



**OPEN SESSION**  
**AGENDA ITEM O-405**  
**MARCH 2022**  
**COMMITTEE OF BAR EXAMINERS**

**DATE:** March 18, 2022

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

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

**SUBJECT:** Report on Progress Regarding Recommendations from the Inspection Report of San Francisco Law School

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**EXECUTIVE SUMMARY**

This agenda item presents San Francisco Law School's progress report filed in November 2021, documenting its progress completing the recommendations adopted by the Committee of Bar Examiners (Committee) after reviewing the law school's periodic inspection report in December 2020. (Attachments A, B).

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**BACKGROUND**

Accredited law schools are inspected for compliance with the Rules for Accredited Law Schools (rules) and Guidelines for Accredited Law School Rules (guidelines). (Rule 4.162). After San Francisco Law School (SFLS) was inspected in 2020, the Committee directed SFLS to address a total of nineteen mandatory recommendations and three suggested recommendations as soon as possible and to file progress reports by May 15, 2021, and again by November 15, 2021, in order to advise of progress and demonstrate that progress previously reported has been sustained. This item presents SFLS's progress report, timely filed along with its Annual Report in November 2021.

San Francisco Law School is an accredited law school with approved campuses in Emeryville and San Diego. The law school is part of Alliant International (AIU), a large university system based in San Diego, though the law school itself is based in Emeryville.

San Francisco Law School has been in continuous operation since 1909 and was first accredited in 1937. In recent years, SFLS has undergone several significant changes. These include a merger with AIU, conversion to for-profit status, sale of its San Francisco campus and two subsequent campus moves, first from one part of San Francisco to another and, most recently, to the law school's current home in Emeryville, as well as the addition of a San Diego branch campus. SFLS also recently underwent a recapitalization process in which the non-profit entity that maintains SFLS scholarships and proceeds from the sale of the San Francisco headquarters divested its ownership stake in the law school, though it will continue to maintain and utilize the scholarship funds and funds from the sale of the building for the benefit of the law school. The law school has also undergone significant staff changes, including extended periods of time when key positions were vacant until recently.

SFLS has long offered a part-time, four-year JD program. During fall 2020, the law school also began a limited-purpose, full-time program approved only for law students transferring from the former John F. Kennedy University School of Law, to allow those students to finish their JD program at a fixed-facility law school when their original law school discontinued its fixed-facility program.

Currently, the law school enrolls 44 students. Seven students are attending full-time as part of the teachout program in Emeryville. There are 20 students at the Emeryville campus and 17 students at the San Diego campus in the part-time program.

In January 2021, the Committee placed the law school on probation through July 1, 2022 because its 2020 Minimum, Cumulative Five-Year Bar Pass Rate of 36.0 percent fell below the required value of 40 percent or greater. The law school remains on probation and will next report its MPR on July 1, 2022 for discussion by the Committee in August 2022.

SFLS was inspected in February and March 2020 by a team composed of State Bar Educational Consultant Heather Georgakis, Committee member Alex Chan, Dean Mitchel Winick of Monterey College of Law, and Interim Dean Robert Humphreys of Humphreys University.

During the visit, a significant number of issues were raised in three general areas: inadequate staffing support; lack of familiarity and proactive compliance with the Rules for Accredited Law Schools; and confusion regarding the division of duties between AIU headquarters and the law school.

The Committee adopted the following list of nineteen mandatory recommendations and three additional recommendations. The law school addressed a number of the issues prior to the Committee's review in December 2020, though some remained to be addressed. The Committee required the law school to include all recommendations in its progress report, in order to ensure and document sustained compliance. The law school appears to have made some permanent changes that have sustained many of the recommendations, and there appears to be more coordinated cooperation and proactive review of the rules between the law school and its parent university. The law school is now focusing on appropriate grading and bar preparation.

Progress as to each recommendation listed in the inspection report is summarized below, and detail is available in the law school's attached progress report from November 2021.

1. **Guideline 2.3(B)-(C):** It is recommended that the school revises the publications of AIU and SFLS to accurately and consistently state its academic and operational policies, and with respect to electives, to delete electives not offered in the past three years or expected to be offered in the next two years, and to inform students that electives are not are taught each year, but are offered from time to time based on student interest and instructor availability. *The school has updated its publications for accuracy and consistency, provided copies to the State Bar, and maintained this status.*
2. **Guideline 2.3(D)(1)-(3):** It is recommended that the school publishes all disclosures required by the guideline on a separate page of its website that is entitled Accreditation and readily accessible to the public by that title, correctly labeled and in their most current version. *Subsequent to the inspection school addressed this recommendation and provided documentary evidence that the proper information remains posted in the required location.*
3. **Business and Professions Code section 6061.7:** It is recommended that the school includes the required link to the current version of the disclosure form on the Admissions page of its website. *Subsequent to the inspection the law school fully addressed this recommendation and provided documentary evidence. The school's AIU Catalog was provided to demonstrate sustained compliance and consistency between the Catalog and the website.*
4. **Guideline 2.3(E)(2):** It is recommended that the school revises all published statements referring to WASC accreditation to indicate that the law school's degree-granting authority is based on accreditation by the Committee of Bar Examiners, as it pertains to qualification to take the California bar exam and become a licensee of the State Bar of California. *Subsequent to the inspection the law school fully addressed this recommendation. The school made the required updates and provided copies to the State Bar.*
5. **Guideline 2.3(E)(2):** It is recommended that the school revises all published statements, in the AIU Catalog and otherwise, to clarify that students who graduate from SFLS are eligible to practice law in California after passing the bar exam, by adding "and successfully fulfilling all other licensing requirements." *Subsequent to the inspection the law school addressed this recommendation and provided copies of the compliant Student Handbook and Faculty Handbook to the State Bar.*
6. **Guideline 2.7(C):** It is recommended that the school adopts, publishes, and implements a written policy on the authentication of student work. *Subsequent to the inspection the law school fully addressed this recommendation and provided documentary evidence. In its May 2021 progress report, the law school advised that it had created a policy, documented that policy in its Student Handbook and Faculty Handbook, and implemented that policy.*

7. **Guideline 2.7(E):** It is recommended that the school amends and republishes its policy on the review of exam answers to permit students to inspect and copy exam questions as provided. *Subsequent to the inspection the law school fully addressed this recommendation and provided documentary evidence. The school amended and republished its policy in the Student Handbook and Faculty Handbook, and it has now implemented that policy.*
8. **Guideline 2.10(A):** It is recommended that the school amends its publications, including the SFLS website, to accurately describe the services, activities, and experiences currently available to students, by campus. *Subsequent to the inspection, the school addressed this recommendation, and its website and Catalog are now updated regularly on a timely basis.*
9. **Guidelines 3.1 and 4.1(A)-(C):** It is recommended that the school evaluates its administrative structure and makes such changes as necessary to ensure full and sustained compliance with the Committee's guidelines, including all administrative requirements. Since the inspection, the school has added a full-time registrar effective June 15, 2020, though hiring of any other positions has been frozen due to the pandemic. *Since the inspection, SFLS hired an experienced registrar, permanently staffed an administrator at the San Diego campus, and hired a full-time faculty member located at the Emeryville campus to teach the additional courses required by the full-time program in Emeryville. The school also received administrative support, first from the general pool of administrative staff, and, more recently, through the assistance of a part-time executive assistant.*
10. **Guidelines 4.7 and 4.8:** It is recommended that the school adopts, publishes, and implements a compliant faculty evaluation process. *Subsequent to the inspection, the law school outlined a process for faculty evaluations delivered to the Committee at its December 2020 meeting. The school created an evaluation policy, published it in the Faculty Handbook, and began implementing the policy. New faculty in their first year have been evaluated, and experienced faculty are in the process of being evaluated. Dean Weimer is personally observing and evaluating professors.*
11. **Guidelines 5.3 and 11.1(B)-(C):** It is recommended that the school adopts, publishes, and implements a policy that meets guideline requirements with respect to the filing of official transcripts, and includes a procedure that will permit validation that all requirements have been met and official transcripts are received within the Committee's time limits. *The school has since updated its policy, procedure, and practice related to the handling of transcripts in order to ensure that all new students have proper original transcripts on file within 45 days of enrollment, and published in the Student Handbook.*
12. **Guidelines 5.6 and 5.7:** It is recommended that the school adopts, publishes, and implements policies that incorporate guideline standards, including a process to ensure that decisions are documented as required. *Subsequent to the inspection, the school created a process to update all student files with documentation of key decisions and to create a centralized repository of communication with the Committee. While completion*

*was originally scheduled for October 30, 2020, completion is now scheduled for spring 2022. The school is now documenting admission, disqualification, and dismissal decisions in the students' files, and it will fully digitize paper files when staff are able to return to campus.*

13. **Guideline 6.5(A):** It is recommended that the school states in the Student Handbook the requirement that the JD must be completed within the time limits specified in the relevant guideline. *Subsequent to the inspection, the school fully addressed this recommendation by creating a policy, publishing it in the Student Handbook and creating and implementing the necessary internal procedures to verify that all JD students complete requirements within the 84-month time limit applicable to JD degrees.*
14. **Guidelines 6.6(A)-(D) and 6.9(D)-(E):** It is recommended that the school revises its externship policy to state the maximum number of externship units that may be earned. *The school has revised its policy. It plans to publish the policy in the Student Handbook to be issued in August 2021 and implement the policy this fall.*
15. **Guideline 6.14:** It is recommended that the school shows compliance with the guideline documenting a process to show that grading is consistent and fair and informs students of their progress. *Subsequent to the inspection and prior to the Committee's consideration in December, the law school asserted that it had a compliant practice documented in the Registrar's Handbook but has not yet provided evidence of the updated policy. The school asserts that they are requiring more formal documentation from faculty regarding grading, conducting a grading workshop for faculty, and keeping the required copies of examinations going forward.*
16. **Guideline 7.1:** It is recommended that the school carefully tracks the relationship between students' GPAs at graduation and their performance on the bar exam, to demonstrate that students are being graded in a manner that will inform them of their level of academic achievement and likely success on the bar exam. *Subsequent to the inspection, the law school advised that staffing levels were previously insufficient to maintain compliance in this area, but now staffing has been adjusted and the registrar now tracks the relationship between GPA and bar exam performance.*
17. **Guideline 7.9:** It is recommended that the school provides the data and exam papers necessary to demonstrate the quality and reliability of its grades. *The law school asserts that this information has been maintained since 2018 but was not available to the inspection team due to time constraints, which conflicts with the team's observations. Since spring 2020, the law school has begun storing all exams and students' answers on the University's cloud server, and a compliant policy has been added to the Registrar's Handbook.*
18. **Guideline 7.11:** It is recommended that the school demonstrates that it documents completion of the minimum number of hours of actual academic engagement for courses delivered by any form of distance-learning technology as required. *The school is currently tracking engagement via Zoom report tracking synchronous participation in*

*classes, which is adequate for the law school's current offerings, which are all offered via synchronous modality.*

- 19. Guideline 11.1 (A)-(F) and (H):** It is recommended that the school takes steps to comply with all administrative guideline requirements in this section and documents that compliance to the Committee. *Subsequent to the inspection, the law school attested that it stores all official paper records in either an offsite secured, environmentally controlled storage facility called DataSafe or on a secured server, while digitized students records are now stored in an information technology system called CampusNexus student.*

### **Additional Recommendations to Enhance Compliance**

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

- 1. Pursuant to Guideline 4.6:** It is suggested that the school considers expanding the faculty development opportunities it provides. *Subsequent to the inspection and prior to Committee consideration in December, SFLS updated its Faculty Handbook, documented its informal practices, and implemented training related to examination drafting and grading. The school also developed a new Faculty Orientation website and a new Center for Teaching Excellence website, and will launch Peer-to-Peer Mentorship in fall 2022. The school will reinitiate peer review and evaluations when on-campus classes resume.*
- 2. Pursuant to Guideline 8.2:** It is suggested that the school clearly labels hard copy library materials that are not being updated. *The law school asserts that compliance will be achieved when the administration and students return to campus.*
- 3. Pursuant to Guideline 9.3:** It is suggested that the school reviews its procedures for promptly addressing technology-related problems to determine what changes are needed, if any. *Subsequent to the inspection, the school indicated that its information technology system has been updated, and the school has fully updated its website. The law school attests that they have maintained compliance and have a system to prioritize Information Technology issues.*

### **DISCUSSION**

Since the law school's purchase in 2010, it has had a number of issues that seem to stem from inadequate resources applied or sustained for the law school, though funds for resources were available. This led to outdated communications, informal or undocumented processes that were not compliant, a failed experiment raising the grading curve, administrative errors that affected students' credit and graduation status, and a probationary status due to a minimum, cumulative bar pass rate below the minimum.

Subsequent to the law school's inspection in spring 2020, SFLS increased staffing and increased staffing coordination between the AIU headquarters and the law school, addressing most of the

recommendations, while also adding a number of new programs designed to address the law school's cumulative bar exam pass rate, and the law school has provided evidence to suggest the progress has been sustained.

By December 2020, the law school had addressed 11 of the 19 recommendations and agreed to make progress as to the additional recommendations.

Since December 2020, the law school has sustained completion of those recommendations and made progress as to the remaining recommendations, though some will not be fully completed until the law school administration can return to campus, such as labeling hard-copy items in the library and digitizing hard-copy documents.

The law school remains on probation, however, because it has not yet raised its minimum, cumulative five-year bar exam pass rate to the minimum 40 percent that is required. The law school will next report this pass rate on July 1, 2022 and the Committee will be able to consider the law school's reported value at the Committee's August 2022 meeting.

The law school will continue to provide progress reports twice per year on May 15 and November 15 until further notice from the Committee, and the law school is scheduled to be inspected in 2022, unless the Committee determines that an inspection is required sooner.

It is suggested that the inspection, currently scheduled for spring 2022, be adjusted to winter 2023, after the law school has had a chance to report its latest MPR, which is one of its probation conditions.

## **RECOMMENDATIONS**

It is recommended that the Committee of Bar Examiners receives and files San Francisco Law School's progress report from November 2021 regarding its progress achieving and sustaining compliance after its 2020 periodic inspection. It is further recommended that the law school continue to provide progress reports twice each year until its next inspection by May 15 and November 15. Finally, it is recommended that the next the inspection of the law school, tentatively set for winter 2022, be delayed until the law school reports its minimum, cumulative five-year bar examination pass rate on July 1, 2022, with an adjusted date of winter 2023.

## **PROPOSED MOTION**

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

**MOVE**, that the November 15, 2021, progress report of San Francisco Law School regarding achieving or sustaining compliance with the recommendations set forth in the law school's 2020 Periodic inspection received and filed, and the law school's next progress report be due as scheduled by May 15, 2022, with an inspection to be set in winter 2023, to allow the law school to first file its 2022 Minimum, Cumulative Five-Year Bar Exam Pass Rate, due July 1, 2022.

**ATTACHMENTS LIST**

- A. SFLS Response to State Bar of California Periodic Inspection Report
- B. SFLS Supporting Evidence to Response



**SFLS Response to State Bar of California Periodic Inspection Report**  
**Prepared by Timothy P. Weimer, Dean**  
**November 3, 2021**

**Introduction**

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

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

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

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

Below is San Francisco Law School’s updated response to these recommendations dated November 3, 2021.

**Action Recommended in the CBE Executive Summary**

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

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

SFLS has already resolved all specific issues related to admissions and reviewed and updated

the school's record keeping policies and procedures. It has also updated its disclosures online and in the Student and Faculty Handbooks. SFLS has also updated the information contained in the AIU Catalog and online to ensure that the school's publications and communications are accurate, consistent and clear. With the hiring of a fulltime Registrar, SFLS will be creating a calendar of yearly events to ensure the timely update of disclosures and other required information.

SFLS has enhanced its capacity to support its compliance efforts by hiring additional personnel. This includes the appointment of a new Dean in January 2020, a new Registrar in June 2020, and a new Core Faculty member at the Emeryville campus in August 2020. SFLS' parent University, Alliant International University (AIU) also hired a part-time (10-15 hours/week) Executive Assistant in September 2021.

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

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

### **Response to Recommended Mandatory Actions**

The following mandatory actions were recommended to establish full compliance.

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

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

Evidence: The language has been updated and included in the AIU Catalog for the 2020-2021 Academic Year. That Catalog was published in July 2020. The same language was included in the 2021-2022 AIU Catalog.

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

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

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

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

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

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

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

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

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

Evidence: The AIU Catalog and other publications have been amended to include this language. The Catalog for 2021-2022 has been published.

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

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

Evidence: The AIU Catalog and other publications have been amended to include this language. The Catalog for 2021-2022 has been published.

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

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

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

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

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

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

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

SFLS Response: Reject. SFLS is in full compliance.

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

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

**9. Guidelines 3.1 and 4.1(A)-(C):** *It is recommended that the school evaluates its administrative structure and make such changes as necessary to ensure full and sustained compliance with the CBE's guidelines, including all administrative requirements. Since the inspection, the school has added a full-time registrar effective June 15, 2020, though hiring of any other positions has been frozen due to the pandemic... to establish full compliance, SFLS must show that it has adequate administrative capacity to support full and sustained compliance with the Rules and Guidelines as further described below<sup>1</sup>... To demonstrate full compliance with Guidelines 3.1 and 4.1(A) through (C), the school should evaluate its administrative structure and ensure adequate capacity at each campus to support full and sustained compliance with the rules and guidelines overall.<sup>2</sup>*

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

Evidence: SFLS has hired a fulltime Registrar, Karen McCray, who will be located at the San Diego branch campus. The SFLS Registrar was moved to the San Diego branch campus so she would be

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<sup>1</sup> Periodic Inspection Report pg. 10

<sup>2</sup> Ibid. pg. 11

closer to AIU's main Registrar and Human Resources offices. This will ensure greater efficiency in record keeping and allow the SFLS Registrar to monitor AIU record keeping ensuring compliance with the Guidelines.

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

Evidence: SFLS' parent University, Alliant International University (AIU) hired a part-time Executive Assistant (10-15 hours/week) in September 2021.

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

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

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

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

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

Evidence: During the summer 2021 semester, Dean Weimer observed eight of his Adjunct Professors while teaching their courses. The observation notes and reports were submitted to the faculty for review and feedback, as well as a copy kept in each Adjunct Professor's personnel

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<sup>3</sup> Ibid. pg 12

files. Additional discussions with the professors were scheduled by Dean Weimer if requested.

Dean Weimer has already observed two adjunct professors teaching fall 2021 and has scheduled observations with three additional professors before the end of the semester.

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

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

Evidence: All transcripts received from LSAC are considered official.

Evidence: AIU has an Academic Processing Center (APC) that receives all official documents, including official transcripts. As confirmed by Jennifer Ruments, the APC Director, the following policies are in place to ensure authentication of official documents received by the center.

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

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

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

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

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

According to the findings related to guidelines 5.3 and 11.1 on page 15 of the Periodic Inspection Report, *SFLS did not demonstrate that is compliant with the “45-day rule” of Guideline 5.3 and Business and Professions Code section 6060(c)(1). Under the rule, SFLS must not allow a student to enroll or attend classes if the student’s official transcripts are not on file within 45 days after the start of the student’s first term. Admissions Department personnel indicated that they follow an SFLS policy, under which the registrar must audit files no later than the 45th day of the term, but then has 14 days to “find or replace the missing items” from*

*student files, in possible contravention of the 45-day rule... The school should adopt, publish, and implement a policy that complies with Guideline 5.3 and Guideline 11.1(B) and (C) with respect to the filing of official transcripts, and includes a procedure that will permit validation that all requirements have been met.*

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

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

Evidence: SFLS was deemed to be out of compliance because of the lack of a fulltime Registrar to audit student records. In response, SFLS hired a new fulltime Registrar, Karen McCray, who started on June 15, 2020. Ms. McCray's vast experience as a Registrar has already benefited SFLS and its students. She has established new procedures to ensure timely review of student records and the administrative withdrawal of students who have not meet the 45-day requirement.

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

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

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

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

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

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

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<sup>4</sup> Ibid pg. 16

Due to many of the documents being stored in paper files on closed campuses, this task will be completed when we are allowed to return to campus by government and health officials.

SFLS plans a full return to campus January 2022. This project is targeted to be completed in spring semester 2022.

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

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

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

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

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

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

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

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

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

Additionally, many of the updated policies and procedures were included in the most recent

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<sup>5</sup> Ibid. pg. 13



updated Student and Faculty Handbooks provided to the State Bar in 2020 and with the 2021 Annual Report.

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

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

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

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

Evidence: SFLS has continued to review these reports for each bar exam through the February 2021 exam results.

17. **Guideline 7.9:** *It is recommended that the school provides the data and exam papers necessary to demonstrate the quality and reliability of its grades... To show compliance with Guideline 7.9, the school should provide the data and exam papers necessary to demonstrate the quality and reliability of its grades<sup>7</sup>... In relaxing grading standards, the school should exercise caution not to retain unqualified students.*<sup>8</sup>

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

Evidence: This is an ongoing task.

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<sup>6</sup> Ibid. pg. 14

<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

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

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

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

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

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

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

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

*demonstrate that it documents completion of the minimum number of hours of required academic engagement for courses delivered by any form of distance-learning technology, as required by Guideline 7.11.<sup>9</sup>*

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

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

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

19. **Guideline 11.1 (A)-(F) and (H):** *It is recommended that the school takes steps to comply with all administrative guideline requirements in this section and documents that compliance to the CBE... SFLS should use fire-safe cabinets, or other similarly secure options, for on-site storage of records of hard copy applicants, admitted applicants, and students that have not been digitized or stored at DataSafe<sup>10</sup>... the team was not able to confirm compliance with Guideline 11.1(A) through (D), because some of the audited files lacked materials required by the guideline, such as official transcripts, admission records, and documentation of academic actions.<sup>11</sup>*

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

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

Evidence: In December 2019, AIU implemented a new student information system created by LexusNexus called CampusNexus Student (CNS). All records from the previous system were transferred to this new system in early 2021.

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<sup>9</sup> Ibid. pg. 15

<sup>10</sup> Ibid. pg. 20

<sup>11</sup> Ibid.

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

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

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

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

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

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

Compliance with subparagraph (C) Student Records:

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

Compliance with subparagraph (D) Transcripts:

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

Compliance with subparagraph (E) Class Records:

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

Compliance with subparagraph (F) Examination and Grade Tabulations:

All examinations (both midterm and final exams) administered from fall 2016 through spring

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<sup>12</sup> Ibid.

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

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

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

Compliance with subparagraph (H) Faculty Personnel:

All faculty personnel files are up to date and in compliance. Alliant HR will be responsible for maintaining these files going forward. To assist with this project, SFLS' parent University, Alliant International University (AIU) hired a part-time Executive Assistant (10-15 hours/week) in September 2021. SFLS Dean, the VP for Human Resources, and the new part-time Executive Assistant will be meeting on a regular basis to review these files and ensure continued compliance in the future.

### **Response to Suggestions for Enhanced Compliance**

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

1. ***Pursuant to Guideline 4.6, it is suggested that the school considers expanding the faculty development opportunities it provides.***

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

Evidence: With the hiring of a new Registrar and a new core Faculty member at the Emeryville campus SFLS has enhanced its capacity to address this issue. Alliant and SFLS have recently expanded its faculty development program with numerous resources that SFLS professors were able to access effective fall 2020. These include but are not limited to; a new Faculty Orientation website, a new Center for Teaching Excellence website, reinitiating Peer Review and Evaluations, and Peer to Peer Mentorship (beginning fall 2022). Alliant also has a mandatory training curriculum for all faculty and staff that includes topics such as FERPA, harassment, managing bias and code of conduct.

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

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

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

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

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

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

Evidence: AIU continues to utilize its prioritization system to ensure all technology issues are addressed promptly.

### **Response to Other Recommendations**

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

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

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

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

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<sup>13</sup> Ibid. pg. 19

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

SFLS' parent University, Alliant International University (AIU) hired a part-time Executive Assistant (10-15 hours/week) in September 2021. SFLS Dean, the VP for Human Resources, and the new part-time Executive Assistant will be meeting on a regular basis to review faculty files and ensure continued compliance in the future.

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

### **Conclusion**

San Francisco Law School and its parent, Alliant International University, are committed to the success of our students and to being fully compliant with the State Bar Guidelines.

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

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

# **SFLS Response to State Bar of California Periodic Inspection Report**

## **Documentary Evidence**

### **Updated November 3, 2021**

#### **Introduction**

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

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

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

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

#### **Evidence for Response to Recommended Mandatory Actions**

The following mandatory actions were recommended to establish full compliance.

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

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

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

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



alliant.edu/schools/sfls

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

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

ACADEMICS | ADMISSIONS | ABOUT | NEWS & EVENTS | STUDENT RESOURCES

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

## Accreditation

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

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

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

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

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

[VIEW REPORT](#)

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

#### Documentary Evidence:

- Please see the attached email string entitled 'Email from IT Indicating Webpage Forms and Links Updated, August 6, 2020.'
- The requested information is also contained on the AIU/SFLS website, <https://p.widencdn.net/n0mrdx/SFLS-Information-Report>.
- The SFLS Admissions page of the 2021-2022 catalog may be found here:
- <https://catalog.alliant.edu/content.php?catoid=37&navoid=1432#sfls-admissions-reqs>

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

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

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

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

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

Documentary Evidence:

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

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

Documentary Evidence:

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

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

Documentary Evidence:

- See AIU Catalog pp. 28-30
- See also website at <https://studentservices.alliant.edu/>.
- See also attachment entitled ‘AIU New Student Orientation 8\_18\_2020 SFLS Version.’

9. **Guidelines 3.1 and 4.1(A)-(C):** *It is recommended that the school evaluates its administrative structure and make such changes as necessary to ensure full and sustained compliance with the CBE’s guidelines, including all administrative requirements. Since the inspection, the school has added a full-time registrar effective June 15, 2020, though hiring of any other positions has been frozen due to the pandemic... to establish full compliance, SFLS must show that it has adequate administrative capacity to support full and sustained compliance with the Rules and Guidelines as further described below<sup>1</sup>... To demonstrate full compliance with Guidelines 3.1 and 4.1(A) through (C), the school should evaluate its administrative structure and ensure adequate capacity at each campus to support full and sustained compliance with the rules and guidelines overall.<sup>2</sup>*

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

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<sup>1</sup> Periodic Inspection Report pg. 10

<sup>2</sup> Ibid. pg. 11

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

Documentary Evidence:

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

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

Documentary Evidence: See SFLS Official Response.

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

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

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

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

Documentary Evidence: SFLS has incorporated the guideline standards in its daily business practices. For example, all admission decisions are documented in the student’s file. Also, all

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<sup>3</sup> Ibid. pg. 12

<sup>4</sup> Ibid pg. 16

decisions related to disqualification and dismissal are documented and maintained in the law school's yearly ADQ file as well as the student's file.

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

Due to the ongoing business disruptions caused by COVID-19 digitizing the hardcopy documents has been delayed. Due to many of the documents being stored in paper files on closed campuses, this task will be completed when we are allowed to return to campus by government and health officials.

SFLS plans a full return to campus January 2022. This project is targeted be completed in spring semester 2022.

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

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

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

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

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

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

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<sup>5</sup> Ibid. pg. 13

document that will be updated over time, as policy and procedure updates are needed.

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

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

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

Documentary Evidence: SFLS has continued to review these reports for each bar exam through the February 2021 exam results.

17. **Guideline 7.9:** *It is recommended that the school provides the data and exam papers necessary to demonstrate the quality and reliability of its grades... To show compliance with Guideline 7.9, the school should provide the data and exam papers necessary to demonstrate the quality and reliability of its grades<sup>7</sup>... In relaxing grading standards, the school should exercise caution not to retain unqualified students.*<sup>8</sup>

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

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

Since June 2018 a sound policy has been in place to comply with guideline 7.9. The new Registrar, Karen McCray has included these policies and procedures in the Registrar's Handbook Folder. The Registrar's Handbook Folder is saved on Alliant's SharePoint servers and accessible by SFLS

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<sup>6</sup> Ibid. pg. 14

<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

Administration. This folder will be a living document that will be updated over time, as policy and procedure updates are needed.

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

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

Documentary Evidence: See SFLS Official Response.

19. **Guideline 11.1 (A)-(F) and (H):** *It is recommended that the school takes steps to comply with all administrative guideline requirements in this section and documents that compliance to the CBE... SFLS should use fire-safe cabinets, or other similarly secure options, for on-site storage of records of hard copy applicants, admitted applicants, and students that have not been digitized or stored at DataSafe<sup>10</sup>... the team was not able to confirm compliance with Guideline 11.1(A) through (D), because some of the audited files lacked materials required by the guideline, such as official transcripts, admission records, and documentation of academic actions.*<sup>11</sup>

Documentary Evidence: See SFLS Official Response.

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

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

Documentary Evidence: See SFLS Official Response.

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

Documentary Evidence: See SFLS Official Response.

Compliance with subparagraph (C) Student Records:

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<sup>9</sup> Ibid. pg. 15

<sup>10</sup> Ibid. pg. 20

<sup>11</sup> Ibid.

<sup>12</sup> Ibid.

Documentary Evidence: See SFLS Official Response.

Compliance with subparagraph (D) Transcripts:

Documentary Evidence: See SFLS Official Response.

Compliance with subparagraph (E) Class Records:

Documentary Evidence: See SFLS Official Response.

Compliance with subparagraph (F) Examination and Grade Tabulations:

Documentary Evidence: See SFLS Official Response.

Compliance with subparagraph (H) Faculty Personnel:

Documentary Evidence:

All faculty personnel files are up to date and in compliance. Faculty files are now maintained by Alliant Human Resources (HR) on Alliant's secure data systems. To assist with this project, SFLS' parent University, Alliant International University (AIU) hired a part-time Executive Assistant (10-15 hours/week) in September 2021. SFLS Dean, the VP for Human Resources, and the new part-time Executive Assistant will be meeting on a regular basis to review these files and ensure continued compliance in the future.

### **Response to Suggestions for Enhanced Compliance**

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

1. ***Pursuant to Guideline 4.6, it is suggested that the school considers expanding the faculty development opportunities it provides.***

Documentary Evidence:

Alliant's Faculty Orientation Webpage:

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

Alliant's Center for Teaching Excellence webpage:

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

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

Documentary Evidence: See SFLS Official Response.

3. ***Pursuant to Guideline 9.3, it is suggested that the school reviews its procedures for promptly***

*addressing technology-related problems to determine what changes are needed, if any... It is suggested that the school review its procedures for promptly addressing technology-related problems to determine what changes are needed, if any.<sup>13</sup>*

Documentary Evidence: See SFLS Official Response.

### **Response to Other Recommendations**

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

Documentary Evidence: See SFLS Official Response.

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<sup>13</sup> Ibid. pg. 19