculty Development programs, http://college.hmco.com/instructors/ins_teachtech_foundations_module_newtech.html
- Stone, L. (2001). Integrating technology. In *Teaching Foundations* [On-line]. Available: Houghton Mifflin Faculty Development programs, http://college.hmco.com/instructors/ins_teachtech_foundations_module_integtech.html
- Stone, L. (2001). Integrating foreign language and tech-based resources. In *Teaching Foundations* [On-line]. Available: Houghton Mifflin Faculty Development programs, http://college.hmco.com/instructors/ins_teachtech_foundations_module_foreignlang.html
- Stone, L. (2000). Defining Globalization- The Lexus and the Olive Tree. Book review. http://www.amazon.com/Lexus-Olive-Tree-Understanding-ebook/product-reviews/B002F0X0LY/ref=cm_cr_dp_hist_5?ie=UTF8&showViewpoints=0&filterBy=addFiveStar
- Stone, L. (2000). Escaped Inmate Reviews the System. Book review. http://www.amazon.com/Inmates-Are-Running-Asylum-Products/product-reviews/0672326140/ref=cm_cr_pr_hist_5?ie=UTF8&showViewpoints=0&filterBy=addFiveStar
- Stone, L. (1996). A case study in space design: The Humanities Instructional Resource Center University of California, Irvine. In *The IALL Lab Planning Kit*. (2nd ed.) (pp. II 9-II 23). (Available from the International Association for Language Learning and Technology, <http://iall.net/Pub.html>)
- Stone, L. and P. Lamb (1996). Staff development. In *Administering the Learning Center: The IALL Management Manual*. (Module IV, pp. IV 1 – IV 37). (Available from the International Association for Language Learning and Technology, <http://iall.net/Pub.html>)
- Stone, L. (Ed.). (1993). *Task-based II: More communicative activities for the language lab*. (Module IV, pp. IV 1 – IV 37). (Available from the International Association for Language Learning and Technology, <http://iall.net/Pub.html>)
- Stone, L. (1992). Language labs and communicative language learning: drawing parallels with CALL. *CAELL Journal*. 3 (3). 10-14.
- Stone, L. (1992). It's not so much the equipment, but what you do with it: The importance of methodology in language lab use. In I. Shinjo, K. Landahl, M. Macdonald, K. Noda, S. Ozeki, T. Shiozawa & M. Sugiura (Eds.) *The proceedings of the second international conference on foreign language education and technology, Nagoya, Japan* (pp. 311-320). (Available from The Office of the Language Laboratory Association of Japan, C/O Chubu University Language Center, 1200 Matsumoto-Cho, Kasugai, Aichi, 487, Japan)
- Stone, L. (1991). Task-Based Activities: Making the Lab Interactive, *ERIC Digest* (ED343407).
- Stone, L. (1990). Foreign language education: Major changes into the 21st Century? A perspective from UC Irvine. In A. Kennedy (Ed.), *Designing the Learning Center of the Future Language Laboratories: Today and Tomorrow* (pp.39-42). (International Association for Language Learning and Technology: Out of print)
- Stone, L. (1990). Applying instructional technologies. *Foreign Language Annals*. 23. 421-422.
- Stone, L. (1988). *Task-based activities: A communicative approach to language laboratory use*. (Available from the International Association for Language Learning and Technology, <http://iall.net/Pub.html>)
- Stone, L. (1983). The tassal headdress at Tetitla, Teotihuacan and Monte Alban: A diagnostic of socio-political relations between the two sites. *Sun Trails* 1 (1). New World Anthropological Society.
- Stone, L. & M. deHerrera (Producers). (1980). *The Murals of East Los*. [video]. Aired KTLA Los Angeles.

CONFERENCE PRESENTATIONS

- 2017 *Bridging the Gap in Competency-Based Learning: An Industry/Higher Ed Partnership*. OLC Innovate 2017, New Orleans.
- 2016 *Taking Action: Next Steps in Supporting an LSP-Dominant Future*. With Mary Riser and Maria Carreira. LSP 2016 Arizona State
- 2016 *Languages for All: Leveraging Technology to Make it Happen*. LLAS 2016 U. Southampton, UK.
- 2016 *Multiculturalism & LfA: Addressing the Challenges*. AULC Cambridge University, Cardiff, Wales
- 2015 *50Years and Beyond: Drawing on Our Past to Predict Our Future* FLEAT 6/IALLT 2015 closing plenary. Organizer/Moderator. Harvard
- 2015 *Advanced Spanish for Medical Communication and Interpretation*. CALICO (Computer Assisted Language Instruction Consortium). U Colorado, Boulder.
- 2014 *Reaching Professional Competence: Language for Specific Purposes* ACTFL (American Conference for the Teaching of Foreign Languages). San Antonio, TX
- 2010 *The iDEAL Makeover: A University-Wide Transition to Blended Courses*. ELI 2010 Fall Focus Session. Online. With Maria Cesario.
- 2009 *Expanding the Range of Tasks through the Web*. IALLT '09 Georgia State University, Atlanta.
- 2009 *Integrating Culture: Meaningful Activities for Digital Natives*. Accommodating Change in World Language Education Today. Costa Mesa, CA.

LEEANN STONE

- 2008 *Practical Strategies for Integrating Technology into the Language Teaching Practice*. Expanding Language Teaching & Learning Capacity through Technology. San Diego, CA.
- 2008 *The Blurring Line Between Face-to-face and Hybrid Learning Environments*. DigitalStream. CSU Monterey Bay.
- 2008 *That's Hot! Google Earth, YouTube and Other New Technologies*. Baltimore World Language Forum.
- 2007 *Putting Electronic Resources to Task*. Key Issues & Strategies in Language Teaching Today. Glendale, CA.
- 2007 *Technology: It's Not Just for Homework Anymore!* American Council on the Teaching of Foreign Languages (ACTFL). San Antonio.
- 2007 *Managing Online Communicative Activities with Wimba*. DigitalStream. CSU Monterey Bay.
- 2007 *Programmatic Integration of Technology in New Hybridized Language Courses*. DigitalStream. CSU Monterey Bay. With Dr. Juliet Falce, Arizona State University.
- 2006 *Nexos Media Edition: A Technology-Enriched Intro Spanish Program for the Varied Teaching and Learning Environments of the 21st Century*. ACTFL. Nashville.
- 2006 *The Nexos Media Edition: An Intuitive Model for Hybrid and E-Learning Environments*. Computer Assisted Language Instruction Consortium (CALICO). U. Hawaii.
- 2006 *Nexos Media Edition: Content and Technology for Media-Rich Instructional Environments*. DigitalStream Conference.
- 2005 *Integrating Media and Technology for Spanish Classrooms of the 21st Century*. ACTFL. Baltimore.
- 2005 *Selected Strategies for Managing and Leading the Language Learning Center*. FLEAT 5, BYU.
- 2005 *Are you Still Listening? Audio in the 21st Century*. FLEAT 5, BYU.
- 2005 *The Online Workbook as a Tool to Address Student Learning Styles and Needs*. DigitalStream Conference, CSU Monterey Bay.
- 2005 *Practical Strategies for Online Language Teaching*. South Central Association for Language Learning Technology. Southeastern Louisiana University.
- 2004 *Enhancing Instruction of Language and Culture*. ACTFL. Chicago.
- 2004 *Practical Strategies for Facilitating the Transition from Face-to-Face to Online Teaching*. Southwest Association for Language Learning Technology. BYU-Hawaii.
- 2003 *Lab workouts: Building Language Skills with Digital Technology*. ACTFL Philadelphia.
- 2003 *The 'New Wave' for Technology Integration in California High Schools*. AECT Anaheim.
- 2002 *Spanning borders, contextualizing culture via technology*. ACTFL Salt Lake City.
- 2002 *Beyond the classroom: Using technology to teach language and culture in context*. ACTFL Salt Lake City.
- 2002 *Active-ating the Computer Lab for Language Instruction*, Southwest Association for Language Learning and Technology (SWALLT), U. of Nevada, Reno
- 2002 *Creating Web-Based Lessons with Track Star*, Digital Stream 2002, CSU Monterey Bay, Monterey.
- 2001 *The new IALLT lab design kit*. IALL '01, Rice University.
- 2001 *Introducing the newly revised IALLT lab management kit*. IALL '01, Rice University.
- 2000 *Strategies for Online Team Teaching*, California Virtual College conference, Lake Tahoe.
- 1999 *Administering the Learning Resource Center: The IALL Management Manual and Beyond*, IALL '99, University of Maryland, College Park.
- 1997 *Lab Design and Planning Essentials*, (Half-day workshop) IALL '97/FLEAT III, University of Victoria, Canada.
- 1997 *Administering the Learning Resource Center: The IALL Management Manual and Beyond*, (Half-day workshop) IALL '97/FLEAT III, University of Victoria, Canada.
- 1996 *Classifying Technologies & Moving towards Internationalizing Language Education via the Internet*, Language Laboratory Association of Japan annual conference, Tokyo, Japan.
- 1996 *Meaningful Technological Communication- Something to Fit in Your Lesson Plans!* 1996 TESOL Roundtable, Kansai Gaidai College, Hawaii.
- 1995 *Navigating the Net*, SALT Fall meeting, CSU San Bernardino, CA.
- 1995 *Planning a Humanities Lab: From Basics to Strategies for Change*, (Full-day workshop) AECT.
- 1993 *Designing Effective Task-Based Activities for the Language Lab*, (Half-day workshop) IALL, U. Kansas.
- 1993 *Language Lab Use: Designing Activities that Work* (Half-day workshop) TESOL, Atlanta. April 13
- 1993 *Recruiting, Training and Retaining Productive Student Workers* (Panel), AECT, New Orleans. January 13.
- 1992 *Using Technologies Communicatively: Activities for the Language Lab*, FLEAT II, Chubu University, Japan.
- 1992 *Language Labs in the 90's: Issues and Options* (Colloquium), TESOL, Vancouver. March 6.
- 1990 *Creating a Communicative Environment with the Language Laboratory*, ACTFL, Nashville.
- 1990 *Using the Language Laboratory- From a Teacher's Perspective and Managing the Language Laboratory- Practical Tips Gleaned from Experience*, Southern California Language Lab Directors Association, Los Angeles.
- 1989 *Making the Lab Interactive- It's in the Task*, TESOL, San Francisco.
- 1988 *Task-Based Activities for the Language Laboratory: A Communicative Approach to Language Lab Use*, AECT, Nashville, TN.

WORKSHOPS, FORA & PROFESSIONAL DEVELOPMENT DELIVERED

- 2019 Advanced ESL Hybrid Instruction. November 22 (Workshop)
- 2019 Pacing Classroom Instruction. City Colleges of Chicago. November 21 and 23 (Workshops)

LEEANN STONE

- 2009 *Task-Based Learning with Student-Centered Production Using Social Networks*. LARC Summer Virtual Institute Going on Safari with Digital Natives (San Diego State). August 10-14, 2009. (Online workshop).
- 2009 Learning through Doing: Creating Meaningful Tasks with Web-Based Resources. IALLT '09, Georgia State University, Atlanta. (Workshop)
- 2009 Accommodating Change in World Language Education Today. Costa Mesa, CA (Full-day forum)
- 2009 Where Do I Start? Practical Strategies to Prepare for Hybrid and Online Teaching. McGraw Hill. Dallas, TX. (Full-day workshop)
- 2008 Expanding Language Teaching and Learning Capacity through Technology. San Diego, CA (Workshop)
- 2007 *Foreign Languages: Teaching with Technology*. San Antonio College (2-day faculty development workshop)
- 2007 *Publishing 101*. DigitalStream. CSU Monterey Bay. (Pre-conference workshop)
- 2007 Graduate Teaching Assistants training. *Integrating Task-Based Approaches into the Intermediate Spanish Curriculum*. U. Kansas.
- 2007 Key Issues and Strategies in Language Teaching Today. Glendale Hilton. (Full-day workshop)
- 2007 World Language: Transforming Teaching and Learning with Technology, Hilton Anatole Hotel, Dallas, TX (Full-day forum)
- 2007 World Language FLEX Forum. American River & Sierra Colleges, Sacramento. CA (Full-day forum)
- 2006 *Maximizing the Teaching & Learning Advantages of an Electronic Workbook*. University of Kansas. (GTA training)
- 2006 *Invigorating Language Learning through Technology*. University of San Francisco. (Full-day faculty in-service)
- 2006 *Web-based Resources for Language Teaching and Learning*. Foreign Language Association of Northern California, UC. Berkeley. With Ed Sterling, CC San Francisco. (Workshop)
- 2006 Gonzaga University. (Full-day faculty in-service)
- 2006 *Building Teaching Strategies for Introductory Italian*. University of Washington. (Full day GTA training)
- 2005 Harvard-Westlake School. North Hollywood, CA. (Full day faculty in-service)
- 2005 Technology and the Heritage Speaker. Denver, CO. (Online forum)
- 2005 Second Annual World Language Forum. Yorba Linda, CA
- 2004 Castilleja School. Palo Alto, CA. (Full day faculty in-service)
- 2004 Head-Royce School. Oakland, CA. (Full day faculty in-service)
- 2004 The Principia School. St. Louis, MO. (Full day faculty in-service)
- 2004 Aspen High School, CO. (Full day faculty in-service)
- 2004 Cherokee Trail High School, CO. (Full day faculty in-service)
- 2004 Changing Needs of Spanish Language Learners in Southern California. Long Beach, CA (Forum)
- 2003 *Foreign Languages: Teaching with Technology*. Swarthmore College. (2-day faculty development workshop)
- 2003 *Teaching with Technology*. Ben Davis High School, Indianapolis, IN.
- 2003 *Teaching with Technology: Practical Applications for Classroom Instruction* Defense Language Institute, Monterey, CA.
- 2003 *Foreign Languages: Teaching with Technology*. Louisiana State University. (2-day faculty development workshop)
- 2003 *Creating Technology-Supported Materials for Gente 3*. Vanderbilt University. (2-day faculty development workshop)
- 2003 *Web-based Resources for Language Instruction*. World Languages Professional Development Conference. South Texas CC.
- 2003 Workshop. *Web-based Resources for Language Instruction*.
- 2003 K12 Teacher In-service workshop. Grand Valley State University.
- 2003 Faculty development workshop. Grand Valley State University.
- 2003 *Foreign Languages: Teaching with Technology*. Maricopa Community College. (2-day faculty development workshop)
- 2003 In-service region-wide technology training for language teachers. Foxborough, MA.
- 2003 *Foreign Languages: Teaching with Technology*. Baylor University. (2-day faculty development workshop)
- 2002 *Foreign Languages: Teaching with Technology*. Salt Lake Community College. (2-day faculty development workshop)
- 2002 In-service district-wide technology training for language teachers. Rochester Unified School District, MN.
- 2002 *Foreign Languages: Teaching with Technology*. U.C. Davis. (2-day faculty development workshop)
- 2002 *Developing Task-Based Lessons for the Language Center*. Foreign Service Institute, Washington, D.C.
- 2002 *Foreign Languages: Teaching with Technology*. Pacific Lutheran University. (2-day faculty development workshop)
- 2002 *Foreign Languages: Teaching with Technology*. Goucher College. (2-day faculty development workshop)
- 2002 Methodology workshop, *Foreign Language and Technology*, Wichita State University, Kansas.
- 2002 *Track Star: Creating Your Own Web-Based Lesson*, University of Houston,
- 2002 *Project COACH Technology Workshop*, Los Alamitos High School.
- 2001 *Project COACH Technology Workshop*, UC Irvine.
- 2001 *Foreign Languages: Teaching with Technology*. Catholic University (D.C.) (2-day faculty development workshop)
- 2001 *Foreign Languages: Teaching with Technology*. St. Thomas University (TX) (2-day faculty development workshop)
- 2001 Methodology workshop, *Foreign Language and Technology*, Wichita State University, Kansas.
- 2001 *Foreign Languages: Teaching with Technology*. Chaffey College. (2-day faculty development workshop)
- 2001 ACTFL workshop, *Integrating Internet Resources*, Mount San Antonio College.
- 2001 ACTFL workshop, *Integrating Internet Resources*, U. Texas, Austin.
- 2001 *Foreign Languages: Teaching with Technology*. University of North Florida. (2-day faculty development workshop)
- 2000 Methodology workshop, *Foreign Language and Technology*, Imperial Valley College, CA.
- 2000 *Foreign Languages: Teaching with Technology*. CSU San Marcos. (2-day faculty development workshop)

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- 2000 *Foreign Languages: Teaching with Technology*. Wright State University. (2-day faculty development workshop)
- 1999 *Foreign Languages: Teaching with Technology*. Purdue University. (2-day faculty development workshop)
- 1999 *Foreign Languages: Teaching with Technology*, Raritan Valley Community College. (2-day faculty development workshop)
- 1999 *Foreign Languages: Teaching with Technology*. San Jose State. (2-day faculty development workshop)
- 1999 ACTFL workshop, *Integrating Internet Resources*, U. Maryland, College Park.
- 1999 *Foreign Languages: Teaching with Technology*. Catholic University. (2-day faculty development workshop)
- 1999 ACTFL workshop, *Integrating Internet Resources*, UC Irvine. (2-day faculty development workshop)
- 1999 *Foreign Languages: Teaching with Technology*. La Sierra University. (2-day faculty development workshop)
- 1999 *Foreign Languages: Teaching with Technology*. St. Lawrence University. (2-day faculty development workshop)
- 1999 *Languages: Teaching with Technology*. CSU Northridge. (2-day faculty development workshop)
- 1999 *Foreign Languages: Teaching with Technology*. SUNY Stony Brook. (2-day faculty development workshop)
- 1998 *Foreign Languages: Teaching with Technology*. UC Irvine. (2-day faculty development workshop)
- 1998 *Foreign Languages: Teaching with Technology*, University of Maryland. (2-day faculty development workshop)
- 1997 *Task-Based Technologies for the Foreign Language Classroom*, Cal State San Marcos. (Full day faculty in-service)
- 1997 *Developing a Proposal for a Comprehensive Language Learning Center and Internet Resources for Language Learning*, Santa Monica College, Santa Monica, California. (Workshops)
- 1997 *Creating Communicative Activities for the Language Lab, and Language Activities via the World Wide Web*, The Lovett School, Atlanta, Georgia. (Teacher In-Service workshops.)
- 1996 *Effective Activities for the Language Laboratory*, Point Loma Nazarene College. (Workshop)
- 1996 *The Internet as a Flexible Resource for Foreign Language Learning* Pepperdine University. (Workshop)
- 1994 *Integrating Technology Resources into Foreign Language Instruction*, Haverford College, PA. (Workshop)
- 1994 *Teacher In-Service: Using the Language Laboratory*, Mira Costa College, CA. (Workshop)
- 1992 *Effectively Using and Integrating Language Lab Work into the ESL Curriculum*, Mills College (Workshop)
- 1990 *Expanding Applications for Language Lab Use*, Lewis and Clark College. (Workshop)
- 1990 *Designing and Implementing Task-Based Activities for Language Lab Use*, University of Michigan. (Workshop)

KEYNOTE ADDRESSES

- 2009 *Less is More? A Comparison of the Effects of Hybrid versus Traditional Course Design*. Day-long forum on navigating an NCAT course re-design project for state of Tennessee English, Math and Science post-secondary programs. Nashville, TN.
- 2006 *Technology in Language Learning: Delivered or Connected? Implications for Teacher Training*. International Association for Teaching English as a Second Language. Online discussion forum for teacher education professionals.
- 2003 *The Collaborative Power of Technology*. Keynote address. World Languages Professional Development Conference, South Texas Community College.
- 2003 *Teaching with Technology*. General session. World Languages Professional Development Conference. South Texas Community College.
- 2002 *Why Learn Language in a Computer Lab?* Grand Valley State University, Grand Rapids, MI,
- 2002 *Taking the Lead with Technology*, Northeast Conference on the Teaching of Foreign Languages, New York City.
- 1997 *New Technologies in the Classroom: How are they being used? How do manage them? and What are the directions of the future*, for "Accessing the Global Village through New Technologies and Teaching Techniques", SUNY New Paltz conference for foreign language and ESL teachers.
- 1997 *Delivering Language Instruction via the WWW, Planning and Managing a Language Lab, and Exploring Web-Delivered Language Learning Activities and Materials*, for the Swedish National Committee on Languages and Technology, the University of Victoria, Canada.
- 1996 *Re-Defining the Lab (Through Space Not Place)*, Ingenious Methodologies through Technology (sponsored by the Culpeper Foundation), Washington and Lee University.
- 1991 *Murder and Mayhem- Using the Lab Communicatively*, for "Taking the Byte out of the Bit", Washington and Lee University.
- 1991 *Murder in the Lab: Communicative Activities for the Language Lab*, AATSP, Southern California Chapter, University of San Diego.
- 1990 *It's Not Just for Individual Work Anymore- The Lab as a Multi-purpose Teaching Tool*, Regents College, London.
- 1989 *Interact '89: Using Technology in the Modern Language Classroom*, Satellite teleconference panelist, CSU Chico.
- 1985 *Do You Hear What I Mean*, California Court Interpreters Annual Conference, Fresno.
- 1984 *Assessing Your Listening Comprehension Skills*, Greater Los Angeles Court Interpreters' Annual Conference, UC Irvine.
- 1984 *International Communications Resources for the Orange County Business Community*, World Trade Association of Orange County International Resource Seminar. Orange County, CA.

GUEST LECTURES

- 2017 *Publishing, Language Educators, and Non-Academic Career Options*. U. Nebraska, Lincoln (Prof. Liz Enkin)
- 2013 *Publishing, Language Educators, and Non-Academic Career Options*. U. Nebraska, Lincoln (Prof. Liz Enkin)
- 2007 *Publishing 101 and Language Technology Today and Into the Future*. CSU San Marcos, November 30. (Prof. Darci Strother)
- 1998 *Technology in Language Instruction: Focus on the Internet*. Spanish 106B Methodology in Secondary Education, UC Irvine, May 28. (Prof. Juergen Kempff).

LEEANN STONE

- 1997 *Technology and the Curriculum*, Spanish 399 graduate methodology course, Spring '97, UC Irvine (Prof. Juergen Kempff). Five lectures: *The Audio Lab and Non-traditional Approaches*, *Video in the Classroom*, *Using the Internet as a Learning Tool: An Introduction*, *Using the Internet as a Learning Tool: Applications*, *The Computer Lab: Writing with a Purpose*.
- 1993 *Visual Realia and Media in Communicative Language Teaching*, Methods in ESL Teaching (Prof. Robin Scarcella). U.C. Irvine. Feb. 17.
- 1989 *Media in Language Education*, Kansas State University. (Via teleconference) April.



Program Curriculum Mapping

| Program Learning Objective | Student Learning Objective | Course | Key Assignment |
|--|--|-------------------------|---------------------|
| Legal Foundations 1. Cite foundational legal theory, rules, facts and processes | a. Identify the public policy from which the law is derived | Constitutional Law | Final exam |
| | b. Identify the processes of federal and state courts in the United States and the function of precedent | Civil Procedure | Final exam |
| | c. Identify key legal issues | Torts/Criminal Law | Final exam |
| | d. Identify each potentially applicable theory as it relates to the facts | Torts/Criminal Law | Final exam |
| | e. Identify each legal rule relevant to each potentially applicable theory | Torts/Criminal Law | Final exam |
| | f. Identify the legally significant facts relating to each applicable legal rule | Torts/Criminal Law | Final exam |
| Legal Reasoning and Application 2. Interpret and apply law accurately through effective fact, case law, and theory analysis. | a. Critically read the applicable authority, including identifying the key rules within each authority | Legal Analysis | Performance Test #8 |
| | b. Identify those facts in an actual or hypothetical scenario which are legally significant to the application of each potentially relevant legal rule | Legal Analysis | Performance Test #8 |
| | c. Analogize the facts to and distinguish the facts from those of precedent cases | Legal Analysis | Performance Test #8 |
| | d. Draw appropriate conclusions based on the applicable law and facts and evaluate potential counterarguments to predict the likely outcome | Legal Analysis | Performance Test #8 |
| | e. Apply the fundamental terms, rules and principles of law including significant alternative formulations | Legal Analysis | Performance Test #8 |
| Legal Research 3. Engage in effective legal research | a. Design and implement a logical research plan | Advanced Legal Research | Bench Memo |
| | b. Employ appropriate resources and technologies to retrieve, use, and manage research materials | Advanced Legal Research | Bench Memo |
| | c. Identify applicable legal theory | Moot Court | Appellate Brief |
| | d. Distinguish binding from persuasive authorities | Advanced Legal Research | Assignment #1 |



| Program Learning Objective | Student Learning Objective | Course | Key Assignment |
|---|---|-----------------|----------------|
| Communication 4. Deliver effective written documentation and oral advocacy in a legal context | a. Communicate effectively in both objective and persuasive styles as appropriate to the circumstances | Moot Court | Oral argument |
| | b. Argue appropriate authority including any relevant contrary authority | Moot Court | Oral Argument |
| Client Representation 5. Employ professional practices associated with client representation | a. Determine the steps necessary to obtain and investigate facts relevant to client's case | Trial Advocacy | Mock Trial |
| | b. Identify appropriate methods of both oral and written discovery | Civil Procedure | Final Exam |
| | c. Apply rules of basic statutory construction | Trial Advocacy | Mock Trial |
| | d. Prepare pretrial motions, conduct jury selection, conduct direct and cross examination, draft jury instructions, prepare post-trial motions and employ post-trial remedies | Trial Advocacy | Mock Trial |
| Ethics 6. Manifest professional and ethical behaviors as an officer of the court | a. Identify professional and ethical dilemmas when presented in actual or hypothetical situations | Adv PR | Final exam |
| | b. Explain the applicable laws governing legal ethics | Adv PR | Mock trial |
| | c. Act ethically in the representation of clients, performance of duties as an officer of the court, and resolution of ethical dilemmas | Trial advocacy | Mock trial |

SFLS Response to State Bar of California Periodic Inspection Report

Prepared by Timothy P. Weimer, Dean

May 13, 2021

Introduction

A periodic inspection of the San Francisco Law School (SFLS) was conducted on February 9–11, 2020 at San Francisco Law School’s branch campus in San Diego, and on March 3–5, 2020 at the main SFLS campus in Emeryville, California. The Visitation Team consisted of: Alex Chan (SFLS Emeryville), member of the Committee of Bar Examiners (CBE) and Chair, Operations and Management; Dean Robert Humphreys of Humphreys University, Drivon School of Law (SFLS San Diego); Dean Mitchel Winick, Monterey College of Law (SFLS Emeryville); and Heather Georgakis, Educational Standards Consultant to the CBE. The Periodic Inspection Report was issued on July 10, 2020.

As mentioned in the report, SFLS was founded in 1909 and accredited in 1937. In 1941, the school became a nonprofit entity and moved to its Haight Street campus in San Francisco. In 2010, SFLS began a merger with Alliant International University (for the purposes of this response AIU is used). As a school within AIU, an institution regionally accredited by the WASC Senior College and University Commission SFLS became eligible to participate in federal financial aid programs. In 2014, SFLS received CBE approval to open a branch campus at an AIU campus in the Scripps Ranch area of San Diego.

The CBE began a partial inspection of the school in 2017, but the inspection was not completed before significant internal change occurred. The full inspection of both campuses was conducted in early 2020 and was summarized in the report submitted to SFLS on July 10, 2020.

In its report, the Inspection team made several recommendations for action in the executive summary, as well as 19 recommended mandatory actions and three (3) suggestions for enhanced compliance. San Francisco Law School reported on its efforts to come into compliance based on these recommendations in its November 2020 report. Below is San Francisco Law School’s updated response to these recommendations dated May 5, 2021.

Action Recommended in the CBE Executive Summary

SFLS agrees with the inspection team that San Francisco Law School (SFLS) “has demonstrated compliance with significant portions of the Rules and Guidelines.”

The team also stated, “it appears that the school must make focused, efficient efforts to address a number of compliance in a number of key areas.”

SFLS has already resolved all specific issues related to admissions and reviewed and updated the school’s record keeping policies and procedures. It has also updated its disclosures online and in the Student and Faculty Handbooks. SFLS has also updated the information contained in

the AIU Catalog and online to ensure that the school's publications and communications are accurate, consistent and clear. With the hiring of a fulltime Registrar, SFLS will be creating a calendar of yearly events to ensure the timely update of disclosures and other required information.

SFLS has enhanced its capacity to support its compliance efforts by hiring additional personnel. This includes the appointment of a new Dean in January 2020, a new Registrar in June 2020, and a new Core Faculty member at the Emeryville campus in August 2020.

In the responses below, SFLS documents and demonstrates timely actions taken and issues resolved through the significant progress towards compliance in all recommendations made by the inspection team.

Any action required related to the school's minimum, cumulative bar passage rate will be discussed under separate cover.

Response to Recommended Mandatory Actions

The following mandatory actions were recommended to establish full compliance.

1. ***Guideline 2.3(B)-(C):*** *It is recommended that the school revises the publications of AIU and SFLS to accurately and consistently state its academic and operational policies, and with respect to electives, to delete electives not offered in the past three years or expected to be offered in the next two years, and to inform students that electives are not are taught each year, but are offered from time to time based on student interest and instructor availability.*

SFLS Response: Accept in part. SFLS is now in full compliance.

Evidence: The language has been updated and included in the AIU Catalog for the 2020-2021 Academic Year. That Catalog was published in July 2020.

2. ***Guideline 2.3(D)(1)-(3):*** *It is recommended that the school publishes all disclosures required by the guideline on a separate page of its website that is entitled Accreditation and readily accessible to the public by that title, correctly labeled and in their most current version.*

SFLS Response: Reject. SFLS was in full compliance as of the date of the inspection.

Evidence: The information is included on the AIU/SFLS website under the subtitle Accreditation (see <https://www.alliant.edu/schools/sfls>).

3. **Business and Professions Code section 6061.7:** *It is recommended that the school includes the required link to the current version of the disclosure form on the Admissions page of its website.*

SFLS Response: Accept in Part. SFLS is now in full compliance.

Evidence: The requested information is contained on the AIU/SFLS website,
<https://p.widencdn.net/n0mrdx/SFLS-Information-Report>.

The SFLS Admissions page of the 2021-2022 catalog may be found here:
<https://catalog.alliant.edu/content.php?catoid=37&navoid=1432#sfls-admissions-regs>

4. **Guideline 2.3(E)(2):** *It is recommended that the school revises all published statements referring to WASC accreditation to indicate that the school's degree-granting authority is based on accreditation by the Committee of Bar Examiners, as it pertains to qualification to take the California Bar Exam and become a licensee of the State Bar of California.*

SFLS Response: Accept in Part. SFLS is now in full compliance.

Evidence: The AIU Catalog and other publications have been amended to include this language. The Catalog for 2020-2021 has been published.

5. **Guideline 2.3(E)(2):** *It is recommended that the school revises all published statements, in the AIU Catalog and otherwise, that students who graduate from SFLS are eligible to practice law in California after passing the bar exam, by adding "and successfully fulfilling all other licensing requirements."*

SFLS Response: Accept in Part. SFLS is now in full compliance.

Evidence: The AIU Catalog and other publications have been amended to include this language. The Catalog for 2020-2021 has been published.

6. **Guideline 2.7(C):** *It is recommended that the school adopts, publishes, and implements a written policy on the authentication of student work. As required by Guideline 2.7(C), SFLS should adopt, publish, and implement a written policy on authentication of student work.*

SFLS Response: Accept in Part. SFLS is now in full compliance.

Evidence: SFLS has had a policy in place for the authentication of student work since fall 2018, the policy was not formally documented. The policy can now be found in both the SFLS Student and Faculty Handbooks.

7. **Guideline 2.7(E):** *It is recommended that the school amends and republishes its policy on the review of exam answers to permit students to inspect and copy exam questions as provided.*

SFLS Response: Accept in Part. SFLS is now in full compliance.

Evidence: SFLS has amended its policies regarding the review of exam questions and answers as required by Guideline 2.7(e). These policies now appear in the revised Student and Faculty Handbooks.

8. **Guideline 2.10(A):** *It is recommended that the school amends its publications, including the SFLS website, to accurately describe the services, activities, and experiences currently available to students, by campus.*

SFLS Response: Reject. SFLS is in full compliance.

Evidence: The AIU catalog and website provides information about services, activities, and experiences available to all students. All services are available to all students at either campus. The information for services available to students can be found at <https://studentservices.alliant.edu/>.

In addition to information provided to students in the catalog and online, during Orientation all new students are walked through how to access this information online.

9. Guidelines 3.1 and 4.1(A)-(C): *It is recommended that the school evaluates its administrative structure and make such changes as necessary to ensure full and sustained compliance with the CBE's guidelines, including all administrative requirements. Since the inspection, the school has added a full-time registrar effective June 15, 2020, though hiring of any other positions has been frozen due to the pandemic... to establish full compliance, SFLS must show that it has adequate administrative capacity to support full and sustained compliance with the Rules and Guidelines as further described below¹... To demonstrate full compliance with Guidelines 3.1 and 4.1(A) through (C), the school should evaluate its administrative structure and ensure adequate capacity at each campus to support full and sustained compliance with the rules and guidelines overall.²*

SFLS Response: Accept in part. SFLS is now in full compliance.

Evidence: SFLS has hired a fulltime Registrar, Karen McCray, who will be located at the San Diego branch campus. The SFLS Registrar was moved to the San Diego branch campus so she would be closer to AIU's main Registrar and Human Resources offices. This will ensure greater efficiency in record keeping and allow the SFLS Registrar to monitor AIU record keeping ensuring compliance with the Guidelines.

¹ Periodic Inspection Report pg. 10

² Ibid. pg. 11

Evidence: SFLS has also hired a new faculty member Katherine Alfieri for the 2020-2021 academic year. Professor Alfieri will be located at the Emeryville office to ensure greater academic and student advisory support for the day and evening program students. This will free Dean Weimer from those responsibilities allowing him to focus more time on Administrative management of SFLS.

10. **Guidelines 4.7 and 4.8:** *It is recommended that the school adopts, publishes, and implements a compliant faculty evaluation process... To bring itself into full compliance, SFLS should adopt, publish, and implement a faculty evaluation process that meets all requirements of Guidelines 4.7 and 4.8. The current process includes only some of the mandated considerations; further, evaluations have not been conducted within required timeframes or routinely documented in faculty files, again perhaps as a result of staffing levels.*³

SFLS Response: Accept in part. SFLS is in full compliance.

Evidence: AIU policy requires the SFLS Dean to review and evaluate faculty performance on an ongoing schedule. New faculty members will be observed and evaluated by Administration during their first term teaching and every three years thereafter. These evaluations are sent electronically to AIU and stored on secured servers for compliance purposes. These evaluations are available for inspection upon request. Faculty members also receive a copy of these evaluations.

Evidence: Student end-of-course and professor evaluations are conducted 100% electronically each semester. Faculty provide students enough time to complete the evaluations. Evaluations are released to both Administration and faculty following posting of grades. These are kept on file by the University's Provost Office. These are used as part of the administrator's evaluation of faculty.

Evidence: New policies and procedures for faculty evaluations have been created and included in the updated SFLS Faculty Handbook. These reviews/evaluations meet the requirements of Guidelines 4.7 & 4.8.

11. **Guidelines 5.3 and 11.1(B)-(C):** *It is recommended that the school adopts, publishes, and implements a policy that meets guideline requirements with respect to the filing of official transcripts, and includes a procedure that will permit validation that all requirements have been met and official transcripts are received within CBE time limits.*

SFLS Response: Accept in part. SFLS is in full compliance.

Evidence: All transcripts received from LSAC are considered official.

Evidence: AIU has an Academic Processing Center (APC) that receives all official documents,

³ Ibid. pg 12

including official transcripts. As confirmed by Jennifer Ruments, the APC Director, the following policies are in place to ensure authentication of official documents received by the center.

In particular, transcripts received/stamped in by LSAC are considered official. Transcripts which are sent electronically to Alliant International University must be received directly by an Alliant staff member from the school or transcript service in order to be considered as official. Transcripts mailed to Alliant must be received in a sealed envelope from the school in order to be considered as official.

Further, official transcripts received by the Admissions Processing Center are stamped in at APC, coded as Final/Official or Partial/Official (if in progress) and initialed by the staff member who processed the official transcript. These official transcripts are entered and scanned to our Student Information System and the original is retained for 5 years.

The policy was also updated after the inspection. Personnel processing incoming documents will be attaching the envelope, in which the transcript was received, to the original transcript. This will allow verification of postmarked and received date.

Unfortunately, the inspection team was unable to meet with the APC Director at the time of their inspection to confirm these policies and procedures.

Guidelines 5.3 and 11.1(B)-(C) continued:

According to the findings related to guidelines 5.3 and 11.1 on page 15 of the Periodic Inspection Report, *SFLS did not demonstrate that is compliant with the “45-day rule” of Guideline 5.3 and Business and Professions Code section 6060(c)(1). Under the rule, SFLS must not allow a student to enroll or attend classes if the student’s official transcripts are not on file within 45 days after the start of the student’s first term. Admissions Department personnel indicated that they follow an SFLS policy, under which the registrar must audit files no later than the 45th day of the term, but then has 14 days to “find or replace the missing items” from student files, in possible contravention of the 45-day rule... The school should adopt, publish, and implement a policy that complies with Guideline 5.3 and Guideline 11.1(B) and (C) with respect to the filing of official transcripts, and includes a procedure that will permit validation that all requirements have been met.*

SFLS Response: Accept in part. SFLS is now in full compliance.

Evidence: The language in the SFLS Student Handbook has been updated and states that all official documents must be received within 45 days of the start of the student’s first term. If documents are not received within the 45 days, the student is administratively withdrawn from classes.

Evidence: SFLS was deemed to be out of compliance because of the lack of a fulltime Registrar to audit student records. In response, SFLS hired a new fulltime Registrar, Karen McCray, who started on June 15, 2020. Ms. McCray’s vast experience as a Registrar has already benefited

SFLS and its students. She has established new procedures to ensure timely review of student records and the administrative withdrawal of students who have not meet the 45-day requirement.

Evidence: These new policies and procedures are now included in the updated Student Handbook.

12. **Guidelines 5.6 and 5.7:** *It is recommended that the school adopts, publishes, and implements policies that incorporate guideline standards, including a process to ensure that decisions are documented as required... The school must demonstrate compliance and should adopt, publish, and implement policies that incorporate the guideline standards, including a process to ensure that decisions are documented as required.*⁴

SFLS Response: Accept in Part. SFLS is now in full compliance.

Evidence: SFLS has incorporated the guideline standards in its daily business practices. For example, all admission decisions are documented in the student's file. Also, all decisions related to disqualification and dismissal are documented and maintained in the student's file.

All digital documents have been saved on a secure Alliant server and are easily accessible at this time.

However, as mentioned in the November 2020 update, completion of this task is dependent on local government and health official regulation changes regarding COVID 19 shutdowns and restrictions. Due to the ongoing disruptions to business caused by COVID 19, including all campuses remaining closed, this task has been delayed.

Due to many of the documents being stored in paper files on closed campuses, this task will be completed when we are allowed to return to campus by government and health officials. That time is still to be determined. Once we return to campus, we can set a proper deadline for the completion of this task.

13. **Guideline 6.5(A):** *It is recommended that the school states in the Student Handbook the requirement that the JD must be completed within the time limits specified in the relevant guideline.*

SFLS Response: Accept in Part. SFLS is now in full compliance.

Evidence: SFLS has amended the language in the updated SFLS Student Handbook.

⁴ Ibid pg. 16

14. **Guidelines 6.6(A)-(D) and 6.9(D)-(E):** *It is recommended that the school revises its externship policy to state the maximum number of externship units that may be earned... The school should revise its externship policy to state the maximum number of externship units that may be earned. (Guideline 6.6(D))*

SFLS Response: Accept in Part. SFLS is now in full compliance.

Evidence: SFLS has amended the language in the updated SFLS Student Handbook.

15. **Guideline 6.14:** *It is recommended that the school shows compliance with the guideline... the team encourages the school to ensure that all instructors are aware of and utilizing the best practices for fostering student engagement... The team was unable to fully assess whether the school's grading standards are compliant with Guideline 6.14 because exam papers and data were not available, though this is required. The school must demonstrate that its grading standards meet the requirements of Guideline 6.14, including the requirement that there be a reasonable correlation among the grades of instructors teaching the same group of students.⁵*

SFLS Response: Accept in Part. SFLS is now in full compliance. This is an ongoing project.

Evidence: SFLS has had a sound policy since 2018 that puts it in compliance with Guideline 6.14. However, these policies were not written down in any formal manner. Since the inspection, new policies and procedures have been included in the new Registrar's Handbook Folder. The Registrar's Handbook Folder is saved on Alliant's SharePoint servers and accessible by SFLS Administration. This folder will be a living document that will be updated over time, as policy and procedure updates are needed.

Additionally, many of the updated policies and procedures were included in the most recent updated Student and Faculty Handbooks provided to the State Bar in 2020.

Finally, Professors are now required to provide the following documents when they submit their final exams and final grades; a model answer and or issue outline for the final exam, grading matrix used on the final exam, grading comments for each student's exam answer, and a final grading sheet showing the calculation for each student's final grade. These documents have been required and submitted each semester since the end of fall 2020 semester. All documents are maintained on Alliant's SharePoint secure servers.

16. **Guideline 7.1:** *It is recommended that the school carefully tracks the relationship between students' GPAs at graduation and their performances on the bar exam to demonstrate that students are being graded in a manner that will inform them of their level of academic achievement and likely success on the bar exam... To show full compliance with Guideline 7.1, the school should carefully track the relationship between student GPA at graduation and performance on the bar exam, to understand whether students are being graded realistically,*

⁵ Ibid. pg. 13

*and are not being misled about their level of academic achievement and likely success on the bar exam.*⁶

SFLS Response: Accept in Part. SFLS is now in full compliance. This is an ongoing task.

Evidence: The new Registrar, Karen McCray has been assigned the task of creating these reports. All student information is stored on Alliant's secure services and database system. Bar exam passage information is stored in a separate Alliant SharePoint secure server. These two reports are run and analyzed after the scores are released for each bar exam administration. The SFLS Registrar has created an annual calendar which includes annual dates for creating these reports for administrators. SFLS will continue to produce, review and analyze these reports after the results of each administration of the bar exam are published to improve its programs.

17. **Guideline 7.9:** *It is recommended that the school provides the data and exam papers necessary to demonstrate the quality and reliability of its grades... To show compliance with Guideline 7.9, the school should provide the data and exam papers necessary to demonstrate the quality and reliability of its grades⁷... In relaxing grading standards, the school should exercise caution not to retain unqualified students.*⁸

SFLS Response: Reject. SFLS is in full compliance with Guideline 7.9.

Evidence: This is an ongoing task.

The documents requested were available to the inspection team during their visit to Emeryville. From fall 2018 through fall 2019 all exam questions and student answers have been stored digitally and as hardcopies at the SFBY/Emeryville campus. Starting in spring 2020 all exams and student answers have been stored electronically on the University's secured cloud servers. However, due to time constraints, the inspection of these particular documents did not take place.

Since Dean Van Tassel and former Registrar Tim Weimer arrived in June 2018 a sound policy has been in place to ensure guideline 7.9 has been followed. However, these policies were not written down in any formal manner. The new Registrar, Karen McCray was assigned the task of writing these policies and including them in a Registrar Handbook Folder in the Alliant SharePoint servers for easy access.

New policies and procedures have been included in the Registrar's Handbook Folder saved on the Alliant SharePoint servers. The Registrar's Handbook Folder is saved on Alliant's SharePoint servers and is accessible to SFLS Administration. This folder will be a living document/folder that will be updated over time, as policy and procedure updates are needed.

⁶ Ibid. pg. 14

⁷ Ibid.

⁸ Ibid.

Additionally, as mentioned in the November 2020 update, Professors are now required to provide the following documents when they submit their final exams and final grades; A model answer and or issue outline for the final exam, grading matrix used on the final exam, grading comments for each student's exam answer, a final grading sheet showing the calculation for each student's final grade. These documents were submitted by professors at the end of fall 2020 and spring 2021 semesters. All documents are maintained on Alliant's secure servers and are accessible via Alliant's SharePoint.

Sections 8.0, 8.4 - 8.8 found on pages 20-22 of the SFLS Student Handbook SFLS also serve as evidence the policy is intended to ensure that SFLS is not retaining any unqualified students. The policy requires any student whose cumulative GPA drops below 2.0 be Academically Disqualified. A student who wishes to continue at SFLS must submit a Petition for Readmission to SFLS' Academic Standards Committee (ASC). This process allows a group of professors to determine if the student can be successful in the future, avoiding readmission of unqualified students. The grading standards implemented under former Dean Van Tassel were reversed in fall of 2019. This supports our efforts to maintain high standards and prevent the retention of unqualified students.

In the prior two years all students readmitted have been readmitted with conditions. The conditions have included retaking classes, creating a success plan with their student advisor, and mandatory monthly meetings with student advisors and professors. This process is in place to ensure that all students are given a fair opportunity to succeed.

18. **Guideline 7.11:** *It is recommended that the school demonstrates that it documents completion of the minimum number of hours of actual academic engagement for courses delivered by any form of distance-learning technology as required... To show full compliance, SFLS must demonstrate that it documents completion of the minimum number of hours of required academic engagement for courses delivered by any form of distance-learning technology, as required by Guideline 7.11.*⁹

SFLS Response: Accept in Part. SFLS is now in full compliance.

Evidence: While SFLS does offer up to twelve credits via distance learning, all courses are delivered using synchronous instruction and student engagement and continue to utilize the Socratic method. This teaching method requires students to attend class during specified hours, be prepared and regularly participate in the class discussions. Attendance is recorded according to State Bar Guideline 6.5 to ensure required academic engagement. Further, all SFLS courses that are taught using a distance learning method clearly outline attendance requirements for the course along with any assignments, quizzes and exams that will be given during the semester.

SFLS uses Zoom as its main distance learning platform. To verify actual student academic engagement, a report is available to show when each individual student logged into and out of any class. This allows SFLS to monitor and ensure compliance with Guideline 7.11.

⁹ Ibid. pg. 15

19. **Guideline 11.1 (A)-(F) and (H):** *It is recommended that the school takes steps to comply with all administrative guideline requirements in this section and documents that compliance to the CBE... SFLS should use fire-safe cabinets, or other similarly secure options, for on-site storage of records of hard copy applicants, admitted applicants, and students that have not been digitized or stored at DataSafe¹⁰... the team was not able to confirm compliance with Guideline 11.1(A) through (D), because some of the audited files lacked materials required by the guideline, such as official transcripts, admission records, and documentation of academic actions.¹¹*

SFLS Response: Reject. SFLS was, and is, in full compliance with Guideline 11.1.

Evidence: All records pertaining to SFLS students created by SFLS since 2018 are maintained digitally. All records created by AIU, relating to SFLS faculty and staff have been maintained digitally since 2016. All student records since 2014 have been maintained digitally by AIU in the SIS, and either the Feith or SchoolDocs document systems. The team inspected the hardcopy files of current student records at the Emeryville office. While these campus hardcopy files were not in fire proof cabinets, SFLS was in full compliance because all official records are stored on a secured server, or stored offsite at secured, environmentally controlled storage facilities such as DataSafe.

Guideline 11.1 (A)-(F) and (H) continued: *Similarly, compliance with other aspects of Guideline 11.1 could not be confirmed, because records were unavailable for review or files did not include required documents. SFLS must demonstrate compliance with the requirements of 11.1, including subparagraphs (A) through (D) on applicant and student files, (E) on course records, (F) on student exam papers, and (H) on faculty personnel files.¹²*

SFLS Response: Accept in part. SFLS was, and is now, in full compliance with Guideline 11.1 (A)-(F) and (H).

Evidence: All student records are maintained digitally in a secure student information system. This ensures that records are protected from theft, destruction, corruption or other types of loss. Hardcopies of records are available at any time upon request.

During the visit the team did not have an opportunity to confirm compliance with Guideline 11.1 due in part to the challenges associated with decentralization as discussed earlier. Since the visit, all documents are maintained in a centralized fashion with direct oversight by the new Registrar who was hired in June 2020.

Compliance with subparagraphs (A) & (B) Applications and Record of Admissions:

All application and admissions records are maintained digitally in a secure student information system for a minimum of one year. Application materials for enrolling students become student records and are maintained per subparagraph (C).

¹⁰ Ibid. pg. 20

¹¹ Ibid.

¹² Ibid.

Compliance with subparagraph (C) Student Records:

All student records required under subparagraph (C) are permanently maintained in a secure student information system (CNS and SchoolDocs) or secure storage facility (records prior to 2016).

Compliance with subparagraph (D) Transcripts:

Student Transcripts are maintained permanently in a secure student information system (CNS and SchoolDocs) or secure storage facility (records prior to 2016). Transcripts contain all required information including but not limited to student identity, date of admission, whether the student is or is not a J.D. degree candidate, course attempted and completed, and cumulative GPA, etc.

Compliance with subparagraph (E) Class Records:

Class records, including course information, student rosters, and grades are maintained permanently in a secure student information system (CNS) or secure storage facility (records prior to 2016).

Compliance with subparagraph (F) Examination and Grade Tabulations:

All examinations (both midterm and final exams) administered from fall 2016 through spring 2018 are maintained as hardcopy files. Hardcopies of midterm exams are scheduled to be destroyed after two years (one year after the guideline requirements). Hardcopies of final examinations are scheduled to be destroyed after six years (one year after the guideline requirements). All examinations administered from fall 2018 are maintained on Alliant's secure SharePoint servers.

Effective summer semester 2018 all examinations have been maintained digitally and are currently stored on AIU's secure servers. All records for grades on examinations, for courses, and distribution by course/professor have been saved digitally since 2016. All hardcopy records have been stored at secured, environmental controlled storage facilities such as DataSafe.

Finally, a review and clearing of all examination records has been added to the Registrar's yearly calendar.

Compliance with subparagraph (H) Faculty Personnel:

All faculty personnel files are up to date and in compliance. Alliant HR will be responsible for maintaining these files going forward. SFLS Dean and VP for Human Resources will be meeting on a regular basis to review these files and ensure continued compliance in the future.

Response to Suggestions for Enhanced Compliance

The 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 considers expanding the faculty development opportunities it provides.***

SFLS Response: Accept in Part. SFLS is now in full compliance.

Evidence: With the hiring of a new Registrar and a new core Faculty member at the Emeryville campus SFLS has enhanced its capacity to address this issue. Alliant and SFLS have recently expanded its faculty development program with numerous resources that SFLS professors were able to access effective fall 2020. These include but are not limited to; a new Faculty Orientation website, a new Center for Teaching Excellence website, reinitiating Peer Review and Evaluations, and Peer to Peer Mentorship (beginning fall 2021). Alliant also has a mandatory training curriculum for all faculty and staff that includes topics such as FERPA, harassment, managing bias and code of conduct.

2. ***Pursuant to Guideline 8.2, it is suggested that the school clearly labels hard copy library materials that are not being updated.***

SFLS Response: Accept in Part. SFLS is progressing towards full compliance.

Evidence: Scott Zimmer the University Librarian in San Diego, and Dean Jones the Librarian in Emeryville have confirmed that compliance will be achieved as soon as campuses reopen and library staff return to campus upon lifting of COVID-19 related restrictions.

3. ***Pursuant to Guideline 9.3, it is suggested that the school reviews its procedures for promptly addressing technology-related problems to determine what changes are needed, if any... It is suggested that the school review its procedures for promptly addressing technology-related problems to determine what changes are needed, if any.¹³***

SFLS Response: Accept in Part. SFLS is now in full compliance.

Evidence: In December 2019 AIU implemented a new Student Information System called CampusNexus Student. In March of 2020 AIU President Andy Vaughn approved resources to be reallocated to address IT related needs and resolve issues promptly. To ensure that technology related issues are addressed promptly, University CIO Josh Blazer instituted a prioritization system accompanied by weekly updates as necessary.

¹³ Ibid. pg. 19

Response to Other Recommendations

Pursuant to Guideline 10.1 – 10.3, It is worthy to note that when budgeting for the school, it will be important to allocate enough resources to provide the services offered to students, and to maintain compliant administrative services and records. Some of the administrative issues experienced by the school may have been due to the large staff turnover and long term open positions at the school, and it should be considered how staff, procedures, and systems can be altered to ensure continued compliance.

SFLS Response: Accept in Part. SFLS is now in full compliance of Guidelines 10.1-10.3.

Evidence: Since the visit SFLS has engaged in revising and updating of its policies and procedures to align with requirements set forth by the Rules and Guidelines.

Since the inspection team's visit SFLS has hired a fulltime Registrar, Karen McCray, who will be located at the San Diego branch campus. The SFLS Registrar was moved to the San Diego branch campus to be closer to AIU's Registrar and Human Resources offices. This will ensure greater efficiency in record keeping and allow for more focused compliance activity.

SFLS has also hired another core faculty member, Katherine Alfieri to start August 2020. Professor Alfieri will be located at the Emeryville office and will be providing greater academic and student advisory support for the day and evening program students. This will free Dean Weimer from those responsibilities so that he can focus more time on Administrative and compliance management of SFLS.

The recently upgraded student information system and SchoolDocs document management system will allow for greater efficiency in maintaining, organizing and accessing student records. It also enhances SFLS's capacity and ability to serve students and meet compliance requirements.

Conclusion

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 Guidelines.

In the short time since the visit San Francisco Law School has taken multiple targeted actions to bring it into full compliance with the Guidelines. These include hiring a new Registrar, hiring another faculty member, updating policies and procedures and publishing the updates in the catalog and on the website, updating and publishing the required language in the Student and Faculty Handbooks, implementing professional development and training for faculty members, enhancing the student information system with a new system, improving IT support and resolving many IT related challenges, as well as resolving many of the challenges previously faced by decentralization of record keeping.

We look forward to working closely with the State Bar of California to ensure the continued compliance and success of San Francisco Law School.

SFLS Response to State Bar of California Periodic Inspection Report

Documentary Evidence

Updated May 13, 2021

Introduction

This document is a supplementary to San Francisco Law School's (SFLS) response to the periodic inspection conducted on February 9–11, 2020 at San Francisco Law School's branch campus in San Diego, and on March 3–5, 2020 at the main SFLS campus in Emeryville, California.

In its report, the Inspection team made several recommendations for action in the executive summary, as well as 19 recommended mandatory actions and three (3) suggestions for enhanced compliance. San Francisco Law School responded to these recommendations on July 27, 2020.

Below you will find the description of the documentary evidence of SFLS's compliance, or evidence of SFLS's work to become complaint as soon as possible.

Attached are several other documents. The responses below will refer to specific sections and/or pages within these attached documents as evidence of compliance. In some cases, the changes/updates requested were made on the AIU or SFLS websites. These will be evidenced by a weblink to the information.

Evidence for Response to Recommended Mandatory Actions

The following mandatory actions were recommended to establish full compliance.

1. ***Guideline 2.3(B)-(C):*** *It is recommended that the school revises the publications of AIU and SFLS to accurately and consistently state its academic and operational policies, and with respect to electives, to delete electives not offered in the past three years or expected to be offered in the next two years, and to inform students that electives are not are taught each year, but are offered from time to time based on student interest and instructor availability.*

Documentary Evidence: See AIU Catalog p. 26 'Electives.'

2. ***Guideline 2.3(D)(1)-(3):*** *It is recommended that the school publishes all disclosures required by the guideline on a separate page of its website that is entitled Accreditation and readily accessible to the public by that title, correctly labeled and in their most current version.*

Documentary Evidence: The information is included on the AIU/SFLS website under the subtitle 'Accreditation' (see <https://www.alliant.edu/schools/sfls>). See Screenshot below.

alliant.edu/schools/sfls

YouTube CrossFit | Home Custom LEGO Sets... how do I register to...

Portal Campus Safety / COVID-19 Updates Faculty Request Info Apply (866) 679-3032

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career in law open to more people. Along with our academic focus on preparation for the California Bar exam, field experience and career services, SFLS has a proud history of being the launching pad for many prestigious legal minds.

Accreditation

San Francisco Law School is a part of Alliant International University, an institution accredited by the WASC Senior College and University Commission (WSCUC) and is approved by the U.S. Department of Education for financial aid.

San Francisco Law School is accredited by the Committee of Bar Examiners of the State Bar of California and has been continuously accredited since California accreditation began in 1937. Students who graduate from one of our law programs are eligible to practice law in the State of California upon passage of the California Bar Exam.

Study at, or graduation from, these law schools may not qualify a student to take the bar exam or be admitted to practice law in jurisdictions other than California. A student who intends to seek admission to practice outside of California should contact the admitting authority in that jurisdiction for information regarding its education and admission requirements.

For information related to the school's bar examination passing rates, visit the [CalBar website](#).

Business & Professions Code Section 6061.7(a) Information Report for All Locations, Reporting Year 2020

[VIEW REPORT](#)

- Business and Professions Code section 6061.7:** *It is recommended that the school includes the required link to the current version of the disclosure form on the Admissions page of its website.*

Documentary Evidence:

- Please see the attached email string entitled 'Email from IT Indicating Webpage Forms and Links Updated, August 6, 2020.'
- The requested information is also contained on the AIU/SFLS website, <https://p.widencdn.net/n0mrxd/SFLS-Information-Report>.
- The SFLS Admissions page of the 2021-2022 catalog may be found here: <https://catalog.alliant.edu/content.php?catoid=37&navoid=1432#sfls-admissions-reqs>

- Guideline 2.3(E)(2):** *It is recommended that the school revises all published statements referring to WASC accreditation to indicate that the school's degree-granting authority is based on accreditation by the Committee of Bar Examiners, as it pertains to qualification to take the California Bar Exam and become a licensee of the State Bar of California.*

Documentary Evidence: AIU Catalog p. 261, 'Programmatic Accreditation.'

5. **Guideline 2.3(E)(2):** *It is recommended that the school revises all published statements, in the AIU Catalog and otherwise, that students who graduate from SFLS are eligible to practice law in California after passing the bar exam, by adding “and successfully fulfilling all other licensing requirements.”*

Documentary Evidence: AIU Catalog p. 285, ‘Accreditation Information.’

6. **Guideline 2.7(C):** *It is recommended that the school adopts, publishes, and implements a written policy on the authentication of student work. As required by Guideline 2.7(C), SFLS should adopt, publish, and implement a written policy on authentication of student work.*

Documentary Evidence:

- See Student Handbook sections 6.9 & 6.9.1 (p. 19)
- See Faculty Handbook section 3.0 (p. 7)

7. **Guideline 2.7(E):** *It is recommended that the school amends and republishes its policy on the review of exam answers to permit students to inspect and copy exam questions as provided.*

Documentary Evidence:

- See Student Handbook section 6.9.2 (p. 19)
- See Faculty Handbook section 2.2.4 (pp. 6-7)

8. **Guideline 2.10(A):** *It is recommended that the school amends its publications, including the SFLS website, to accurately describe the services, activities, and experiences currently available to students, by campus.*

Documentary Evidence:

- See AIU Catalog pp. 28-30
- See also website at <https://studentservices.alliant.edu/>.
- See also attachment entitled ‘AIU New Student Orientation 8_18_2020 SFLS Version.’

9. **Guidelines 3.1 and 4.1(A)-(C):** *It is recommended that the school evaluates its administrative structure and make such changes as necessary to ensure full and sustained compliance with the CBE’s guidelines, including all administrative requirements. Since the inspection, the school has added a full-time registrar effective June 15, 2020, though hiring of any other positions has been frozen due to the pandemic... to establish full compliance, SFLS must show that it has adequate administrative capacity to support full and sustained compliance with the Rules and Guidelines as further described below¹... To demonstrate full compliance with Guidelines 3.1 and 4.1(A) through (C), the school should evaluate its administrative structure and ensure adequate capacity at each campus to support full and sustained compliance with the rules and guidelines overall.²*

Documentary Evidence: See SFLS Official Response (i.e. New Registrar and new Fulltime Faculty).

¹ Periodic Inspection Report pg. 10

² Ibid. pg. 11

10. **Guidelines 4.7 and 4.8:** *It is recommended that the school adopts, publishes, and implements a compliant faculty evaluation process... To bring itself into full compliance, SFLS should adopt, publish, and implement a faculty evaluation process that meets all requirements of Guidelines 4.7 and 4.8. The current process includes only some of the mandated considerations; further, evaluations have not been conducted within required timeframes or routinely documented in faculty files, again perhaps as a result of staffing levels.*³

Documentary Evidence:

- See Faculty Handbook sections 1.7 – 1.9 (pp. 3-4) and Appendices A-C.
- See attached Faculty Assessment and Evaluation Forms

11. **Guidelines 5.3 and 11.1(B)-(C):** *It is recommended that the school adopts, publishes, and implements a policy that meets guideline requirements with respect to the filing of official transcripts, and includes a procedure that will permit validation that all requirements have been met and official transcripts are received within CBE time limits.*

Documentary Evidence: See SFLS Official Response.

Guidelines 5.3 and 11.1(B)-(C) continued:

According to the findings related to guidelines 5.3 and 11.1 on page 15 of the Periodic Inspection Report, *SFLS did not demonstrate that is compliant with the “45-day rule” of Guideline 5.3 and Business and Professions Code section 6060(c)(1). Under the rule, SFLS must not allow a student to enroll or attend classes if the student’s official transcripts are not on file within 45 days after the start of the student’s first term. Admissions Department personnel indicated that they follow an SFLS policy, under which the registrar must audit files no later than the 45th day of the term, but then has 14 days to “find or replace the missing items” from student files, in possible contravention of the 45-day rule... The school should adopt, publish, and implement a policy that complies with Guideline 5.3 and Guideline 11.1(B) and (C) with respect to the filing of official transcripts, and includes a procedure that will permit validation that all requirements have been met.*

Documentary Evidence: See Student Handbook section 3.1.1 (p. 11)

³ Ibid. pg. 12

12. **Guidelines 5.6 and 5.7:** *It is recommended that the school adopts, publishes, and implements policies that incorporate guideline standards, including a process to ensure that decisions are documented as required... The school must demonstrate compliance and should adopt, publish, and implement policies that incorporate the guideline standards, including a process to ensure that decisions are documented as required.*⁴

Documentary Evidence: SFLS has incorporated the guideline standards in its daily business practices. For example, all admission decisions are documented in the student's file. Also, all decisions related to disqualification and dismissal are documented and maintained in the student's file.

While communications between CBE and the law school have always been maintained, the new Registrar has been assigned the task of collecting these documents and compiling them into a centralized location for easy access and retrieval. These communications are now stored in the Registrar's Handbook Folder on the Alliant SharePoint servers.

Due to the ongoing business disruptions caused by COVID-19 digitizing the hardcopy documents has been delayed. Due to many of the documents being stored in paper files on closed campuses, this task will be completed when we are allowed to return to campus by government and health officials. That time is still to be determined. Once we return to campus, we can set a proper deadline for the completion of this task.

13. **Guideline 6.5(A):** *It is recommended that the school states in the Student Handbook the requirement that the JD must be completed within the time limits specified in the relevant guideline.*

Documentary Evidence: See Student Handbook section 2.4 (p. 8)

14. **Guidelines 6.6(A)-(D) and 6.9(D)-(E):** *It is recommended that the school revises its externship policy to state the maximum number of externship units that may be earned... The school should revise its externship policy to state the maximum number of externship units that may be earned. (Guideline 6.6(D))*

Documentary Evidence: See Student Handbook section 2.6 (p. 9, second paragraph)

⁴ Ibid pg. 16

15. **Guideline 6.14:** *It is recommended that the school shows compliance with the guideline... the team encourages the school to ensure that all instructors are aware of and utilizing the best practices for fostering student engagement... The team was unable to fully assess whether the school's grading standards are compliant with Guideline 6.14 because exam papers and data were not available, though this is required. The school must demonstrate that its grading standards meet the requirements of Guideline 6.14, including the requirement that there be a reasonable correlation among the grades of instructors teaching the same group of students.*⁵

Documentary Evidence: While SFLS has had a sound policy since 2018, the new policies and procedures have been included in the new Registrar's Handbook Folder. The Registrar's Handbook Folder along with all exam and grading documents created since fall of 2018 are saved on Alliant's SharePoint servers and accessible by SFLS Administration. This online digital folder will be a living document that will be updated over time, as policy and procedure updates are needed.

Due to the ongoing business disruptions caused by COVID-19 digitizing the hardcopy documents has been delayed. Due to many of the documents being stored in paper files on closed campuses, this task will be completed when we are allowed to return to campus by government and health officials. That time is still to be determined. Once we return to campus, we can set a proper deadline for the completion of this task.

16. **Guideline 7.1:** *It is recommended that the school carefully tracks the relationship between students' GPAs at graduation and their performances on the bar exam to demonstrate that students are being graded in a manner that will inform them of their level of academic achievement and likely success on the bar exam... To show full compliance with Guideline 7.1, the school should carefully track the relationship between student GPA at graduation and performance on the bar exam, to understand whether students are being graded realistically, and are not being misled about their level of academic achievement and likely success on the bar exam.*⁶

Documentary Evidence: The SFLS Registrar has created an annual calendar which includes dates for running these reports each year for administrators. SFLS will continue to produce, review and analyze these reports after the results of each administration of the bar exam are published to improve its programs.

17. **Guideline 7.9:** *It is recommended that the school provides the data and exam papers necessary to demonstrate the quality and reliability of its grades... To show compliance with Guideline 7.9, the school should provide the data and exam papers necessary to demonstrate the quality and reliability of its grades⁷... In relaxing grading standards, the school should exercise caution not to retain unqualified students.*⁸

⁵ Ibid. pg. 13

⁶ Ibid. pg. 14

⁷ Ibid.

⁸ Ibid.

Documentary Evidence: From fall 2018 through fall 2019 all exam questions and student answers have been stored digitally and as hardcopies at the Emeryville campus. The documents requested were available to the inspection team during their visit to Emeryville. Due to time constraints, the inspection of these particular documents did not take place.

Starting in spring 2020 all exams and student's answers have been stored electronically on the University's secured cloud servers.

Since June 2018 a sound policy has been in place to comply with guideline 7.9. The new Registrar, Karen McCray has included these policies and procedures in the Registrar's Handbook Folder. The Registrar's Handbook Folder is saved on Alliant's SharePoint servers and accessible by SFLS Administration. This folder will be a living document that will be updated over time, as policy and procedure updates are needed.

Additional Documentary Evidence: See Student Handbook sections 8.0 - 8.7 (pp. 25 – 27)

18. **Guideline 7.11:** *It is recommended that the school demonstrates that it documents completion of the minimum number of hours of actual academic engagement for courses delivered by any form of distance-learning technology as required... To show full compliance, SFLS must demonstrate that it documents completion of the minimum number of hours of required academic engagement for courses delivered by any form of distance-learning technology, as required by Guideline 7.11.*⁹

Documentary Evidence: See SFLS Official Response.

19. **Guideline 11.1 (A)-(F) and (H):** *It is recommended that the school takes steps to comply with all administrative guideline requirements in this section and documents that compliance to the CBE... SFLS should use fire-safe cabinets, or other similarly secure options, for on-site storage of records of hard copy applicants, admitted applicants, and students that have not been digitized or stored at DataSafe¹⁰... the team was not able to confirm compliance with Guideline 11.1(A) through (D), because some of the audited files lacked materials required by the guideline, such as official transcripts, admission records, and documentation of academic actions.*¹¹

Documentary Evidence: See SFLS Official Response.

Guideline 11.1 (A)-(F) and (H) continued: *Similarly, compliance with other aspects of Guideline 11.1 could not be confirmed, because records were unavailable for review or files did not include required documents. SFLS must demonstrate compliance with the requirements of 11.1, including subparagraphs (A) through (D) on applicant and student files, (E) on course records, (F) on student exam papers, and (H) on faculty personnel files.*¹²

⁹ Ibid. pg. 15

¹⁰ Ibid. pg. 20

¹¹ Ibid.

¹² Ibid.

SFLS Response: Accept in part. SFLS was, and is now, in full compliance with Guideline 11.1 (A)-(F) and (H).

Documentary Evidence: See SFLS Official Response.

Compliance with subparagraphs (A) & (B) Applications and Record of Admissions:

Documentary Evidence: See SFLS Official Response.

Compliance with subparagraph (C) Student Records:

Documentary Evidence: See SFLS Official Response.

Compliance with subparagraph (D) Transcripts:

Documentary Evidence: See SFLS Official Response.

Compliance with subparagraph (E) Class Records:

Documentary Evidence: See SFLS Official Response.

Compliance with subparagraph (F) Examination and Grade Tabulations:

Documentary Evidence: See SFLS Official Response.

Compliance with subparagraph (H) Faculty Personnel:

Documentary Evidence:

All faculty personnel files are up to date and in compliance. Faculty files are now maintained by Alliant Human Resources (HR) on Alliant's secure data systems. Alliant HR will be responsible for maintaining these files going forward. SFLS Dean and VP for Human Resources will be meeting on a regular basis to review these files and ensure continued compliance in the future.

Response to Suggestions for Enhanced Compliance

The 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 considers expanding the faculty development opportunities it provides.***

Documentary Evidence:

Alliant's Faculty Orientation Webpage:

<https://alliantintluni.sharepoint.com/provost/SitePages/facultyorientation.aspx>

Alliant's Center for Teaching Excellence webpage:

<https://alliantintluni.sharepoint.com/provost/SitePages/cntrteachexcel.aspx>

2. ***Pursuant to Guideline 8.2, it is suggested that the school clearly labels hard copy library materials that are not being updated.***

Documentary Evidence: See SFLS Official Response.

3. ***Pursuant to Guideline 9.3, it is suggested that the school reviews its procedures for promptly addressing technology-related problems to determine what changes are needed, if any... It is suggested that the school review its procedures for promptly addressing technology-related problems to determine what changes are needed, if any.***¹³

Documentary Evidence: See SFLS Official Response.

Response to Other Recommendations

Pursuant to Guideline 10.1 – 10.3, It is worthy to note that when budgeting for the school, it will be important to allocate enough resources to provide the services offered to students, and to maintain compliant administrative services and records. Some of the administrative issues experienced by the school may have been due to the large staff turnover and long term open positions at the school, and it should be considered how staff, procedures, and systems can be altered to ensure continued compliance.

Documentary Evidence: See SFLS Official Response.

¹³ Ibid. pg. 19

**PEOPLES COLLEGE OF LAW
NOVEMBER 2020 PROGRESS REPORT
ON COMPLIANCE WITH RECOMMENDATIONS
IN STATE BAR INSPECTION REPORT OF 2020**

RECOMMENDED MANDATORY ACTIONS IN 2020 INSPECTION REPORT

1. Guidelines 1.9 and 2.10:

Bar's Inspection Report

“To achieve full compliance, the school should demonstrate that it has adopted adequate procedures to properly document applications for accommodations and decisions in student files, to secure health records against unauthorized disclosure, and to effectively administer the school's privacy policy. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*”

PCL'S Progress Report

As noted in the Inspection Report, PCL adopted a compliant policy some months ago. One provision of the policy is: “Once each calendar month, the Administrator shall distribute a reminder of this Student Privacy Policy, with its full contents, to the Registrar, the Dean, and all officers, members of committees, members of the Community Board, employees and Faculty Members, by automatically scheduled email or otherwise.” Starting at the beginning of this academic year, we have complied by distributing the policy by email every month to the required recipients. The Dean has calendared for himself a reminder to distribute it at the beginning of every month. Soon our new Student Information System, Populi, will distribute it automatically on the first of every month.

2. Guideline 2.2(B)

Bar's Inspection Report

“To bring itself into full compliance, the school should demonstrate that its refund policies have been stated clearly and consistently in its publications. *Subsequent to the inspection, the school published a single clear policy, and provided a copy of that policy to the State Bar.*”

PCL'S Progress Report

As noted in the Inspection Report, PCL adopted a compliant policy some months ago. This new policy appears in our Tuition and Enrollment Agreement and our Student Handbook & Catalog. In late August and early September 2020 the students signed their Tuition and Enrollment Agreements, with the refund policy prominently displayed. The Student Handbook & Catalog, with the new refund policy, is posted on our website.

3. Guideline 2.3(B)

Bar's Inspection Report

“To bring itself into full compliance, the school should remove from the Catalog any electives not offered in the past three years or not expected to be offered in the next two years, and inform students in the Catalog that electives are not are taught each year, but are offered from time to time based on student interest and instructor availability. *Subsequent to the inspection, the school updated the course list, deleting two courses that did not meet these criteria, and added the language regarding frequency.*”

PCL'S Progress Report

As noted in the Inspection Report, some months ago PCL came into compliance by deleting from the Student Handbook & Catalog the courses required to be deleted. Also, this past summer (2020) we had two elective courses, clinical courses on Criminal Defense and Eviction Defense. It was the second year in which the clinical course on Criminal Defense was given, the first year for Eviction Defense. We want to repeat them next summer, but since the courses are so new, we have refrained from listing them in the catalog yet.

4. Guideline 2.3(D)

Bar's Inspection Report

“To bring itself into full compliance, the school should demonstrate that the disclosure statements required by Guideline 2.3(D)(1)-(3), Business and Professions Code section 6061.7, and Rule 4.241 have been implemented accurately, completely, consistently, and as mandated. *These disclosures have been corrected and implemented.*”

PCL'S Progress Report

As noted in the Inspection Report, some months ago PCL came into compliance by correcting, revising and implementing the disclosures. Since then the required disclosures were made in the Tuition and Enrollment Agreements signed by each student at the start of the fall quarter. The Rule 2.3(D) disclosure has been updated to reflect the change in the principal method of instruction, a change caused by COVID-19, from physical classroom instruction to online interactive instruction. On October 18, 2020, well before the deadline in Rule 4.241, the Dean signed and sent to the State Bar the certification of compliance required by the rule. In connection with preparation of the Annual Compliance Report, the Business and Professions Code section 6061.7 disclosure is being updated.

5. Guidelines 2.9(A)-(B) and 5.24

Bar's Inspection Report

“To bring itself into full compliance, the school should demonstrate that the Catalog and other publications set forth the school's academic standards and student assessment policies accurately, clearly, consistently, and as mandated. *Subsequent to the inspection, the school provided evidence of the updates as required.*”

PCL'S Progress Report

As noted in the Inspection Report, some months ago PCL came into compliance by revising these policies as required. One of the changes in our policies has to do with student privacy. Specifically, our Student Handbook & Catalog now prohibits students from participating in proceedings involving possible academic disqualification of other students without consent of the student in jeopardy of disqualification. Likewise it prohibits students from participating in academic grievance proceedings without the consent of the student who made the grievance. These new provisions are being implemented right now. We are in the midst of proceedings in which a student is challenging a failing grade, and these new provisions have been put into practice. Specifically, the student was informed at the outset that without the student's consent, other students would not participate in the proceedings. The student in question chose to have the other students participate. The other students are members of our Faculty-Curriculum Committee. One of the functions of that committee is to pass on petitions for grade changes.

6. Guideline 2.9(C)

Bar's Inspection Report

"To bring itself into full compliance, the school should adopt, publish, and implement a policy, including oversight provisions, to ensure that students are provided with written statements of the components of course grades. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*"

PCL'S Progress Report

As noted in the Inspection Report, some months ago PCL came into compliance by revising the policies as required. The Dean has reviewed the syllabi that have been entered into Populi, and finds that all but three professors have included in syllabi written statements of the components of course grades, but two of those are pass-fail courses. For the coming winter quarter, the Dean will send a reminder to all faculty to comply with this requirement.

7. Guideline 2.9(D)

Bar's Inspection Report

"To bring itself into full compliance, the school should adopt, publish, and implement a policy on authentication of student work, and discontinue its current practice of allowing students to take in-class exams using devices that are not protected by exam-security software. *Subsequent to the inspection, the school advised that it is actively evaluating options to implement secure testing.*"

PCL'S Progress Report

During this fall quarter, PCL adopted the following policy and procedures on authentication of student work:

POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK

A. Exams: All exams must be given using Microsoft Teams. If the exam is given remotely, the monitoring function of Teams must be used. If the exam is given in the classroom, the instructor or a non-student substituting for the instructor must be present during the entire exam to monitor the students. Students who handwrite exam answers must have all their electronic devices turned off. Students who answer the exams by Teams on a computer must have all their other electronic devices turned off. If the exam is given remotely, all students must have their video activated during the entire exam, but exceptions are allowed for student who encounter technical problems that result in the student not being able to have their video activated.

(The Faculty-Curriculum Committee notes that exams are given with Microsoft Teams. Teams requires students to register for each exam. The students' exam answers are sent to the Microsoft Teams account and only accessible through Teams. When taking the exams, the students' computer screens are locked upon being opened by the student, and thus the students cannot access other materials while the test is being taken. While taking the exam, the student is observed by the exam proctor through the webcam. The students' exam answers are submitted to the proctor through the students' Microsoft Teams account.)

B. Remote Class Participation: In all classes given remotely every student should have their video activated during the entire class, unless the student has hardware or software issues related to their computer or internet service provider or an extraordinary circumstance.

(The Faculty-Curriculum Committee notes that online classes are given with Microsoft Teams. The students attend class through teams. The students' names are shown during the class. The students are on camera during the class. Students speak during the classes, and their voices also identify them.)

8. Guidelines 2.10 and 5.17

Bar's Inspection Report

“To bring itself into full compliance, the school should review, revise, and republish its grade review policy to meet guideline requirements. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*”

PCL'S Progress Report

We have begun implementing our new administrative grade review policy. Our committee in charge of it, the Faculty-Curriculum Committee, has met to formulate plans for the first implementation, which will be for the fall quarter grades later in November. Our Registrar/Administrator has adjusted our Student Information System to hold the grades for administrative review before the grades are issued to students and entered in their transcripts.

9. Guidelines 2.11, 7.1, and 9.1

Bar's Inspection Report

“To bring itself into full compliance, the school should adopt policies and procedures that are adequate to protect the school’s digital records. **Subsequent to the inspection, the school purchased Populi, a commercially available package designed for schools containing the safeguards identified in this report.**”

PCL'S Progress Report

Our Registrar/Administrator has largely completed the very substantial job of entering the digital records into Populi.

10. Guideline 3.1

Bar's Inspection Report

“To bring itself into full compliance, PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the CBE’s standards, including written job descriptions for the dean and registrar, and adequate oversight provisions. ***Subsequent to the inspection, the school increased the paid hours of the administrator, and secured significant volunteer assistance from the dean, the Board, and alumni. The school will monitor the adequacy of its administrative capacity. The school also created compliant job descriptions for both the dean and the registrar.***”

PCL'S Progress Report

Our Registrar/Administrator continues working full-time. During this fall quarter, others have greatly contributed to the school’s administrative work. Following are some examples. One of our upper division students trained faculty and students in the use of Microsoft Teams, our new system for online classes and exams, has inquired with faculty and students about problems experienced with Teams, and has assisted them with problems. Our Faculty-Curriculum Committee, whose members are students, faculty, alumni and the Dean, organized and conducted our student orientation and our fall faculty meeting. An ad hoc committee is organizing our upcoming Strategy Planning Meeting and Membership meeting. (PCL is a nonprofit corporation. That type of corporation has members rather than shareholders, and PCL’s members are students, faculty, alumni and former board members and officers.) Our Development and Fundraising Committee, whose members are alumni and the Dean, has weekly meetings with our professional fundraiser, and along with her has submitted several grant applications this fall, and has begun planning an online fundraising event. We have been awarded one grant so far. Our Building Committee has helped with obtaining bids for repair of the library roof.

11. Guidelines 4.8 and 4.9

Bar's Inspection Report

“To bring itself into full compliance, the school must adopt and implement a faculty evaluation policy that meets guideline requirements. ***Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.***”

PCL'S Progress Report

We have begun the process of instructor evaluation. Instructors are evaluated by their own students and by members of the Faculty-Curriculum Committee. We use a standard evaluation form. It has been sent to the students. Members of the Faculty-Curriculum Committee already have the form, and have begun sitting in on classes online as part of the evaluations.

12. Guidelines 5.3(A)(1) and 5.9

Bar's Inspection Report

“To bring itself into full compliance, the school should adopt, implement, and publish attendance policies and procedures that: require student attendance at no less than 80 percent of the regularly scheduled class hours for each course during a particular term, not a series of courses over two or more terms; provide for accurate and timely maintenance of records; and eliminate the policy of permitting students to make up absences from regularly scheduled class hours with alternate activities. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*”

PCL'S Progress Report

As noted in the Inspection Report, some months ago we adopted the required policy. This fall our Registrar/Administrator has been viewing the classes in order to take attendance and record it in Populi. At times the instructors have taken attendance and reported it to the Registrar/Administrator.

13. Guideline 5.8

Bar's Inspection Report

“To bring itself into full compliance, the school should demonstrate that its clinical courses meet all Guideline 5.8 requirements, including maintenance of records for each student in the course. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*”

PCL'S Progress Report

As noted in the Inspection Report, some months ago we adopted the required policy. Thereafter we had two clinical courses this summer. The Dean created an Excel spreadsheet form to be used by students as timesheets to record the time and activities of their course work. As an attachment to the email below, the Dean sent the timesheet form to all students and instructors in the clinical courses. The Dean sent reminder emails to the students a number of times during the summer quarter. At the end of the quarter, the Dean reviewed the timesheets submitted by the students, evaluated them, and reported to the Registrar/Administrator which students were entitled to credit for these clinical courses, and which were not.

From: Ira Spiro

Sent: Monday, June 29, 2020 6:49 PM

[names of recipients omitted from this report]

Subject: TIMESHEETS for CLINICAL CLASSES - MUST BE FILLED OUT BY STUDENTS TO GET CREDIT

Importance: High

Dear PCL SUMMER Students

Because of State Bar requirements, **you have to fill out timesheets in order to get credit for our clinical courses.** A form timesheet is attached, an Excel spreadsheet. It's very easy to use. I filled them out every day, all through the day, when I was practicing law. Here's what to do:

1. Download the attachment to your computer.
2. Type your name and the course name at the top.
3. If you're taking both clinical courses, you'll have to have two separate timesheets, so save it twice, each with a different name for use by your computer.
4. **Fill them out every day when you're done with work for the day.** Way too hard to wait, say, a week, and try to remember your time at the end of the week. This is very good practice for when you become a lawyer, because most all lawyers have to fill out timesheets
5. "Date" column: When you start typing the date, e.g. 6/29, the year gets filled in automatically.
6. "Hours" column: You can round to the nearest quarter hour, for example .45, 1.75, 2.25. (But when you practice law, you should round to nearest tenth.)
7. "Task" column: What you fill in can be very short. For example, "attend Zoom" or "draft letter" or "draft memorandum" or "phone call to prof". You can use abbreviations if you're sure you'll remember what they stand for. For example TC for telephone call, dft for draft, memo is fine for memorandum.
8. **Email them to me every Friday when you're done with your work that day.** State Bar requires someone on faculty to monitor the students, and it's going to be me.
9. If you have any questions about this, give me a call (310-235-2350), or send me an email. Remember, my phone doesn't receive texts.

14. Guidelines 5.17, 5.18, and 5.25

Bar's Inspection Report

"To bring itself into full compliance, the school should review, revise, and republish its exam and grading policies and procedures, taking action as necessary to improve the quality of exams, curb grade inflation, and ensure that students receive adequate feedback on their exam performance. *Subsequent to the inspection, the school began addressing this issue and it continues to discuss further options with priority.*"

PCL'S Progress Report

The Inspection Report does not reflect a number of very important improvements PCL made between the time the report was first published by State Bar staff and the time it was adopted by the Committee of Bar Examiners. Therefore, we discuss those changes below, although we did report them during the summer.

Policies to Eliminate Grade Inflation

The Inspection Report, on page 15, referring to the 2014 inspection, states:

“To address grade inflation, PCL adjusted its grading scale and urged instructors not to inflate grades. PCL did not, however, adopt other policies to control inflation, such as administrative review of grades prior to their release, or reasonable limits on the extent to which grades may be based on class participation, including attendance. As concluded in 2014, a sound grading program would limit participation points to no more than three [of 100], and the award of points based on attendance is “clearly inappropriate” in light of Guideline 5.3(A)(1) minimum attendance requirement. PCL’s policy allows up to thirty percent of a course grade to be based on participation.”

This summer we did adopt the policies recommended in that paragraph. They are now in the Student Handbook & Catalog and the Faculty Handbook, as follows:

Grading Standards:

It is of primary importance for PCL students and all of PCL that the students have a realistic picture of a realistic picture of their outlook for passing First Year Law Students Exam (FYLSX) and Bar Exam. The pass rates for both exams have been very low. For example, the pass rate for the July 2019 Bar Exam was 14.4% for California Unaccredited law schools and 18.8% for California-Accredited (non-ABA) law schools.

On the FYLSX of June 2019, the pass rate was 23.5% for all takers and 28.1% for California Unaccredited Fixed-Facility law schools (PCL is in that category). Students’ ideas about their chances on these exams are very likely influenced by their law school grades. If a student receives high grades, that is likely to raise the student’s expectations of passing the FYLSX and the Bar Exam, but because of the low pass rates on the exams, the heightened expectations could well be unrealistic. In light of these and similar considerations, PCL has adopted these Grading Standards for all examinations and final grades (grades for the full quarter) in all courses that are not graded pass-fail. NOTE that in the grouping of grades in the table below, C- grades are grouped with the D grades. That is because at PCL, in order for a student to advance to the next academic year and graduate, the student must have a grade point average of C or better.

| | |
|-------------------------------|---|
| 90 - 100 (A+, A and A-) | Grades in this range should be only for very superb, outstanding work, not merely the best work among the students. The best work is often not in the A range. On an essay exam, the student should not only have identified all issues, but should have done a very superb, outstanding job of analyzing the issues. Sometimes there will be no grades in this range on an exam or for a quarter. This range should be under 10% of the grades, occasionally as much as 10%. |
| 80 – 89 | Grades in this range should be only for excellent work, not merely good work. On |

| | |
|--------------------|---|
| (B+ , B and B-) | an essay exam, the student should have identified all issues, and should have done an excellent job of analyzing the issues. This range should be under 20% of the grades, occasionally as much as 20%. |
| 73 – 79 (C+ and C) | Grades in this range should comprise by far the largest share of the grades, often higher than 50%. But these grades are for good work, not necessarily average work, because the average might be less than good. A PCL student must have a C average or better, not C-, for all quarters, in order to advance to the next academic year and in order to graduate. |
| 60 – 72 (C- to D-) | Grades in this range are for work that is somewhat less than good (C-) to work that is poor (D+ and D) to work that is marginally passing (D-). Unfortunately, this range will often comprise 15% to 20% of the grades, sometimes higher than 20%. |
| 59 and below (F) | Failing. Unfortunately, there will often be multiple failing grades, even in a small class. A failing grade is not just for work that is entirely lacking – it is also for work that shows some grasp of the subject of the exam or course, but very little. On an essay exam, the student might have identified and discussed some issues but still receive an F. In a multiple choice exam, if a student has correctly answered up to 59% of the questions, the grade will still be an F. |

... class participation must not count for more than three percent (3%) of the final grade in a course, and attendance may not be counted at all towards the grade, inasmuch as minimum 80% attendance is required.

Administrative Review of Grades

In August, 2020, our Board adopted the following Administrative Review policy:

When faculty members have determined what grades they intend to give, the next step would not be to release the grades to the students, but instead to send the grades to reviewers. The reviewers very likely would include the Dean. Others could be members of the Faculty- Curriculum Committee and current or former faculty members, but faculty would not, of course, review their own grades, and students would not participate without consent of the student between reviewed.

The reviewers would study the grades for adherence to PCL grading policies. ... If the grade reviewers find deficiencies, they would communicate with the faculty member about curing the deficiencies and changing the grades. The Dean or the Faculty- Curriculum Committee or both would participate in those discussions and decisions on changing grades. When the decisions are made, the grades would then be sent to the Administrator for release to students.

Improvements in Eliminating Faculty Turnover

The 2014 Inspection Report observed (p. 9):

“PCL operates with an all-volunteer, adjunct faculty and has someone so since its founding [it remains true in 2020]; a clear testament to the faculty’s dedication to PCL’s mission of public service. One negative aspect of a volunteer faculty, however, is that PCL experiences a higher rate of faculty turnover than most law schools where faculty

members are paid even a modest stipend or salary. ... on average, 20% of PCL's faculty appears to be new each academic year."

That turnover situation has been reversed. In the present academic year, 2020-2021, all faculty members except three taught at PCL the previous year, 2019-2020. Faculty turnover had been on the decline previously as well.

15. Guidelines 5.18–5.20

Bar's Inspection Report

"To bring itself into full compliance, the school should adopt, publish, and implement policies for academic advancement that adhere to the school's academic standards and comply with the guidelines, and eliminate policies that do not adhere to the guidelines. *All identified policies were updated, and non-compliant policies deleted.*"

PCL'S Progress Report

The problem was some inappropriate policies. PCL has eliminated them, so by the very nature of this item 15, no further progress is needed or possible.

16. Guideline 5.24

Bar's Inspection Report

"To bring itself into full compliance, the school should revise and republish its course repetition policy to meet all requirements of the guideline. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*"

PCL'S Progress Report

As the Inspection Report notes, some months ago we adopted the required policy. The policy concerns limitations on repeating courses. As stated above, this fall a student has petitioned for permission to attempt to raise a failing grade. In order to raise the grade, the student will have to take a new exam or complete some other assignment to be determined by the instructor and the Faculty-Curriculum Committee working together. It is possible that the student may choose instead to convert the petition to one for repetition of the course pursuant to the new policy.

17. Guideline 6.2–6.4

Bar's Inspection Report

"To bring itself into full compliance, the school must devise a plan and a timeline to return to compliance regarding the library by owning and maintaining its own hard copy library as required under Guideline 6.2 and provide this timeline and proof of library purchase to the CBE; however, it may be appropriate to provide a waiver for this academic year while the law school teaches courses online due to the pandemic. In addition, to bring itself into full compliance, PCL should also demonstrate that students are receiving instruction in both physical publication and electronic-based legal research, as required by Guideline 6.3. The Catalog states that legal research is taught in several courses, but a review of syllabi attached to the self-study did not validate that statement. *Subsequent to the inspection, the school did confirm that legal research*

is being taught using both hard copy and electronic resources, and the syllabi are being updated appropriately.”

PCL’S Progress Report

PCL has devised the requested plan regarding the library. It is set out in the Annual Report. It reads as follows:

PLAN TO RETURN TO COMPLIANCE: The brother of PCL founder, attorney Hank di Suvero, who died this year, has offered to donate funds for the library. Our plan is to use the money to restore the library to usable condition and purchase the books needed to bring the required hardbound books up to date, all to be completed by August 31, 2021. Our Board of Directors approved this plan on October 18, 2020.

We do still believe that the hardbound library requirement, which does not apply to other categories of California law schools, should not be applied to our category, as we have explained previously.

18. Guidelines 7.1 and 7.2

Bar’s Inspection Report

“To bring itself into full compliance, the school should maintain essential and permanent hard-copy records in fire-safe lockable cabinets, maintain all electrical equipment in working order, and provide digital projection equipment adequate to meet the needs of faculty and students. Subsequent to the inspection, the school transferred files to lockable, fire-safe cabinets; projectors were replaced with other options.”

PCL’S Progress Report

PCL purchased four matching, locking, letter-size Fireking fireproof file cabinets. We took delivery of them at our building and locked our paper files in them.

19. Guideline 9.1

Bar’s Inspection Report

“To bring itself into full compliance, the school should adopt and implement a policy to ensure that records are fully compliant with Guideline 9.1, that the law school has adopted written procedures, including oversight provisions, of record-keeping processes and record retention requirements, and that it has adopted a written policy on transcript changes, as required by Guideline 9.1(D). *Subsequent to the inspection, the school adopted compliant policies and provided the State Bar with copies of those policies.*”

PCL’S Progress Report

Our Registrar/Administrator reported as follows to the Bar and the Committee:

New Student Information System

To streamline and organize student records, faculty records, and other required organizational documentation, Peoples College of Law is transitioning to Populi, a web-

based Student Information System (SIS) to electronically maintain and store school records in a secure and confidential environment.]

Our SIS manages and stores student transcripts, student attendance (for online and in-class instruction) & participation records, academic programs & courses, course mapping for students and course rosters as well as provides reporting analytics to give perspectives on student data through particular data sets. The SIS also tracks a prospective student's application process and generates applicant reports for accepted and rejected applications. Once a student is enrolled, student agreements, billing (including invoices, payments, transactions, deposits, and tax forms) are also stored electronically. Faculty, Admin, and Registrar will have detailed information on students' grades and attendance in courses, with student course summaries and reports.

Our SIS system also has group sections that will accommodate our committees and store committee documents including minutes & agendas. Hardcopies of board minutes and Faculty minutes will also be kept in the administrator's office.

In addition to the SIS, the administrator will also maintain hardcopy files for students, administrative personnel, and faculty in fireproof, securely locked file cabinets.

We are currently transitioning to our new SIS. Our phase one phase has begun. We are integrating our historical and past data into our SIS and we will be entering student records for the past ten years, faculty information & records for the past five years, personnel records for the past ten years, and course information. We anticipate phase one will be completed by August. Phase 2 will involve entering historical student records and personnel records dating back to 2005. Historical permanent records dating back before 2005 will be electronically scanned and stored securely in the cloud as a back-up to the existing hardcopy files that are kept in fireproof, securely locked file cabinets.

PCL Files and Records

In preparation for the State Bar of California inspection, the administrator completed a thorough assessment of the school's files and records that fall under Rule 9.1 in the Guidelines for Unaccredited Law School Rules. Much of the reason that the school's records and files were out of compliance at that time was because there has not been a systematic uniform process set for each administrator who has worked at the school over the past several years.

For files and records that the administrator found to be out of compliance, best efforts were made to reconcile them prior to the inspection in January.

Files and records that were not compliant post inspection, the administrator continued to reconcile the deficiencies to complete the records.

Currently, the remaining noncompliant files under the Unaccredited Law School Rules Division 9.1 requirements are: faculty files, administrative personnel, and the file of all examinations given in the last (5) years.

Faculty Files: Approximately 1/3 of the faculty files for the past (5) years are missing law school transcripts. Administrator is actively contacting current and past instructors and requesting the missing law school transcripts. To prevent noncompliance within the

faculty records, our Faculty & Curriculum Committee are developing policy to request transcripts prior to hiring interviews or requiring them during new faculty onboarding.

Administrative Personnel Files: Several administrative personnel files are missing all or part of the required personal histories giving undergraduate education, graduate education, and law school education (if any) listing years attended, degrees conferred and summaries of professional careers and qualifications for being administrative personnel. The administrator is currently going through archived materials for older administrative personnel files. The administrator has requested information from current administrative personnel who have files missing the required information and will continue to follow up with those persons who are still missing some of their personal history.

File of Examinations: As required under 9.1(F), all examinations given in the last five years are to be kept in a file for inspection by the Committee. The administrator has been making best efforts to compile administered midterm and final exams for the past five years. For exams given in the 2019-2020 academic year, administrator has created a hard copy file and has actively been adding exams as they are administered. Our student information system (which we will implement for faculty this upcoming 2020 Fall Quarter) facilitates the creation of tests by instructor that are saved electronically per course as well as permits uploading of exams created outside of the SIS. Further, administrator is developing protocols to collect the hard copies of the exams as part of the administrator's checklist re: maintenance of required records.

Record Retention and Disposal Policy:

The school is also developing a policy for record retention and disposal and a retention schedule to ensure we keep records according to the State Bar Rules and Guidelines.

New Policy on Changes to Entries in Transcripts

PCL has adopted the following new policy on changes to entries in transcripts:

Changes to entries on a PCL transcript may be made only upon a showing of good cause. However, a contention or possibility that a grade given by an instructor was not justified shall not be good cause or an acceptable reason for a transcript change. If a present or former student wishes a change to an entry on the person's transcript, the following procedures apply

1. The present or former student must submit a written application to the Dean, specifying the change requested and the reasons for it. The application must include any documentation or evidence supporting the application.
2. The Dean must investigate the facts and circumstances pertinent to the application. In doing so, the Dean must read the entire application and materials submitted with it. The applicant shall have the right to speak with the Dean in support of the application, and to have an attorney or other representative do so as well. If the applicant requests the Dean to listen to any other person with information pertinent to the application, the Dean shall do so, but the Dean need not listen to an excessive number of such persons. The Dean may also communicate any person who may have information pertinent to the application, including but not limited to any present or former faculty member. The Dean may also speak with the Registrar, the Administrator and any other person with information pertinent to the application. The Dean may also consult any person outside

PCL who has expertise on the subject of transcripts, but shall maintain the confidentiality of the student's information by not disclosing the identity of the applicant. Before the Dean transmits to the applicant the Dean's decision on the application, the applicant may submit additional materials to the Dean, who must read them if time permits.

3. Within thirty days after receiving the application, the Dean must render a written decision on it and transmit the decision to the applicant. The Dean shall cause the application and decision and any materials the Dean read or considered in connection with the application to be placed in the applicant's student file. If the decision is that a change is to be made, the decision must specify the change, and if the applicant has not requested an appeal within the fourteen days to appeal, Dean shall transmit the decision to the Registrar, who shall make the specified change on the transcript, and place on the transcript a notation of the reason(s) for the change.

4. The applicant may appeal the decision of the Dean to the Community Board, but may do so only by transmitting to the Chair of the Board a request for appeal within fourteen days of receiving the Dean's decision. In the request, the applicant must state whether the applicant consents to participation in the appeal by student members of the Community Board. The Community Board may delegate the appeal to the Executive Committee. Within thirty days after the Chair receives the request for appeal, the Community Board or the Executive Committee, as the case may be, shall render a written decision on the appeal, and transmit it to the applicant. The Chair shall cause the request for appeal and any materials read or considered in connection with the appeal to be placed in the applicant's student file. If the decision on appeal is that a change is to be made, the decision must specify the change, and the Chair shall transmit the decision to the Registrar, who shall make the specified change on the transcript, and place on the transcript a notation of the reason(s) for the change.

5. No student member of the Community Board or the Executive Committee shall participate in the appeal unless the applicant consents in writing to participation by students.

RECOMMENDED SUGGESTIONS IN 2020 INSPECTION REPORT

1. Bar's Inspection Report

"Pursuant to Guideline 2.9(C) and 5.13, it is suggested that the school require faculty to use a standard syllabus template to promote consistent communication of course requirements."

PCL'S Progress Report

As we have said, PCL's new Student Information System has electronic features that enable the school to create global rubrics for use in any or all the courses. Those features can also be used to create a standard syllabus template.

2. Bar's Inspection Report

“Pursuant to Guidelines 2.11, 7.1, and 9.1, it is suggested that the school base its data security policies and procedures upon the recommendations of generally accepted industry standards, consulting with an expert if the expertise is not available within the school.”

PCL'S Progress Report

As we report above, our data security is provided by the security protections of our new Student Information System, Populi. Populi's website states the following, among other things, concerning its security protections:

“Populi's servers are stored in an SSAE 16 Type II compliant data center that is physically secured behind a battery of compartmentalized security zones with biometric access controls. Numerous security, power supply, and infrastructure redundancies layer on additional safeguards.

“We built Populi on the open-source “LAMP” stack (Linux, Apache, MySQL, PHP), availing you of the same powerful, secure technology undergirding web companies like Google, Vimeo, Facebook, and Amazon.”

3. Bar's Inspection Report

“Pursuant to Guidelines 5.14 through 5.16 and 5.25, it is suggested that the school adopt and implement a procedure requiring that examination questions, accompanied by issue outlines or model answers, must be reviewed and approved by the Dean or other legal educator before being administered.”

PCL'S Progress Report

We have not instituted this procedure. It would require a great deal of additional work for the Dean, and we do not have other legal educators available for it. The Dean has a good deal of other work to do for the school. Our entire faculty, and the Dean, are unpaid volunteers.

4. Bar's Inspection Report

“Pursuant to Guidelines 5.17, 5.18, and 5.25, it suggested that the school adopt and implement a procedure requiring that grades and student examinations papers must be reviewed and approved by the Dean or other legal educator before being posted.

PCL'S Progress Report

As we state above, we have adopted a procedure for administrative review of grades to take place before they become final and are posted. We have not adopted a procedure for review of examination papers. If we understand this idea correctly, it would be very difficult for us to do that for the same reasons that apply to item 3 above.