



The State Bar of California

San Joaquin College of Law Periodic Inspection Report Conducted Pursuant to Rule 4.162

October 26-28, 2021

REPORT ON PERIODIC INSPECTION OF

SAN JOAQUIN COLLEGE OF LAW

901 5th St

Clovis, CA 93612

EXECUTIVE SUMMARY AND RECOMMENDATIONS

Introduction

A periodic inspection of the San Joaquin College of Law (San Joaquin) was conducted from October 26-28, 2021, by an inspection team (team) consisting of Dr. James Bolton, Member, Committee of Bar Examiners (Committee) and Heather Georgakis, Educational Consultant and Team Leader.

San Joaquin is a private, non-profit California-accredited law school. Founded in 1969 to offer residents of the greater Fresno and Clovis communities the opportunity to obtain an affordable legal education, the law school's mission is "to educate and develop individuals to become highly skilled attorneys and problem solvers who will benefit their communities through public and private service." San Joaquin alumni now comprise 25 percent of the Fresno County bar.

The law school has been accredited by the Committee since 1976 and by the Western Association of Schools and Colleges (WASC) since 1993. Eligible students may qualify for federal financial aid.

The school offers only one course of study, a Juris Doctor (JD) degree program that leads to eligibility to take the California bar exam (bar exam), and in fall 2021, 161 students were enrolled. Most courses are taught through in-person class sessions at the law school's Clovis campus. Beginning in mid-March 2020, classes were held by videoconference pursuant the Committee's pandemic-based waiver, but instruction resumed on campus in October 2021.

Students may earn a JD degree in three, four, or five years, depending upon their needs and academic performance. To graduate, students must complete 86 semester units with a cumulative grade point average (GPA) of at least 65.

The curriculum includes courses in all subjects tested on the bar exam, practical skills instruction, and elective courses, including clinical and externships. The law school's two live-client clinics include the New American Legal Clinic, for immigration and citizenship matters, and the BREN Clinic, for issues related to special education.

Dean Janice Pearson has led San Joaquin since 1985. A law graduate of the University of California, Berkeley, she previously served as Staff Attorney, Managing Attorney, and Interim Director of Fresno-Merced Counties Legal Services. Dean Pearson is joined on the faculty by 7 full-time faculty members and 20 adjunct professors. Of the full-time professors, seven are licensees of the State Bar of California (State Bar) and two are San Joaquin graduates. All faculty members are admitted to practice law, or are judges, in at least one jurisdiction.

As of fall 2020, the demographics of student body were: American Indian or Alaska Native (1 percent), Asian (13 percent), Black or African American (2 percent), Hispanic/Latinx (42 percent), and White (36 percent). Sixty-six percent of San Joaquin's students are women. Of the fall 2021 entering class, 78 percent identify as first-generation college students.

Total program tuition is \$83,850 based upon per-unit tuition of \$975. For a Four-Year program, total books and fees are estimated to be \$9,700.

An accredited law school must maintain a minimum cumulative pass rate (MPR) on the bar exam of at least 40 percent among its graduates who take the exam (Guideline 12.1.) San Joaquin typically ranks first or second for MPR among Committee-accredited law schools, with recent MPR results of 77.4 percent (2018), 72.4 percent (2019), 68.8 percent (2020), and 77.7 percent (2021).

Recommended Action by the Committee

The inspection team recommends that the Committee receive and file this Periodic Inspection Report, approve all recommended and suggested actions, continue the accreditation of San Joaquin College of Law, and schedule the next periodic inspection for fall 2026 unless an earlier visitation is deemed necessary.

Recommended, Mandatory Actions

1. Guidelines 2.7(A)(3) and 7.8: The law school must revise the course repetition policy to address all effects of both required and permitted course repetition.
2. Guideline 2.3 and 6.6: The law school must revise its publications to clearly state its policies related to the award of academic credit for non-classroom activities pursuant to Guideline 6.6.

Submission of Self-study

San Joaquin submitted a comprehensive self-study to assist the team in its assessment of the school's compliance with the Rules and Guidelines. Administrators responded promptly to requests for additional information and information provided was considered when drafting this report.

Conduct of Site Visit

The inspection occurred during the pandemic. San Joaquin was given the choice to undergo a remote visit based on the same standards as an in-person visit, and the law school agreed.

Videoconference meetings were held to discuss academic issues, admissions, and student services with Dean Jan Pearson, Academic Dean Justin Atkinson, Dean of Students Logan Tennerelli, Faculty Chair Jeffrey Purvis, and others. Operations were addressed with Registrar Joyce Morodomi, CFO Jill Waller-Randles, and CIO Derron Wilkinson. The team met with groups of trustees, professors, students, and alumni and concluded the visit by discussing their observations with Deans Pearson and Atkinson in an exit interview.

The inspection included a virtual campus tour, review of learning resources, observation of class sessions, and review of a sample of records. Materials reviewed include student-related files; course materials and attendance records; examinations, assignments, and responses; and administrative files. At the Consultant's request, the law school invited students to send her comments about the school and one comment was received and reviewed.

SPECIFIC FINDINGS AS TO THE COMMITTEE'S RULES AND GUIDELINES

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

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

San Joaquin College of Law operates as a private, non-profit institution in good standing with the California Secretary of State. The law school is tax exempt under section 501(c)(3) of the Internal Revenue Code and California Revenue and Taxation Code section 23701(d) and has met legal requirements to do business in the City of Clovis where the sole campus is located. As an institution accredited by WASC, San Joaquin is authorized to participate in the Title IV federal financial aid program and maintains a loan default rate within program limits.

The campus is accessible to all. The Student Handbook (Handbook) sets forth policies and procedures on disability accommodations, pursuant to the Americans with Disabilities Act (ADA) and related laws. Requests are processed under the supervision of the Dean of Students and held in confidential files. Students are advised that testing accommodations granted by the law school may differ from those granted by the State Bar.

The Handbook also includes policies on the use of drugs and alcohol, non-discrimination, and the privacy of student records under the Family Educational Rights and Privacy Act (FERPA).

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

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

The law school's website, Catalog, and Handbook offer current, consistent information about accreditation, academic programs, faculty, and services. The Catalog may be downloaded through the website, while the Handbook is provided to students upon enrollment. San Joaquin employs sufficient personnel to deliver programs and services as promised.

Financial affairs are conducted with integrity. An audit is conducted annually by an independent certified public accounting firm, most recently by Price Page & Company of Clovis. Financial assets

appear to be effectively managed and adequate controls are in place to provide protection against fraud. Tuition and fees are accurately described on the website and, as an institution eligible to offer federal financial aid, San Joaquin provides appropriately staffed financial aid services.

Refund policies satisfy Guideline 2.2(B), as explained in the Catalog. A student who withdraws from a class by the drop date will receive a full tuition refund and a student who withdraws from the school through completion of 50 percent of the semester will receive a pro rata refund of tuition and fees, less an administrative fee. The Catalog addresses how refunds will be applied to financial aid accounts. Refunds are paid within thirty days after a triggering event, as required.

All disclosures are made as required by Guideline 2.3.

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

Student discipline policies comply with Guideline 2.6. Prohibited conduct includes, for example, cheating and dishonesty, and the range of sanctions is appropriate. Students charged with misconduct are given written notice, an opportunity for a hearing before an impartial panel, and a written final decision that includes a statement of facts, conclusions, and, if applicable, sanctions.

The Handbook describes academic standards, including the grading system and requirements for good standing, probation, dismissal, and graduation. To graduate, students must complete 86 units, including all required courses, with a cumulative GPA of at least 65.

Most courses, including bar-tested subjects, are graded numerically on a scale from 50 to 100 with 5 categories that define levels of student achievement (e.g., grades of 64-55 are “inadequate but passing”) (Guideline 2.7(A)(1).) Pass/fail grading is used for independent study, clinical courses, and some skills courses (Guideline 2.7(A)(2).) Instructors may adjust a course grade by up to 2 points for participation and may offer extra credit projects worth 5 percent of course grades.

Academic standing is evaluated after a student’s initial first-year semester and again at the end of each spring semester. To advance to the second semester, a first-year student must pass at least two core courses and achieve a cumulative GPA of 60 or better. After each spring semester, a student must have a cumulative GPA of at least 65 to advance in good standing. Students who lack good standing are dismissed, unless granted probation (Guideline 2.7(A)(6).)

The Faculty Committee handles petitions for probation, which are granted rarely. Generally, a student is eligible for probation only once. A student granted probation must achieve a GPA of at least 65 by the end of the next academic year or be disqualified. A first-year student who is disqualified may petition to repeat the first year. If allowed to repeat the first year, a student will be ineligible for probation after the repeated year (Guideline 2.7(A)(7).)

Course repetition is addressed in the Handbook. One section provides that students who have failed a required course are required to repeat it, in which case both grades will appear on the transcript but only the second grade will be used in calculating the cumulative GPA. A later section, on course repetition, states that only students who have failed or withdrawn from a course will be allowed to repeat it, except for students with permission to repeat the first year. This section does not address the consequences of permitted repetition to the transcript or GPA. To comply more fully with Guidelines 2.7(A)(3) and 7.8, the law school must revise the policy to address all effects of course repetition, whether repetition is required or permitted. (Guideline 7.8.)

To preserve anonymity in grading, students are informed that exams are to be identified only with school-issued Exam ID numbers (Guideline 2.7(A)(5).)

As required by law school policy, instructors use a standardized course syllabus template and inform students in the syllabus about how course grades will be determined (Guideline 2.7(B).)

San Joaquin follows a written policy to verify the authenticity of student work (Guideline 2.7(C).) Students log in to the law school's computer platforms using unique credentials that allow their identification. Examsoft is used to authenticate the identity of students taking exams and to prevent their access to other computer files during exams. Writing assignments are submitted through the faculty/student exchange or TWEN, and writing professors and the library director use Westlaw, Lexis, or other technology to check for plagiarism.

Students are informed promptly of their grades (Guideline 2.7(D).) Exam questions are posted in the student portal and students may obtain copies of their answers for a reasonable time after grades are posted (Guideline 2.7 (E).)

San Joaquin follows a compliant grade review policy (Guidelines 2.7(A)(8) and (F)-(G).) Students may petition for review of any grades believed to be the product of unfairness or departure from established grading policies. Petitions are screened by a faculty Grade Review Subcommittee which makes recommendations to the Faculty Committee for final disposition.

Appropriate policies and procedures have been established to protect student privacy and the confidentiality of student records. Reasonable security and backup protocols are in place to protect the law school's computer systems, communications systems, and records against corruption, destruction, or loss (Guidelines 2.8 and 2.9.)

Students are provided with services, experiences, and activities appropriate for a school with a full-time JD program. Opportunities include clinical and externship experiences, independent study, moot court, and a bar preparation program (Guideline 2.10.) Academic counseling is provided by individual instructors and the dean, academic dean, dean of students, and law library director.

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

The University is governed by a 23-member Board of Trustees that holds meetings quarterly. The current trustees are local attorneys, judges, and business executives, and include an Alumni Association representative and a Clovis city council member. Attorney Doug Noll is the Chair.

The Board seeks to fill several vacant positions with rising leaders with means to support the law school financially or through community connections. Candidates are sought who understand San Joaquin's local role, promote diversity, and represent community segments other than lawyers.

Minutes reflect that the trustees are actively engaged in strategic planning and oversight. Much of the Board's work is done through seven standing committees (Guideline 3.2.) The Board reviews and approves the annual budget based on Dean Pearson's recommendation and the Finance Committee and Investment Committee meet quarterly.

Janice Pearson has been the law school's dean since 1985. She works full time for the law school and oversees the faculty and an administrative staff of 30. She has been given the necessary authority necessary to perform her duties (Guideline 3.2.)

San Joaquin has no advisory board (Guideline 3.3) although it has an active alumni organization that supports the school and its students.

The administrative staff is adequate in number to support law school operations. Administrative functions are well defined, and lines of authority are clearly drawn. All staff members appear to be knowledgeable about the Committee's requirements and to be effective in their roles.

The Board, Dean Pearson, and other administrators work collegially for the benefit of the law school and its students. The law school, in turn, maintains a strong relationship with the City of Clovis and has made a significant impact on the San Joaquin Valley, through its representation in the local legal community and clinical activities on behalf of immigrants and students with special needs.

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

Dean Janice Pearson earned her JD at the University of California, Berkeley and is a State Bar licensee. She has been affiliated with San Joaquin since 1981, having served as an adjunct professor and Associate Dean before being appointed the dean in 1985. Previously, she worked at Fresno-Merced Counties Legal Services as a staff Attorney, managing attorney, and interim director.

The dean has been widely recognized for her contributions. She received the Fresno Women Lawyers' Justice Pauline Hanson Award, the Fresno County Bar Association Liberty Bell Award, and the Soroptimist Women Helping Women Award. She is the principal author of a publication on

foreclosure law. She is qualified to serve as full-time administrator of the law school due to her education and experience (Guideline 4.1(B).)

Academic Dean Justin Atkinson holds a JD and a Master's degree in Languages and Literature from the University of Utah. After law school, Dean Atkinson worked in private practice and as a Deputy County Counsel for Fresno County. He joined the faculty in 2010 and has served in his current position since 2014, except for a one-year hiatus in a non-academic role. Dean Atkinson is the founder of the law school's Immigration Law Clinic, now known as the New American Legal Clinic.

Director of Student Services/Special Events Coordinator Joyce Morodomi is a 29-year employee of San Joaquin. She manages recruitment, admissions, and registrar functions (Guideline 4.1(C).)

The faculty includes eight full-time and thirty-four part-time professors. All instructors are graduates of a variety of law schools approved by the ABA or accredited by the State Bar, such as the University of Chicago, several University of California campuses, and the University of Utah. Each faculty member is admitted to law practice in a United States jurisdiction or is a judge of a United States Court or a court of record in a United States jurisdiction (Guideline 4.5.)

Under the Faculty Constitution, the Faculty Committee is charged with setting academic policy and making academic decisions, with authority to act for the full faculty. The committee meets monthly, and its members include all full-time professors and up to 6 adjunct professors, with rotating annual elections. Dean Pearson participates as an ex officio member and Professor Jeffrey Purvis serves as Chairperson. Faculty subcommittees include Admissions, Curriculum, Program Review, and Scholarship. Ad hoc subcommittees are convened as needed (Guideline 4.2.)

San Joaquin has enough faculty to maintain a sound program. In required courses, the average class size is 22 students, and class sizes are adjusted as necessary to ensure that students receive timely feedback (Guideline 4.3.) Teaching loads are appropriate in that professors are not required to teach more than 10 hours per week (Guideline 4.4.)

Students expressed satisfaction with the faculty support they receive (Guideline 4.4.) Instructors make themselves available to meet with students on campus, off-campus, after hours, and on weekends, as necessary. When classes were held online, office hours were conducted on the Zoom platform. While administrators believe that face-to-face meetings are the best practice, a Zoom license will be maintained to allow convenient faculty-student meetings.

Professors are expected to improve their teaching skills and remain current in the areas in which they teach (Guideline 4.6.) The law school incorporates faculty development activities into various meetings, including twice-yearly all-faculty meetings, and conducts regular faculty training sessions. The Academic Dean meets regularly with adjunct instructors to provide guidance about courses, teaching techniques, and exam drafting and grading, and instructors have attended national conferences, State Bar grading calibration sessions, seminars, and webinars.

Faculty evaluation processes were revised following the last inspection and are now compliant (Guidelines 4.7-4.8.) As required, instructors are to be evaluated at least once in the first year and at least once every three years thereafter. A peer reviewer is assigned to observe an instructor and to prepare a report. The dean, or dean's designee, completes a comprehensive evaluation, based on the peer reviewer's report and other documents, including the instructor's course materials, resume, and student evaluations.

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

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

The JD curriculum requires completion of 86 semester units within three, four, or five academic years, depending on whether a student pursues a full- or part-time schedule. An academic year consists of two semesters of at least 15 weeks each, in fall and spring, and a five-week summer term. Students may enter the JD program only in the fall semester.

All first-year students are enrolled in the part-time Four-Year Program. Students earn 22 to 25 units each academic year, including three summer sessions, and typically spend 10 hours in class each week, over three or four evenings. High-achieving first-year students who complete fall and spring courses with a GPA of 75 or better may transfer to the full-time Three-Year Option.

Students in the Three-Year Option generally take a mix of daytime and evening classes, earning 34-36 units in each of the last two years, including two summer sessions. They typically spend 15 hours in class each week during fall and spring semesters after the first year, must complete at least 4 clinical units, and may not work more than 20 hours per week (Guideline 6.5(J).) Students who must reduce their load may extend their JD program to 5 years (Guideline 6.5(A).)

The curriculum includes 69 units of required courses, including all subjects tested on the bar exam and practical skills courses. Students take Legal Methods I and II (each 2 units) in their first year, Appellate Advocacy (2) and Moot Court (2) in their second year, and Advanced Legal Writing (3) in their third or fourth year (Guidelines 6.7 and 6.9.) Required courses are given every year, sometimes with multiple sections, and Community Property and Professional Responsibility are offered twice yearly (Guideline 6.5(D).)

San Joaquin offers between 8 and 14 elective courses each year, most during the summer term. Some courses are offered annually, including Legal Process and the Trial Practice courses, and several are given at least once every two years, including Administrative Law, Bankruptcy, and Advanced Criminal Procedure. Other electives are scheduled based on interest and legal trends, such as Water Law, Homicide, and Practice 99, in which student learn how to grow a community-based law practice to serve those of modest means. The Catalog informs users that courses listed were offered in the past four years (Guidelines 2.3 and 6.8.)

Until the pandemic, most courses were taught in person. Between mid-March 2020 and October 1, 2020, all courses were held online through synchronous Zoom videoconference sessions. Next spring, courses totaling 8 units of coursework will be held online.

To earn the JD, students at an accredited law school must complete at least 1,200 hours of tracked, or “verified” academic engagement (VAE) over no fewer than 80 semester units (Guideline 6.5(A).) San Joaquin students who complete the 86-unit program earn 1,290 hours of VAE. Each unit of credit represents fifteen hours of VAE and thirty hours of untracked homework and preparation. VAE may be earned by attendance in a physical classroom, participation in distance learning, or a combination of those modalities (Guideline 6.5(B).)

San Joaquin tracks VAE by recording attendance at each class session. To allow verification of experiential work hours, the law school requires students to submit timesheets and other substantiating documents. Each unit of experiential credit requires 72 hours of verified work.

As mandated, San Joaquin requires students to attend at least 80 percent of scheduled classes (Guideline 6.5(C).) Students sign an attendance roster for each class. Rosters are monitored and students who violate the attendance policy are withdrawn from the course.

Regular course loads are within guideline limits. Students must take courses requiring verified academic engagement of 6 to 10 hours per week if part-time, or 10 to 15 hours per week if full-time. Exceptions require the dean’s permission (Guideline 6.5(J).) Students must complete the JD program within 5 years, which is two years shorter than the limit set by Guideline 6.5(A.)

Course materials reflect the use of recognized texts and informative syllabi. San Joaquin has developed a program to assess student learning outcomes in each course and to evaluate the curriculum, co-curriculum, and faculty regularly. Class sizes are reasonable (Guideline 6.5(K)-(N).)

The team observed several class sessions held in hybrid format, with most students in the classroom but some attending remotely due to pandemic concerns. Professors were well prepared and used effective strategies for teaching students present in the classroom. Students attending remotely were not served equally well, because audio-visual constraints made it hard to hear the instructor and other students, and to see notes on the whiteboard. Administrators are aware of these issues and plans are underway to install remote-instruction technology in many classrooms, and to conduct training on strategies for teaching hybrid class sessions.

Policies related to the award of academic credit for non-classroom activities comply with Guideline 6.6 but must be stated more clearly (Guideline 2.3.) Since 2012 San Joaquin has operated with a waiver, granted by the Committee, allowing the award of up to 14 units of non-classroom credit, 6 units more than otherwise permitted by Guideline 6.6(A.) Last year, the faculty reduced the credit allowed for non-classroom work and the school will not request a further waiver of guideline limits.

Students entering the law school in or after 2020 may elect to earn up to 4 units of credit for non-classroom activities, including work done in externships, in-house clinics, teaching assistantships,

and directed research. An additional 4 units may be earned for work in the New American Legal (NALC) Clinic and, at the Dean's discretion, non-classroom activities other than externships. Students enrolled in the Three-Year Option must complete at least 4 "clinical units" which includes externships and in-house clinic work only, according to the self-study.

For students entering before 2020, the clinical unit cap was 8 units, 4 per placement, and 6 units for other non-classroom work including law review, a program now suspended for lack of interest.

To earn one unit of non-classroom credit, a student must complete 72 hours of work, a standard that satisfies Guideline 6.6(D.) Externships can be performed in governmental law offices or approved private legal settings. Students who work in the in-house clinics handle all major aspects of client representation under the supervision of a faculty member and, for each 3-unit clinic course, they complete a classroom component equal to 1 unit of work. These components are not counted toward the credit limits for non-classroom activities, although they are counted toward the clinical units required of Three-Year Option students.

San Joaquin's publications generally are clear and well organized but the materials on non-classroom courses in the Catalog and Handbook require clarification. To comply more fully with Guidelines 2.3 and 6.6, the law school must revise its publications to state its policies on non-classroom activities clearly and completely. It would appear advisable, for example, to refer to in-house clinics in the Catalog description for Clinical Program courses, and to explain non-classroom credit fully in the Handbook, identifying all courses or course components that qualify for such credit and the specific requirements that must be met as to each.

As noted, students expressed satisfaction with their opportunities to interact with faculty members (Guideline 6.10.)

Exams are given in all courses other than those in which substantial written or oral work is required. Instructors in required courses, other than skills or writing courses, must base at least 90 percent of the course grade on exams and may base up to 10 percent on sources such as papers, research projects, and drafting assignments. First-year instructors are encouraged to give at least one practice exam or midterm. Grades may be raised or lowered by no more than 2 points based on "class participation and/or attendance" and extra credit projects worth up to 5 percent of the course grade generally may be offered.

Choice of exam format is left up to instructors, but the Faculty Handbook provides clear guidance about institutional norms for exam length, components, content, and grading. Exam questions drafted by new instructors are reviewed by the Academic Dean before being distributed and, as part of the peer review process, the faculty chair reviews the exams and sample answers to exams of an instructor being evaluated (Guidelines 6.11-6.14.)

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

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

The law school fulfills competency training mandates. All students must complete 8 semester units of courses designated as competency training, 2 units more than required by the rule. Required courses include Appellate Advocacy (2 units), Moot Court (2), Real Property Drafting (1), and Advanced Legal Writing (3 units.)

Students who wish to pursue additional training may do so while completing the 17 elective units needed to graduate. The law school regularly offers 17 units of elective classroom instruction designated as competency training, including 3-unit courses in Pretrial Civil Litigation, Civil Trial Practice, and Criminal Trial Practice and a 2-unit course in Law Practice Management. In addition, students may earn up to 8 units of clinical credit. Course descriptions, provided on the website and in the Catalog, are sufficiently detailed to inform students of the topics covered.

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

The law school has adopted sound policies defining academic standing, academic disqualification, advancement in good standing and on probation, retention, and the requirements for graduation (Guidelines 7.1 and 7.2.) These policies are published on the website and in the Catalog and Handbook and may be changed only by the Faculty Committee.

A cumulative GPA of at least 65 constitutes good academic standing and is required to graduate and, in most cases, to advance. Students are evaluated for advancement and retention after the first semester, the first year, and the spring semester, at the end of each academic year (Guideline 7.4.) As detailed above, students who do not meet standards for advancement are disqualified unless granted probationary status by Faculty Committee, and such status is rarely granted. Students granted probation must achieve good standing by the end of the next academic year (Guideline 7.3.)

Graduation requirements are clearly stated in the Catalog and Handbook. Students must complete 86 semester units; achieve a final minimum cumulative GPA of 65 and grades of at least 55 in all required courses; meet minimum per-year course requirements; and complete all requirements within 5 years of initial enrollment, or 6 years if allowed to repeat the first year.

Academic support is available to all students, as coordinated by the dean of students. Academic counseling is provided by the dean, academic dean, dean of students, and law library director. Students have access to writing tutors, student-led workshops, and opportunities to take practice

exams, with feedback. They learn skills for law school success in Legal Methods I, and for bar exam success in the Legal Process course, class-related review sessions, school-sponsored workshops, and alumni-sponsored “Tips from Bar-Passers” events. Students on probation are required to meet individually with the academic dean, dean of students, or professors (Guideline 7.3.)

San Joaquin has admitted one special student in the past three years. Special students must take and pass the FYLSX before they will be advanced to the second year (Guidelines 7.5 and 7.6.)

Duplicate credit is not granted to a student repeating the same or substantially the same course (Guideline 7.7.) The course repetition policy has been addressed above (Guideline 7.8.)

Professors draft their own essay exam questions and submit their questions to the administration for review, together with a rough answer or grading matrix. The academic dean provides guidance to new faculty about exam drafting and grading and reviews their exams.

San Joaquin seeks to achieve grading accuracy and consistency while maintaining professors’ academic freedom. The law school does not use a grade curve, but administrators regularly share information with the faculty about institutional grading norms, best practices, and grade studies.

With regularity, the academic dean meets with first-year instructors to discuss grade correlation reports, and at all-faculty meetings, professors receive grade distribution sheets that show how their grades compare to those of others teaching the same students, and to all other faculty. These sheets, which include data since 2007-2008, show a year-to-year distribution of grades that has remained “surprisingly constant”, as stated in the self-study.

Grading effectiveness is also assessed by studies comparing first-year and cumulative GPAs with bar exam success. Over time, the greatest indicator of bar exam success has been a student’s graduating GPA, although first-year grades are also a valuable indicator. In a recent 5-year study, students with a first-year GPA of over 72.5 had a 92 percent overall bar pass rate. The law school’s data show that its grading practices have controlled inflation effectively (Guidelines 7.9.)

San Joaquin has attrition of between 40 to 50 percent in the first year, but little attrition thereafter. Since 2013, an average of 50 to 60 percent of students advance to the second year and of those students, between 92 and 97 percent graduated. The law school is encouraged to continue to study its guidelines for admission and teaching to improve initial admissions or retention outcomes to approach the strong retention seen after year one. State Bar periodic compliance reports now require students to capture reasons for attrition, which may assist in this analysis.

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

Under Guideline 7.11, a school offering distance learning must verify the minimum required academic engagement for the JD degree. Before the pandemic-related shift to online instruction, San Joaquin offered a few online courses taught through synchronous class sessions. Academic

engagement hours were verified by the school's attendance records, as permitted by Guideline 7.11(C)(2).

The law school does not admit auditors or visiting students.

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

San Joaquin does not admit transfer students from registered unaccredited schools.

According to the self-study, San Joaquin seeks to admit to the JD program any individual with a reasonable prospect of success in law school. New students are enrolled only in the fall semester.

Applicants are considered for admission in all permitted categories, including special students who seek entry based on college-level equivalency test scores (Guidelines 5.1 and 5.2.) Most admitted applicants have earned an associate's degree or bachelor's degree, but two special students have been accepted since 2018 and one chose to enroll. The law school also considers applicants with prior law school experience at ABA-approved or Committee-accredited law schools, including those who were disqualified.

The faculty Admissions Committee makes all admission and readmission decisions. The committee is chaired by the academic dean and includes four other full-time faculty members, with the dean as an ex officio member.

The admissions process is explained on the website and in the Catalog. Applicants must submit an online application form, fee, personal statement, three recommendation letters, official transcripts, and an LSAT score. The application asks whether applicants have attended another law school and, if so, whether they left in good standing. (Guideline 5.4.)

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

In making admissions decisions, San Joaquin evaluates life accomplishments, goals, undergraduate GPA, trend of grades and nature of courses taken, LSAT score, work experience, writing skills, and what the self-study terms "an unmeasurable factor called "grit." Applicants must submit an LSAT score but the law school has not set a minimum acceptable score.

The law school regularly evaluates data related to student success, including attrition, grades, and bar exam pass rates. In a study of graduates' admissions credentials and grades, San Joaquin found

that students' GPAs after completion of the first year of law school and upon graduation were significantly better indicators of likely success on the bar exam than LSAT scores.

In the 2019-2020 academic year, 71 percent of first-year applicants were admitted and 58 percent enrolled. Of those who enrolled in the first year, their 75th, 50th, and 25th percentile undergraduate GPAs were 3.44, 3.0, and 2.62, respectively. Their 75th, 50th, and 25th percentile LSAT scores were 152, 146, and 142, respectively.

San Joaquin has compliant policies and practices for the admission of applicants with prior law school experience. About 10 percent of students admitted in fall 2020 had prior law study, and almost all were students who had been disqualified from San Joaquin. Pursuant to law school policy, a student readmitted to San Joaquin after disqualification must start as a first-year student, unless the student has passed the FLSX. As required, the Admissions Committee has documented its reasons for admitting previously dismissed students.

In appropriate circumstances, transfer credit is awarded pursuant to transfer credit policies stated in the Handbook. Transfer credit is limited to 43 units and is never given for courses in which the student earned a grade below the good standing level. (Guidelines 5.6-5.8.)

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

The law school operates only one campus, and this rule is not applicable.

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

San Joaquin meets the Committee's library standards. The library is overseen by library director Mark McMasters, who holds a JD and a Master's degree in Library and Information Science. He is assisted by a technical services librarian, head of public services, and several part-time student proctors.

The law library occupies 7,000 square feet on two levels of the law school and includes 7,600 linear feet of shelving that houses most of the print collection. Two nearby outbuildings, with 650 linear feet of shelving, store older or duplicative materials. As discussed below, plans are underway to relocate the library to a building adjacent to the law school in 2023.

The print collection includes 6,858 titles, with 28,000 volumes. However, the library's collection efforts are gradually shifting away from extensive print materials in favor of expanded access to electronic materials, including an e-book platform through Lexis Digital Library.

Each library is equipped with adequate furnishings to support research, quiet study, and small group meetings. Seating is available for 59 users, or 40 percent of the study body, in study carrels, tables, soft seating, and two small study rooms. Users have access to several computer terminals and a networked printer/copier/scanner. Wireless high-speed internet access is provided throughout the building.

Typically, the library is open 78 hours each week, Sunday through Monday, except for national holidays. Hours are extended during finals periods and reduced during term breaks (Guideline 8.1.) Generally, library access is restricted to students, faculty, and alumni of the law school. Most materials are non-circulating, but limited circulation is permitted for textbooks and study guides.

Students and faculty members have access to all Committee-required resources through San Joaquin's subscriptions to Lexis+ and Westlaw Edge, except that a general dictionary is provided in print (Guidelines 8.2 and 8.5.) The law school also subscribes to CEB Pro, HeinOnline, and Wolters Kluwer's Cheetah and, in total, offers access to 131,000 legal information titles. The print collection also provides access to many required resources.

As required by Guideline 8.3, first-year students receive legal research instruction in online and print-based research in Legal Methods II (2 units) and develop their skills further as upper-level students in Appellate Advocacy (2) and Advanced Research and Writing (3), all required courses. The library director is responsible for all legal research instruction, and he also teaches Electronic Legal Research, a one-unit elective.

Records of library expenditures are properly maintained. (Guideline 8.6.)

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

Since 1994, the law school has occupied a 34,500 square-foot, two-story building that was once used as the Clovis High School. San Joaquin leases the property from the City of Clovis for \$1 a year pursuant to a lease that expires in 2049. To renovate the space, the law school spent more than \$2 million, including some loan funds, and annual loan payments now total \$54,000.

The facility is adequate for current enrollment, and consists of 7 classrooms, a courtroom, library, student study rooms, student organizations office, New American Legal Clinic, and faculty and staff offices. In 2012, the law school remodeled a classroom to accommodate the expanding clinic program and in 2013 the City of Clovis gifted two adjacent portable buildings.

All administrative staff and full-time faculty members have private offices, and adjunct instructors have access to a designated office to counsel students and prepare for class. Separate lounges are

provided for students and employees and adequate parking is available. High-speed wireless access is available throughout the building, which is connected to the City of Clovis' fiber connection.

Classroom resources include adequate seating, lighting, and whiteboards, and access to transportable projectors with computers. Two classrooms are equipped as smart classrooms with interactive whiteboards, high resolution projectors, speakers, and tablet connectivity. Plans have been made to install remote classroom technology in several classrooms to allow for simultaneous instruction to students in the classroom and attending live online.

Additional space will be needed in the future and the law school has entered an agreement with the City of Clovis to purchase an adjacent building, the Clovis Senior Center. The law school plans to relocate the law library to the 11,500-square-foot building, and to repurpose the current library as additional classrooms, offices, and study spaces. Renovations are required and the new library is expected to open in 2023.

The information technology (IT) infrastructure is current, secure, and adequate to needs. Security is a high priority for the IT department and appropriate steps have been taken to protect systems and records against corruption, misuse, or destruction. The law school's network has been segmented, and tools employed to establish a virtual wall between staff and student networks. The law school employs competent personnel and provides sufficient resources to maintain the IT infrastructure. Service issues occur infrequently and have been carefully tracked and resolved.

Technology has also been used to create a Faculty Student Exchange that permits students to anonymously upload and download course materials, and to protect against unauthorized access to a student's exam materials. Software is used to prevent bypassing of security features. Access is appropriately controlled to platforms used for record-keeping and academic operations and authorized personnel can produce all school data as required by Guideline 9.1.

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

San Joaquin has adequate present and anticipated financial resources to support its programs in compliance with the Committee's standards. Documents submitted for review include a current year budget and, for the fiscal years 2019 and 2020, audited financial statements and independent auditor's report prepared by Price, Paige & Company, certified public accountants in Clovis.

According to the self-study, San Joaquin rarely has shown a net loss of income in 52 years of operation. The law school has a history of unqualified audits and financial aid audits, and maintains a financial aid default rate of 3.3 percent, within federal limits. The most recent auditor's report, summarizing San Joaquin's financial position between 2008 and 2020, confirms that during each of those years the school achieved an operating surplus before depreciation.

Tuition is the law school's primary source of income. Total program tuition is \$83,850, based upon per-unit tuition of \$975, and estimated total books and fees are \$9,700 for a Four-Year program.

Enrollment totals have fluctuated since the last inspection, from 163 (fall 2016) to 183 (fall 2020) and then down to 161 (fall 2021.) First-year enrollment rose in fall 2020 by 15 percent, to 77, despite the pandemic onset the prior spring, but dropped by a third in fall 2021, to 51, as the pandemic continued and made recruitment more difficult.

San Joaquin is well positioned to meet current enrollment challenges. Fiscal year 2021 was projected to end with a substantial surplus, buoyed in part by proceeds from a Paycheck Protection Loan, now forgiven, and CARES Act funding. The law school has significant reserves.

The investment portfolio has been managed effectively. Designed to “grow modestly during market growth while minimizing the impact of market downtrends,” the portfolio has doubled since 2013, with average annual growth of 7.5 per cent. The Investment Committee meets regularly with the school’s financial advisor to oversee the Board’s investment strategy.

As of July 30, 2020, the law school held unrestricted assets of over \$4 million and restricted assets of almost \$2 million in restricted assets, including \$800,000 set aside for library development.

In 2018, San Joaquin signed a lease-purchase agreement with the City of Clovis to acquire an adjacent building for a Library/Study Center that will be renovated to house the library, small classrooms, study rooms, and clinical space. Alumnus Darryl B. Freedman has pledged \$1 million to fund the facility, which will bear his name. The law school expects to take possession of the property in early 2023, after the City of Clovis relocates current Senior Center operations to a new facility and completes repairs to the building.

Development has been challenging during the pandemic but in fiscal year 2022 the law school intends to rebuild its annual fund. Dean Pearson now leads fundraising efforts as the law school no longer employs a development officer. The law school expects that gifts and grants, which represent 15 percent of operating funds, will continue to fully fund the NALC and BREN legal clinics.

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

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

The law school has met the record-keeping requirements of Guideline 11.1.

Primary responsibility for maintaining the school’s records belongs to director of student services/special events coordinator Joyce Morodomi. Ms. Morodomi began her career with San Joaquin in 1992 and has performed the school’s registrar duties since 1995.

Legacy records, from 1970 to 2012, are maintained primarily in hard copy. Some permanent documents also have been digitized and stored online. The law school follows a set procedure when copies of these records are needed.

Since 2013, the law school has maintained files in both paper and electronic format for applicants, admitted students who did not enroll, and students who registered and attended classes, with all documents required by Guideline 11.1(A)-(C.) Disability-related documents are held in separate paper files by the law coordinator, Pat Smith.

Permanent transcripts are held in paper form and, in some cases, electronic form. Transcripts include all required information, including grade and other details applicable to transfer students (Guideline 11.1(A)-(D).)

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

Faculty files are maintained by the law coordinator, and they hold all documents required by Guideline 11.1(H), including official transcripts of instructors' legal education and evidence of current bar admission status, if applicable.

The law school keeps all physical files with sensitive, legally protected information in locked file cabinets, while files of a less sensitive nature are kept in locked offices or areas with restricted access. Electronic files are protected pursuant to the law school's Cyber Security Policy, overseen by Derron Wilkinson, the chief information officer.

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

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

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

An accredited law school must maintain a minimum cumulative five-year bar exam pass rate (MPR) of at least 40 percent among its graduates who take the examination. San Joaquin has done so, having achieved an MPR of 77.4 percent in 2018, 72.4 percent in 2019, 68.8 percent in 2020 and 77.7 percent in 2021. After a period of decline, though clearly in compliance at all times, it is positive

to see the MPR increase, and the school is encouraged to continue to focus on improvement in this area to ensure continued compliance.

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

The law school adheres to a policy of non-discrimination in the administration of the JD program (Guideline 14.1.) As set forth in the Catalog and Handbook, the policy states in pertinent part:

San Joaquin College of Law provides equality of opportunity in legal education for all persons, including faculty, employees, applicants for admission, enrolled students and alumni, without discrimination on the basis of race/color, religious creed, national origin/ancestry, age, gender, mental or physical disability, medical condition, marital status, sexual orientation, pregnancy or any other basis protected by federal, state, or local law or ordinance or regulation.

Policies and procedures also have been established for the handling of harassment, sexual harassment, sexual assault, and sexual misconduct.

San Joaquin's commitment to equal opportunity is reflected in the law school's leadership role in the Regional Pathway to Law Program, which received the 2021 State Bar of California Education Pipeline Award. The program is a collaborative effort among San Joaquin Valley educational institutions to provide a clear educational pathway for diverse students from high schools, community colleges, and four-year institutions into law schools or law-related careers.

As reported in the 2020 Annual Compliance Report, over 66 percent of the JD students are women. Students self-identified as belonging to racial or ethnic groups as follows: American Indian or Alaska Native (1 percent), Asian (13 percent), Black or African American (2 percent), Hispanic/Latino of any race (42 percent) and white (36 percent.) Approximately 3 percent of students declined to identify themselves by race or ethnicity.

Of the law school's first-time bar passers in October 2020, 78 percent self-identified as people of color, including 48 percent who identified as Latinx.

Among the faculty, half of instructors are women and 90 percent are white. One instructor is Black or African American, three instructors are Hispanic/Latinx, and thirty-seven instructors are White. The law school is encouraged to foster diversity and inclusion in recruitment, development, and retention of faculty.

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

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

CONCLUSION AND RECOMMENDATION

The team recommends that the Committee receive and file this Periodic Inspection Report, approve the team's recommended and suggested actions, continue the accreditation of the San Joaquin College of Law, and schedule its next periodic inspection in fall of 2026, unless an earlier visitation is deemed necessary by the Committee. The law school should provide an update on its progress toward the recommendations noted as part of its 2022 Annual Report.