



The State Bar of California

OPEN SESSION AGENDA ITEM O-406 AUGUST 2021 COMMITTEE OF BAR EXAMINERS

DATE: August 20, 2021

TO: Members, Committee of Bar Examiners

FROM: Natalie Leonard, Principal Program Analyst, Office of Admissions

SUBJECT: Action on Periodic Inspection of University of West Los Angeles

EXECUTIVE SUMMARY

This agenda item presents the attached report of the periodic inspection of University of West Los Angeles School of Law (UWLA) conducted on April 28-30, 2021, as well as the law school's acceptance of the report and its findings, and recommends that the Committee of Bar Examiners (CBE) continue the law school's accreditation and set its next inspection for spring 2026. (Attachments A, B).

BACKGROUND

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

The University of West Los Angeles is comprised of both a business school and a California accredited law school with campuses in Inglewood and Chatsworth. As of the time of the inspection, the law school enrolled 204 students in its JD program. The larger university also enrolled 20 students in the business school.

The law school is led by Dean Jay Frykberg, who graduated *magna cum laude* from UWLA. He has taught and held other administrative roles since 2006, was named dean in 2014, and University provost in 2020. Dean Frykberg has also participated in the Leadership Academy sponsored by the Western Association of Schools and Colleges. The faculty includes 6 full-time

and 46 part-time instructors. All graduated from ABA approved or California accredited or unaccredited law schools, all but one are licensed to practice law, and 88 percent are State Bar of California licensees.

Though the law school generally teaches courses in a fixed-facility format, it has been teaching classes online via Zoom during the pandemic pursuant to the Committee's waiver allowing online course delivery. UWLA has a pending major change request to maintain its current fixed facility program and add an online JD program.

JD students must complete 85 semester units, including 73 units of required courses. Total program tuition is \$90,015 and total program fees are \$2,465.

DISCUSSION

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

The inspection was conducted by the team of Heather Georgakis, educational consultant to the State Bar along with Committee member Dr. Michael Cao.

As part of the inspection, the team reviewed the curriculum, learning platform, admissions, scholastic standards, legal research resources, facilities, records, Dean, administrators, and faculty. The inspection team recommends that the CBE receive and file this Periodic Inspection Report, adopt the report's recommendations listed below, and continue the California accreditation of UWLA.

The team's recommendations follow here.

Recommended, Mandatory Actions

1. Guideline 1.6: The law school should adopt and publish written policies to ensure that disclosure of all private information to third parties is properly restricted and that students are clearly informed of the scope of their rights under FERPA.
2. Guideline 2.3(D)(1): The law school should revise the Student Handbook to include the required disclosure language.
3. Guideline 2.3(E)(2): The law school should revise all published references to accreditation by the Western Association of Schools and Colleges, in the Student Handbook, website, and elsewhere, to indicate that the law school's degree-granting authority is based on accreditation through the Committee of Bar Examiners, as specified in the guideline.
4. Guideline 2.7(E): The law school should revise the policy on review of exam papers to state that students may inspect and copy exam questions and their own exam answers as provided by the guideline.

5. Guideline 4.5: The law school should continue to make efforts, when adding new faculty, to hire qualified graduates from other law schools to maintain a faculty with diverse educational perspectives.
6. Guidelines 4.7 and 4.8: The law school should revise its faculty evaluation policies to require that the instructor be promptly provided with a copy of the evaluation and that the evaluation include review of all criteria listed in Guidelines 4.7 and Guideline 4.8. The law school should report on implementation of these revisions in the next Annual Compliance Report.
7. Guidelines 2.7(B)(4): The law school should, in the required statement informing students about the basis for their final grades, explain the extent to which they will be evaluated by persons other than the course instructor, if any.
8. Guideline 7.1: The law school should evaluate its attrition, retention, disqualification, and grading practices over the past five years to determine what improvements, if any, should be made to ensure that students who lack the capacity to succeed are promptly identified and excluded. The school should report the results of its evaluation in its 2021 Annual Compliance Report.
9. Guidelines 8.1, 8.2, and 8.5: The law school should provide access to online law library material as required by the guidelines, by issuing passwords to students automatically, without the need for a request, upon or shortly after their enrollment.

Suggestions for Enhanced Compliance

1. Pursuant to Guideline 2.2(B), the law school should explain, in the refund policy, how refunds will be applied to students' financial aid accounts.
2. Pursuant to Guideline 14.1, the law school is encouraged to foster diversity and inclusion in recruitment, development, and retention of faculty.

Subsequent to the inspection, Dean Frykberg provided a formal response on behalf of the law school affirming the findings in the inspection report, accepting the inspection team's recommendations, and noting that some progress had already been made regarding the recommendations. (Attachment B).

FISCAL/PERSONNEL IMPACT

None

RECOMMENDATIONS

RESOLVED, that the **Committee of Bar Examiners** receives and files the 2021 Periodic Inspection Report of University of West Los Angeles School of Law, and the response from the law school accepting the report.

and it is

FURTHER RESOLVED, that the report's recommendations be approved; that the law school is directed to implement the recommendations and to document the completion with supporting evidence as part of the law school's 2021 Annual Report;

and it is

FURTHER RESOLVED, that the accreditation of University of West Los Angeles School of Law be continued; and that the law school's next periodic inspection be scheduled for spring 2026, unless an earlier visitation is deemed necessary by the Committee.

ATTACHMENT(S) LIST

- A. 2021 Periodic Inspection Report for University of West Los Angeles School of Law
- B. Formal Response from University of West Los Angeles School of Law Accepting the Report



The State Bar of California

University of West Los Angeles School of Law
Periodic Inspection Report
Conducted Pursuant to Rule 4.162

April 28-30, 2021

REPORT ON PERIODIC INSPECTION OF

THE UNIVERSITY OF WEST LOS ANGELES SCHOOL OF LAW

San Fernando Valley: 19900 Plummer Street, Chatsworth, California 91311

West Los Angeles: 9800 South La Cienega Boulevard, 12th Floor, Inglewood, California 90301

EXECUTIVE SUMMARY AND RECOMMENDATIONS

Introduction

A periodic inspection of the University of West Los Angeles School of Law was conducted from April 28-30, 2021, by an inspection team (team) consisting of Michael Cao, Member, Committee of Bar Examiners (Committee) and Heather Georgakis, Educational Consultant and Team Leader.

The University of West Los Angeles (UWLA or University) was founded in 1966 as a non-profit entity to offer the Juris Doctor (JD) degree. In 1978 the law school (UWLA Law) was accredited by the Committee and in 2002 a second campus was added when the University acquired the San Fernando Valley College of Law. UWLA now operates two campuses, one in Inglewood (West Los Angeles) and another in Chatsworth (San Fernando Valley). Operations in Chatsworth were relocated to a nearby facility in mid-March 2020, shortly before COVID-19 pandemic (pandemic) restrictions were imposed, and that campus likely will not be opened for classes until fall 2021.

In 2010, the University became a for-profit entity, with the Committee's permission, and two years later it added a second division, now called the School of Business. The business school is regulated by the Bureau for Private Postsecondary Education and enrolls students in hybrid programs for a Bachelor of Science in Business Administration, primarily for degree completion, and a Master of Science in Organizational Innovation. Before the pandemic, students attended classes at the Inglewood campus and completed the remainder of their studies online.

The Western Association of Schools and Colleges Senior College and University Commission (WASC) granted UWLA Initial Accreditation in 2018 and set an Accreditation Visit for fall 2023. By virtue of the University's WASC accreditation status, qualified law students have been able to participate in federal financial aid programs since spring 2020.

At the time of inspection, the law school enrolled 204 students and the business school enrolled 20 students. This report addresses only the JD program, except as noted.

The law school pursues an opportunity mission, aiming "to provide student initiated inquiry-based learning experiences to enable resilient men and women from diverse backgrounds, without regard to age, sexual orientation or disability to become self-educators who will be ethical practitioners of the law and who will contribute to the democratization of the legal community without regard to age, sexual orientation or disability."

Dean Jay Frykberg has been UWLA Law's Chief Academic Officer since 2013. A *magna cum laude* graduate of the law school, he joined the full-time faculty in 2006, was appointed Dean in 2014 after serving as Interim Dean and became University Provost in late 2020. The faculty includes six

full-time and forty-six part-time instructors, all of whom are graduates of law schools approved by the ABA or regulated by the State Bar. With one exception, all instructors are licensed to practice law and 88 percent are State Bar licensees.

The academic year includes two 15-week semesters plus exam periods and an 8-week, mandatory summer session. Students must complete 85 semester units to graduate, including 73 units of required courses covering all subjects tested on the bar exam as well as practical skills. The 12 semester unit elective curriculum offers clinical and externship opportunities.

Since mid-March 2020, courses have been held synchronously by videoconference pursuant to a pandemic-based waiver by the Committee. Subsequent to the inspection, UWLA Law applied for the Committee's permission to offer a fully online JD program, in addition to its fixed-facility program.

Forty-six percent of the law school's students are women. The demographics of the law school's enrollment are as follows: American Indian or Alaska Native (1 percent), Asian (7 percent), Black or African American (9 percent), Hispanic/Latinx (14 percent), and white (57 percent).

Estimated total program tuition is \$90,015 and estimated total fees are \$2,465.

An accredited law school must maintain a minimum cumulative pass rate (MPR) on the bar exam of at least 40 percent amongst its graduates who take the exam. (Guideline 12.1) UWLA Law is compliant, though the law school must be vigilant, as pass rates were trending down until the law school saw a significant increase in 2021: 54.1 percent (2018), 50 percent (2019), 41.8 percent (2020), and 49.4 percent (2021). While the prior trend has been concerning, recent focus in this area has improved results.

Recommended Action by the Committee

The inspection team recommends that the Committee receive and file this Periodic Inspection Report, approve all recommended and suggested actions, continue the accreditation of University of West Los Angeles School of Law, and schedule the next periodic inspection for spring 2026 unless an earlier visitation is deemed necessary.

Recommended, Mandatory Actions

1. Guideline 1.6: The law school should adopt and publish written policies to ensure that disclosure of all private information to third parties is properly restricted and that students are clearly informed of the scope of their rights under FERPA.
2. Guideline 2.3(D)(1): The law school should revise the Student Handbook to include the required disclosure language.
3. Guideline 2.3(E)(2): The law school should revise all published references to accreditation by the Western Association of Schools and Colleges, in the Student Handbook, website, and

elsewhere, to indicate that the law school's degree-granting authority is based on accreditation through the Committee of Bar Examiners, as specified in the guideline.

4. Guideline 2.7(E): The law school should revise the policy on review of exam papers to state that students may inspect and copy exam questions and their own exam answers as provided by the guideline.
5. Guideline 4.5: The law school should continue to make efforts, when adding new faculty, to hire qualified graduates from other law schools to maintain a faculty with diverse educational perspectives.
6. Guidelines 4.7 and 4.8: The law school should revise its faculty evaluation policies to require that the instructor be promptly provided with a copy of the evaluation and that the evaluation include review of all criteria listed in Guidelines 4.7 and Guideline 4.8. The law school should report on implementation of these revisions in the next Annual Compliance Report.
7. Guidelines 2.7(B)(4): The law school should, in the required statement informing students about the basis for their final grades, explain the extent to which they will be evaluated by persons other than the course instructor, if any.
8. Guideline 7.1: The law school should evaluate its attrition, retention, disqualification, and grading practices over the past five years to determine what improvements, if any, should be made to ensure that students who lack the capacity to succeed are promptly identified and excluded. The school should report the results of its evaluation in its 2021 Annual Compliance Report.
9. Guidelines 8.1, 8.2, and 8.5: The law school should provide access to online law library material as required by the guidelines, by issuing passwords to students automatically, without the need for a request, upon or shortly after their enrollment.

Suggestions for Enhanced Compliance

1. Pursuant to Guideline 2.2(B), the law school should explain, in the refund policy, how refunds will be applied to students' financial aid accounts.
2. Pursuant to Guideline 14.1, the law school is encouraged to foster diversity and inclusion in recruitment, development, and retention of faculty.

Submission of Self-study

UWLA Law submitted a thorough and complete Self-study to assist the team in its assessment of the school's compliance with the Rules and Guidelines. Dean Frykberg responded promptly to requests for additional information and information he provided was considered when drafting this report.

Conduct of Site Visit

The inspection occurred during the pandemic when authorities warned that travel and face-to-face meetings should be limited. UWLA Law was given the choice to undergo a remote visit based on the same standards as an in-person visit, and the law school agreed.

Videoconference meetings were held with President Robert Brown, Board members, Dean Frykberg, administrators, professors, and students. The team concluded the videoconference portion of the visit by discussing their observations with Dean Frykberg in an exit interview.

The team also took virtual campus tours, reviewed the learning management platform, and observed class sessions. A sample of digital records was inspected, including applicant and student files; course materials and attendance records; examinations, assignments, and responses; and administrative files. At the Consultant's request, the law school invited students to send her comments about the school and one comment was received and reviewed.

SPECIFIC FINDINGS AS TO THE COMMITTEE'S RULES AND GUIDELINES

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

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

As part of the University, the law school is owned and operated by Sapere Aude, LLC, a for-profit, limited liability, minority-owned corporation established in California and in good standing with the California Secretary of State. UWLA has met the legal requirements to do business in the cities where campuses are located, Inglewood and Los Angeles. Since spring 2020, the University has been authorized to participate in the Title IV Federal Financial Aid program and appears to be complying with financial aid regulations.

Both campuses meet the requirements of the Americans with Disabilities Act (ADA). The student Information Handbook (Handbook) explains how to request accommodations. These requests are processed by Associate Dean Eric Zegarra, UWLA's ADA officer, pursuant to the Committee's protocols. Students are advised that testing accommodations granted by the law school may differ from those granted by the State Bar.

The Handbook mentions students' privacy rights under the Family Educational Rights and Privacy Act (FERPA) in a section on disclosure of academic performance information. The law school should adopt and publish policies to ensure that disclosure of all private information to third parties is properly restricted and that students are clearly informed of the scope of their rights under FERPA. Adequate policies are published on non-discrimination and the use of drugs and alcohol.

UWLA Law is compliant with California Business and Professions Code section 6061.7 requiring schools overseen by the Committee to post a specific list of statistics about their programs. The report was updated for 2021 and posted on the school's website (website) as required.

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

Generally, the law school's website and publications offer students and prospective students current, consistent information about accreditation, academic programs, faculty, and services at the law school. The Handbook, accessible through the website, states policies clearly and the law school employs sufficient personnel to deliver programs and services as promised.

Financial affairs are conducted with integrity. The University's finances are audited annually by an independent certified public accounting firm. Financial assets appear to be effectively managed and adequate controls are in place to provide reasonable protection against fraud. Tuition and fees are accurately described on the website and, as an institution eligible to offer federal financial aid, UWLA provides appropriately staffed financial aid services.

The refund policy satisfies Guideline 2.2(B). Pro rata refunds are made for withdrawal from a course or the JD program through the 60 percent point in the semester, after which no refund is made. Refunds are paid within thirty days after a triggering event. It is suggested that the school should explain, in the refund policy, how refunds will be applied to students' financial aid accounts.

To bring itself more fully into compliance with Guideline 2.3, the law school should amend the Handbook to include the disclosure mandated by Guideline 2.3(D)(1) and revise all published references to WASC accreditation, in the Handbook, website, and elsewhere, to indicate that the school's degree-granting authority is based on accreditation by the Committee of Bar Examiners. (Guideline 2.3(E)(2).)

UWLA operates as a for-profit California corporation and is not tax-exempt. (Guideline 2.4(A).) The school does not compensate individuals based on the number of persons enrolled, applying for admission, or registering. (Guideline 2.5.)

Non-academic discipline policies comply with Guideline 2.6. Prohibited conduct includes, for example, willful and material misrepresentation about qualifications for admission and academic dishonesty, and sanctions range from warning to dismissal. Students charged with misconduct are given written notice, an opportunity for a hearing before an impartial faculty panel, and a written final decision that includes a statement of facts, conclusions, and, if applicable, sanctions.

Academic standards are clearly stated. (Guideline 2.7.) Most courses, including all bar-tested subjects, are letter-graded from A to F on a traditional four-point scale, with plus and minus increments above D. Each grade increment is assigned a qualitative descriptor and a numerical value (e.g., a C grade is "minimally adequate" and carries 2.0 grade points). Academic standing is

evaluated after each term and good standing requires a cumulative grade point average (GPA) of 2.0. Pass/fail grading is used for Legal Externship, Independent Study, and Moot Court.

Students are informed that anonymous grading is used to the extent practicable but not, for example, in performance-based courses such as Trial Advocacy. (Guideline 2.7(A)(5).) Instructors are not allowed to give extra credit for class participation or to award other so-called “push” points.

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

The Handbook effectively communicates requirements for good standing, probation, dismissal, and graduation. To graduate, students must complete 85 units, including all required courses, and achieve a cumulative GPA of at least 2.0. Students may not take more than 84 months to complete their legal education.

All course syllabi follow an established template and state the basis for the final course grade. (Guideline 2.7(B).) As noted below, syllabi should give notice if someone other than the course instructor will evaluate students’ exams or other performance. (Guideline 2.7(D).)

The school prohibits plagiarism and follows a written policy to verify the authenticity of student work. (Guideline 2.7(C).)

Students are informed of their grades promptly. The Handbook states that students may view and copy exam “papers” but to more fully comply with Guideline 2.7 (E) the policy should state that students may inspect and copy exam questions and their own answers as provided by the guideline. An appropriate written grade review policy has been adopted in compliance with Guideline 2.7(F).

As noted, the law school should adopt and publish a more comprehensive written policy to address student privacy rights under FERPA. The school has, however, implemented appropriate policies and procedures to protect the confidentiality of disability records. Reasonable security and backup protocols are in place to protect the school’s computer systems, communications systems, and records against corruption, destruction, or loss. (Guidelines 2.8 and 2.9.)

Students are provided with services, experiences, and activities appropriate for a school with a full-time JD program. Opportunities include academic counseling, clinical and externship experiences, independent study, moot court, and a bar preparation program. (Guideline 2.10.)

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

The University is governed by a Board of Managers that typically meets at least three times a year. Currently the Board operates with ten members; five managers are law graduates, and the others have expertise in business, education, and nonprofit management. Shareholders serve on the Board but may not constitute a majority according to the Bylaws. Jay Askari, president of another higher education institution, is the current Board Chair.

The managers are actively engaged in strategic planning and oversight of the University's operational and academic policies and procedures. Much of the Board's work is accomplished through six committees. (Guideline 3.2) UWLA's President and Chief Executive Officer, Robert W. Brown, Jr., is responsible for day-to-day operations of UWLA and reports to the Board. He is a UCLA law school graduate and member of Sapere Aude, LLC, the University's corporate entity.

Jay Frykberg has been the law school's Dean since his interim appointment in 2013. In September 2020 he was named UWLA's Provost, Chief Academic Officer, and Chief Equity Officer, roles that will complement, rather than detract from, his responsibilities at the law school. He has been given the necessary authority necessary to perform his duties. (Guideline 3.2.)

The Dean has direct oversight of nine staff members, including the Registrar, three faculty members who coordinate the curriculum, and an associate dean and other support staff who direct student services, institutional research, e-learning, career services, and the library. University personnel handle admissions, enrollment, and marketing, and provide support for business office, finance, facilities, and other functions. The school does not have an advisory board. (Guideline 3.3.)

Registrar Patty White maintains the school's student records and is responsible for recording grades and issuing transcripts. (Guideline 4.1(C).) The administrative staff of twenty-seven full-time and eighteen part-time employees is adequate to support law school operations. Administrative functions are well defined by job descriptions and lines of authority are clearly drawn. All staff members interviewed during the visit appeared to be knowledgeable about the Committee's requirements and to be effective in their roles.

The Board of Managers, President, Dean, and other law school administrators work together effectively for the benefit of the law school and its students.

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

Dean Jay Frykberg manages UWLA Law's academic and non-academic affairs and, together with the faculty, establishes academic policies and programs. He earned his JD degree at UWLA Law in 2004, graduating *magna cum laude*, and is an active State Bar licensee. Dean Frykberg joined UWLA in 2005 as an adjunct instructor and became a full-time professor in 2006. Before being appointed Interim Dean in 2013 and Dean in 2014, he served as Associate Dean. He works full-time, splitting his time between campuses, and continues to teach Contracts.

Dean Frykberg has served on accreditation visit teams for WASC and the Committee and is a graduate of the WASC Assessment Leadership Academy. For five years, he was a State Bar Special Master, and he is now a member of the Committee's CSBARS (California State Bar Accredited and Registered Law Schools) committee. Since 2018, he has been Co-Chair of the CALS (California

Accredited Law Schools) organization. His scholarly work includes publications and presentations. Based upon Dean Frykberg's professional and academic credentials, he is qualified to serve as Dean and full-time administrator. (Guidelines 4.1(A)-(B).)

Associate Dean Eric Zegarra was appointed to his current role after four years as Director of Student Services. He oversees student services, assessment, and ADA matters from his office at the Chatsworth campus, where he also teaches Contracts. As a UWLA Law graduate, active State Bar licensee, and experienced legal educator and administrator, he is qualified to serve as a full-time administrator of that campus. (Guideline 4.1(B).)

As of fall 2020, the faculty included six full-time and forty-six part-time instructors. All instructors are graduates of law schools approved by the ABA or regulated by the State Bar. With one exception, all faculty members are licensed to practice, and 88 percent are State Bar licensees. Instructors have successful teaching and/or relevant professional experience in the subjects they teach; most have been teaching for a decade or more and several for more than thirty years.

UWLA's own graduates comprise 45 percent of the faculty and 50 percent of the full-time faculty, although three of the four instructors hired last year were graduates of other law schools. Under Guideline 4.5, the faculty "should possess a diverse educational background demonstrated in part by degrees earned from a variety of colleges and universities." To comply more fully, it is recommended that UWLA Law should continue to make efforts, when adding instructors, to hire qualified graduates of other law schools to maintain a faculty with diverse educational perspectives.

Faculty Bylaws state the faculty's primary authority with respect to the formulation, implementation, and supervision of academic policies and procedures. All instructors are members of the Faculty Senate, the primary governing body, which convenes twice each year and appoints members to seven faculty committees. The Academic Council, comprised of all full-time instructors, meets periodically to advise the Dean, and decide student petitions. (Guideline 4.2.)

UWLA Law has enough faculty to maintain a sound program. In required courses, the average class size is 16 students and practicum courses are limited by policy to no more than 20 students. (Guideline 4.3.)

Teaching loads are compliant with Guideline 4.4. Full-time instructors usually teach nine units each fall and spring, while adjunct professors typically teach one course per term. To encourage collaboration, different instructors are hired for each section of a multi-section course when possible. Instructors are expected to hold regular office hours, make themselves "as available as possible" to counsel students, reply promptly to student emails, and submit grades on time. During the visit, students expressed satisfaction with the faculty support they receive. (Guideline 4.4.)

Professors are expected to improve their teaching skills and remain current in the areas of law in which they teach. Faculty development activities are listed in the Faculty Handbook, such as retreats and workshops, and each year a faculty meeting is devoted to faculty development. UWLA recently hired a business professor as Director of Faculty Development to oversee an effort to

improve teaching skills, revamp peer evaluation processes, and develop a more effective academic onboarding experience across the University. (Guideline 4.6.)

Faculty evaluation processes meet some but not all requirements. (Guidelines 4.7-4.8.) Students complete evaluations after each course and each instructor completes a self-evaluation annually. A peer evaluation, by the Dean or another professor, is to be conducted in an instructor's first year and every third year thereafter, based upon "observation in the classroom or other instructional activities." According to the Self-study, the Dean is responsible for reviewing all course materials.

To bring itself into full compliance, the law school should revise its faculty evaluation policies to require that the instructor be promptly provided with a copy of the evaluation (Guideline 4.7) and that the evaluation include review of all criteria listed in Guidelines 4.7 and 4.8. The law school should report on implementation of these revisions in the next Annual Compliance Report.

A policy protecting Faculty Academic Freedom is found in the Faculty Handbook. (Guideline 4.10.)

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

The JD curriculum requires completion of 85 semester units and is designed to be completed in three or four academic years, depending on whether a student attends full- or part-time. An academic year consists of two 15-week semesters, fall and spring. An eight-week summer term is also offered. First-year students may begin the program in fall, spring, or summer.

Classes are taught in three-hour blocks, Monday through Friday. A full schedule of required courses is offered each year, with day and evening options at each campus, and students may choose their preferred campus and time slot. Students are assigned a "home" campus based on initial enrollment, but more than 70 percent take classes at both campuses, and more than 80 percent choose a mix of day and evening classes. (Guideline 6.5(D).) Until the pandemic, most courses were taught on campus. Since mid-March 2020, all on-campus courses have been held online through synchronous Zoom videoconference sessions.

To earn the JD, students at an accredited school must complete at least 1,200 hours of tracked, or "verified" academic engagement (VAE) over no fewer than 80 semester units. (Guideline 6.5(A).) UWLA Law students who complete the 85-unit program earn 1,275 hours of VAE. Each unit of credit represents fifteen hours of verified engagement and thirty hours of untracked homework and preparation. VAE may be earned by attendance in a physical classroom, participation in distance learning, or a combination of those modalities. (Guideline 6.5(B).) UWLA Law tracks each student's VAE by recording attendance at each class session.

Under Guideline 6.5(C), the law school must require students to complete "not less than eighty percent of the academic engagement in regularly class scheduled class hours or not less than eighty percent of the minimum hours of other types of academic engagement . . ." UWLA Law has established a compliant attendance policy. Faculty members are required to keep attendance

records and submit them to the Registrar's Office after each class, and students who violate the attendance policy are dismissed from the course.

Semester course loads vary from twelve to fifteen units for full-time students and from eight to ten units for part-time students. Full-time students attend six semesters and two summer terms, while part-time students attend eight semesters and three summer terms. The Handbook informs students of the Committee's degree-completion time limits. (Guideline 6.5(F) and (J).)

Course materials, and a sample review of class sessions, reflect the use of recognized texts, informative syllabi, and appropriate instructional formats. UWLA Law has developed a program to assess student learning outcomes in each course that also includes evaluation of the curriculum and faculty effectiveness. Class sizes are reasonable. (Guideline 6.5(K)-(N).)

Students have experiential learning opportunities at each campus. Advanced students may earn up to eight units of such credit, with each unit requiring at least fifty hours of work. In the Legal Clinic course, students assist families of children with special needs with matters related to their children's individual educational plans (IEPs) while in Legal Externship, students work with local public agencies, legal aid clinics, and judges. UWLA Law also sponsors a Moot Court program that has garnered both team and individual awards in national competitions. (Guidelines 6.6 and 6.9.)

The curriculum includes 73 units of required courses, including 55 units in subjects tested on the bar exam and 18 units of practicum courses, including Introduction to Legal Study (3 units), Legal Research & Writing (3), Advanced Legal Writing (3), Pre-Trial Litigation Procedure (3), Trial Advocacy (3) and Appellate Advocacy (3). Students must also complete 12 elective units. (Guidelines 6.7 and 6.9.)

Elective courses are designed to give students practical skills training or a substantive introduction to a specialized area of law, and include topics such as Courtroom Decorum, Debtor-Creditor Relations, and Domestic Violence. The website states the number of units offered for each elective course and gives notice that not all elective courses are offered each year. (Guidelines 2.3 and 6.8.)

As noted above, students expressed satisfaction with their opportunities to interact with faculty members. Lounge areas at both campuses promote student interactions. (Guideline 6.10.)

Final exams are given in almost all courses and midterm exams are given at the instructor's option. In subjects tested on the bar exam, exams must consist of bar-exam style essay questions except that, for subjects tested on the Multistate Bar Exam (MBE), one-third of the exam grade must be based on MBE-style questions. In practice-oriented courses, performance-style exams may be used. Exams must be one hour in length for each unit of credit given, up to a limit of three hours.

During the pandemic, students have been allowed to complete their exams in a take-home, open-book format over a 24-hour period, without proctoring software supervision. If classes do not resume on campus by fall 2021, ProctorU will be used to supervise exams in bar exam subjects. Letter grades have been issued for subjects tested on the bar exam, but pass/fail options have been

allowed in other subjects for students who earn at least a C- on the final exam. (Guidelines 6.11-6.14.)

Based upon a representative sample, the team found the law school's exam materials to be well drafted and to fairly test the subjects at hand. Further, grading records reflect the application of sound grading practices, except as noted below. (Guideline 6.14.)

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

UWLA Law's required curriculum includes 18 units of practical skills training and thus meets the mandates of Rule 4.160(F) and Guideline 6.9. All students must take Advanced Legal Writing (3 units), Appellate Advocacy (3), Introduction to Legal Study (3), Legal Research and Writing (3), Pre-Trial Litigation and Procedure (3), and Trial Advocacy (3).

Students who wish to pursue more training may do so while completing the 12 elective units needed to graduate. Practical skills electives are numerous and include courses such as Billing and Case Management, Client Counseling, and How to Start a Successful Law Practice in California.

Course descriptions, provided on the website, are sufficiently detailed to allow students and prospective students to identify courses that offer practical skills training. (Guideline 2.3 and 6.0; Rule 4.160(F).) After the inspection, UWLA Law amended its Legal Externship policy, consistent with existing practice, to require that site supervisors must be licensed attorneys with two years of experience, so externship units will also qualify as practical skills training under Guideline 6.9(E).

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

The law school has sound scholastic standards defining academic standing, disqualification, advancement in good standing and on probation, retention, and the requirements for graduation. (Guidelines 7.1 and 7.2.) Academic standing is determined after each semester and term. A cumulative GPA of at least 2.0 constitutes good standing and is required to graduate and, in most cases, to advance in the program. UWLA Law studied whether the good standing level should be raised but determined that 2.0 is the proper standard because a reasonable number of graduates with law school GPAs at or near 2.0 had passed the bar exam, some on the first attempt. (Guideline 7.4.)

Probation and dismissal are explained in the Handbook. Students completing the first semester or term are academically dismissed with a cumulative GPA below 1.7, a failing grade in any course, or a grade below C in Introduction to Legal Studies as a non-transfer student. Those with a cumulative

GPA below 2.0 but at least 1.7 are allowed to advance automatically on probation. After the second term, a student with a cumulative GPA below 2.0, but of at least 1.9, may petition the Academic Council to advance on probation. A student may be granted probation only once and must achieve a cumulative GPA of 2.0 by the end of the next term to avoid dismissal.

Academic support has been integrated into the curriculum for all students. Fundamental skills are covered in Law School Bootcamp, Introduction to Legal Studies, Legal Writing, Legal Analysis and Writing, Legal Analysis and Writing B, MBE Review and MBE Review B. Students on probation or with a cumulative GPA below 2.3 are required to repeat the basic legal writing course for no academic credit. Peer mentoring, a bar preparation course, and academic advisement by classroom professors are also offered.

In May 2021, the law school added another academic support event, Law Day, a two-day mock bar exam featuring multiple-choice and essay exams, with feedback. About 20 percent of the student body participated but Law Day is envisioned to become an annual, mandatory event. (Guideline 7.3.)

The law school will admit qualified special students but has not done so in the past three years. (Guideline 7.5 and 7.6.)

Course repetition policies comply with Guidelines 7.7 and 7.8. Duplicate credit is not awarded. A student who fails a required course and remains in good standing must repeat the course when it is next offered. Both grades will remain on the transcript but only the new grade will be used to compute the student's GPA. A student who fails an elective course may choose to repeat it, in which case both grades will appear on the transcript and be used in computing the GPA.

Instructors generally draft and grade their own essay exam questions. When multiple sections of a course are taught, often the same exam is given to all sections by agreement of the instructors. Dean Frykberg has encouraged the faculty to allow exam drafting and grading to be done by specially trained instructors, rather than course instructors, but that has occurred infrequently. To comply with Guideline 2.7 (B)(4), the required statement informing students about the basis for their final grades should explain the extent to which they will be evaluated by persons other than the course instructor, if any.

Most courses are letter-graded from A to F on a traditional four-point scale while pass/fail grading is used for some courses other than bar-tested subjects. Exams are reviewed by the Dean before being administered and instructors are clearly informed about grading expectations. Grades are reviewed by a faculty committee for consistency and signs of grade inflation, and any recommendation for grade adjustment may be appealed to the Faculty Senate.

Grade tables for the past three years show reasonable consistency and cohort correlation but grading has varied somewhat from stated expectations. According to the Self-study, a significant majority of grades awarded are in the C range, which was true in 2017-2018 (56 percent) and 2018-2019 (61 percent) but not true in 2019-2020 (49 percent). It is expected that no more than 15

percent of grades will be B- or above, but such grades have accounted for between 34 percent and 44 percent of grades. Few grades have been given below C-, ranging from 4.5 percent to 6 percent. (Guideline 7.9.)

As a general rule, most attrition at accredited law schools typically occurs by the end of the first year and is fairly limited thereafter. Data submitted with the Self-study do not permit a thorough attrition analysis, but first-year attrition at UWLA Law is much lower than would be expected, ranging from six to eight percent over the past three years. Over a five-year period, only 9 percent of first-year students did not continue, including 5 percent who were academically dismissed. The 2020 Annual Report indicates that upper-level disqualifications are higher than would be expected, at least at the West Los Angeles campus. In two of the past three years, disqualifications of upper-level students were almost equal to first-year disqualifications and in 2019, more than twice as many upper-level students were dismissed as first-year students, including students apparently on the verge of graduation.

In combination, these data raise concerns about the degree to which students are being accurately evaluated early in their law studies. It is recommended that the school evaluate its attrition, retention, disqualification, and grading practices over the past five years to determine what improvements, if any, should be made to ensure that students who lack the capacity to succeed are promptly identified and excluded, as required under Guideline 7.1. The school should report the results of its evaluation in its next Annual Compliance Report.

The law school has complied with the record-keeping requirements of Guideline 7.10.

Under Guideline 7.11, a school offering distance learning must verify the minimum required academic engagement for the JD degree. At UWLA, the use of distance learning has been limited to courses taught through synchronous class sessions and the hours of academic engagement by each student have been verified by the school's attendance records, as permitted by Guideline 7.11(C)(2).

The law school allows students currently enrolled and in good standing at other law schools to apply for enrollment as visiting students, as detailed on the website. (Guideline 7.12.)

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

UWLA Law admits students in fall, spring, and summer. Applicants are considered for admission in all permitted categories, but most admitted applicants have earned an associate's degree or bachelor's degree. Since 2018, the law school has accepted only seven special students, those who sought entry based on college-level equivalency test scores. Individuals with prior law school experience are eligible for admission, including those who were disqualified. (Guidelines 5.1 and 5.2.)

A Faculty Admissions Committee, consisting of the Dean, Associate Dean, and at least three faculty members, sets admissions policies and reviews all complete admissions files. Director of Recruitment and Enrollment Troy Brown manages the admissions process.

Admissions procedures are explained on the website. Applicants must submit an application form, fee, personal statement, two recommendation letters, official transcripts, and an LSAT score. The application asks whether applicants have attended another law school and, if so, whether they left in good standing. All applicants are interviewed by Director Brown or, in exceptional cases, members of the Admissions Committee. (Guideline 5.4.)

Effective procedures are in place to ensure that applicants are considered for admission only if their credentials satisfy the pre-legal education requirements of California Business and Professions Code section 6060(c) and that official transcripts or other credentials are on file within forty-five days of the start of a student's first term. A sample file review confirmed that student files contain required documents, including official transcripts of all prior education. (Guidelines 5.3 and 11.1(B)-(C).)

UWLA Law considers prior education and life experience, but applicants must have an LSAT score at or above the 18th percentile to be admitted. The law school has determined that its admissions criteria are properly calibrated to admit only those students who have a reasonable prospect of completing the JD program and passing the bar exam. In a study of graduates' admissions credentials, law school GPAs, and bar exam pass rates, UWLA Law found no correlation between low LSAT scores and low law school GPAs and found that some students with low GPAs passed the bar exam.

Applicants with LSAT scores in the fifth to seventeenth percentiles, who are otherwise eligible for admission, may demonstrate their academic ability by becoming "participants" in UWLA Law's Performance Program. Participants are not enrolled but are permitted take the three-unit Introduction to Legal Studies (ILS) course; those who earn a grade of at least C+, after taking the course up to three times, are admitted as JD students. The law school does not charge tuition, only a \$250 registration fee, and does not reveal participants' contingent status to the professor or students. In 2020-2021, participants accounted for between 23 percent and 77 percent of those taking ILS courses.

The Performance Program has been in place since 2010. According to Dean Frykberg, about one-third of participants qualify for admission to the JD program after taking ILS and they go on to graduate and pass the bar at the same rates as those admitted based on their LSAT scores.

In the 2019-2020 academic year, 63 percent of first-year applicants were admitted. Of those who enrolled in the first year, their 75th, 50th, and 25th percentile undergraduate GPAs were 3.91, 3.01, and 1.7 (with approval), respectively. Their 75th, 50th, and 25th percentile LSAT scores were 152, 143, and 120, respectively.

UWLA Law has compliant policies and practices for the admission of applicants with prior law school history. About 20 percent of all first-year students admitted in fall 2020 had prior law school experience; of those students, only 25 percent had been previously dismissed. As required, the Admissions Committee has documented its reasons for admitting previously dismissed students.

In appropriate circumstances, transfer credit is awarded pursuant to transfer credit policies stated in the Handbook. Transfer credit is limited to 42 units and is never awarded for experiential courses. (Guidelines 5.6-5.8.)

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

Since UWLA acquired the San Fernando College of Law in 2002, UWLA Law has operated as a single law school with two campuses. The West Los Angeles campus is designated as the primary administrative office, and it houses required physical records; the San Fernando Valley campus is a branch campus. The law school files a single Annual Compliance Report with separate reports for each campus on matters such as admissions, enrollment, and grading.

In all significant respects, the law school offers the same educational experience to JD students at both campuses. Both locations are governed by a single Board and one Dean. Academic and operational policies and procedures apply uniformly without regard to campus, as published in a Student Handbook distributed to all law students and a Faculty Handbook applicable to all law faculty. Faculty credentials and experience, educational opportunities, student services, information technology, and campus amenities are similar at both locations.

The Dean maintains an office at each campus and regularly splits his time between them, while the Registrar is headquartered in Inglewood and visits the Chatsworth campus on occasion. Each campus has a full-time faculty presence as well as assigned library and IT staff. Students expressed satisfaction with the facilities and services at both campuses, although at the time of the inspection they had not had the opportunity to visit the new Chatsworth location due to the switch to online classes during the pandemic.

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

UWLA meets the Committee's library standards. The libraries at both campuses are overseen by

Librarian Shay Aboutalebi, a UWLA Law graduate, who is assisted by a Library Services Manager and several part-time staff members. Each library is equipped with adequate furnishings to support research, quiet study, and small group meetings. Users have access to several computer terminals, a networked printer, and a copier/scanner. Textbooks are available for library use and checkout. Wireless high-speed internet access is provided throughout both campuses.

The libraries are typically open for 48 hours each week, Monday through Saturday, although during the pandemic the campuses have been closed and access to library materials has been limited to electronic resources. (Guideline 8.1.)

All Committee-required resources (Guideline 8.2) are also provided through subscriptions to the Lexis-Nexis and Westlaw legal databases. Under Guideline 8.5, a law school must provide each student with access to such online materials “during the student’s attendance.” UWLA Law issues passwords to the databases only when students request them, and according to library staff many students wait to do so until the summer of their first year. To be more fully compliant, and to prompt student awareness and use of these resources, the law school should provide access to online law library material as required by the guidelines, by issuing passwords to students automatically, without the need for a request, upon or shortly after their enrollment. (Guidelines 8.1, 8.2, and 8.5.)

The library at each campus also houses a print collection that includes some required texts, as well as other authorities such as practice guides. (Guideline 8.2.)

As required by Guideline 8.3, students receive legal research instruction in both online and print-based research, except that instruction in print-based research has been suspended during the pandemic. The required curriculum includes four legal research and writing courses, for a total of 12 units, during which students complete numerous assignments requiring research skills.

Library management software is used to track essential functions and records of library expenditures are properly maintained. (Guideline 8.6.)

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

Each UWLA campus occupies leased space in a modern commercial building. The West Los Angeles campus has served as UWLA’s headquarters for more than a decade pursuant to a lease that expires in December 2021. In March 2020, with the Committee’s approval, the law school relocated the San Fernando Valley campus one block away to another Chatsworth facility, in space subleased from Campbellsville University pursuant to an agreement that expires in June 2022. The new location will become operational when pandemic conditions allow.

At the West Los Angeles campus, UWLA has exclusive use of a 12th floor suite of about 22,000 square feet in a high-security, multi-story office building. Six classrooms of varying size are

appointed with adequate seating, lighting, acoustics, and electrical outlets for laptop use. Classroom capacity is 240 students, allowing for significant enrollment growth.

Private offices are available for President Brown, Dean Frykberg, Registrar White, one full-time professor, and several key employees, including the Chief Financial Officer. Other employees occupy workstations in a large open area and adjunct instructors have access to a private office to counsel students and prepare for class. Additional facilities include separate lounges for staff and students, a large conference room, and a spacious library. Parking in the building's parking structure is validated for classes or law school business during the day and free in the evenings and on weekends. Annually, the West Los Angeles campus hosts a two-day seminar in which up to thirty judges give presentations on cultural competency for attorneys and law students.

The Chatsworth facility is a modern 43,000 square foot, single-story building that UWLA shares with a Campbellsville University graduate program, Phillips Graduate Academy (PGI), and its family counseling center. The law school has the right of first refusal to use eight classrooms of varying size, with seating capacity for 275 and adequate lighting, acoustics, and electrical outlets for laptop use. This shared-use arrangement is not expected to impede law school operations because PGI has only four students and the business school is not expected to offer classes at the campus.

Private offices are assigned to the Dean, Associate Dean, and three faculty members, while two offices are used by the Admissions Office and business school. Shared spaces include a large library, four conference rooms, staff break room, and student lounge. Parking is ample and free, with reserved spaces for regular staff.

UWLA's information technology infrastructure is current, secure, and adequate to needs at both campuses. Classroom resources include digital projectors and learning management software. Lecture capture equipment will be installed in all classrooms by fall 2021. Commercial-standard wireless internet access is provided, with fiber-optic connections completed in Chatsworth and pending in Inglewood. The University is also evaluating hybrid classroom technology, to allow simultaneous instruction to students in the classroom and those attending live online.

Several software platforms are used for record-keeping and academic operations and access to these platforms is appropriately controlled. Authorized personnel can produce all school data at either campus. (Guideline 9.1) Campus Café, a cloud-based enterprise resource planning (ERP) application, is used to manage admissions, enrollment, student records, and business records. Desire2Learn (D2L), a learning management system, is used by instructors and students to communicate and exchange course materials. Online synchronous classes are held through the Zoom videoconference platform and archived sessions of many classes are available through D2L.

Reasonable steps have been taken to protect UWLA's computer systems, communication systems, and written and electronic records against corruption, misuse, or destruction. Software vendors are selected based on their adherence to high security standards, standard security protocols are followed, and appropriate redundancy is provided. The University employs competent personnel,

including an IT consultant, and provides sufficient resources to maintain the law school's technology infrastructure. Service issues occur infrequently and are carefully tracked and resolved.

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

As a part of the University, the law school has adequate present and anticipated financial resources to comply with Rule 4.160(L) and related guidelines. Audited financial statements for three years were submitted for review, together with a budget for the current fiscal year, and budget projections through fiscal year 2024. Annual audits have been conducted by Vasquez & Company LLP, a certified public accounting firm based in Glendale, California.

UWLA Law is the primary source of revenue for the University. Total law school enrollment has declined by 8.3 percent since 2017, in part due to 19.6 percent drop in first-year enrollment in 2019. First-year enrollment rebounded by 19.7 percent in 2020, perhaps triggered in part by the availability of federal financial aid in spring 2020. The Dean is optimistic that annual growth of 10 percent will be achieved over the next several years, based on financial aid and the prospect that the Committee may grant the law school permission to add a fully online JD program.

Estimated total program tuition is \$90,015 and estimated total fees are \$2,465. It is anticipated that tuition will be raised in fall 2021, by an amount yet to be decided.

The University is on track to meet or slightly exceed the modest surplus projected for the current fiscal year and based on conservative estimates total income is projected to almost double each year through fiscal year 2024. These projections include enrollment growth in the business school, from twenty to fifty students.

Since fiscal year 2017, the University has seen modest to substantial gains in net income, except in 2019 when a dip in tuition revenue contributed to a moderate net loss. By 2020, however, the institution's financial position had improved considerably, with net income of \$380,000 buoyed by increased tuition revenues and a substantial Paycheck Protection Program loan, now forgiven. The members have made cash contributions to settle notes payable and for other purposes and current assets include cash and cash equivalents of about \$1.5 million.

The financial impact of the COVID-19 pandemic and its aftermath remains uncertain at the time of the inspection.

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

The law school has met the record-keeping requirements of Guideline 11.1. Primary responsibility for maintaining the school's records belongs to Registrar Patty White. A seventeen-year employee at UWLA, she has been in her current position for five years and works full time.

Most current records are now maintained in digital format, although a few records are also held in redundant paper format for ease of use, such as admissions files. Legacy hard copy records are held at the West Los Angeles campus.

Digital files are password-protected, accessible only by authorized personnel, and backed up pursuant to the University's standard data protocols. Access to hard copy legacy files is controlled by Registrar White. Adequate security and backup systems are in place to protect the records against unauthorized use, corruption, and destruction. (Guideline 11.1.)

Hard copy admissions files are the responsibility of Admissions Director Troy Brown. Admissions records are held for at least one year for all applicants, as required. Permanent student files are maintained by the Registrar's Office and include matriculants' applications and other required records. Disability documents are secured in the office of Associate Dean Eric Zegarra. UWLA Law staff are careful to ensure that official transcripts are timely obtained and held as required.

Transcripts include all required information, including grade information for transfer students, and transcript changes are governed by a written policy. (Guideline 11.1(A)-(D).)

Recently Registrar White has assumed responsibility for ensuring that faculty files hold all documents required by Guideline 11.1(H), including official transcripts of instructors' legal education. Each instructor's bar licensure status is confirmed annually and disciplinary measures or negative actions, if any, will be reported to the Dean.

At the time of inspection, the law school was completing a major transition to a cloud-based enterprise resource planning (ERP) application, Campus Café, that will be used to manage admissions, enrollment, student records, and business records. Historical records, including transcripts, were being transferred from Transcript, the law school's former proprietary software.

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

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

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

An accredited school must maintain a minimum cumulative five-year bar exam pass rate (MPR) of at least 40 percent among its graduates who take the examination. UWLA Law has done so, having achieved an MPR of 54.1 percent in 2018, 50.0 percent in 2019, 41.8 percent in 2020 and 49.4 percent in 2021. After a number of years of decline, it is helpful to see the MPR increase, and the school is encouraged to continue to focus on improvement in this area in order to ensure continued compliance.

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

UWLA has established policies and practices that are intended to offer fair treatment and equal opportunity. (Guideline 14.1.) A Non-Discrimination Policy provides for broad protection, stating in pertinent part:

UWLA does not discriminate on the basis of race, color, sex, age, national or ethnic origin, religion, sexual orientation, ancestry, military discharge status, marital status, parental status, or any other protected status in administration of its educational policies, admission policies, scholarship and loan programs.

The law school also has a Policy on Sexual Harassment, Sexual Assault Policy, and procedures for the handling of complaints based on these and other types of misconduct.

As reported in the 2020 Annual Compliance Report, over 56 percent of the JD students are women. Students self-identified as belonging to racial or ethnic groups as follows: American Indian or Alaska Native (1 percent), Asian (7 percent), Black or African American (9 percent), Hispanic/Latino of any race (14 percent) and white (57 percent). Approximately 11 percent of students declined to identify themselves by race or ethnicity. More than 40 percent of the law school's graduates in the past five years were born outside the United States.

Among the faculty, one-third of instructors are women and three-fourths are white. Six instructors are Black or African American, three instructors are Asian, two instructors are Hispanic/Latinx, and two declined to self-identify. The law school is encouraged to foster diversity and inclusion in recruitment, development, and retention of faculty.

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

UWLA Law timely submitted an Annual Compliance Report and all other required submissions and responses to requests by the State Bar have been timely addressed by the school.

CONCLUSION AND RECOMMENDATION

The team recommends that the Committee receive and file this Periodic Inspection Report, approve the team's recommended and suggested actions, continue the accreditation of the University of West Los Angeles School of Law, and schedule its next periodic inspection in spring of 2026, unless an earlier visitation is deemed necessary by the Committee. The school should provide an update on its progress toward the recommendations noted as part of its 2021 Annual Report.



SINCE 1966

SCHOOL OF LAW
OFFICE OF THE DEAN

July 29, 2021

Natalie Leonard, Esq.
Principal Program Analyst, Educational Standards
Office of Admissions
The Committee of Bar Examiners
of the State Bar of California
180 Howard Street
San Francisco, California 94105-1639

***** Transmitted by Email*****

Re: Acceptance of State Bar Inspection Team's Report and Actions Taken to Address Recommendations within Report of April 28-30, 2021, Periodic Inspection

Dear Ms. Leonard:

Pursuant to your letter Re: Periodic Inspection Report for Law School Review dated July 13, 2021, this will constitute the response of the University of West Los Angeles' School of Law ("UWLA"). UWLA is in agreement with and accepts the team report and below addresses its response to actions taken to address both mandatory and suggested actions contained and discussed within the Periodic Inspection Report of the University of West Los Angeles to the extent that the law school has already started or completed the recommendations noted in the report

That said, the following will address *seriatim* UWLA's actions taken to date regarding the nine (9) Recommended, Mandatory Actions and then the two (2) Recommended, Suggested Actions appearing on pages three (3) through four (4) of the Inspection Report:

Recommended, Mandatory Actions:

1. Guideline 1.6: The law school should adopt and publish written policies to ensure that disclosure of all private information to third parties is properly restricted and that students are clearly informed of the scope of their rights under FERPA.

UWLA is in now more perfect compliance with Guideline 1.6 through adoption and publication of the below language within UWLA's School of Law's Student Information Handbook at page 78. Which is quoted below and located at https://uwla.edu/apps/pages/index.jsp?uREC_ID=321742&type=d&termREC_ID=&pREC_ID=606640:

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Principal Program Analyst, Educational Standards
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“STUDENT RECORDS (FERPA)”

A. Access to Student Records

In accordance with Section 99.5 of Title 34 of the Code of Federal Regulations, the following rights are provided for all UWLA students under the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. Sec. 1232g (Supp. IV, 1974):

1. The law school maintains records for each student that include name, address, student identification number, information on parents, guardian, and spouse, general information on academic status at the law school, previous school data, results of standardized admissions examinations, courses previously taken or being taken, credits, and grades. Applicants for financial aid have an additional file established to maintain financial aid records.
2. The Registrar’s Office is responsible for maintaining all of these records, except for those involving financial aid. All records are available to the Registrar, the Dean, the Chief Financial Officer, the Associate Dean, the Director of Financial Aid, the faculty of the law school, and their respective staffs for the normal academic and business purposes of the law school. There may be instances where student records need to be shared between UWLA, its accreditors, and other institutions for legitimate academic purposes.

Records involving financial aid are maintained by the Director of Financial Aid and are available to the Director and staff, the Dean, and the Chief Financial Officer, for the purpose of granting and administering the law school financial aid program. All of these records are also available to such other organizations and persons as are entitled to them under Part 99 of Title 34 of the Code of Federal Regulations.

Students have the right to provide written consent before the law school discloses personally identifiable information from student records, except to the extent that FERPA authorizes disclosure without consent. UWLA discloses education records without a student’s prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests. A school official is a person employed by UWLA in an administrative, supervisory, academic, research, or support staff position (including security unit personnel); or a person serving on the board of managers. A school official may also include a volunteer or contractor outside of the law school who performs an institutional service or function for which the law school would otherwise use its own employees and who is under the direct control of the law school with respect to the use and maintenance of personally identifiable information from education records, such as an attorney, auditor, collection agent, housing management

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company personnel, or a student volunteering to assist another school official in performing his or her tasks. External agents of the law school that are considered school officials with legitimate educational interests include organizations such as the National Student Clearinghouse. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for UWLA. Upon request, the law school also discloses education records without consent to officials of another school in which a student seeks or intends to enroll or has already enrolled.

Students have the right to file a complaint with the U.S. Department of Education concerning alleged failures by UWLA to comply with the requirements of FERPA. The name and address of the office that administers FERPA is as follows:

Family Policy Compliance Office U.S. Department of Education 400 Maryland Avenue, SW
Washington, DC 20202

FERPA permits the disclosure of personally identifiable information from students' education records, without consent of the student, if the disclosure meets certain conditions found in §99.31 of the FERPA regulations. These situations include the following:

1. disclosure to other school officials, including faculty, within UWLA whom the law school has determined to have legitimate educational interests;
2. disclosure to authorized representatives of the U.S. Comptroller General, the U.S. Attorney General, the U.S. Secretary of Education, or state and local educational authorities, such as a state postsecondary authority that is responsible for supervising the law school's state-supported education programs;
3. disclosure in connection to financial aid for which the student has applied or which the student has received, if the information is necessary to determine eligibility for the aid, determine the amount of the aid, determine the conditions of the aid, or enforce the terms and conditions of the aid;
4. disclosure to organizations conducting studies for, or on behalf of, the law school, in order to (a) develop, validate, or administer predictive tests, (b) administer student aid programs, or (c) improve instruction;
5. disclosure to accrediting organizations to carry out their accrediting function;

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6. disclosure to comply with a judicial order or lawfully issued subpoena; and
7. disclosure to appropriate officials in connection with a health or safety emergency.

The law school retains documentation, available to the student and kept with his or her file, of all persons and organizations, other than those authorized and designated above, requesting or obtaining access to the file. This record will indicate specifically the legitimate interest that each person or organization obtaining access to the records has in such records. Where records are furnished in compliance with judicial order or pursuant to any lawfully issued subpoena, students will be notified in advance of the law school's compliance.

3. Students are allowed access to their records as follows: A student may inspect his or her academic transcript during normal working hours in the Registrar's Office. To see other records, the student must submit a written request to the Registrar, the Director of Financial Aid, the Dean, or to their staff, as appropriate. A mutually convenient time will be arranged within 15 working days after receipt of the request for the student to examine the records of his or her file. At that time, the student may examine all records in the file with the exception of those specifically exempted by Part 99 of Title 34 of the Code of Federal Regulations. The student may obtain copies of any of the records available to him or her. A student may not obtain copies of another institution's transcript or letters of recommendation. All reasonable requests for explanations or interpretations of the records will be honored, and if inaccurate, misleading, or otherwise inappropriate data are found in the records, they will be promptly corrected or deleted. The student also has the right to insert into the records a written explanation respecting the contents of such records.

If the student and the Registrar, or the Director of Financial Aid, or the Dean, or their staff, do not agree on any item contained in the records, the student may submit a written request to the Provost for a hearing to challenge the content of the records. The Provost will schedule such a meeting within 30 days after receipt of the request and will notify the student reasonably in advance of the hearing of its date, time and place. The hearing will be before a Board composed of the Provost, Dean, or their designated alternates, and at least one disinterested member of the faculty who shall be appointed by the Dean. None of those hearing the challenge may have a direct interest in the outcome. The student will be afforded a full and fair opportunity to present evidence relevant to the issues raised and may be assisted or represented by individuals of his or her choice at his or her own expense, including an attorney. The decision of the Board on the correctness of the record, as determined by majority vote, will be rendered in writing within ten days after the conclusion of the hearing, and will be

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final. This decision will be based solely upon the evidence presented at the hearing and will include a summary of the evidence and of the reasons for the decision.

If, as a result of the hearing, the law school decides that the information in the files is inaccurate, misleading, or otherwise in violation of the privacy or other rights of the student, the law school shall amend the records accordingly and so inform the student in writing. However, if as a result of the hearing, the law school decides that the information is not inaccurate, misleading, or otherwise in violation of the privacy or other rights of the students, it shall inform the student of the right to place in the records a statement commenting on the information in the records and/or setting forth any reasons for disagreeing with the decision of the law school.

4. At its discretion, UWLA may provide “directory information” in accordance with the provisions of FERPA. Directory information is defined as that information which would not generally be considered harmful or an invasion of privacy if disclosed. Designated directory information at UWLA includes the following: student’s name, address, telephone listing, electronic mail address, photograph, date and place of birth, dates of attendance, grade level, enrollment status (e.g., full-time or part-time), participation in officially recognized activities, degrees, honors and awards received, and the most recent educational institution attended. Students may block the public disclosure of directory information by notifying the Registrar’s Office in writing.

Students should consider very carefully the consequences of a decision to withhold directory information. A non-disclosure block will call for UWLA not to release any or all of this “directory information;” thus, any future requests for such information from non-UWLA persons or organizations will be refused unless required by law.

UWLA will honor a student’s request to withhold directory information but cannot assume responsibility to contact you for subsequent permission to release this information. Although the initial request may be filed at any time, requests for non-disclosure will be honored until removed, in writing, by the student. Regardless of the effect upon you, UWLA assumes no liability as a result of honoring your instructions that such information be withheld.

5. No student can be required to waive rights under Part 99 of the Code of Federal Regulations. However, a student may voluntarily waive right of access to confidential statements made by third parties respecting admission to educational agencies or institutions, applications for employment, or the receipt of an honor or honorary recognition. In case of waiver, the confidential statements will be used solely for the purposes for which they were specifically

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intended, and the student will, upon request, be notified of the names of all persons making such confidential statements. If a student should desire to waive right of access, so as to facilitate the obtaining of a confidential statement of this nature, he or she should contact the Registrar's Office.

6. The law school reserves the right to destroy from time to time any and all records that it maintains on a student, except to the extent that the law requires their maintenance for a longer period of time. However, access to records which has been requested under Part 99 of the Code of Federal Regulations, are not allowed to be and will not be destroyed until such access has been granted or a decision to deny such access has been arrived at as described in (3) of this section.

7. Any student has the right to file a complaint with the United States Department of Education concerning an alleged failure by the law school to comply with the provisions of Section 438 of the General Education Provision Act (20 U.S.C.A. Section 1232g)."

2. Guideline 2.3(D)(1): The law school should revise the Student Handbook to include the required disclosure language.

UWLA is in now more perfect compliance with Guideline 2.3(D)(1): through adoption and publication of the below revised language within UWLA's School of Law's Student Information Handbook at page 14. Which is quoted below and located at https://uwla.edu/apps/pages/index.jsp?uREC_ID=321742&type=d&termREC_ID=&pREC_ID=606640:

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

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3. Guideline 2.3(E)(2): The law school should revise all published references to accreditation by the Western Association of Schools and Colleges, in the Student Handbook, website, and elsewhere, to indicate that the law school's degree-granting authority is based on accreditation through the Committee of Bar Examiners, as specified in the guideline.

UWLA is in now more perfect compliance with Guideline 2.3(E)(2): through revision and publication of its references to accreditation by the Western Association of Schools and Colleges, in the Student Handbook, website, and elsewhere, to indicate that the law school's degree-granting authority is based on accreditation through the Committee of Bar Examiners, as specified in the guideline. The below revised language within UWLA's School of Law's website at https://www.uwla.edu/apps/pages/index.jsp?uREC_ID=321729&type=d and https://uwla.edu/apps/pages/index.jsp?uREC_ID=321729&type=d and within the Student Information Handbook at page 12. Which is quoted below and located at https://uwla.edu/apps/pages/index.jsp?uREC_ID=321742&type=d&termREC_ID=&pREC_ID=606640:

4. Guideline 2.7(E): The law school should revise the policy on review of exam papers to state that students may inspect and copy exam questions and their own exam answers as provided by the guideline.

UWLA is in now more perfect compliance with Guideline 2.7(E): through adoption and publication of the below revised language within UWLA's School of Law's Student Information Handbook at page 57. Which is quoted below and located at https://uwla.edu/apps/pages/index.jsp?uREC_ID=321742&type=d&termREC_ID=&pREC_ID=606640:

"Examination Papers

Final examination papers are retained by the School for one year and, therefore, are not returned to the students. They may be viewed in the office during specified posted hours. Students are welcome to make photocopies (at student's expense.)

UWLA allows students to inspect and copy examination questions and their answers to those questions (other than for multiple-choice, true-false, and similar tests) for a reasonable period after grades are recorded. UWLA allows students to compare their answer sheets to the answer key for multiple-choice, true-false, and similar tests for a reasonable period of time after grades are recorded. UWLA releases multiple-choice, true-false, and similar questions and answers to students only with the professor's approval which is discretionary."

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5. Guideline 4.5: The law school should continue to make efforts, when adding new faculty, to hire qualified graduates from other law schools to maintain a faculty with diverse educational perspectives.

UWLA will of course endeavor to make efforts when adding instructors to hire qualified graduates of other law schools to maintain a faculty with diverse educational perspectives. This recommendation by the Committee has been transmitted to UWLA's Faculty Hiring and Retention Committee. Additionally, over the last two years UWLA has hired 13 new law professors and of those 13, none were UWLA graduates and nine (9) were female.

6. Guidelines 4.7 and 4.8: The law school should revise its faculty evaluation policies to require that the instructor be promptly provided with a copy of the evaluation and that the evaluation include review of all criteria listed in Guidelines 4.7 and Guideline 4.8. The law school should report on implementation of these revisions in the next Annual Compliance Report.

UWLA is in now more perfect compliance with Guidelines 4.7 and 4.8: through adoption and publication of the below revised language within UWLA's Faculty Handbook at page 19. Which is quoted below:

"Evaluation of Faculty

Several evaluation procedures are in place (as outlined in the below quoted guidelines for the School of Law, UWLA's process for the evaluation of instructor competence is to comply with the below guidelines) for the purposes of: 1) assisting faculty members in improving their teaching effectiveness and their contribution to the School of Law or the School of Business; 2) identifying faculty excellence and accomplishments; and 3) assisting the Deans in making decisions relating to retention, assignment or courses and other projects, and salary.

To bring UWLA's Faculty Evaluation Policies in to a more perfect alignment with our programmatic accreditor, the following guidelines are quoted verbatim from the Committee of Bar Examiners and will be complied with in all School of Law Faculty evaluations commencing with the Fall 2021 semester and going forward.

"4.7 Evaluation of Instructors.

(A) A law school must adopt a written process for the evaluation of instructor competence. In evaluating the competence of an instructor, the factors to be considered are:

- (1) The instructor's education, knowledge, and experience in the subject matter;
- (2) The instructor's competence in the classroom or in other instructional activities;
- (3) The instructor's teaching skills given the technology and methodology used in instruction, and the quality of participatory experiences employed;
- (4) The instructor's organization of the course as demonstrated by outlines and syllabi;
- (5) The quality, nature, and type of examinations and assignments, and the quality of grading;
- (6) The relation between the field of instruction and the area of specialization, if any, of the instructor in private practice or other professional activities; and
- (7) The years of experience, both in teaching and in private practice or other professional activities.

(B) A law school is not required to evaluate guest lecturers invited to address specific class sessions during a course.

(C) On and after the effective date of these guidelines, a law school must:

- (1) evaluate each newly hired instructor not less than once in the instructor's first academic year of instruction and then not less than once every third academic year thereafter and must, in addition to promptly providing a copy of the evaluation to the instructor, include a written report on each evaluation in the instructor's file promptly upon its completion; and

(2) evaluate all other instructors at least once within the next three academic years of instruction and then not less than once every third academic year thereafter and must, in addition to promptly providing a copy of the evaluation to the instructor, include a written report on each evaluation in the instructor's file promptly upon its completion.

4.8 Basis of Instructor Evaluations.

The evaluation of instructor competence is generally determined by observation in the classroom or other instructional activities, which may include, for distance-education courses, monitoring both synchronous and asynchronous activities. Evaluation also includes review of the materials used in the course, examinations given, and the extent to which examinations and grading standards provide a reasonably accurate appraisal of each student's ability. A comparison of course grades with examination scores in like subjects and the relation between the two are regarded as some indication of the quality of instruction, examinations, and grading standards. A law school may not base instructor evaluations solely on student surveys or the input or assessment of one person."

a. **Student Evaluation**

Faculty members are evaluated by students every semester in each course they teach. The results of the evaluation are tallied and distributed to faculty members in writing after grades are in.

b. **Peer Evaluation**

Each year, all instructors' classes are visited by either the Dean of the School of Law or the School of Business or a present or past faculty member. The faculty members are selected for a team based on their experience and background in the course being visited. The team members each complete a Peer Evaluation. The respective Deans review the evaluations of the faculty member observed and discusses the recommendations with the faculty member on an as needed basis. The Faculty Evaluation Report is available for review

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c. **Self-Evaluation**

At least once per academic year, every faculty member is asked to complete a self-evaluation, which is reviewed by the Dean of the School of Law or the School of Business and, when appropriate, by the members of the personnel-related Committee (or Committees)."

7. Guidelines 2.7(B)(4): The law school should, in the required statement informing students about the basis for their final grades, explain the extent to which they will be evaluated by persons other than the course instructor, if any.

UWLA is in now more perfect compliance with Guideline 2.7(B)(4): through adoption and publication of the below revised language within UWLA's Faculty Handbook at page 45. Which is quoted below:

"Disclosure of Basis for Final Grades-SOL (When Evaluated by Persons Other Than the Course Instructor

UWLA has added a policy effective for the Fall 2021 semester and forward that any professor who avails themselves of UWLA's Grading Project in which professors other than the one instructing the course grade and evaluate the final exams will be expressly disclosed within the syllabus for that course. This policy has been added to our faculty handbook as well."

8. Guideline 7.1: The law school should evaluate its attrition, retention, disqualification, and grading practices over the past five years to determine what improvements, if any, should be made to ensure that students who lack the capacity to succeed are promptly identified and excluded. The school should report the results of its evaluation in its 2021 Annual Compliance Report.

UWLA will continue to evaluate its attrition, retention, disqualification, and grading practices over the past five years to determine what improvements, if any, should be made to ensure that students who lack the capacity to succeed are promptly identified and excluded. Additionally, UWLA will include an update as to this guideline within its 2021 Annual Compliance Report.

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9. Guidelines 8.1, 8.2, and 8.5: The law school should provide access to online law library material as required by the guidelines, by issuing passwords to students automatically, without the need for a request, upon or shortly after their enrollment.

UWLA is in now more perfect compliance with Guidelines 8.1, 8.2, and 8.5: through adoption and publication of the below language within UWLA's School of Law's Student Information Handbook at page 77. Which is quoted below and located at https://uwla.edu/apps/pages/index.jsp?uREC_ID=321742&type=d&termREC_ID=&pREC_ID=606640:

"DESCRIPTION OF FACILITIES

UWLA maintains a campus in both Inglewood and Chatsworth, California. The campuses have ample classrooms, meeting rooms, and office space as well as two distinctive library facilities, computers and wireless capabilities.

LIBRARY

The University has an outstanding library for onsite research and study facility for students, faculty, and alumni. The University also offers access to Internet legal research via Westlaw Next, Lexis Advance, ProQuest and CALI for our students.

Students may use the library M-Th 1:00PM – 9: 30PM, Fri 10:00AM – 4:00PM and Sat 9AM-5:30PM.

UWLA has added a policy effective for the Fall 2021 semester and forward that all law students will be issued passwords automatically without the need for a request to access online law library material upon or shortly after their enrollment."

In addition, the below language was added to UWLA's ELVIS' Policies and Procedures Manual at pages 9-10 within ELVIS Policy 4 as quoted below (**ELVIS** (eLearning Virtual Instruction Support) exists as an allied support to UWLA's School of Business and School of Law programs to enable and enhance eLearning. Its primary purpose is to provide support to both the student and educator as they meet in UWLA virtual learning spaces: 1) UWLA's LMS Desire2Learn ("D2L"), 2) UWLA's SIS Campus Café ("CC"), 3) UWLA's online library resources (CALI, Lexis, ProQuest, and Westlaw) and 4) UWLA's virtual classroom experience provided within Zoom Video Conferencing Solution):

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“DESCRIPTION OF FACILITIES

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LIBRARY

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Students may use the library M-Th 1:00PM – 9: 30PM, Fri 10:00AM – 4:00PM and Sat 9AM-5:30PM.

UWLA has added a policy effective for the Fall 2021 semester and forward that all law students will be issued passwords automatically without the need for a request to access online law library material upon or shortly after their enrollment.”

Suggestions for Enhanced Compliance:

1. Pursuant to Guideline 2.2(B), the law school should explain, in the refund policy, how refunds will be applied to students’ financial aid accounts.

UWLA is in now more perfect compliance with Guideline 2.2(B): through adoption and publication of the below language within UWLA’s School of Law’s Student Information Handbook at page 25. Which is quoted below and located at https://uwla.edu/apps/pages/index.jsp?uREC_ID=321742&type=d&termREC_ID=&pREC_ID=606640:

“Tuition Refund Policy (School of Law)

Refund policies depend on a student’s status and when the student withdraws. For students who withdraw from any class up through the 60% point in the semester, charges are reduced in proportion to the percentage remaining in the semester after the student’s withdrawal date. For students who withdraw from any class after the 60% point in the semester, **NO REFUND IS GIVEN.**

The withdrawal date is set as the date that the student submits a Change of Program Form or a Full Withdrawal Form and the applicable fee. A \$45.00 fee is assessed each

time a student withdraws from a class (after the second week of school in a given semester) or withdraws from the school (at any time).

If the student withdraws from ALL classes in a given semester, refunds on tuition are first returned to the private loan agency if applicable.

Any request to withdraw from a class or from the school **MUST BE IN WRITING** and accompanied by the appropriate fee to be valid. Verbal notifications of intent to withdraw from a class or from the school are insufficient, and will not be recognized as an appropriate notice to the school.

All legitimate requests for the refund of tuition payments will be made within 30 days after a student withdraws from school, or 30 days after the law school's notice that it will discontinue any class or program.

The University of West Los Angeles School of Law has adopted an institutional refund policy that is both fair and equitable and satisfies Department of Education guidance. All student withdrawals become effective on either the date the student notifies the institution of their intent to withdraw or the date the institution determines that the student is no longer attending and is administratively withdrawn, whichever date is earliest.

Institutional Refunds (IR) are determined based on a pro-rata calculation of tuition charges for the given payment period. If a student completes less than sixty percent (60%) of the payment period, a pro-rata calculation is completed. If a student completes more than sixty percent (60%) of the payment period, the student has effectively completed the term and 100% of the tuition charges will be retained by the institution.

In addition to the pro-rata calculation described above, a student who receives Title IV Federal Direct Loan will be subjected to a Return to Title IV (R2T4) calculation as prescribed by the U.S. Department of Education. Please see the UWLA Return to Title IV policy for details.

The University will issue any refunds as described above within the required 30-day timeframe from the official withdrawal date as established by the University.

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The Office of Student Financial Services is notified of a student's withdrawal by the Registrar's Office and will proceed with calculating the Institutional Refund and Return to Title IV amounts accordingly. If there is a refund required, the dollar amount of the refund is given to the accounting office to issue a refund check to the student or eligible Title IV program. The Office of Student Financial Services will then confirm the tuition adjustment and the refund amount is posted to the student's account ledger within 30 days of the official withdrawal date.

The Office of Student Financial Services is responsible for sending the Notification of Refund communication to the student, which explains both IR and R2T4 calculations, within 45 days of the official withdrawal date."

2. Pursuant to Guideline 14.1, the law school is encouraged to foster diversity and inclusion in recruitment, development, and retention of faculty.

UWLA will as always foster diversity and inclusion in recruitment, development, and retention of faculty as it does in all matters institutionally as in alignment with its Mission, Values, and Vision:

MISSION STATEMENT OF THE UNIVERSITY OF WEST LOS ANGELES

University of West Los Angeles is a family.

Our culture of diversity creates a unique equitable educational empowerment environment. We provide opportunities for resilient learners to become servant leaders to their communities.

Values:

F.E.E.L.: Family, Equity, Educational Empowerment, Leadership

Definitions of Our Values:

Family – Our Family value of interpersonal relationships requires that we care for and treat all *members of our community in a constructive but honest and respectful manner.

*members of our community are all who share our values.

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Equity – Our value of Equity encompasses diversity and inclusion, it requires that we support each member based upon their unique needs for support and gives them fair access to educational empowerment. UWLA affirms its position as an antiracist institution.

Educational Empowerment – Educational Empowerment adds to and refines the members of our communities' existing capacity and knowledge with the creation of opportunities for professional development and social mobility.

Leadership – Irrespective of titles or names, the value of Leadership is the ability to bring about transformative change from vision to completion, while at the same time remaining a humble lifelong learner.

Vision Statement:

Liberation through educational empowerment.

In conclusion and on behalf of all of our University's stakeholders, thank you very much for your continuing professional courtesy demonstrated by both you and the team and your continuing consideration in helping us to become a better and stronger institution for our students and the communities that we serve.

Sincerely,

A handwritten signature in black ink that reads "Jay Frykberg". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Jay Frykberg
Dean and Professor of Law