

IRA SPIRO

Attorney at Law

10573 West Pico Blvd. #865, Los Angeles, CA 90064
Telephone (310) 235-2350 - Email ira@spirolawcorp.com

June 8, 2022

Committee of Bar Examiners
State Bar of California

By email to lawschoolregulation@calbar.ca.gov

re: Peoples College of Law

Dear Committee of Bar Examiners:

I write to point out that Peoples College of Law (PCL) is more than 90% in compliance with the mandatory recommendations in the State Bar inspection reports, as I explain below.

In light of this, I urge the Committee to withhold issuing a Notice of Non-compliance.

I am the attorney for Peoples College of Law. I was the dean from May 2017 to August 2021.

Below is an encapsulation of the law school's compliance as shown in its June 3, 2022 Amended Progress Report. (Note that the report would have been submitted earlier, but PCL and I believed that the report we submitted to Bar staff on May 19, 2022 was the Amended Progress Report that the Committee had requested, as described in the Bar's letter of April 8, 2022. However, we acknowledge that May 19 was well after the 30 days specified in the Committee's decision at its March 2022 meeting.)

RECOMMENDED MANDATORY ACTIONS IN 2020 INSPECTION REPORT

1. Guidelines 1.9 and 2.10 - COMPLIANT

(students requests for accommodation)

The Bar's 2020 Inspection Report states: "Subsequent to the inspection, the school adopted a compliant policy" PCL's June 3 Amended Progress Report adds: "Recently Bar staff called to our attention" a problem with a paragraph in the Handbook, and PCL revised it accordingly.

2. Guideline 2.2(B) - COMPLIANT

(refund policies)

The Bar's 2020 Inspection Report states: "Subsequent to the inspection, the school adopted a compliant policy" PCL's June 3 Amended Progress Report adds: "Recently State Bar staff alerted us to a possible problem regarding the provision in the refund policy for pro rata refund" and PCL revised the policy accordingly.

3. Guideline 2.3(B) - COMPLIANT

(removal from Catalog of electives no longer offered)

The Bar's Inspection 2020 Report states: "Subsequent to the inspection, the school updated the course list, deleting two courses that did not meet these criteria, and added the language regarding frequency." PCL's June 3 Amended Progress Report notes that they remain deleted.

4. Guideline 2.3(D) – COMPLIANT, THOUGH PARTIALLY TARDY

(disclosure statements under Guideline 2.3(D)(1)-(3), Busn. and Prof. Code 6061.7, and Rule 4.241)

The Bar's Inspection 2020 Report states: "These disclosures have been corrected and implemented." PCL's June 3 Amended Progress Report shows that the school remains in compliance, but acknowledges that the 6061.7 was posted quite late, though it is now posted on the website, as Bar staff will verify.

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

(accuracy, clarity and consistency of academic standards and student assessment policies)

The Bar's Inspection 2020 Report states: "Subsequent to the inspection, the school provided evidence of the updates as required." PCL's June 3 Amended Progress Report states that the compliant updated policies were initially implemented in 2020 and have remained in effect.

6. Guideline 2.9(C) – DEFICIENT BECAUSE A FEW INSTRUCTORS HAVE NOT PROVIDED SYLLABI DESPITE PCL'S EFFORTS

(providing students with written statements of the components of course grades)

The Bar's Inspection 2020 Report states: "Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy." PCL's June 3 Amended Progress Report states "PCL has repeatedly written and telephoned instructors who have not submitted syllabi, but we still have not received some, as set out below. PCL will have to consider not allowing these instructors to teach at PCL again, at least for number of years."

7. Guideline 2.9(D) – COMPLIANT

(students taking in-class exams using devices not protected by exam-security software)

The Bar's Inspection 2020 Report states: "Subsequent to the inspection, the school advised that it is actively evaluating options to implement secure testing." PCL's June 3 Amended Progress Report explains that PCL additional safeguards and a change to a different remote platform.

8. Guidelines 2.10 and 5.17 – COMPLIANT, after a hiatus in compliance

(grade review policy)

The Bar's Inspection 2020 Report states: "Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy." PCL's June 3 Amended Progress Report states that Administrative Grade Review was implemented, then there was a hiatus in its use, but it has been in use from winter quarter 2021-2022 to date.

9. Guidelines 2.11, 7.1, and 9.1 – COMPLIANT

(protection of digital records)

The Bar's Inspection 2020 Report states: "Subsequent to the inspection, the school purchased Populi, a commercially available package designed for schools containing the safeguards identified in this report." PCL's June 3 Amended Progress Report states that Populi is still in use.

10. Guideline 3.1 – DEFICIENT BUT MAJOR NEW IMPROVEMENTS

(administrative capacity)

The Bar's Inspection 2020 Report states: "Subsequent to the inspection, the school increased the

paid hours of the administrator, and secured significant volunteer assistance from the dean, the Board, and alumni. The school will monitor the adequacy of its administrative capacity. The school also created compliant job descriptions for both the dean and the registrar.” PCL’s June 3 Amended Progress Report states that four new administrative positions have been established and PCL plans to pay the Dean a stipend. The positions are:

- 1) Part-time student resource coordinator, 20 hours per week, from February 2022 to June 2022. This position will most likely be a yearly seasonal position dealing with tutoring, administering mock exams, reviewing essays and giving feedback.
- 2) Part-time admissions recruitment coordinator, a seasonal position from late May 2022 to early September 2022. PCL has approved 10-13 hours per week for this position.
- 3) legal clinic coordinator, 10-13 hours per week through May 2023. It is funded by a grant PCL obtained, and the position may expand if additional grant money is awarded.
- 4) PCL contracts on a project-by-project basis with a professional fundraiser. Her hours are not fixed. So far this year she has worked an estimated 30 to 40 hours. PCL is currently applying for a grant which may expand it into a full-time position, which will help free up capacity of the Registrar/Administrators and the Faculty and Curriculum Committees, a key committee at PCL.

11. Guidelines 4.8 and 4.9 – COMPLIANT (faculty evaluation policies)

The Bar’s Inspection 2020 Report states: “Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.” PCL’s June 3 Amended Progress Report states that the policy is still in effect, though few student evaluations are received.

12. Guidelines 5.3(A)(1) and 5.9 – COMPLIANT (attendance policies)

The Bar’s Inspection 2020 Report states: “Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.” PCL’s June 3 Amended Progress Report states that the policy is still in effect and has been enhanced by use of Populi.

13. Guideline 5.8 – COMPLIANT (clinical courses, including maintenance of records attendance policies)

The Bar’s Inspection 2020 Report states: “Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.” PCL’s June 3 Amended Progress Report states a 9-point instruction on clinical course attendance records formulated by the former dean is still in effect.

14. Guidelines 5.17, 5.18, and 5.25 – COMPLIANT, after same hiatus in Item 8 above (quality of exams, grade inflation, adequate feedback to students)

The Bar’s Inspection 2020 Report states: “Subsequent to the inspection, the school began addressing this issue and it continues to discuss further options with priority.” PCL’s May 2021 Progress Report sets out a two-page policy adopted to address these issues. These policies are still in effect, though there was the same hiatus Administrative Grade Review referred to in Item 8 above.

15. Guidelines 5.18–5.20 – COMPLIANT

(policies for academic advancement)

The Bar’s Inspection 2020 Report states: “All identified policies were updated, and non-compliant policies deleted. PCL’s June 3 Amended Progress Report states that the deleted policies are still deleted.” The updated policies remain in place.

16. Guideline 5.24 – COMPLIANT

(course repetition policy)

The Bar’s Inspection 2020 Report states: “Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.” PCL’s June 3 Amended Progress Report states that PCL learned of an unpublished State Bar practice and deleted a paragraph of its policy in order to comply with the practice.

**17. Guideline 6.2–6.4 – COMPLIANT, BUT ACCOMMODATION REQUESTED
STARTING FALL 2022**

(hardbound library)

The Bar’s Inspection 2020 Report states: “Subsequent to the inspection, the school did confirm that legal research is being taught using both hard copy and electronic resources, and the syllabi are being updated appropriately. PCL’s June 3 Amended Progress Report states that the library has been restored to usable condition after fire damage, and that PCL has a plan to comply with the hardbound book requirement, but points out that only registered law schools are subject to the hardbound book requirement, while State Bar accredited schools are not, and asks that PCL be allowed to designate the Los Angeles County Law Library, three miles distant.

18. Guidelines 7.1 and 7.2 – COMPLIANT

(hard copy record storage in fire-safe lockable cabinets, other equipment)

The Bar’s Inspection 2020 Report states: “Subsequent to the inspection, the school transferred files to lockable, fire-safe cabinets; projectors were replaced with other options.”. PCL’s June 3 Amended Progress Report states that the cabinets are still in use.

19. Guideline 9.1 – COMPLIANT

(record-keeping processes and record retention requirements)

The Bar’s Inspection 2020 Report states: “Subsequent to the inspection, the school adopted compliant policies and provided the State Bar with copies of those policies..” PCL’s May 2021 Progress Report sets out the Administrator’s three-page report on the record-keeping and storage features of Populi. PCL’s June 3 Amended Progress Report states these features are still in use.

18. Guidelines 7.1 and 7.2 – COMPLIANT

(hard copy record storage in fire-safe lockable cabinets, other equipment)

The Bar’s Inspection 2020 Report states: “Subsequent to the inspection, the school transferred files to lockable, fire-safe cabinets; projectors were replaced with other options.”. PCL’s June 3 Amended Progress Report states that the cabinets are still in use.

Sincerely,

Ira Spiro