



OPEN SESSION

AGENDA ITEM O-400

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: Action on Inspection of California School of Law

EXECUTIVE SUMMARY

California School of Law was inspected on August 4-5, 2021. The inspection report and the law school's response are attached. (Attachments A, B.) Due to the number of compliance issues identified, the inspection team originally recommended that a warning letter be issued to the law school pursuant to 4.244(G)(4) requesting a response within 30 days. Based on the law school's immediate response, however, it is recommended that the law school's registration be renewed, and that the school be inspected again during summer of 2023.

BACKGROUND

California School of Law is a for-profit registered, unaccredited distance law school located in Santa Barbara, California.

According to its 2021 Annual Report, the law school enrolls 95 students in its JD program. The law school's most recent pass rates on the First-Year Law Students' Examination were 37.5 percent in October 2020, 11.1 percent in June 2021, and 15.8 percent in October 2021. Its most recent cumulative five-year bar exam pass rate according to its 2022 disclosure pursuant to California Business and Professions Code 6061.7(a) is 50 percent, but the attrition at the law school is significant.

The law school was inspected on August 4-5, 2021 by the team of Heather Georgakis, consultant to the Office of Admissions, and Paul Kramer, Vice Chair of the Committee of Bar Examiners and Chair of Educational Standards for the Committee of Bar Examiners.

When a registered law school may not be in compliance, the Committee may issue a warning pursuant to Rule 4.244 (G)(4) to the law school to take immediate action to correct the deficiencies noted as Recommended Mandatory Actions in the inspection report and to provide notice to the State Bar. The warning letter should also provide notice pursuant to Rule 4.263 that the Committee intends to pursue probation or termination of registration unless the law school can demonstrate evidence of compliance in a response provided to the State Bar within 30 days after the State Bar issues the warning letter.

DISCUSSION

An Inspection Report summarizing the observations regarding the inspection visit is attached. (Attachment A.) During the inspection, the team observed a significant number of issues, and recommended that a warning letter be issued to the law school.

Subsequent to the inspection, however, the law school reacted quickly to proactively address the inspection team's recommendations as noted below. Significant changes include installation of a new enterprise software system, updating a significant number of policies, documenting the policies in the relevant catalogs, and implementing the policies.

While the law school's swift reaction subsequent to the inspection to establish compliance is appreciated, the law school must show that it has sufficient staff, systems, intent and capacity to proactively establish and maintain compliance. Some of the recommendations require long term commitment, such as addressing grade inflation and attrition.

Given the significant nature of the issues observed and the large number of changes proposed, an additional inspection in 2023 is warranted to ensure that the law school promptly addresses the remaining recommendations, and that the law school fully implements the new policies and initiatives identified proactively in a manner that sustains compliance.

The report's recommendations are summarized below. Each recommendation is discussed in detail in the attached report. Information provided subsequent to the report is noted here in the summary, though the inspection report itself is not changed, in order to document the conditions as they existed at the time of the inspection.

RECOMMENDED ACTIONS

1. Guidelines 1.9 and 2.3: The law school must publish procedures for seeking accommodations of all types, eliminate from the application questions about disabilities, and eliminate from the Student Handbook a statement suggesting the State Bar will grant the same accommodations for the First-Year Law Students' Exam and bar exam.

Subsequent to the inspection, the law school has made changes to the testing accommodations application, Student Handbook, and Catalog. It is recommended that the law school takes steps to carefully review its obligations in this very technical area to ensure full compliance and to provide evidence of its proper review in its 2021 Annual Compliance, including changes from the review currently being conducted for the law school by the Association on Higher Education and Disability.

2. Guidelines 1.9 and 2.3: The law school must eliminate the policy that transcripts will not be released if records are on hold for financial reasons, pursuant to Civil Code section 1788.90.

Subsequent to the inspection, the policy has been removed from the Student Handbook.

3. Guidelines 2.1-2.3 and 2.12: The law school must review and as necessary revise its publications to describe and depict its services and policies clearly, completely, and accurately including, without limitation, admissions information, tuition refund policy, schedule of tuition and fees, and student services.

Subsequent to the inspection, the law school has made updates to their Catalog and Student handbook in the following areas: adding a table of contents, detailing all student costs, providing information related to transcripts, a policy on grade changes, more description of student services, a grade change policy, and correcting the law school's documentation to note that the law school is registered with The Committee of Bar Examiners of The State Bar of California as an unaccredited distance learning law school, grade change policy and student services.

The law school also updated its website to place its disclosure required by Business and Professions Code 6061.7(a) in the correct location on the website attached to a live link. The law school advised they are in the process of updating their website and will consider making the suggested changes to the photos that depict resources which are not available to law students. The law school should document completion of this recommendation in its 2022 Annual Compliance Report, including screen shots of the date completed.

The law school has adjusted its disclosure policy to ensure that students sign the disclosure prior to any payment, consistent with Guideline 9.1(C)(2) and its new computer system will require this process to be followed, according to the law school. The law school has updated its Disclosure statement informing students that they have filed and withdrawn an application for accreditation in the past five years. The law school must provide proof as to the disclosures for each student and signing date. The law school should provide updates prior to each payment cycle confirming that all disclosures were provided to students for a reasonable time in advance, and were collected prior to or along with accepting payment.

4. Guideline 2.3: The law school must publish the Guideline 2.3(D)(1) disclosure in the Catalog and the Student Handbook; revise its website to comply with Guideline 2.3(D)(2);

revise its publications to comply with Guideline 2.3(D)(4); and remove statements that it is accredited from its publications.

Subsequent to the inspection, the law school advised that the items indicating accredited status were templates prepared for the Accreditation Self Evaluation Report when the law school was seeking accreditation before it voluntarily withdrew its application. The law school publicly refers to itself as Approved or Registered but must change this designation to advise that it is registered as an unaccredited, distance category law school and provide evidence of this in its 2022 Compliance Report.

The law school lists Guideline 2.3(D) on its website and Catalog and Student Handbook.

5. Rule 4.241 and Guidelines 2.1-2.3 and 9.1: The law school must revise its procedures to comply with all Rule 4.241 requirements and related record-keeping requirements of Guideline 9.1. The law school must further consider making the Rule 4.241 Disclosure Statement part of the enrollment agreement, and it is required to receive these signed disclosures prior to accepting payment.

Subsequent to the inspection, the law school advises that it is in the process of converting to a new Student Information System to assist the registrar in pulling reports regarding forms completed by students. The law school states that each students has a Disclosure statement for each semester attended and the registrar is also making efforts to prioritize when students sign Disclosure statements during enrollment. However, this is a fundamental requirement that must be accomplished, rather than attempted. The law must not accept payment prior to receipt of signed disclosures in any instance.

6. Guideline 2.8: The law school must adopt, implement, and publish a student discipline policy that is compliant with the guideline.

Subsequent to the inspection, the law school has revised its student discipline policy in to enhance compliance, and documented the policy in the Student Handbook.

7. Guideline 2.9(B): The law school must provide quality descriptors for letter grades and inform students whether anonymous grading is used, and if so, by what procedures.

Subsequent to the inspection, the law school added quality descriptors for letter grades to the Catalog, Student Handbook and Faculty Handbook. The law school advised that information was added to the Catalog, Student handbook and Faculty handbook informing students of the law school's anonymous grading procedures.

8. Guidelines 2.9(B)(3) and 5.24: The law school must adopt, implement, and publish a policy on course repetition that is compliant with the guidelines.

Subsequent to the inspection, the law school has updated, implemented, and published its repetition policy in its Catalog and Student Handbook.

9. Guideline 2.9(B)(8) and (G): The law school must adopt, implement, and publish a policy on grade review that is compliant with the guidelines.

Subsequent to the inspection, the law school has published a policy on grade review that is compliance with Guideline 2.9(B)(8) and (G) in its Student Handbook and Faculty Handbook.

10. Guidelines 2.7, Guideline 2.9(A), and 5.19-5.20: The law school must adopt, implement, and publish policies that clearly state when good academic standing is calculated, what GPAs constitute good standing, and under what circumstances students will be allowed to advance on probation, including the process by which probation decisions will be made.

Subsequent to the inspection, the law school has adopted, implemented and published policies regarding when good academic standing is calculated, the GPA requirements for good standing, and the circumstance in which students will be allowed to advance on probation in their Catalog, Student Handbook and Faculty Handbook.

11. Guideline 2.9(D): The law school must revise the authentication policy to give students notice of current requirements.

Subsequent to the inspection, the law school has revised the Student Work Authentication policy in its Catalog and Student Handbook. The law school should specifically demonstrate how the new policy complies in its 2022 Periodic Compliance Report.

12. Guideline 2.9(F): The law school must adopt, implement, and publish a policy on review of exam questions and student answers that is compliant with the guidelines.

Subsequent to the inspection, the law school has revised its policy on review of exam questions and student answers in its Student Handbook. The law school should specifically demonstrate how the new policy complies in its 2022 Periodic Compliance Report.

13. Guideline 3.1: The law school must analyze its staffing needs and report to the Committee the steps it intends to take to provide the administrative capacity necessary for sustained compliance with the Committee's standards, including job descriptions that clarify roles and responsibilities.

Subsequent to the inspection, the law school has hired an assistant to the registrar. The law school has also revised and updated its job descriptions and can be found in the Administrative Handbook. The law school must continue to evaluate staffing levels as it implements a large number of new policies and its enrollment grows. It must evaluate staffing levels and provide a report in the 2022 Compliance Report.

14. Guidelines 2.3, 5.9(C), and 5.10: The law school must inform instructors in writing how many hours of the "preparation and study" their courses must be designed to require.

Subsequent to the inspection, the law school advised that it has revised its Course Development Manual to inform instructors that the course content must meet the required student hours of study according to the law school's policy as documented in the Faculty Handbook on page 33. The law school must advise in its 2022 Compliance Report how it tracks whether the course content complies with the policy as to each course offered in the 2021-2022 and fall 2022 school years in its 2022 Compliance Report.

15. Pursuant to Guidelines 4.1-4.3 and 4.7, the law school must maintain minutes for all faculty and faculty committee meetings.

Subsequent to the inspection, the law school has added a procedure codified in their Administrative Handbook in which all Faculty Meetings, committee meetings, hearings or other meetings are recorded, and a transcription is saved by the registrar.

16. Pursuant to Guidelines 4.6-4.7, the law school must adhere to its faculty evaluation policies and consider ways to make evaluations more meaningful.

Subsequent to the inspection, the law school has implemented a faculty peer-review policy codified on page 20 of the Faculty Handbook. The policy states that professors will complete at least one evaluation of another professor each year. The law school must take further steps to address the timing and level of feedback in the evaluations, including clear feedback that may be universally constructive but is also specific.

17. Guideline 5.3(C)(1): The law school must implement procedures to ensure that attendance records are maintained and reviewed regularly by staff, students are warned of attendance issues before their absences reach the 20 percent limit in any course, administrative action on attendance issues is properly documented, and instructors are not permitted to authorize absences in a manner inconsistent with the guideline.

Subsequent to the inspection, the law school has installed a new learning management system, Canvas, which allows attendance to be tracked and analyzed. The registrar's office will review attendance on Wednesdays and Fridays. The law school has also developed a procedure to warn students in a timely fashion and documented that policy in the Administrative Handbook and conformed the policies in the Student Handbook and the Faculty Handbook. The law school must provide sample analytical reports as part of its 2022 Compliance Report.

18. Guideline 2.3 and 5.11: The law school must revise its curriculum to make elective opportunities available and amend its publications to give notice of the course rotation structure; provide accurate course descriptions for all courses, together with a statement that not all courses are given each year; and remove from the website a course schedule that suggests that upper-level students will take specific courses each year.

Subsequent to the inspection, the law school amended its publications to give notice of the law school's course rotation structure, noting that not all courses are offered each

year. The law school also removed the notice from its Catalog and website that previously indicated that and has removed course schedule that suggests that upper-level students will take specific courses each year in the Catalog and website.

The law school has also separately listed required courses versus electives and has added additional electives in Environmental Law and Bankruptcy Law.

19. Guideline 5.8: The law school must demonstrate in the next Annual Compliance Report that its internship program meets all Guideline 5.8 requirements or delete the course and remove references to it from school publications.

Subsequent to the inspection, the law school advised that it has adjusted its internship program to meet all Guideline 5.8 requirements. The law school must specifically demonstrate how the new policy meets the guideline requirements in its 2022 Compliance Report.

20. Guidelines 5.17-5.18: The law school must review its grading practices to determine what changes, if any, are needed to improve the accuracy, validity, consistency, and reliability of grades, and to give students a more realistic assessment of their likely success on the First-Year Law Students' Examination and bar exam.

Subsequent to the inspection, the law school reviewed its grading practices. The law school will strive to reduce grade inflation and improve the accuracy, validity, consistency, and reliability of grades, and to give students a more realistic assessment of their likely success on the First-Year Law Students' Exam and bar exam. The new policies are listed in their Catalog and Student handbook. Because this has been an issue identified in multiple inspections, and the law school's attrition remains substantial, the law school must provide its analyses and metrics as part of its compliance report, including any planned changes to the admissions, communications and education policies, as part of its 2022 Compliance Report.

21. Guideline 5.28: The law school should evaluate applicants' pre-legal education qualifications as required by Rule 4.25 of the Rules Regulating Admission to Practice Law in California based on documentation, not applicants' statements.

Subsequent to the inspection, the law school advised that it would continue to evaluate applicants' pre-legal education qualifications in compliance with Guideline 5.28, Guideline 5.30 and Rule 4.25.

22. Guidelines 5.28 and 9.1(B)(2) and (C)(2): The law school must clarify the statement in the Catalog that applicants with a U.S. master's degree but without a bachelor's degree are eligible for admission.

Subsequent to the inspection, the law school has removed the statement from their Catalog that applicants with a U.S. master's degree but without a bachelor's degree are eligible for admission.

23. Pursuant to Guideline 5.29, it is recommended that the LSAT must be required of students admitted after a prior disqualification.

Subsequent to the inspection, the law school has revised its policy of readmitting students that have been previously dismissed and no longer permits students to have a “second chance” that is not contemplated by the law school rules.

The law school is also considering requiring applicants to include an LSAT score.

24. Guidelines 5.31-5.32 and 9.1: The law school must comply with all guideline requirements as to receipt and filing of official transcripts.

Subsequent to the inspection, the law school states that it is in compliance with Guidelines 5.31-5.32 and 9.1, and maintains students’ application, records, files, transcripts, and class records in compliance with 9.1

The law school has purchased a date stamp for the paper transcripts received and a process has been created for stamping transcripts, as documented in the Administrative Handbook. The law school must demonstrate how this policy complies and that it has been implemented, as part of its 2022 Compliance Report.

25. Guidelines 2.3 and 5.34: The law school must comply with all guideline requirements for admission of applicants previously dismissed from law school for academic reasons.

Subsequent to the inspection, the law school has added a section to the Administrative handbook named “Applicants Previously Disqualified for Academic Reasons” outlining the requirements of Guideline 5.34. The law school has also developed process for the registrar to screen students for qualifications prior to admission, which can also be found in the Administrative Handbook. The law school must provide evidence that each student admitted under this guideline satisfies all requirements of the guideline for all current students and all new students admitted in 2022, and document this in its 2022 Compliance Report.

26. Guideline 5.35(B): The law school must comply with all guideline requirements in awarding transfer credit.

Subsequent to the inspection, the law school states that they are in compliance with Guideline 5.35(B) and do not admit transfer students’ credit for courses more than 27 months old. The law school must advise whether it previously awarded credit for any courses older than this as part of its 2022 Compliance Report and make any necessary adjustments.

27. Guidelines 2.1 and 5.26-5. The law school must study the factors contributing to high attrition, both voluntary and involuntary, after the first year; consider changes to its

communications, admissions process and standards, curriculum, or other program elements to improve both admission of qualified candidates and retention of qualified students, and report to the Committee, in its next Annual Compliance Report, the efforts being made to reduce attrition and the results of those efforts.

Subsequent to the inspection, the law school reevaluated its attrition statistics over the last five years and submitted the new statistics with their response document and the 2021 Annual Report.

The law school has also changed its policy for readmitting students dismissed from a law school. Going forward it will not readmit students who were dismissed from California School of Law and will wait two years to admit students dismissed from other law schools.

In compliance with Guideline 5.18 and 5.27, the law school the has adjusted its grading standards in the pre-enrollment course, Legal Methods, and will not admit students who show little or no ability to succeed in the JD program.

The law school must also report on the steps taken to provide the resources required for those students who are admitted to succeed, and provide its plan and progress in evaluating and reducing attrition as part of its 2022 Compliance Report.

28. Guideline 8.3: The law school must revise its curriculum to ensure that instruction is provided in both electronic and hard-copy legal research.

Subsequent to the inspection, the law school states that its curriculum was modified to add instruction in hard-copy legal research.

29. Guideline 9.1: The law school should revise its recordkeeping practices to comply with all guideline requirements and take all necessary steps to ensure that records are protected and that duplicate records can be retrieved in the event primary records are lost, corrupted, or destroyed.

Subsequent to the inspection, the law school transitioned from its prior software to Campus Café to improve accuracy and access to records. A process has been created for the recordkeeping of current students and the merging of records for students who are no longer enrolled. An assistant to the registrar has been hired to help maintain student files. The new software use industry-standard security procedures and backs up data in a secure location.

Overall, the law school's performance as observed during the inspection warrants serious concern. The law school accepted funds prior to receiving the required disclosures. It also accepted students into the program knowing that they did not demonstrate the intent and capacity to succeed in the JD program after they completed the law school's pre-course designed to evaluate their qualifications. The law school has had a history of grade inflation that must be addressed. This is especially important here because the law school has a

capstone course that students must pass in the first year in order to advance, and student callers have expressed surprise at failing based on their prior grades.

The law school must take steps to proactively seek out, understand, and implement its compliance responsibilities and sustain compliance over time.

The initial report recommended a warning letter. Based on the swift and substantial adjustments made and demonstrated, it is recommended that the law school file a detailed progress report along with its 2022 Annual Report documenting completion of all recommendations and sustained compliance, and that the law school's registration as a distance law school be continued with an inspection to be set for summer 2023.

FISCAL/PERSONNEL IMPACT

None

RECOMMENDATION

It is recommended that the Committee of Bar Examiners receive and file the Inspection Report of California School of Law and adopt all of the team's recommendations listed in the report.

It is recommended that the Committee receive and file the inspection report, continue the law school's registration as an unaccredited, distance law school, and direct the law school to file a detailed progress report confirming compliance as to each recommendation, and that the law school's next inspection be set for summer 2023.

PROPOSED MOTION

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

MOVE, that the Committee of Bar Examiners receives and files the inspection report of California School of Law conducted August 4-5, 2021 and adopts its recommendations.

FURTHER MOVE, that the law school file a detailed progress report with supporting evidence documenting completion and continued compliance as to all recommendations as part of its 2022 Periodic Compliance Report due by November 15, 2022.

FURTHER MOVE, that the law school's registration as an unaccredited distance law school be continued and the law school's next inspection be set for summer 2023.

ATTACHMENTS LIST

- A. Inspection Report Regarding California School of Law
- B. Response of California School of Law to the Inspection Report



The State Bar of California

California School of Law Periodic Inspection Report Conducted Pursuant to Rule 4.244(A)

August 4 – 5, 2021

CALIFORNIA SCHOOL OF LAW
PERIODIC INSPECTION REPORT
5276 Hollister Avenue, Suite 262, Santa Barbara, CA 93111

EXECUTIVE SUMMARY AND RECOMMENDATIONS

Introduction

A periodic inspection of the California School of Law (Cal SOL) was conducted from August 4 to 5, 2021 by a team that included Paul Kramer, a member of the Committee of Bar Examiners (Committee) and Heather Georgakis, Educational Standards Consultant.

The law school was last inspected in September 2015 and was found to be compliant.

Cal SOL has offered a part-time, online Juris Doctor (JD) degree program since January 2007. The law school was founded in December 2005 as a California for-profit institution by its owner and current Dean, William Hunt, and was approved and given degree-granting authority by the former Bureau for Private Postsecondary and Vocational Education. Since 2008, Cal SOL has been regulated by the Committee as a registered, unaccredited, distance education law school.

In late 2020, Cal SOL filed an application for accreditation with the Committee and on December 4, 2020, the Committee ordered an inspection to verify the law school's compliance with the Rules for Accredited Law Schools and Guidelines for Accredited Law Schools. Before the scheduled inspection, Cal SOL withdrew its application and the inspection proceeded as a periodic inspection under the Unaccredited Law School Rules (Rules) and Guidelines for Unaccredited Law School Rules (Guidelines).

Total enrollment was 68 students in fall 2020, including 61 first-year students and 7 continuing students, and 93 students at the time of inspection. The law school's institutional mission is, in part, to provide "prepare adults for the legal profession, through innovative scholarship and professional training, via distance learning, with online video conferencing classrooms."

The four-year JD program is delivered over three fifteen-week "trimester" study periods through synchronous videoconference class sessions and asynchronous activities such as drills and exams. To graduate, students must earn 864 hours of study each year over 48 to 52 weeks each year. The curriculum includes required courses in all subjects tested on the California Bar Examination (bar exam) and practical skills topics. Elective courses are limited. Clinics are not offered, and students have not taken the Internship elective course in several years.

Dean William Hunt is a University of San Francisco Law School graduate and licensee of the State Bar of California (State Bar). He is assisted by a full-time Registrar and Bursar, Lara Lytle, and four part-time staff members, including two assistant deans. The faculty includes all three deans and nine other adjunct instructors. All instructors are graduates of law schools approved by the American Bar Association (ABA) or registered by the Committee, and most are State Bar licensees.

Cal SOL admits students in all permitted categories, including special students who qualify for admission based upon test scores rather than college credits. Two-thirds of Cal SOL students are women and 43 percent identify as white. Half of the instructors are women and half are white.

Total JD program tuition is \$36,000 based on current per-trimester tuition of \$3,000 and estimated total program fees are from \$800 to \$2,000.

On the First-Year Law Students' Examination, 37 percent of takers from Cal SOL passed the November 2020 exam while 11 percent passed the June 2021 exam. Of the Cal SOL graduates who took the October 2020 bar exam, 13 percent passed, while 17 percent passed the February 2021 exam. Cal SOL reported a cumulative bar exam five-year passage rate of 46.15% for the period between January 1, 2015 and December 31, 2019, in the 2021 Business and Professions Code section 6061.7 Information Report.

Recommended Action by the Committee

It is recommended that this Periodic Inspection Report be received and filed. It is also recommended that the Committee adopt each of the recommended actions listed below and issue a warning to California School of Law pursuant to Rules 4.244(G)(4) and 4.263. While the law school's tuition is affordable this must be balanced against the significant noncompliance and lack of success in the educational program that was observed. It is further recommended that if the Committee believes that the inspection report demonstrates that the law school is not in compliance or will not likely be in compliance with these rules, the Committee should notify the law school via the warning letter that it recommends probation or withdrawal of registration, pursuant to Rule 4.263.

Recommended, Mandatory Actions

1. Guidelines 1.9 and 2.3: The law school must publish procedures for seeking accommodations of all types, eliminate from the application questions about disabilities, and eliminate from the Student Handbook a statement suggesting the State Bar will grant the same accommodations for the FYLSX and bar exam.
2. Guidelines 1.9 and 2.3: The law school must eliminate the policy that transcripts will not be released if records are on hold for financial reasons, pursuant to Civil Code section 1788.90.
3. Guidelines 2.1-2.3 and 2.12: The law school must review and as necessary revise its publications to describe and depict its services and policies clearly, completely, and accurately including, without limitation, admissions information, tuition refund policy, schedule of tuition and fees, and student services.
4. Guideline 2.3: The law school must publish the Guideline 2.3(D)(1) disclosure in the Catalog and the Student Handbook; revise its website to comply with Guideline 2.3(D)(2); revise its publications to comply with Guideline 2.3(D)(4); and remove statements that it is accredited from its publications.

5. Rule 4.241 and Guidelines 2.1-2.3 and 9.1: The law school must revise its procedures to comply with all Rule 4.241 requirements and related record-keeping requirements of Guideline 9.1. The law school must further consider making the Rule 4.241 Disclosure Statement part of the enrollment agreement, receiving these signed disclosures prior to accepting payment.
6. Guideline 2.8: The law school must adopt, implement, and publish a student discipline policy that is compliant with the guideline.
7. Guideline 2.9(B): The law school must provide quality descriptors for letter grades and inform students whether anonymous grading is used, and if so, by what procedures.
8. Guidelines 2.9(B)(3) and 5.24: The law school must adopt, implement, and publish a policy on course repetition that is compliant with the guidelines.
9. Guideline 2.9(B)(8) and (G): The law school must adopt, implement, and publish a policy on grade review that is compliant with the guidelines.
10. Guidelines 2.7, Guideline 2.9(A), and 5.19-5.20: The law school must adopt, implement, and publish policies that clearly state when good academic standing is calculated, what GPAs constitute good standing, and under what circumstances students will be allowed to advance on probation, including the process by which probation decisions will be made.
11. Guideline 2.9(D): The law school must revise the authentication policy to give students notice of current requirements.
12. Guideline 2.9(F): The law school must adopt, implement, and publish a policy on review of exam questions and student answers that is compliant with the guidelines.
13. Guideline 3.1: The law school must analyze its staffing needs and report to the Committee the steps it intends to take to provide the administrative capacity necessary for sustained compliance with the Committee's standards, including job descriptions that clarify roles and responsibilities.
14. Guidelines 2.3, 5.9(C), and 5.10: The law school must inform instructors in writing how many hours of the "preparation and study" their courses must be designed to require.
15. Pursuant to Guidelines 4.1-4.3 and 4.7, the law school must maintain minutes for all faculty and faculty committee meetings.
16. Pursuant to Guidelines 4.6-4.7, the law school must adhere to its faculty evaluation policies and consider ways to make evaluations more meaningful.
17. Guideline 5.3(C)(1): The law school must implement procedures to ensure that attendance records are maintained and reviewed regularly by staff, students are warned of attendance issues before their absences reach the 20 percent limit in any course, administrative action on attendance issues is properly documented, and instructors are not permitted to authorize absences in a manner inconsistent with the guideline.
18. Guideline 2.3 and 5.11: The law school must revise its curriculum to make elective opportunities available and amend its publications to give notice of the course rotation structure; provide accurate course descriptions for all courses, together with a statement that not all courses are given each year; and remove from the website a course schedule that suggests that upper-level students will take specific courses each year.

19. Guideline 5.8: The law school must demonstrate in the next Annual Compliance Report that its internship program meets all Guideline 5.8 requirements or delete the course and remove references to it from school publications.
20. Guidelines 5.17-5.18: The law school must review its grading practices to determine what changes, if any, are needed to improve the accuracy, validity, consistency, and reliability of grades, and to give students a more realistic assessment of their likely success on the FYLSX and bar exam.
21. Guideline 5.28: The law school should evaluate applicant's pre-legal education qualifications as required by Rule 4.25 of the Rules Regulating Admission to Practice Law in California based on documentation, not applicant's statements.
22. Guidelines 5.28 and 9.1(B)(2) and (C)(2): The law school must remove or clarify the statement in the Catalog that applicants with a U.S. master's degree but without a bachelor's degree are eligible for admission.
23. Pursuant to Guideline 5.29, it is recommended that the LSAT must be required of students admitted after a prior disqualification.
24. Guidelines 5.31-5.32 and 9.1: The law school must comply with all guideline requirements as to receipt and filing of official transcripts.
25. Guidelines 2.3 and 5.34: The law school must comply with all guideline requirements for admission of applicants previously dismissed from law school for academic reasons.
26. Guideline 5.35(B): The law school must comply with all guideline requirements in awarding transfer credit.
27. Guidelines 2.1 and 5.26-5.27: The law school must study the factors contributing to high attrition, both voluntary and involuntary, after the first year; consider changes to its communications, admissions process and standards, curriculum, or other program elements to improve both admission of qualified candidates and retention of qualified students, and report to the Committee, in its next Annual Compliance Report, the efforts being made to reduce attrition and the results of those efforts.
28. Guideline 8.3: The law school must revise its curriculum to ensure that instruction is provided in both electronic and hard-copy legal research.
29. Guideline 9.1: The law school should revise its recordkeeping practices to comply with all guideline requirements and take all necessary steps to ensure that records are protected and that duplicate records can be retrieved in the event primary records are lost, corrupted, or destroyed.

Submission of Self-study

Cal SOL submitted a self-study to assist the team in its assessment of the law school's compliance with the Rules and Guidelines. Dean Hunt responded to requests for additional information and the information provided was considered when drafting this report.

Conduct of Site Visit

The inspection occurred during the COVID-19 pandemic when travel options were limited. Cal SOL was given the choice to undergo a remote visit based on the same standards as an in-person visit, and the law school agreed. Before the visit, the team received training to allow review of the student portal and learning management system, and reviewed self-study materials and records.

The inspection visit took place via videoconference over a two-day period. The team met with administrators, faculty members, and students, and toured Cal SOL's administrative office. To conclude the visit, the team met with Dean Hunt and Registrar Lara Lytle for an exit interview.

After the visit the team observed real-time class sessions via Zoom videoconference technology and completed their review of law school records. At the Consultant's request, Cal SOL invited students to send comments about the law school, and comments received were reviewed.

SPECIFIC FINDINGS AS TO THE COMMITTEE'S RULES AND GUIDELINES

Below are the team's findings, conclusions, and recommendations as to the law school's compliance with the Unaccredited Law School Rules (Rules) and Guidelines for Unaccredited Law School Rules (Guidelines).

Rule 4.240(A): Lawful Operation. The law school must operate in compliance with all applicable federal, state, and local laws and regulations. (Guideline 1.9).

Cal SOL is a for-profit corporation in good standing with the California Secretary of State. The law school has met legal requirements of the City of Santa Barbara, where its headquarters is located, and appears to follow applicable federal, state, and local laws except as noted. (Guideline 2.4).

The law school has a process for providing testing accommodations, and the policy is documented in the Student Handbook, as required by the Americans with Disabilities Act and similar laws.

To comply more fully with disability laws and Guidelines 1.9 and 2.3, Cal SOL should publish procedures for seeking accommodations of all types, eliminate from the application questions about disabilities, and eliminate from the Student Handbook a statement suggesting the law school will provide the same accommodations that the State Bar will provide, as the law school cannot know this in advance, or if the same accommodation would be appropriate for each exam.

The Catalog informs students of their rights under the Family Educational Rights and Privacy Act (FERPA) and includes policies on civil rights and substance abuse.

To comply with Civil Code section 1788.90, Cal SOL should eliminate its policy that transcripts will not be released if records are on hold for financial reasons. The statute bars schools such as Cal SOL from withholding transcripts based on debt owed or alleged to be owed.

Rule 4.240(B): Integrity. The law school must demonstrate integrity in all of its programs, operations, and other affairs. (Guidelines 2.1 – 2.3, 2.8 – 2.12).

Law schools must conduct their affairs and communications honestly and forthrightly. (Guidelines 2.1-2.3). Cal SOL communicates through a website, Catalog, Student Handbook, Faculty Handbook, and Administrative Procedures Handbook. These materials contain factual inaccuracies and other errors that undermine their usefulness and transparency.

Cal SOL should review, and as necessary, revise its publications to describe its services and policies, clearly, completely, and accurately. Publications should be free from inconsistent, inaccurate, or incomplete statements, and should be made more accessible and coherent through, for example, features such as tables of contents, logical organization of topics, and careful proofreading to eliminate grammatical and typographical mistakes. (Guidelines 2.1-2.3).

Financial matters are handled in a timely, appropriate manner and adequate financial safeguards are employed to protect financial assets against impropriety. (Guideline 2.2).

Tuition, fees, and terms of the tuition payment plan are stated in the Catalog and on the [website](#). Refund requests are processed within 30 days. It is unclear whether refunds are based on the number of classes attended or the week during which the student withdrew. Refunds are based on a percentage of “refundable tuition” a term that should be clearly defined. An illustration of how tuition is calculated refers to a “termination fee” and that fee should be disclosed in the schedule of tuition and fees. Cal SOL must clarify the tuition refund policy and schedule of tuition and fees to comply more fully with Guideline 2.2(B).

On the website, Cal SOL has used stock photography depicting face-to-face classroom and other interactions. As a distance learning law school that offers no on-site student facilities or services, Cal SOL should revise its website to reflect the nature of its program and services more honestly. (Guideline 2.3).

Guideline 2.3(D)(1) requires the publication of certain disclosures, giving notice that students must take the FLSX and that graduates may not qualify for bar admission in other jurisdictions. Cal SOL must publish the required language in the Catalog and Student Handbook.

Under Guideline 2.3(D)(4), when Cal SOL states that it is registered with the Committee it must also “indicate that its registration is as an unaccredited law school in the category in which it is registered.” Cal SOL should disclose its unaccredited distance education status in all references to its registration, such as those on the webpage entitled State Bar Registration, and in the Catalog, Student Handbook, and Faculty Handbook.

Cal SOL should remove published statements that it is accredited, such the statement on page 12 of the Student Handbook that it is accredited to confer a Juris Doctor in law.

The law school has posted the Information Report required by Business and Professions Code section 6061.7 but should locate an active link to the report on its homepage under the “Admissions” tab and provide all required information. (Guideline 2.3(D)(2)).

Under Rule 4.241, Cal SOL must provide each student with a Disclosure Statement with specific information both before the student pays any initial registration fee and again before the student pays a fee for a subsequent academic term. The law school must maintain a copy of each such statement, signed by the student, in the student’s permanent file. (Guideline 9.1(C)(2)).

A sample review of Cal SOL’s records showed that several of the law school’s Rule 4.241 statements contained outdated information on matters such as the law school’s student-faculty ratio, bar results, and accreditation application. If the school states its assets and debts, it should do so accurately. (Guideline 4.241(A)(3)). Some student files lacked the required signed copies of Rule 4.241 Disclosure Statements. The potential consequences of such non-compliance were discussed with Dean Hunt.

The law school should revise its procedures to comply with all Rule 4.241 requirements. Disclosure Statements should consist of updated, accurate information including, as mandated by Rule 4.241(A)(2), a statement that Cal SOL has filed and withdrawn an application for accreditation in the past five years. It is recommended that the Rule 4.241 Disclosure Statement be made part of the enrollment agreement to ensure that students sign an updated statement prior to enrolling for their initial term and again prior to any subsequent term. Copies of the signed statements, not just signature pages, should be maintained in students’ records and made available for review when requested by the Committee. (Guidelines 2.1-2.3 and 9.1).

Cal SOL is a for-profit entity. (Guideline 2.4). It does not compensate individuals based on the number of persons enrolled, applying for admission, or registering. (Guideline 2.5).

To comply more fully with Guideline 2.8, Cal SOL should revise the student discipline policy to provide all due process procedures specified by the guideline, including a hearing by a panel and a written determination, and to do so for all matters without regard to level of misconduct.

Students must be clearly informed of grading policies. (Guideline 2.9(B)). Courses are letter-graded on a four-point A+ to F scale, with final exams counting at least 70 percent toward course grades. Cal SOL should provide quality descriptors to indicate the level of achievement represented by each grade, such “inadequate but passing” (Guideline 2.9(B)(1)) and inform students whether anonymous grading is used. (Guideline 2.9(B)(5)).

The law school permits repetition of failed courses by some upper-level students but must revise its policy to meet all requirements of Guideline 5.24. (Guidelines 2.9(B)(3)).

To comply more fully with Guideline 2.9(B)(8) and (G), the law school should adopt, publish, and implement a grade review policy that does not require a student to obtain instructor approval for a grade change, provides that grade review decisions will be made by a faculty-led committee, and

allows grade changes on grounds specified. The entire policy should appear in one section of the Student Handbook, not in disparate locations as now occurs.

The course repetition policy should be revised to state the effect repetition will have on a student's GPA, the amount of credit earned, and the course grade. Students should be informed of how the prior and new grades will be used to calculate the GPA and whether both grades will appear on the transcript. (Guidelines 2.9(B)(3) and 5.24)

To graduate, students must fulfill the Committee's minimum hours requirements, pass the FYLSX, maintain a minimum cumulative GPA of 2.0 "at all times", pass all required courses, and pay all charges due.

The probation policy requires clarification. First year students with a cumulative and trimester GPA of 2.5 or below are automatically placed on probation, enrolled in the PASS academic support program, and dismissed after one trimester if they do not earn a GPA above 2.5. Upper-level students with a trimester GPA of 2.25 or below are placed on probation and enrolled in PASS. They must achieve a GPA above 2.25 by the next trimester to be removed from probation, but it is unclear whether that requirement refers to the cumulative or trimester GPA.

The policy provides that upper-level students who fail to raise their GPA above 2.25 within one trimester "may" be dismissed, but does not explain how, by whom, or upon what standard the decision to dismiss or retain will be made. If the student is retained, rather than dismissed, it is unclear what that student will need to do to avoid future dismissal or otherwise be released from probation in the future. Exceptions to the probation policy must be made and documented as specified by Guideline 5.19.

To comply more fully with Guidelines 2.7, 2.9(B)(6), and 5.19-5.20, Cal SOL should adopt, implement, and publish policies that clearly state when good standing is calculated for all students, whether advanced in good standing, on probation, or completing the JD; what GPAs constitute good academic standing; and under what circumstances students will be allowed to advance on probation, including the process by which probation decisions will be made.

Syllabi consistently explain the components upon which final grades will be based. Participation points are typically limited to no more than 5 percent of the grade. (Guideline 2.9(C)).

Under the policy on authentication of student work, attendance is verified with government-issued photos. Assignments are authenticated by the accounts used to send files and plagiarism detection software is not used. Cal SOL had required in-person proctoring of exams, but students now take exams remotely, using ExamSoft with remote proctoring. Cal SOL should revise the authentication policy to give students notice of current requirements. (Guideline 2.9(D)).

Exam grades are returned to students promptly. (Guideline 2.7(D)).

Cal SOL allows students to review exam materials, but the law school should adopt, implement, and publish a policy to inform students of this opportunity. (Guideline 2.9(F)).

Student privacy is protected, and students are informed of their privacy rights. (Guideline 2.10). Reasonable security and backup procedures are followed for records. (Guideline 2.11).

Services available to students are inconsistently described on the website and other publications and certain services are no longer provided, such as certain career services. To comply more fully with Guideline 2.12, all materials should be updated to accurately describe services offered.

Under Guideline 2.12, students must be provided with academic counseling. The Faculty Handbook states that instructors must schedule office hours of 10 to 15 minutes per week, either before or after class, to meet with students about “non-academic issues or to answer specific questions.” Students appear to be satisfied with the availability of their instructors.

Support for students on probation or in danger of being placed on probation is provided by the Dean of Students Andrew Sherman through the Provisional Academic Student Success (PASS) program initiated in late 2018. Dean Sherman conducts mandatory weekly sessions that include essay review and/or review of multiple-choice questions and he evaluates students on attendance, participation, and completion of assignments but not performance. The academic success of PASS participants has been limited but will continue to be tracked. (Guideline 2.12).

Rule 4.24(C): Governance. The law school must be governed, organized, and administered so as to provide a sound educational program. (Guideline 3.1).

Cal SOL is a California limited liability corporation owned and administered by founder and Dean William Hunt. The law school has no governing board or board of visitors but has an administrative staff of two full-time and four part-time employees. (Guideline 3.1-3.3).

Dean Hunt works full-time at the Santa Barbara office. He is responsible for reviewing and revising the curriculum, selecting textbooks, dealing with student and faculty disputes, and interviewing instructors. Dean Hunt also teaches several courses. He is a 1994 graduate of the University of San Francisco School of Law and a State Bar licensee. Before founding Cal SOL in 2005, Dean Hunt worked at several institutions as a paralegal professor and program coordinator.

Registrar and Bursar Lara Lytle has held her full-time position for three years. Ms. Lytle manages Cal SOL’s records and administers several other functions, including admissions, human resources, student financial affairs, and accounting and bookkeeping. She is assisted by Records Administrator Hazel Stark, a six-year employee who works several hours a month, as needed.

IT Director Gary Alan manages the technology infrastructure. He was recently hired and works slightly more than half-time while pursuing graduate studies.

Two assistant deans work part-time and remotely to assist with academic matters. Dean of Faculty Tricia Zunker is a graduate of UCLA School of Law and a State Bar licensee. She joined the faculty in 2007 and teaches several courses. She also works for Colorado State University's global campus as a professor and curriculum development specialist and is an Associate Justice for the Ho-Chunk Nation Supreme Court.

Dean of Students Andrew Sherman is a 2017 Cal SOL graduate who joined the faculty in 2018 and became a State Bar licensee in November 2020. He oversees the PASS academic support program and teaches introductory and bar preparation courses while maintaining a consultancy practice.

To clarify roles, it is suggested that job descriptions be created. (Guideline 3.1). In some cases, staff members did not understand their duties to be as described in the self-study and other publications and in other cases it was unclear how responsibilities were divided.

Cal SOL personnel appear to be dedicated to the law school's mission, but it is not clear that the law school has adequate administrative capacity to support full compliance with the Rules and Guidelines. Administrators have attributed some of the concerns raised in this report to an unexpected increase in enrollment and others to inadequate computer software, a problem administrators hope will be resolved by using more robust programs.

To bring itself into full compliance with Guideline 3.1, Cal SOL should analyze its staffing needs and report to the Committee the steps it intends to take to provide the administrative capacity necessary for sustained compliance with the Committee's standards.

Rule 4.240(D): Dean and Faculty. The law school must have a competent dean or other administrative head and a competent faculty that devotes adequate time to administration, instruction, and student counseling. (Guidelines 4.1- 4.10).

By virtue of his law degree and experience in higher education, Dean Hunt is qualified to serve as Cal SOL's Dean and administrator. (Guidelines 4.1 and 4.2).

The credentials of the faculty satisfy Guideline 4.6. According to the self-study, the faculty consists of twelve part-time instructors, including the three deans. All instructors are graduates of law schools approved by the American Bar Association or registered by the Committee and all but one are State Bar licensees. Most instructors have taught at Cal SOL for at least five years.

Guideline 4.5 requires the faculty to "possess a diverse educational background." Cal SOL's instructors graduated from a variety of law schools, including UCLA, Golden Gate University, and Harvard, while one quarter are Cal SOL graduates, including the unlicensed instructor. Cal SOL is encouraged to continue to make efforts, when adding instructors, to hire qualified graduates of other law schools to maintain a faculty with diverse educational perspectives.

Instructors attend periodic faculty meetings and serve on several committees, according to the self-study while the deans are the sole members for the Admissions, Academic Affairs, and Faculty

Hiring Committees. It is suggested that minutes should be maintained of these meetings to document decision-making and faculty development. (Guidelines 4.1-4.3 and 4.7).

Cal SOL employs enough instructors to meet student needs. (Guideline 4.4). The student-faculty ratio is about ten to one. Required courses have an average class size of 15 students while first-year courses are taught in sections of up to about 30 students.

The law school does not have a written faculty course load policy, but records confirm that instructors have been assigned teaching loads within the limits of Guideline 4.5.

The Faculty Handbook does not address the duty of faculty to continuously improve their teaching skills and substantive expertise (Guideline 4.7) but states that instructors must be members of a state bar and stay current with continuing legal education requirements.

Faculty development is supported through performance evaluations according to the self-study. Deans Hunt and Zunker have evaluated instructors (Guidelines 4.7 and 4.8), although the near-uniform assessment of instructors as “exceptional” suggests that evaluations could be improved. Certain policies created in response to the 2015 Inspection Report do not appear to be followed, including instructor peer review and self-assessment. It is recommended that Cal SOL adhere to its faculty evaluation policies and consider ways to make faculty evaluations more meaningful.

Faculty are protected by an academic freedom policy published in the Faculty Handbook. (Guideline 4.9).

Rule 4.240(C): Educational Program. The law school must maintain a sound program of legal education. (Guidelines 5.1-5.16).

Students at registered, unaccredited distance-learning law schools must complete, each year for four years, a minimum of 864 hours of “preparation and study”, including at least 135 hours of interactive classes. (Guideline 5.9(C)). Cal SOL students who complete the JD curriculum exceed these requirements. The academic year spans forty-eight to fifty-two weeks and students must complete 880 total hours of study, including 270 hours of class time, each year for four years.

The law school offers three fifteen-week trimesters each year and admits students in January, May, and September. The program is based on hours of instruction rather than units, as permitted, but trimester units are assigned to each course. Students complete 19.5 units each year, for a total of 78 units. Most courses are three units and require 140 hours of work, while a few courses are four and one-half units and require 180 hours of work. Following the inspection visit Cal SOL updated course descriptions to reflect current course units.

Cal SOL verifies student hours of “preparation and study” through study logs submitted online through the learning management system. Instructors design their own courses and the Course Development Manual should inform instructors how many hours of “preparation and study” their courses must be designed to require. (Guidelines 2.3, 5.9(C), and 5.10).

Before being allowed to enroll, admitted students must complete a free, no-credit, four-week Legal Methods program. According to Dean Hunt, who teaches the program, about a third of the students show little or no ability for law study during this program, although only 5 percent to 10 percent are not allowed to enroll in the JD program. As the law school seeks ways to meet its duty under Guidelines 5.18 and 5.27 to admit and advance only qualified students, this program presents a clear opportunity and responsibility for immediate change and response.

All courses are taught online and include synchronous and asynchronous elements. Students take two courses each trimester and for each course participate in two, 90-minute interactive Zoom sessions weekly, on Tuesday and Thursday evenings. Sessions are recorded and archived for later viewing. To receive attendance credit, students must be on camera with a working microphone. Students complete assignments online, now through Canvas, and take remotely-proctored exams through ExamSoft.

As mandated by Guideline 5.3(C)(1), students are required to attend at least 80 percent of class sessions to earn course credit. Instructors take attendance and have been held responsible to alert administrators about attendance issues, but records indicate that absences have not been tracked effectively. Further, a policy allowing instructors to “make allowances” for interruptions in attendance, stated in the Catalog, may result in noncompliance with the 80 percent rule and is inconsistent with Guideline 5.6 requirements for exemptions on hours mandates.

Cal SOL should implement procedures to ensure that attendance records are maintained and reviewed regularly by staff, students are warned of attendance issues before their absences reach the 20 percent limit in any course, administrative action on attendance issues is properly documented in student files, and instructors are not permitted to authorize absences in a manner inconsistent with Guideline 5.3(C)(1).

The law school does not appear to have granted exceptions to hour and weeks requirements. (Guideline 5.6).

The curriculum includes required courses on all bar exam-tested doctrinal subjects, including Professional Responsibility. (Guideline 5.10). First-year students study all subjects tested on the First-Year Law Students’ Examination (FYLSX) and take Legal Writing and Analysis (LWA). To advance beyond the first year and be certified to take the FYLSX, students must pass the LWA final exam, a seven-hour test that mimics the FYLSX in format.

Upper-level students must take Legal Research and Writing I, II, and III and Bar Review in addition to doctrinal courses. After the first year, all courses are given on a three-year rotation and all upper-level students take their courses together.

Students have two elective opportunities and generally they take Remedies and Family Law, although Trial Advocacy is also a listed elective. As a practical matter, these courses are not true electives because students have almost no choice but to take them, when and if offered. The only other option is Legal Internship, discussed below.

The law school should revise its curriculum to make elective opportunities available as required by Guideline 5.11 and amend its publications to give notice of the course rotation structure, state that not all courses are given each year, provide accurate course descriptions for all courses offered including Family Law, and remove from the website a course schedule that suggests that upper-level students will take specific courses each year. (Guidelines 5.11 and 2.3).

Cal SOL does not offer clinics or law review. Legal Internship is listed as an elective option, but no students have taken that course for at least four years and information needed to confirm compliance with Guideline 5.8 was not provided. In its next Annual Compliance Report, the law school should demonstrate that it has an internship program that meets all Guideline 5.8 requirements, or the course should be deleted and references to it removed.

Interactions among students and their instructors and classmates are made possible by the learning management system and Zoom platform. (Guideline 5.13).

Policies on exams and grading fulfill Guidelines 5.14 through 5.16. Instructors draft their own exams and submit them for review. Midterm exams are given in most courses and count for up to 25 percent of the course grade. Final exams are required and must count for at least 70 percent of the course grade. Final exams traditionally have been taken under live proctoring conditions at approved facilities, but the school has now shifted to remotely-proctored exams.

A selection of essay exam questions and student answers was reviewed. Most questions were well-drafted and presented a fair test of the issues being examined, although some included lengthy facts and numerous issues relative to the time allotted. A better practice would be to draft questions of a more reasonable length and number of issues, and to hold students accountable for an appropriate analysis of those issues. Although the rank order of student answers was reasonable, overall grades appeared higher than warranted. Grading is discussed below. (Guidelines 5.16 and 5.25).

Rule 4.240(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 designated to teach practice-based skills and competency training. Such competency training must teach and develop those skills needed by a licensed attorney to practice law in an ethical and competent manner. (Rule 4.240(F)).

Rule 4.240(F) mandates that Cal SOL to require students to complete at least 6 semester units of practice-based skills and competency training. Cal SOL exceeds this mandate, requiring its students to complete 21 trimester units of training, equal to 21 semester units. A trimester unit requires 15 hours of class time and at least 30 hours of study, the same as a semester unit.

Required training courses include Legal Writing and Analysis (4.5 units), Professional Responsibility (3 units), and three Legal Research and Writing courses (I, II, and III) (4.5 each). According to the self-study, some doctrinal courses require training activities, but time spent in those activities was not documented and those courses are not included in the calculation above.

Rule 4.240(G) Scholastic Standards. The law school must maintain sound scholastic standards and must as soon as possible identify and exclude those students who have demonstrated they are not qualified to continue. (Guidelines 5.17-5.25).

Grading standards must ensure accuracy, validity, consistency, and reliability in grading. Students must be realistically assessed and those who are unqualified must be promptly dismissed. (Guidelines 5.17 and 5.18). Cal SOL's grading practices were questioned during the 2015 inspection and though changes were made, concerns remain about grade inflation and the quality of grading practices.

Cal SOL uses an A+ to F letter grading scale with plus/minus increments that correspond to grade points. An A+ earns 4.00 grade points and a D earns 1 grade point and is the lowest passing level. A cumulative GPA of at least 2.0 is needed to graduate. Students are placed on probation with a cumulative GPA of 2.50 (C+) or below in the first year and of 2.25 or below after the first year.

Instructors receive minimal guidance on grading in the Faculty Manual. The core principle is that students who pass courses "are likely to be able to pass the bar" yet the law school appears to grade students relative to one another, rather than on an objective standard of competence. To combat inflation, instructors "are not permitted to give more "A's in a course than B's and C's", but this practice is not always observed and has not controlled inflation.

After the 2015 inspection, Cal SOL eliminated an "overly generous" curve that limited instructors to giving no more than 45 percent A's or B's. Grades in most courses remain heavily weighted to A's and B's. The 2020 Annual Report shows that 54 percent of grades given were A's and B's, with 21 percent being A's. Other reports with the self-study confirm that grade inflation has persisted.

Grades in first year doctrinal courses skew toward both ends of the grading scale. The low grades indicate that at least some unqualified students are being identified promptly, as required under Guideline 5.18, but the high grades may mislead students about their likely success on high-stakes exams such as the FYLSX and bar exam. Many students with A's and B's fail the final exam in Legal Writing and Analysis (LWA) and they are dismissed by Cal SOL and not certified to take the FYLSX. It is not clear that consistent grading standards are being applied in all first-year courses.

Bar exam and FYLSX results also provide evidence that grading practices should be reconsidered. An undated multi-year study attached to the self-study shows that Cal SOL graduates with a law school GPA below B (3.0) did not pass the bar exam, except for one who passed with a 2.9 GPA. Of graduates who did not pass, 68 percent had GPAs in the B range. Data in the 2020 Annual Report show that of Cal SOL students who did not pass the FYLSX, all had received at least 40 percent A's, and all had cumulative GPAs of 2.9 or above.

Cal SOL should review its grading practices to determine what changes, if any, are needed to improve the accuracy, validity, consistency, and reliability of grades, and to give students a more realistic assessment of their likely success on the FYLSX and bar exam. (Guidelines 5.17-5.18).

As noted above, Cal SOL must clarify some academic policies (Guidelines 5.19-5.20). The law school is compliant with the requirements of Guidelines 5.21 and 5.22 as to the FYLSX.

Rule 4.240(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 5.26-5.35).

Under Guidelines 5.26 and 5.27, a law school must admit only those applicants who reasonably appear qualified to study law and must adopt “adequate and appropriate screening procedures” to identify those who lack the necessary ability. Cal SOL has unusually high attrition, but the law school appears to have the means to address this problem through its admissions policies and academic programs.

Cal SOL admits students in all admission categories, including regular students who have at least 60 acceptable college units, special students who qualify based on test scores, and transfer students. In the past three years, Cal SOL has accepted between 94 percent and 96 percent of applicants, and about 50 percent of admitted applicants have enrolled. According to the law school’s Business and Professions Code section 6061.7 report, for students entering in fall 2020, the 75th, 50th, and 25th percentile undergraduate GPAs were 3.50, 3.33, and 2.90, respectively.

Based on its opportunity mission, Cal SOL has determined that applicants with a prelaw GPA of 2.0 or higher, or minimum acceptable scores in College Level Examination Program (CLEP) tests, have the capacity for law study. Any applicant with these qualifications will be admitted, absent a record of crime or other misconduct deemed to involve moral turpitude.

The Catalog and website provide admissions information, but these sources should be revised to state all requirements accurately, including the application fee; requirements for College Level Examination Placement tests, as applicable; and official transcripts requirements, as noted below. (Guideline 2.3).

Applicants are asked to submit an application form, \$75 fee, and official transcripts. Cal SOL does not interview applicants or require them to provide personal statements, writing samples, letters of recommendation, or Law School Admissions Test (LSAT) scores, although applicants with scores are encouraged to provide them. (Guideline 5.29).

The application asks about prior law school history and exit status, as Guideline 5.31 requires, and about prior criminal conduct, court martial, or dishonorable discharge. As noted, questions about disabilities must be removed to comply with disability-related laws.

Registrar Lara Lytle reviews admission files to determine whether applicants have met minimum pre-legal educational requirements. In some cases, this determination is based on the applicant’s statements alone, rather than on transcripts or other documentation. This practice should be

discontinued as it does not comply with Guideline 5.28 or Rule 4.25 of the Rules Regulating Admission to Practice Law in California.

Dean Hunt makes all admissions decisions, based upon applicants' pre-legal GPAs and whether they have shown good moral character and the capacity to make a positive contribution to the legal profession. The Assistant Deans serve nominally on an Admissions Committee with Dean Hunt, but he consults them only on close moral character issues.

Cal SOL must maintain "official transcripts of all prelaw studies or showing a bachelor's degree from a qualified institution and transcripts of any graduate studies" for admitted applicants and enrolled students. (Guidelines 9.1(B)(2) and (C)(2)). The Catalog states that applicants with a U.S. master's degree but without a bachelor's degree are eligible for admission, which is true only when other pre-law eligibility requirements have been met. Cal SOL should eliminate or clarify that statement. (Guidelines 5.28 and 9.1(B)(2) and (C)(2)).

In a sample review of student files, Cal SOL's records were found to be incomplete in that several files lacked required pre-law and prior law school transcripts and it could not be established that transcripts on file had been received in a timely manner. (Guidelines 5.31-5.32 and 9.1). Cal SOL should revise its procedures to comply more fully with these guidelines. Students must be dismissed if the required original transcripts are not received within 45 days of enrollment.

Cal SOL admits students previously disqualified for academic reasons from Cal SOL and other law schools. In the last five years, ninety-two percent of such students withdrew or were dismissed a second time, including all re-admitted students from Cal SOL. The law school should comply with all Guideline 5.34 standards in admitting or re-admitting previously disqualified students, including requiring an affirmative showing of ability for successful law study. It is recommended that the LSAT should be required of such students. (Guideline 5.29). not listed

Transfer admitted by the law school must complete at least two years of their studies at Cal SOL and will receive transfer credit only for grades of C+ or above from the prior law school. Decisions about transfer credit are made by Dean Hunt. The law school should comply with all Guideline 5.35(B) requirements in admitting transfer students. Student files should clearly document any transfer credits and course requirements deemed satisfied. Transfer credit should be based on when the original credit was earned, not when the student left the prior school, and a compliant process for deciding and documenting exceptions should be followed.

Special students are admitted but none were enrolled in 2020. (Guidelines 5.26 and 5.27).

Attrition at Cal SOL is very high, as acknowledged in the self-study. Law school data for 2015 through 2018 show that the percentage of first-year students ineligible to advance to the second year due to withdrawal or academic failure ranged from 77 percent to 93 percent and averaged 86 percent. Actual attrition may have been higher, because the data did not include any students who did not return for the second year.

Cal SOL has taken some steps to address academic disqualification through the Legal Methods and PASS programs. The law school should continue to inform applicants and students about the demands of its program and to expand opportunities for students to practice, and receive feedback on, the legal analytical skills they must develop to succeed. The law school, however, also has an obligation to address high attrition through effective screening of candidates for admission, including re-admission. (Guidelines 5.26-5.27).

The law school should study the factors contributing to high attrition, both voluntary and involuntary, after the first year; consider changes to its communications, admissions process and standards, curriculum, or other program elements to improve both admission of qualified candidates and retention of qualified students, and report to the Committee, in its next Annual Compliance Report, the efforts being made to reduce attrition and the results of those efforts.

The law school has a compliant policy on enrollment as an auditor or visitor. As stated in the Catalog, only enrolled students are allowed to attend Cal SOL. (Guideline 5.36).

Rule 4.240(I) Library. The law school must maintain a library consistent with the minimum requirements set by the Committee. (Guidelines 6.1-6.6).

Students have access to all required library resources in electronic format through the law school's contract with Fastcase, and hard bound copies of texts or treatises for courses in the JD curriculum are held at the law school's office. (Guideline 6.2). Individual Fastcase passwords are issued to students upon registration, and they retain access to the service while enrolled.

Fastcase is available to both students and faculty without time restriction and technical assistance is available on weekdays from 11 a.m. to 11 p.m. Pacific time by telephone, email, or live chat. (Guideline 6.5) Students also have online access to over 600 tutorials in 32 different legal subject areas through the Center for Computer-Assisted Legal Instruction ("CALI"). Each student is charged a library fee of \$200.00 each year.

To comply more fully with Guideline 6.3, the law school should revise its curriculum to ensure that instruction is provided in both electronic and hard-copy legal research. According to Assistant Dean Zunker instruction in hard-copy research has not been given for several years.

Records of library expenditures are properly maintained. (Guideline 6.6).

Rule 4.240(J) Physical Resources. The law school must have physical resources and an infrastructure adequate for its programs and operations. The law school must, at a minimum, maintain its primary administrative office in the State of California. (Guidelines 7.1-7.2).

Cal SOL maintains an administrative office in a secure ADA-compliant commercial office complex in Santa Barbara, California. The three-room, 540 square-foot suite was leased in 2008 pursuant to a one-year lease agreement and tenancy is now month-to-month. All administrators except the Assistant Deans work in the office and adequate parking is available.

All student services are provided by telephone, email, or videoconference. (Guidelines 7.1-7.2) Adequate space is available for operations, including the technology and personnel required to support the law school's computer systems. The law school maintains no hard-copy records. (Guideline 7.2)

Cal SOL has allocated enough resources to support its instructional equipment and distance learning technology. With the adoption of new student information and learning management systems, the JD program will be delivered through programs that are up-to-date, secure, and adequate to meet program needs. Students now access their course materials through Canvas and view live class sessions through Zoom. Administrators will soon complete a transition from Orbund, a standard educational package, to Campus Café, another reputable program.

According to administrators, information resources have been protected by means of various security protocols, such as firewalls, regular backups, and password procedures, and data are held securely in off-site servers through third-party vendors. Orbund, the student information system in use for several years, holds data in the cloud through Amazon Web Services and employs industry standard security practices, including firewalls, intrusion detection, change management, and security policies. Interim Information Technology Director, Gary Alan, handles security authorization and maintenance of roles.

Despite these protections, administrators reported that certain electronic files appear to have been lost. The law school should take all necessary steps to ensure that required records are protected and that duplicate records can be retrieved in the event primary records are lost, corrupted, or destroyed. (Guideline 9.1)

Except for the loss of records, the technology infrastructure has been reliable and service outages have been promptly tracked and resolved. Trained personnel are available during regular business hours and live lecture sessions to address technology-related issues. (Guideline 7.2)

Rule 4.240(K) Financial Resources. The law school must have adequate present and anticipated financial resources to support its programs and operations. (Guidelines 8.1-8.3).

Cal SOL submitted unaudited profit and loss and balance sheet statements for 2018 through 2020, budget materials for 2019 through 2022, and audit reports for 2013 and 2014 prepared by Walpole & Co., LLP, CPA in Goleta, California. Mark Ringel, CPA, of Las Vegas, Nevada now provides monthly accounting services, but audits are not prepared.

Total JD program tuition is \$36,000, based on the tuition rate of \$3,000 per trimester, a rate that has not been increased since 2010. Estimated total program fees are from \$800 to \$2,000.

Cal SOL derives its revenues almost entirely from tuition and fees and its financial position has been unstable in recent years due to periodic low enrollments. The law school projected steady enrollment growth through 2022 based on the assumption that its application for accreditation

would be granted. Although that application has now been withdrawn, enrollment was robust in 2020 and remained so at the time of inspection.

Since 2015, year-to-year enrollment has fluctuated significantly, as follows: 2016 (+12 percent), 2017 (-40 percent), 2018 (+54 percent), 2019 (-19 percent), and 2020 (+94 percent). From the 2015 baseline of 42 students, the student population dropped in 2017 to 28 and to 35 in 2019, before hitting a high of 68 students in 2020 and another high of 93 students in summer 2021.

Recruitment of a large first year class has become increasingly important to Cal SOL's bottom line. First year students accounted for 36 percent of the student population in 2015 but 90 percent in 2020, and at least 64 percent of Cal SOL's total enrollment in three of the last four years.

In 2018, Cal SOL experienced a modest loss in net income and a more significant reduction in net assets. After restructuring its staff and instituting wage reductions of more than \$100,000, the law school had net income of \$38,000 and increased its assets substantially in 2019. Last year, Cal SOL received a Paycheck Protection Program (PPP) loan for \$38,000, now forgiven. After restoring about half of the wages previously cut, Cal SOL ended 2020 with a modest loss in net income and total assets of \$42,000, including a shareholder loan and small investment account.

According to Dean Hunt, the law school is on track to meet its expenses in 2021. Future uncertainties include potential financial impacts of the continuing COVID-19 pandemic.

Rule 4.240(L) Records and Reports. The law school must maintain adequate records of its programs and operations. (Guidelines 9.1).

Based upon review of representative records and as discussed below, Cal SOL should revise its recordkeeping practices to maintain records that are complete, accurate, accessible, and capable of being produced promptly when requested by the Committee. (Guideline 9.1).

Records reviewed included applicant, admitted student, and enrolled student records, (Guidelines 9.1(A)-(D)); class records, examinations, and grade tabulations (Guidelines 9.1(E)-(F)); faculty files (Guideline 9.1(H)); and Annual Compliance Reports (Guideline 9.1(O)). Some documents were requested but were not available.

Registrar Lara Lytle oversees all records and is responsible for updating records, including transcripts, and producing copies when requested. All records are stored electronically and until recently all student records have been held in the Orbund platform. According to Ms. Lytle, Orbund's limitations have made it difficult to maintain records as required by the Committee and needed by administrators. In May 2021, Cal SOL began a transition to new software, including Canvas for learning management and Campus Café for student information management.

Cal SOL's student-related files include some but not all documents required by Guideline 9.1(A)-(C). Applicant files held applications but lacked other information. Several student files were missing some or all official transcripts required to show pre-law and prior law school education (Guideline

5.31 and 9.1(B)(2-3) and (C)(1)). Student files held no records of administrative or faculty actions as required by Guideline 9.1(C)(4).

As noted above, some student files lacked signed copies of Rule 4.241 Disclosure Statements (Guideline 9.1(C)(2)) and possible penalties for non-compliance were discussed with Dean Hunt.

Recordkeeping requirements appear to have been met for permanent transcripts, official class records, and records of examinations and grades. (Guideline 9.1(D)-(F)).

New or improved practices should be implemented as to other required records. Legal education transcripts should be held in all faculty members' files. (Guideline 9.1(H)(6)). The minutes of all faculty and faculty committee meetings should be maintained. (Guideline 9.1(I)). Operating records should be maintained such that the Annual Compliance Report and other required documents can be prepared accurately and consistently from year to year. (Guideline 9.1(K)). Finally, permanent files should be maintained of correspondence with the Committee. (Guideline 9.1(M)). As noted above, as required by various guidelines applicant and student files should be documented to show administrative decisions about admissions, academic, and disciplinary matters.

All records should be maintained such that Cal SOL can produce all required information promptly and show compliance with the Committee's rules and guidelines. (Guideline 9.1).

Rule 4.240(M) Equal Opportunity and Non-Discrimination. Consistent with sound educational policy and these rules, the school should demonstrate a commitment to providing equal opportunity to study law and in the hiring, retention and promotion of faculty without regard to sex, race, color, ancestry, religious creed, national origin, disability, medical condition, age, marital status, political affiliation, sexual orientation, or veteran status. (Guideline 10.1).

Cal SOL meets guideline requirements for equal opportunity and non-discrimination. A widely published policy of non-discrimination provides in pertinent part:

All classes, programs and activities of the California School of Law, including admission and employment are provided in a way that is free of discrimination based on race, color, national origin, ancestry, religions, creed, sex, pregnancy, marital status, medical condition, sexual orientation, age, handicap, or veteran status.

The law school also declares its commitment to equal opportunity and affirmative action thusly:

California School of Law is committed to basing judgments concerning the admission, education, and employment of individuals upon their qualifications and abilities and seeks to attract to its faculty, staff, and student body qualified persons of diverse backgrounds.

Of the students enrolled at Cal SOL in fall 2020, 66 percent were female. Students self-identified with various backgrounds, including American Indian or Alaska Native (1 percent), Asian (7 percent), Black or African American (36 percent), Hispanic/Latinx (4 percent), Native Hawaiian or Other Pacific Islander (1 percent), and White (43 percent). Six percent declined to state their background.

Of the eight faculty members reported in fall 2020, 50 percent were female. Faculty backgrounds were as follows: American Indian or Alaska Native (25 percent) Hispanic/Latinx (12.5 percent), Native Hawaiian or Other Pacific Islander (12.5 percent), and White (50 percent).

Rule 4.240(N) Compliance with Committee Requirements. The law school must demonstrate its compliance with these rules by submitting the required annual reports and otherwise complying the rules. (Guidelines 9.1(M)-9.1(Q)).

Cal SOL has followed Rule 4.240(N). Generally, the law school has submitted Annual Compliance Reports and other documents as mandated by the Rules and Guidelines. Further, it has responded to requests by the Committee, including information requests from the Consultant.

CONCLUSION AND RECOMMENDATION

It is recommended that this Periodic Inspection Report be received and filed. It is also recommended that the Committee adopt each of the recommended actions listed below and issue a warning to California School of Law pursuant to Rules 4.244(G)(4) and 4.263. While the law school's tuition is affordable this must be balanced against the significant noncompliance and lack of success in the educational program that was observed. It is further recommended that if the Committee believes that the inspection report demonstrates that the law school is not in compliance or will not likely be in compliance with these rules, the Committee should notify the law school via the warning letter that it recommends probation or withdrawal of registration, pursuant to Rule 4.263.



California School of Law
2021 – Inspection

ACKNOWLEDGMENT & RESPONSE – November 17, 2021

Recommended, Mandatory Actions

1. Guidelines 1.9 and 2.3: The law school must publish procedures for seeking accommodations of all types, eliminate from the application questions about disabilities, and eliminate from the Student Handbook a statement suggesting the State Bar will grant the same accommodations for the FYLSX and bar exam.

The California School of Law has removed questions about disabilities from its application.

The California School of Law has removed the statement suggesting the State Bar of California will grant the same accommodations for the FYLSE and the CBX Student Handbook page 10.

The California School of Law has modified its policies and procedures language to better reflect our accommodations of all types in the Catalog pages 22-23 and Student Handbook pages 9-10.

2. Guidelines 1.9 and 2.3: The law school must eliminate the policy that transcripts will not be released if records are on hold for financial reasons, pursuant to Civil Code section 1788.90.

The policy has been removed from our Student Handbook page 13.

3. Guidelines 2.1-2.3 and 2.12: The law school must review and as necessary revise its publications to describe and depict its services and policies clearly, completely, and accurately including, without limitation, admissions information, tuition refund policy, schedule of tuition and fees, and student services.

The California School of Law will continue to revise and review its publications to inform potential students and students as clearly as possible information regarding admissions, tuition, tuition refund policy, fees, and student services.

The California School of Law has added a Table of Contents to our Catalog, Student Handbook, Faculty Handbook, and Administrative Handbook.

The California School of Law tuition refund policy is based on weeks of study.

The California School of Law has added the Termination Fee of \$300.00 to our **Additional Costs** In the Catalog on page 12 and the Student Handbook on page 3.

The California School of Law has added the Application Fee of \$75.00 to our **Additional Costs**

In the Catalog on page 12 and to the Student Handbook page 5.

The California School of Law requirement of Official Transcripts can be found in the Catalog on Page 8 and on our Admissions Standard web page.

The California School of Law is in the proses of updating the website and will consider the State Bar's cretic out the photos selected. This could not be accomplished in the time given before this response was due.

The California School of Law has updated the Catalog, Student Handbook, and Faculty Handbook to inform students the California School of Law is registered with The Committee of Bar Examiners of The State Bar of California as an unaccredited distance learning law school.

The California School of Law has changed the word accredited to confer a Juris Doctor in law to approved in the Student Handbook on page 13.

The California School of Law has created a link to the Information Report required by Business and Professions Code section 6061.7 to an active link to the report on its homepage under the "Admissions" tab.

The California School of Law has a Disclosure Statement for each student in compliance with Guideline 9.1(C)(2).

The California School of Law has updated its Disclosure Statement to inform students that the California School of Law has filed and withdrawn an application for accreditation in the past five years.

The California School of Law has updated its Grade Change Policy in the Students Handbook pages 38 -41 and in its Faculty, Handbook pages 9-11.

The California School of Law has updated its Student Services in compliance with Guideline 2.12 to better reflect the support provided to students in the Students Handbook pages 17 -18 and Catalog pages 15-16.

4. Guideline 2.3: The law school must publish the Guideline 2.3(D)(1) disclosure in the Catalog and the Student Handbook; revise its website to comply with Guideline 2.3(D)(2); revise its publications to comply with Guideline 2.3(D)(4); and remove statements that it is accredited from its publications.

The California School of Law publications that were reviewed by the inspectors were prepared for the Accreditation Self Evaluation Report with the intent of receiving Accreditation. Any mention of Accreditation in our publications (Catalog and Student Handbook) was strictly for that purpose. The California School of Law publications primary refer to the law school as Approved or Registered.

The California School of Law has Guideline 2.3(D) on its website and in its Catalog and Student Handbook.

5. Rule 4.241 and Guidelines 2.1-2.3 and 9.1: The law school must revise its procedures to comply with all Rule 4.241 requirements and related record-keeping requirements of Guideline 9.1. The

law school must further consider making the Rule 4.241 Disclosure Statement part of the enrollment agreement, receiving these signed disclosures prior to accepting payment.

The California School of Law is in the process of converting to a new SIS that will permit the registrar to better pull reports regarding forms completed by students. The registrar has also prioritized when students will sign the Disclosure Statement during the enrollment process. The California School of Law has a Disclosure Statement for each student for each semester attended.

6. Guideline 2.8: The law school must adopt, implement, and publish a student discipline policy that is compliant with the guideline.

The California School of Law has revised its student discipline policy to include a right to a hearing for Minor Offences and the right to counsel if the student chooses. The student discipline policy in compliance with Guideline 2.8 can be found in the Student Handbook on pages 19 -26.

7. Guideline 2.9(B): The law school must provide quality descriptors for letter grades and inform students whether anonymous grading is used, and if so, by what procedures.

The California School of Law has added quality descriptors for letter grades to the Catalog page 18, Student Handbook page 10 and Faculty Handbook pages 6-7.

The California School of Law has added information, to inform the students of the law schools anonymous grading procedures in the Catalog, Student Handbook and Faculty Handbook.

8. Guidelines 2.9(B)(3) and 5.24: The law school must adopt, implement, and publish a policy on course repetition that is compliant with the guidelines.

The California School of Law has updated, implemented, and published our course repetition policy in its Catalog pages 21 and Student Handbook page 15.

9. Guideline 2.9(B)(8) and (G): The law school must adopt, implement, and publish a policy on grade review that is compliant with the guidelines.

The California School of Law has published a policy on grade review that is compliant with the Guideline 2.9(B)(8) and (G) in its Student Handbook page 16 and Faculty Handbook.

10. Guidelines 2.7, Guideline 2.9(A), and 5.19-5.20: The law school must adopt, implement, and publish policies that clearly state when good academic standing is calculated, what GPAs constitute good standing, and under what circumstances students will be allowed to advance on probation, including the process by which probation decisions will be made.

The California School of Law has published policy's on; "when good academic standing is calculated, what GPAs constitute good standing, and under what circumstances students will be allowed to advance on probation, including the process by which probation decisions will be

made.” in its Catalog pages 19 -21, Student Handbook pages 13- 15 and Faculty Handbook pages 5.

The California School of Law has corrected the language for Second, Third- and Fourth-year students, with a GPA below 2.0 that they “will” be dismissed not ‘may’.

11. Guideline 2.9(D): The law school must revise the authentication policy to give students notice of current requirements.

The California School of Law has revised the Student Work Authentication policy in its Catalog page 22, and Student Handbook page 18.

12. Guideline 2.9(F): The law school must adopt, implement, and publish a policy on review of exam questions and student answers that is compliant with the guidelines.

The California School of Law has revised its policy on review of exam questions and student answers in its Student Handbook page 16.

13. Guideline 3.1: The law school must analyze its staffing needs and report to the Committee the steps it intends to take to provide the administrative capacity necessary for sustained compliance with the Committee’s standards, including job descriptions that clarify roles and responsibilities.

The California School of Law has retained an assistant to the registrar to help facilitate a smoother running office with the capacity to our administrative needs. The Resume of Mia Relis is included as a supporting document to this reply.

The California School of Law has revised its job descriptions to clarify roles and responsibilities of law school administrators. The updated job descriptions can be found in the Administrative Handbook on pages 16-17.

14. Guidelines 2.3, 5.9(C), and 5.10: The law school must inform instructors in writing how many hours of the “preparation and study” their courses must be designed to require.

The California School of Law has revised our Course Development Manual to inform instructors that the course content must meet the required student hours of study. This can be found Faculty Handbook on page 31.

15. Pursuant to Guidelines 4.1-4.3 and 4.7, the law school must maintain minutes for all faculty and faculty committee meetings.

The California School of Law has implemented a procedure in which all Faculty Meetings, committee meetings, hearings or other meetings are recorded, and a transcription is saved by the registrar. This policy can be found in the Administrative Handbook on page 15.

16. Pursuant to Guidelines 4.6-4.7, the law school must adhere to its faculty evaluation policies and consider ways to make evaluations more meaningful.

Deans Hunt, Zunker and Sherman have informally discussed how to make faculty evaluations more meaningful by providing ways the individual professors can improve.

The California School of Law has implemented a faculty per-review policy that professors will complete at least one evaluation of another professor each year. This policy can be found in the Faculty Handbook on page 18.

17. Guideline 5.3(C)(1): The law school must implement procedures to ensure that attendance records are maintained and reviewed regularly by staff, students are warned of attendance issues before their absences reach the 20 percent limit in any course, administrative action on attendance issues is properly documented, and instructors are not permitted to authorize absences in a manner inconsistent with the guideline.

The California School of Law is now using Canvas as our LMS which has an attendance feature. Canvas is integrated with our new SIS program, Campus Café, which can run attendance reports. Following the Tuesday and Thursday classes, the Registrar office will review students' attendance each on Wednesday and Friday.

The Registrar office will warn students of attendance issues and has developed 4 email templates to send students. The last 2 emails are accompanied by a phone call from the Dean of Students.

This policy can be found in the Administrative Handbook on page 16.

The California School of Law has removed the sentence in the catalog that suggested the professor had some discretion to not count absences. The updated attendance policy can be found in the Catalog on page 17, Student Handbook page 8-9, Faculty Handbook page 5-6, Administrative Handbook pages 16.

18. Guideline 2.3 and 5.11: The law school must revise its curriculum to make elective opportunities available and amend its publications to give notice of the course rotation structure; provide accurate course descriptions for all courses, together with a statement that not all courses are given each year; and remove from the website a course schedule that suggests that upper-level students will take specific courses each year.

The California School of Law has amended its publications to give notice of the course rotation structure, with a statement that not all courses are given each year and has removed course schedule that suggests that upper-level students will take specific courses each year in our Catalog on pages 28 -32 and on our website.

The California School of Law has also reorganized its Course Descriptions so that required courses are listed separately from electives. The law school has also supplemented its curriculum to make more elective opportunities available to students by adding courses in Environmental Law, and Bankruptcy Law. This can be found in the Catalog on pages 28 -32.

19. Guideline 5.8: The law school must demonstrate in the next Annual Compliance Report that its internship program meets all Guideline 5.8 requirements or delete the course and remove references to it from school publications.

The California School of Law continue to ensure its internship program meets all Guideline 5.8 requirements.

20. Guidelines 5.17-5.18: The law school must review its grading practices to determine what changes, if any, are needed to improve the accuracy, validity, consistency, and reliability of grades, and to give students a more realistic assessment of their likely success on the FYLSX and bar exam.

The California School of Law has reviewed its grading practices and will strive to reduce grade inflation and improve the accuracy, validity, consistency, and reliability of grades, and to give students a more realistic assessment of their likely success on the FYLSX and Bar Exam. This information can be found in the Faculty Handbook on Page 7 and in the Students Handbook page 10-11.

21. Guideline 5.28: The law school should evaluate applicant's pre-legal education qualifications as required by Rule 4.25 of the Rules Regulating Admission to Practice Law in California based on documentation, not applicant's statements.

The California School of Law continue to evaluate applicant's pre-legal education qualifications in compliance with Guideline 5.28, Guideline 5.30 and Rule 4.25.

The vast majority of students are admitted based on documentation, not the applicants' statements alone, but on occasion the California School of Law exercises Guideline 5.30 and transcripts are received after the start of the first trimester but prior to the 45-day requirement. According to the registrar this happens "one or two times a year, maybe 3."

22. Guidelines 5.28 and 9.1(B)(2) and (C)(2): The law school must remove or clarify the statement in the Catalog that applicants with a U.S. master's degree but without a bachelor's degree are eligible for admission.

The California School of Law has removed the statement that applicants with a U.S. master's degree but without a bachelor's degree are eligible for admission from the Catalog page 7.

23. Pursuant to Guideline 5.29, it is recommended that the LSAT must be required of students admitted after a prior disqualification.

The California School of Law has revised its policy of readmitting students that have previously been dismissed from the law school, and no longer permits students to have a "second chance" in compliance with Guideline 5.34. This can be found in the Catalog on page 8 and in the Administrative Handbook on page 4.

The California School of Law is deliberating the use of the LSAT in admissions of students, as well as for students' disqualification from other law schools.

24. Guidelines 5.31-5.32 and 9.1: The law school must comply with all guideline requirements as to receipt and filing of official transcripts.

The California School of Law is in compliance with Guidelines 5.31-5.32 and 9.1. The law school's applications require prospective students to provide information about prior law schools

attended and to provide official transcripts from the student's prior education and/or prior law school within 45 days of starting the program.

The California School of Law has purchased a date stamp for the purposes of date stamping the paper transcripts received. The paper transcripts will be date stamped within 5 business days, except in cases when the 45-day deadline is close and then should be date stamped that day. This can be found in the Administrative Handbook page 5.

The California School of Law maintains the student's application, records, files, transcripts, class records, in compliance with 9.1

25. Guidelines 2.3 and 5.34: The law school must comply with all guideline requirements for admission of applicants previously dismissed from law school for academic reasons.

The California School of Law has added a section to the Administrative Handbook **Applicants Previously Disqualified for Academic Reasons** outlining Guidelines 5.34 and the Registrar will screen applicants for previous disqualification and if less than two years obtain required documentation before referring to the Admissions Committee. This can be found in the Administrative Handbook page 4.

26. Guideline 5.35(B): The law school must comply with all guideline requirements in awarding transfer credit.

The California School of Law is in compliance with Guideline 5.35(B) and does not admit transfer students' credit for courses more than 27 months old.

27. Guidelines 2.1 and 5.26-5. The law school must study the factors contributing to high attrition, both voluntary and involuntary, after the first year; consider changes to its communications, admissions process and standards, curriculum, or other program elements to improve both admission of qualified candidates and retention of qualified students, and report to the Committee, in its next Annual Compliance Report, the efforts being made to reduce attrition and the results of those efforts.

The California School of Law has reevaluated our attrition statistics for the last 5 years and they are substantially less than 86% reported in the Accreditation SER. Over the last 5 the attrition rate is closer to 60% each year. The new attrition numbers are submitted with this document and with this year's Annual Report.

The California School of Law has (after much discussion with the inspectors) changed its policy regarding readmitting previously dismissed students and admissions of prospective students dismissed from other law schools. The law school will no longer readmit students previously dismissed from the California School of Law and will not admit dismissed from other law schools until 2 years has passed if at all.

To comply with Guidelines 5.18 and 5.27 and admit and advance only qualified students, the California School of Law has adjusted its grading standards in the pre-enrollment course, Legal Method, and will not admit students who show little or no ability to succeed in the program. This will provide better consumer protection and further reduce the law school's attrition.

28. Guideline 8.3: The law school must revise its curriculum to ensure that instruction is provided in both electronic and hard-copy legal research.

The California School of Law has modified its curriculum to comply with Guideline 6.3 to ensure that instruction is provided in both electronic and hard-copy legal research.

29. Guideline 9.1: The law school should revise its recordkeeping practices to comply with all guideline requirements and take all necessary steps to ensure that records are protected and that duplicate records can be retrieved in the event primary records are lost, corrupted, or destroyed.

The California School of Law is in the process of transitioning its recordkeeping software to Campus Café so that our records are easily accessible and are practices are in compliance with Guideline 9.1. The California School of Law administration believes our school recordkeeping is through but not easily accessible, our intent is to rectify this difficulty in producing documents with the transition to Campus Café.

Current students and Graduates will have their student file and documents uploaded onto Campus Café, where one complete file can be maintained. Students that have left the program will have their student files archived onto the server by merging the student records and information stored on Orbund (our old data base) with the student documents stored on the server, creating a complete student file that is all in one location on the server.

Furthermore, the California School of Law has retained an assistant to the registrar to help facilitate document management of student files. The Resume of Mia Relis is included as a supporting document to this reply.

The California School of Law records are well protected on the SIS and backed up on the school server and in the cloud with MS 365.