



OPEN SESSION
AGENDA ITEM O-406
JUNE 2022
COMMITTEE OF BAR EXAMINERS

DATE: June 17, 2022

TO: Members, Committee of Bar Examiners

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

SUBJECT: Action on Progress Report Related to Periodic Inspection and Notice of Noncompliance – Peoples College of Law

EXECUTIVE SUMMARY

At its March meeting, the Committee of Bar Examiners (Committee) reviewed the Peoples College of Law's progress report on its implementation of recommendations from the law school's 2020 inspection report. At that meeting, the Committee directed the law school to file an amended progress report and to respond to outstanding staff requests, both within 30 days. This directive was also emailed to the law school on April 8, 2022. Peoples College did not respond within 30 days, but did file an amended progress report on June 3, 2022 documenting recent changes and updates. (Attachment A). Consistent with prior guidance requiring the law school to demonstrate sustained compliance, it is recommended that the Committee issue a Notice of Noncompliance to the law school.

BACKGROUND

Peoples College of Law is a registered, unaccredited fixed facility law school founded in 1973 and located in Los Angeles, California. The law school focuses specifically on preparing students to practice public interest law.

The law school was last inspected by the State Bar on January 14-16, 2020. Registered, unaccredited law schools undergo inspections periodically to confirm continuing compliance with the Rules for Unaccredited Law Schools and their guidelines.

During the 2020 inspection, the consultant discovered an unusually large number of compliance issues. Subsequent to the inspection, the law school worked quickly to address the issues prior to the report being presented to the Committee and provided evidence to document the law school's compliance. The law school also increased the paid hours for its one paid staff position from part-time to full-time.

After the Committee reviewed the resulting inspection report and the subsequent documentation and renewed the law school's registration subject to several conditions. The Committee placed conditions on the renewal because it observed that, for the last three inspection cycles, the State Bar discovered significant compliance issues at the law school, the law school addressed them quickly, and then significant similar and new issues recurred. Therefore, the Committee conditioned its renewal of registration upon the following three steps. First, the law school was directed to file a progress report annually along with its Periodic Compliance Report due by November 15, 2022, documenting sustained completion of the recommendations contained in the inspection report. (See [Item O-406, Committee of Bar Examiners Meeting, Aug. 21, 2020](#)). Next, the Committee put the law school on notice that if it did not appear to sustain compliance, the Committee would issue a Notice of Noncompliance as follows: "FURTHER MOVE, that "the school provide in each Annual Report a detailed update as to its compliance status with respect to each of the recommendations noted above, with the understanding that failure to demonstrate continuing compliance will result in the issuance of a Notice of Noncompliance." Finally, the law school agreed to undergo a subsequent inspection in 2022.

In 2020, PCL provided a progress report along with its 2020 Annual Report, and further updated the progress report in May 2021 prior to Committee review. The Committee accepted that report and also granted the law school a waiver of time to complete the purchase of required library books, since students were attending class remotely due to the pandemic at that time.

In 2021, there were a number of concerning observations. The law school's progress report was filed late, requiring two extensions. Around the same time, inquiries from the State Bar went unanswered, or were answered in an incomplete or nonresponsive manner. The law school also failed to post its mandatory statutorily required web disclosures (California Business and Professions Code section 6061.7(a)) by the recommended deadline of November 15 or the required deadline of January 2022, and it did not respond to repeated requests to do so until June 7, 2022.

Peoples College of Law's progress report relied, in part, on the policies documented in the law school's Student Handbook. That handbook, posted on the law school's public website, contained internal notes and policies to be updated. When the State Bar advised the law school of this, the draft version of the Student Handbook remained posted for several months. Recently, the law school indicated that a more finished version had also been posted online at the same time, but, even if it were, (and it is not clear that it was), it was not posted at the main link for the Student Handbook, and it still contained policies that needed to be updated. On June 3, 2022, the law school advised that it posted an updated version of the handbook and provided a copy.

Prior to the Committee's March 2022 meeting, staff contacted the law school to continue to seek answers to the staff questions, encourage the law school to update its handbook and post its disclosures, and advise the law school that its progress report would be discussed at the March meeting, noting that the Committee would determine whether to accept the report, accept it with conditions, or reject it. The law school was advised that it had the option to attend the meeting, and, if not, that it should be ready to review any action taken by the Committee by viewing the webcast of the meeting and the written follow up to be sent to the law school after the meeting.

At the March 2022 meeting, the Committee reviewed the law school's 2021 Progress Report. (See [Item O-406, Committee of Bar Examiners Meeting, Mar. 18, 2022](#)). The Committee provided the law school with an additional 30 days, as a courtesy, to amend its progress report to document its compliance and also respond to outstanding staff requests. (See [Item O-406, Committee of Bar Examiners Meeting, Mar. 18, 2022](#)).

Staff emailed written notice of the Committee's action along with an invoice on April 8, 2022. The law school paid the invoice, but did not file an amended progress report or respond to staff questions within the 30-day timeframe specified, despite reminders from staff in addition to the letter. Staff set a meeting with the law school to determine its status. The law school agreed to meet on May 27, 2022, and provided responses to prior staff requests on May 24 and May 26, 2022 in advance of the meeting.

At the meeting on May 27, 2022, the law school agreed to file an amended progress report, which was submitted on June 3, 2022. After the meeting, staff sent the law school a detailed summary of outstanding issues as well as resources to help the law school address them.

At a subsequent meeting on June 2, 2022, the law school advised that it had held a special board meeting on June 1, 2022 to address some of the policy changes that were needed and that another regularly scheduled board meeting was set for June 12, 2022. On June 3, 2022, the law school provided the amended progress report set forth in Attachment A along with an updated [Student Handbook/Handbook of Rules and Policies Catalog](#) (Student Handbook). On June 7, 2022, the law school posted the [web disclosure statutorily required under California Business and Professions Code 6061.7\(a\)](#).

DISCUSSION

Today, the Committee will discuss whether the law school has demonstrated through its amended progress report and actions that it has sufficient staffing, policies, and procedures to maintain compliance or whether a Notice of Noncompliance should issue.

If the Committee believes that the law school is likely to be out of compliance with the Unaccredited Law School Rules, it should provide a notice pursuant to Rule 4.263 indicating that the Committee recommends and intends to pursue probation or termination of registration unless the law school can provide evidence to demonstrate compliance in its response.

During the last several weeks, the law school has taken several specific steps to meet its obligations, posting required disclosures, responding to outstanding staff requests, reviewing the Student Handbook, and setting board meetings to discuss needed changes. The leadership team is clearly working hard to address issues that were not addressed during this school year. The law school also indicated that it will be adding additional paid staff hours to assist going forward.

Despite the law school's very recent efforts, over the course of the year, the law school has failed to respond or provided non-responsive answers to directives from the Committee and inquiries from staff, and failed to post correct, complete, statutorily required information to the public. The law school demonstrated difficulty in grasping its responsibilities as a law school registered with the State Bar. Therefore, it is recommended that the Committee issue a Notice of Noncompliance to the law school, consistent with its prior direction to the law school. The law school will have an opportunity to respond within 15 days, and the Committee can use this response to determine when and whether to take the next steps in the noncompliance process.

The law school largely operates with the help of volunteers, and points to this to explain some of the issues discussed. It should be noted, however, that staffing levels were highlighted as key issues to address at the 2020 inspection, but and its level of volunteer participation does not change the law school's compliance obligations.

The law school is already scheduled for an inspection in 2022 per prior Committee action; if appropriate, this can be combined with the noncompliance process if the Committee finds at a future meeting that the law school's required response to the Notice of Noncompliance is insufficient and a further inspection is required under the rules.

RECOMMENDATIONS

It is recommended that the Committee find that Peoples College of Law did not file an amended progress report or respond to staff requests within 30 days, receive and file the law school's amended progress report received on June 3, 2022, and acknowledge that the law school provided responses to staff questions during the week of May 23, 2022, an updated

handbook on June 3, 2022, and publicly posted statutorily required web disclosures on June 7, 2022.

It is further recommended that the Committee issue a Notice of Noncompliance, based on the need to review staffing levels, procedures, required deliverables, and timelines to ensure compliance. The law school should be directed to respond within 15 days consistent with the rules.

The Committee should further provide notice pursuant to Rule 4.263 indicating that the Committee recommends and intends to pursue probation or termination of registration unless the law school can provide evidence to demonstrate compliance as part of its timely response.

It should be noted that the law school was already set for inspection in 2022, and no further action is needed for this to take place.

PROPOSED MOTION

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

MOVE, that the Committee find that Peoples College of Law did not file an amended progress report or respond to staff requests within 30 days, receive and file the law school's amended progress report received on June 3, 2022, and acknowledge that the law school provided responses to staff questions during the week of May 23, 2022, an updated handbook on June 3, 2022, and publicly posted statutorily required web disclosures on June 7, 2022;

FURTHER MOVE, that the Committee issue a Notice of Noncompliance, based on the need to review staffing levels, procedures, required deliverables, and timelines to ensure compliance. The law school should be directed to respond within 15 days consistent with the rules; and

FURTHER MOVE, that the Committee provides notice to the law school pursuant to Rule 4.263 that it intends to pursue probation or termination of registration unless the law school can demonstrate compliance in its timely response.

ATTACHMENT LIST

- A. Peoples College of Law Amended Progress Report, June 3, 2022

**PEOPLES COLLEGE OF LAW
JUNE 2022 PROGRESS REPORT
ON COMPLIANCE WITH RECOMMENDATIONS
IN STATE BAR INSPECTION REPORT OF 2020**

RECOMMENDED MANDATORY ACTIONS IN 2020 INSPECTION REPORT

1. Guidelines 1.9 and 2.10:

Bar's Inspection Report

*“To achieve full compliance, the school should demonstrate that it has adopted adequate procedures to properly document applications for accommodations and decisions in student files, to secure health records against unauthorized disclosure, and to effectively administer the school's policy. **Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.**”*

PCL'S Progress Report of May, 2021

As noted in the Inspection Report, PCL adopted a compliant policy some months ago. One provision of the policy is: “Once each calendar month, the Administrator shall distribute a reminder of this Student Privacy Policy, with its full contents, to the Registrar, the Dean, and all officers, members of committees, members of the Community Board, employees and Faculty Members, by automatically scheduled email or otherwise.” Starting at the beginning of this academic year, we have complied by distributing the policy by email every month to the required recipients. The Dean has calendared for himself a reminder to distribute it at the beginning of every month. Soon our new Student Information System, Populi, will distribute it automatically on the first of every month.

PCL's Addendum of June 2022

As stated above, in 2020 PCL adopted a compliant policy. The policy is in the PCL Handbook, submitted herewith, and on the PCL website. Since adoption of the policy, PCL has distributed it monthly as required therein, by email. The Dean and most recently the Registrar/Administrator.

In regard to student privacy of grades, test scores, and personal information, PCL does not disclose students' grades or test scores to other students. Student members of the Faculty and Curriculum Committee (FCC) are not privy to students' grades, test scores, or personal information.

PCL's Disciplinary Code (also in the Handbook) has procedures carried out by bodies members of the Community Board and the Executive Committee. Since the inception of the Disciplinary Code, it has provided in Section 3.3:

No student (including student members of the Community Board and the Executive Committee and student members of any Delegatee) shall participate in any of the disciplinary of the Community Board or the Executive Committee or any Delegatee unless, before participation by any student, the subject of the discipline and the student (if any) who submitted the Grievance consent in writing to participation by students in those functions.

One body that carries out Disciplinary Code procedures is titled Investigatory Committee. With regard to those committees, Section 3.10 of the Handbook used to provide that the Investigatory Committee is to be composed of:

- a. One person who is or has been a faculty member in the current academic year or within the three academic years preceding the current one;
- b. One person who is or has been a student in the current academic year or within the three academic years preceding the current one, and who has never been a faculty member;
- c. One member of the PCL Corporation who does qualify under a. or b. above.

Recently Bar staff called to our attention that paragraph b should be clarified that it excludes current students. Thus, in May, 2022, Section 3.10 was revised to provide as follows (emph. added here)

- a. One person who is or has been a faculty member in the current academic year or within the three academic years preceding the current one;
- b. One person who is or has been a student in the current academic year or within the three academic years preceding the current one, and who has never been a faculty member, **but not a current student unless the student who is the subject of the proceeding consents in writing.**
- c. One member of the PCL Corporation who does qualify under a. or b. above.

2. Guideline 2.2(B)

Bar's Inspection Report

*"To bring itself into full compliance, the school should demonstrate that its refund policies have been stated clearly and consistently in its publications. **Subsequent to the inspection, the school published a single clear policy, and provided a copy of that policy to the State Bar.**"*

PCL'S Progress Report of May 2021

As noted in the Inspection Report, PCL adopted a compliant policy some months ago. This new policy appears in our Tuition and Enrollment Agreement and our Student Handbook & Catalog. In late August and early September 2020 the students signed their Tuition and Enrollment Agreements, with the refund policy prominently displayed. The Student Handbook & Catalog, with the new refund policy, is posted on our website.

PCL's Addendum of June 2022

As noted in the 2020 Inspection Report & 2021 Update, PCL adopted a compliant policy in 2020 and continues to remain compliant. The policy is located in the Handbook, and in the Tuition Enrollment Agreement. Students are required to sign their Tuition and Enrollment Agreements before beginning their courses each new academic year, in the fall quarter.

Recently State Bar staff alerted us to a possible problem regarding the provision in the refund policy for pro rata refund to a student who withdraws from less than all courses. The potential problem concerns the requirement in Business and Professions Code section 6060 that students must have 270 hours of classroom instruction each academic year. To address PCL revised a warning in the refund policy, Section VIII, paragraph 9(b) of the Handbook. The warning now reads, in bold:

Also, with the written permission of PCL signed by an officer or the Registrar or the Administrator, a student may withdraw from less than all the student's courses and receive a pro rata refund ... **However, California law requires that a student at a school like PCL must have a minimum of 270 hours of classroom attendance per year. Thus, if a student does withdraw from less than all courses, the student will not receive credit for any courses taken during that academic year, even if the student received passing grades in them. That would jeopardize the ability of a student to complete their PCL education within four years and would probably result in increased tuition costs.**

3. Guideline 2.3(B)

Bar's Inspection Report

*"To bring itself into full compliance, the school should remove from the Catalog any electives not offered in the past three years or not expected to be offered in the next two years, and inform students in the Catalog that electives are not are taught each year, but are offered from time to time based on student interest and instructor availability. **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 Progress Report of May 2021

As noted in the Inspection Report, some months ago PCL came into compliance by deleting from the Student Handbook & Catalog the courses required to be deleted. Also, this past summer (2020) we had two elective courses, clinical courses on Criminal Defense and Eviction Defense. It was the second year in which the clinical course on Criminal Defense was given, the first year for Eviction Defense. We want to repeat them next summer, but since the courses are so new, we have refrained from listing them in the catalog yet.

PCL's Addendum of June 2022

As stated in prior reports PCL has deleted from the Student Handbook & Catalog elective courses required to be deleted and they remain deleted as of June 2022.

4. Guideline 2.3(D)

Bar's Inspection Report

*"To bring itself into full compliance, the school should demonstrate that the disclosure statements required by Guideline 2.3(D)(1)-(3), Business and Professions Code section 6061.7, and Rule 4.241 have been implemented accurately, completely, consistently, and as mandated. **These disclosures have been corrected and implemented.**"*

PCL's Progress Report of May 2021

As noted in the Inspection Report, some months ago PCL came into compliance by correcting, revising and implementing the disclosures. Since then the required disclosures were made in the Tuition and Enrollment Agreements signed by each student at the start of the fall quarter. The Rule 2.3(D) disclosure has been updated to reflect the change in the principal method of instruction, a change caused by COVID-19, from physical classroom instruction to online

interactive instruction. On October 18, 2020, well before the deadline in Rule 4.241, the Dean signed and sent to the State Bar the certification of compliance required by the rule. In connection with preparation of the Annual Compliance Report, the Business and Professions Code section 6061.7 disclosure is being updated.

PCL's Addendum of June 2022

PCL came into compliance, as stated above, by correcting, revising, and implementing the aforementioned disclosures in 2020. The disclosures are located in both the Tuition and Enrollment Agreements signed by each student at the start of the academic school year. Furthermore, as a result of changes necessitated by COVID-19 Rule 2.3(D) disclosure has been updated to reflect the principal method of instruction from physical classroom instruction to online interactive instruction. On October 18, 2020, former Dean, Ira Spiro, signed and sent to the State Bar the certification of compliance required by the rule.

However, we did not make the most recent section 6061.7 disclosure nearly on time, because a Registrar/Administrator who since resigned failed to calendar it or do it. But it has now been done. It is on the website and submitted herewith.

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

Bar's Inspection Report

"To bring itself into full compliance, the school should demonstrate that the Catalog and other publications set forth the school's academic standards and student assessment policies accurately, clearly, consistently, and as mandated. Subsequent to the inspection, the school provided evidence of the updates as required."

PCL's Progress Report of May 2021

As noted in the Inspection Report, some months ago PCL came into compliance by revising these policies as required. One of the changes in our policies has to do with student privacy. Specifically, our Student Handbook & Catalog now prohibits students from participating in proceedings involving possible academic disqualification of other students without consent of the student in jeopardy of disqualification. Likewise it prohibits students from participating in academic grievance proceedings without the consent of the student who made the grievance. These new provisions are being implemented right now. We are in the midst of proceedings in which a student is challenging a failing grade, and these new provisions have been put into practice. Specifically, the student was informed at the outset that without the student's consent, other students would not participate in the proceedings. The student in question chose to have the other students participate. The other students are members of our Faculty-Curriculum Committee. One of the functions of that committee is to pass on petitions for grade changes.

PCL's Addendum of June 2022

PCL came into compliance by revising these policies as required in 2020. The changes included (a) prohibiting student participation in proceedings regarding possible academic disqualification of other students without consent of the other student; (b) prohibiting students from participating in academic grievance proceedings without consent of the student who made the grievance. These policies were initially implemented in 2020 and have remained in effect to the present.

6. Guideline 2.9(C)

Bar's Inspection Report

"To bring itself into full compliance, the school should adopt, publish, and implement a policy, including oversight provisions, to ensure that students are provided with written statements of the components of course grades. Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy."

PCL's Progress Report of May 2021

As noted in the Inspection Report, some months ago PCL came into compliance by revising the policies as required. The Dean has reviewed the syllabi that have been entered into Populi, and finds that all but three professors have included in syllabi written statements of the components of course grades, but two of those are pass-fail courses. Attachment 1 to this report is examples of the statements of the components of course grades, contained in faculty members' syllabi.

PCL's Addendum of June 2022

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.

Spring 2021-2022 courses missing syllabus:

Legal Writing III

Civil procedure III

Real Property III

Torts III

7. Guideline 2.9(D)

Bar's Inspection Report

"To bring itself into full compliance, the school should adopt, publish, and implement a policy on authentication of student work, and discontinue its current practice of allowing students to take in-class exams using devices that are not protected by exam-security software. Subsequent to the inspection, the school advised that it is actively evaluating options to implement secure testing."

PCL's Progress Report of May 2021

During this fall quarter, PCL adopted the following policy and procedures on authentication of student work:

POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK

A. Exams: All exams must be given using Microsoft Teams. If the exam is given remotely, the monitoring function of Teams must be used. If the exam is given in the classroom, the instructor or a non-student substituting for the instructor must be present during the entire exam to monitor the students. Students who handwrite exam answers

must have all their electronic devices turned off. Students who answer the exams by Teams on a computer must have all their other electronic devices turned off. If the exam is given remotely, all students must have their video activated during the entire exam, but exceptions are allowed for student who encounter technical problems that result in the student not being able to have their video activated.

(The Faculty-Curriculum Committee notes that exams are given with Microsoft Teams. Teams requires students to register for each exam. The students' exam answers are sent to the Microsoft Teams account and only accessible through Teams. When taking the exams, the students' computer screens are locked upon being opened by the student, and thus the students cannot access other materials while the test is being taken. While taking the exam, the student is observed by the exam proctor through the webcam. The students' exam answers are submitted to the proctor through the students' Microsoft Teams account.)

B. Remote Class Participation: In all classes given remotely every student should have their video activated during the entire class, unless the student has hardware or software issues related to their computer or internet service provider or an extraordinary circumstance.

(The Faculty-Curriculum Committee notes that online classes are given with Microsoft Teams. The students attend class through teams. The students' names are shown during the class. The students are on camera during the class. Students speak during the classes, and their voices also identify them.)

PCL's Addendum of June 2022

A. Exams: PCL no longer uses Microsoft Teams, because many PCL professors reported they had problems connecting with it and that it interfered with their ability to conduct classes. Thus, PCL changed to allow professors to use Zoom instead. To maintain exam integrity during examinations all students must have their video activated during the entire exam, but exceptions are allowed for students who petition the college for a reasonable accommodation request or students who encounter technical problems that result in the student not being able to have their video activated. If an exam is given in the classroom, the instructor or a non-student substituting for the instructor must be present during the entire exam to monitor the students. Students who handwrite exam answers must have all their electronic devices turned off.

B. Remote Class Participation: In all classes given remotely every student should have their video activated during the entire class, unless the student has hardware or software issues related to their computer or internet service provider or an extraordinary circumstance.

PCL plans to return to in-class instruction starting in September, 2022.

8. Guidelines 2.10 and 5.17

Bar's Inspection Report

"To bring itself into full compliance, the school should review, revise, and republish its grade review policy to meet guideline requirements. Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy."

PCL's Progress Report of May 2021

We have begun implementing our new administrative grade review policy. Our committee in charge of it, the Faculty-Curriculum Committee, has met to formulate plans for the first implementation, which will be for the fall quarter grades later in November. Our Registrar/Administrator has adjusted our Student Information System to hold the grades for administrative review before the grades are issued to students and entered in their transcripts.

PCL's Addendum of June 2022

Administrative Grade Review was conducted for the fall quarter of 2020. Starting in late 2020 or early 2021, a great deal of dissatisfaction with it was expressed by many in our school's community. Thus, there was a hiatus in performing the review while a committee formulated a revised review policy, and during the tenure of the previous administrator who resigned in March 2022. However, our new, current administrator, resumed conducting Administrative Grade Review in the winter and spring quarters of 2022, and it did result in professors revising some grades downwards.

9. Guidelines 2.11, 7.1, and 9.1

Bar's Inspection Report

"To bring itself into full compliance, the school should adopt policies and procedures that are adequate to protect the school's digital records. Subsequent to the inspection, the school purchased Populi, a commercially available package designed for schools containing the safeguards identified in this report."

PCL's Progress Report of May 2021

Our Registrar/Administrator has largely completed the very substantial job of entering the digital records into Populi.

PCL's Addendum of June 2022

PCL has been utilizing the student information system called Populi since 2020 and plans to continue using it. Our Registrar/Administrator is our resident expert on this student information system is tasked on a regular basis with entering student data into Populi with the end goal of digitizing most, if not all student transcripts and other critical files.

10. Guideline 3.1

Bar's Inspection Report

“To bring itself into full compliance, PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the CBE’s standards, including written job descriptions for the dean and registrar, and adequate oversight provisions.

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 Progress Report of May 2021

Our Registrar/Administrator continues working full-time. During this fall quarter, others have greatly contributed to the school's administrative work. Following are some examples. One of our upper division students trained faculty and students in the use of Microsoft Teams, our new system for online classes and exams, has inquired with faculty and students about problems experienced with Teams, and has assisted them with problems. Our Faculty-Curriculum Committee, whose members are students, faculty, alumni and the Dean, organized and conducted our student orientation and our fall faculty meeting. An ad hoc committee is organizing our upcoming Strategy Planning Meeting and Membership meeting. (PCL is a nonprofit corporation. That type of corporation has members rather than shareholders, and PCL's members are students, faculty, alumni and former board members and officers.) Our Development and Fundraising Committee, whose members are alumni and the Dean, has weekly meetings with our professional fundraiser, and along with her has submitted several grant applications this fall, and has begun planning an online fundraising event. We have been awarded one grant so far. Our Building Committee has helped with obtaining bids for repair of the library roof.

PCL's Addendum of June 2022

To address the issue of capacity, PCL has recently hired three new positions, which will assist the Administrator in the overall running of the College, particularly in three areas, preparing students for the First Year Law Students Exam, admissions and recruitment, and development and oversight of legal clinics and clinical courses. Because the Registrar/Administrator is responsible for the majority of the day-to-day tasks at PCL, new hires are key to building the capacity of the organization. The positions, duration, and the number of hours allocated are the following:

- 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.

PCL also plans to pay the PCL Dean position a stipend to attract more interest in the Dean position. We must add that our responses to State Bar communications slowed from summer 2021 to March 2022 in large part because, much to our surprise and disappointment, the person in the Administrator position beginning May, 2021 responded late or not at all to a significant number of assignments. Our new Administrator began full-time in April, 2022 and she has improved our response time very significantly.

Furthermore, this past year our Development and Fundraising Committee, comprised of alumni, current board members, and former Dean Ira Spiro, very successfully raised over \$55,000 for PCL's May 2021 annual fundraiser, a very large amount compared to our budget and fundraising history. PCL will strive to surpass that \$55,000 mark, with a goal of \$100,000 for our Winter 2022 fundraiser. The Fundraising Committee meets twice a month with our professional fundraiser, and along with her has submitted several grant applications this past year. We have been awarded two grants so far.

11. Guidelines 4.8 and 4.9

Bar's Inspection Report

*"To bring itself into full compliance, the school must adopt and implement a faculty evaluation policy that meets guideline requirements. **Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.**"*

PCL's Progress Report of November 2020

We have begun the process of instructor evaluation. Instructors are evaluated by their own students and by members of the Faculty-Curriculum Committee. We use a standard evaluation form. It has been sent to the students. Members of the Faculty-Curriculum Committee already have the form, and have begun sitting in on classes online as part of the evaluations.

PCL's Progress Report of May 2021

We use a standard evaluation form. Thirty-Three evaluations have been done this academic year.

PCL's Addendum of June 2022

We continue to conduct instructor evaluations. However, we do not receive many evaluations from students. This calendar year the Registrar/Administrator sent out the evaluation requests but received only one evaluation from a student. We could consider making it a requirement that students submit evaluations, although we are reluctant to impose additional requirements on our students, nearly all of whom have full-time jobs and many of whom also care for families.

12. Guidelines 5.3(A)(1) and 5.9

Bar's Inspection Report

"To bring itself into full compliance, the school should adopt, implement, and publish attendance policies and procedures that: require student attendance at no less than 80 percent of the regularly scheduled class hours for each course during a particular term, not a series of courses over two or more terms; provide for accurate and timely maintenance of records; and eliminate the policy of permitting students to make up absences from regularly scheduled class hours with alternate activities. Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy."

PCL's Progress Report of May 2021

As noted in the Inspection Report, some months ago we adopted the required policy. Our Registrar/Administrator has been viewing the classes in order to take attendance and record it in Populi, our electronic information system. At times the instructors have been the ones to take attendance, and then report it to the Registrar/Administrator, who enters it in Populi. Attachment 2 to this report is an example of the student attendance reports generated by Populi, the report for the most recent quarter, Spring, 2021. As the report shows, attendance for all the students was well above 80%; the lowest was 92.86%.

PCL's Addendum of June 2022

Since 2021 PCL has used its student information system, Populi, to keep track of attendance in classes. Instructors are strongly encouraged to take attendance and record it on Populi, however, if an instructor has difficulty utilizing Populi's attendance feature then they must report those numbers to the Registrar/Administrator so they may be recorded on Populi.

13. Guideline 5.8

Bar's Inspection Report

"To bring itself into full compliance, the school should demonstrate that its clinical courses meet all Guideline 5.8 requirements, including maintenance of records for each student in the course. Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy."

PCL's Progress Report of May 2021

As noted in the Inspection Report, some months ago we adopted the required policy. Thereafter we had two clinical courses this summer. The Dean created an Excel spreadsheet form to be used by students as timesheets to record the time and activities of their course work. As an attachment to the email below, the Dean sent the timesheet form to all students and instructors in the clinical courses. The Dean sent reminder emails to the students a number of times during the summer quarter. At the end of the quarter, the Dean reviewed the timesheets submitted by the students, evaluated them, and reported to the Registrar/Administrator which students were entitled to credit for these clinical courses, and which were not.

From: Ira Spiro

Sent: Monday, June 29, 2020 6:49 PM

[names of recipients omitted from this report]

Subject: TIMESHEETS for CLINICAL CLASSES - MUST BE FILLED OUT BY STUDENTS TO GET CREDIT

Importance: High

Dear PCL SUMMER Students

Because of State Bar requirements, **you have to fill out timesheets in order to get credit for our clinical courses.** A form timesheet is attached, an Excel spreadsheet. It's very easy to use. I filled them out every day, all through the day, when I was practicing law. Here's what to do:

1. Download the attachment to your computer.
2. Type your name and the course name at the top.
3. If you're taking both clinical courses, you'll have to have two separate timesheets, so save it twice, each with a different name for use by your computer.
4. **Fill them out every day when you're done with work for the day.** Way too hard to wait, say, a week, and try to remember your time at the end of the week. This is very good practice for when you become a lawyer, because most all lawyers have to fill out timesheets
5. "Date" column: When you start typing the date, e.g. 6/29, the year gets filled in automatically.
6. "Hours" column: You can round to the nearest quarter hour, for example .45, 1.75, 2.25. (But when you practice law, you should round to nearest tenth.)
7. "Task" column: What you fill in can be very short. For example, "attend Zoom" or "draft letter" or "draft memorandum" or "phone call to prof". You can use abbreviations if you're sure you'll remember what they stand for. For example TC for telephone call, dft for draft, memo is fine for memorandum.
8. **Email them to me every Friday when you're done with your work that day.** State Bar requires someone on faculty to monitor the students, and it's going to be me.
9. If you have any questions about this, give me a call (310-235-2350), or send me an email. Remember, my phone doesn't receive texts.

PCL's Addendum of June 2022

PCL continues to apply the policies and requirements stated in the former Dean's June 29, 2020 email quoted above. PCL plans to have a year-long clinical course beginning in the Fall 2022 quarter, and we plan to apply the same or similar policies and requirements to it.

14. Guidelines 5.17, 5.18, and 5.25

Bar's Inspection Report

“To bring itself into full compliance, the school should review, revise, and republish its exam and grading policies and procedures, taking action as necessary to improve the quality of exams, curb grade inflation, and ensure that students receive adequate feedback on their exam performance. Subsequent to the inspection, the school began addressing this issue and it continues to discuss further options with priority.”

PCL's Progress Report of May 2021

The Inspection Report does not reflect a number of very important improvements PCL made between the time the report was first published by State Bar staff and the time it was adopted by the Committee of Bar Examiners. Therefore, we discuss those changes below, although we did report them during the summer of 2020.

In addition, recently the Dean formulated a policy to require that students receive adequate and substantial feedback on their exam performance. It was furnished to State Bar staff. Adoption of a policy on this subject is scheduled to be considered at the next meeting of our board of directors.

Attachment 3 to this Report is examples of feedback to students during this academic year. Each is feedback in a spring quarter final exam, a spring quarter midterm exam, and a winter quarter midterm exam.

Policies to Eliminate Grade Inflation

The Inspection Report, on page 15, referring to the 2014 inspection, states:

“To address grade inflation, PCL adjusted its grading scale and urged instructors not to inflate grades. PCL did not, however, adopt other policies to control inflation, such as administrative review of grades prior to their release, or reasonable limits on the extent to which grades may be based on class participation, including attendance. As concluded in 2014, a sound grading program would limit participation points to no more than three [of 100], and the award of points based on attendance is “clearly inappropriate” in light of Guideline 5.3(A)(1) minimum attendance requirement. PCL’s policy allows up to thirty percent of a course grade to be based on participation.”

This summer we did adopt the policies recommended in that paragraph. They are now in the Student Handbook & Catalog and the Faculty Handbook, as follows:

Grading Standards:

It is of primary importance for PCL students and all of PCL that the students have a realistic picture of a realistic picture of their outlook for passing First Year Law Students Exam (FYLSX) and Bar Exam. The pass rates for both exams have been very low. For example, the pass rate for the July 2019 Bar Exam was 14.4% for California Unaccredited law schools and 18.8% for California-Accredited (non-ABA) law schools.

On the FYLSX of June 2019, the pass rate was 23.5% for all takers and 28.1% for California Unaccredited Fixed-Facility law schools (PCL is in that category). Students' ideas about their chances on these exams are very likely influenced by their law school grades. If a student receives high grades, that is likely to raise the student's expectations of passing the FYLSX and the Bar Exam, but because of the low pass rates on the exams, the heightened expectations could well be unrealistic. In light of these and similar considerations, PCL has adopted these Grading Standards for all examinations and final grades (grades for the full quarter) in all courses that are not graded pass-fail. NOTE that in the grouping of grades in the table below, C- grades are grouped with the D grades. That is because at PCL, in order for a student to advance to the next academic year and graduate, the student must have a grade point average of C or better.

90 - 100 (A+, A and A-)	Grades in this range should be only for very superb, outstanding work, not merely the best work among the students. The best work is often not in the A range. On an essay exam, the student should not only have identified all issues, but should have done a very superb, outstanding job of analyzing the issues. Sometimes there will be no grades in this range on an exam or for a quarter. This range should be under 10% of the grades, occasionally as much as 10%.
80 – 89 (B+ , B and B-)	Grades in this range should be only for excellent work, not merely good work. On an essay exam, the student should have identified all issues, and should have done an excellent job of analyzing the issues. This range should be under 20% of the grades, occasionally as much as 20%.
73 – 79 (C+ and C)	Grades in this range should comprise by far the largest share of the grades, often higher than 50%. But these grades are for good work, not necessarily average work, because the average might be less than good. A PCL student must have a C average or better, not C-, for all quarters, in order to advance to the next academic year and in order to graduate.
60 – 72 (C- to D-)	Grades in this range are for work that is somewhat less than good (C-) to work that is poor (D+ and D) to work that is marginally passing (D-). Unfortunately, this range will often comprise 15% to 20% of the grades, sometimes higher than 20%.
59 and below (F)	Failing. Unfortunately, there will often be multiple failing grades, even in a small class. A failing grade is not just for work that is entirely lacking – it is also for work that shows some grasp of the subject of the exam or course, but very little. On an essay exam, the student might have identified and discussed some issues but still receive an F. In a multiple choice exam, if a student has correctly answered up to 59% of the questions, the grade will still be an F.

... class participation must not count for more than three percent (3%) of the final grade in a course, and attendance may not be counted at all towards the grade, inasmuch as minimum 80% attendance is required.

Administrative Review of Grades

In August, 2020, our Board adopted the following Administrative Review policy:

When faculty members have determined what grades they intend to give, the next step would not be to release the grades to the students, but instead to send the grades to

reviewers. The reviewers very likely would include the Dean. Others could be members of the Faculty- Curriculum Committee and current or former faculty members, but faculty would not, of course, review their own grades, and students would not participate without consent of the student between reviewed.

The reviewers would study the grades for adherence to PCL grading policies. ... If the grade reviewers find deficiencies, they would communicate with the faculty member about curing the deficiencies and changing the grades. The Dean or the Faculty- Curriculum Committee or both would participate in those discussions and decisions on changing grades. When the decisions are made, the grades would then be sent to the Administrator for release to students.

Improvements in Eliminating Faculty Turnover

The 2014 Inspection Report observed (p. 9):

“PCL operates with an all-volunteer, adjunct faculty and has someone so since its founding [it remains true in 2020]; a clear testament to the faculty’s dedication to PCL’s mission of public service. One negative aspect of a volunteer faculty, however, is that PCL experiences a higher rate of faculty turnover than most law schools where faculty members are paid even a modest stipend or salary. ... on average, 20% of PCL’s faculty appears to be new each academic year.”

That turnover situation has been reversed. In the present academic year, 2020-2021, all faculty members except three taught at PCL the previous year, 2019-2020. Faculty turnover had been on the decline previously as well.

PCL’s Addendum of June 2022

In the present academic year, 2021-2022, of 16 faculty members, 7 taught at PCL in previous years.

15. Guidelines 5.18–5.20

Bar’s Inspection Report

*“To bring itself into full compliance, the school should adopt, publish, and implement policies for academic advancement that adhere to the school’s academic standards and comply with the guidelines, and eliminate policies that do not adhere to the guidelines. **All identified policies were updated, and non-compliant policies deleted.**”*

PCL’s Progress Report of May 2021

The problem was some inappropriate policies. PCL has eliminated them, so by the very nature of this item 15, no further progress is needed or possible.

PCL’s Addendum of June 2022

The inappropriate policies that were eliminated are still eliminated.

16. Guideline 5.24

Bar's Inspection Report

*“To bring itself into full compliance, the school should revise and republish its course repetition policy to meet all requirements of the guideline. **Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.**”*

PCL's Progress Report of May 2021

As the Inspection Report notes, some months ago we adopted the required policy. The policy concerns limitations on repeating courses. As stated above, this fall a student has petitioned for permission to attempt to raise a failing grade. In order to raise the grade, the student will have to take a new exam or complete some other assignment to be determined by the instructor and the Faculty-Curriculum Committee working together. It is possible that the student may choose instead to convert the petition to one for repetition of the course pursuant to the new policy.

PCL's Addendum of June 2022

We believe the first paragraph set out below in the part of the Handbook dealing with course repetition, Section 11, is compliant. However, we learned of an unpublished practice of the State Bar under which for virtually all our students, the academic year ends at the end of spring quarter (virtually all our students begin their studies at PCL in the fall quarter). Thus, we have eliminated the second paragraph from Section 11. Here are the two paragraphs:

Repeating a Course or Quarter after Failing and Thus Not Completing 270 Hours: If (1) a student fails a course or a quarter of a course, and if (2) as a result of the failure the student does not successfully complete 270 hours in an academic year, then the following applies. Because of State Bar requirements that the required 270 hours per year must all be taken in the same 12 month academic year, the student, in order to be eligible for the J.D. degree and to take the FYLSX and the Bar Exam, cannot make up for the failed course or quarter by repeating only that course or quarter again in a later academic year, but instead must repeat the entire year's courses – unless the student petitions the State Bar and the Bar issues a written decision that allows the student to take the failed course or quarter again and allows the student to receive a J.D. and be eligible to take the FYLSX and the Bar Exam despite not successfully completing 270 hours in the year the student failed the course.

Following is an exception to the previous paragraph. If the student failed one quarter of a course, the student may make a written request to the Dean to repeat the course in the summer quarter if PCL can make arrangements for the course to be taught in a summer quarter. Note that though it is possible, it is unlikely that such arrangements can be made. The student will be permitted to repeat the quarter in the summer only if the Dean gives the student written permission to do so.

We do have a question for the Bar about course repetition. Does the Bar agree or disagree with the following line of reasoning?

- Section 6060 and Guideline 5.3(a)(1) don't state that the student must have satisfactorily completed 270 hours in a year, although they might imply it. What they state is that (a) the student must have satisfactorily completed a course of study and (b) the course of study must require 270 hours per year.

- Thus, if the course of study requires 270 hours of attendance per year, a student attends 270 hours in a year, the student fails one of the classes, but takes the class again the next year and does well enough that under the school's rules the student's grade is raised to a passing grade, then (a) the student has satisfactorily completed the course of study, and (b) the course of study did require 270 hours of attendance per year.
- Is Rule 4.32 a problem for this analysis? It says no credit for repeating a course. But that seems to mean if you take course once and get credit, you can't get credit for taking it again, i.e. no double credit for taking a course twice. Doesn't seem to rule out getting credit for a course once by repeating it after failing it first time.

17. Guideline 6.2–6.4

Bar's Inspection Report

*"To bring itself into full compliance, the school must devise a plan and a timeline to return to compliance regarding the library by owning and maintaining its own hard copy library as required under Guideline 6.2 and provide this timeline and proof of library purchase to the CBE; however, it may be appropriate to provide a waiver for this academic year while the law school teaches courses online due to the pandemic. In addition, to bring itself into full compliance, PCL should also demonstrate that students are receiving instruction in both physical publication and electronic-based legal research, as required by Guideline 6.3. The Catalog states that legal research is taught in several courses, but a review of syllabi attached to the self-study did not validate that statement. **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 Progress Report of May 2021

PCL has devised the requested plan regarding the library. It is set out in the Annual Report. It reads as follows:

PLAN TO RETURN TO COMPLIANCE: The brother of PCL founder, attorney Hank di Suvero, who died this year, has offered to donate funds for the library. Our plan is to use the money to restore the library to usable condition and purchase the books needed to bring the required hardbound books up to date, all to be completed by August 31, 2021. Our Board of Directors approved this plan on October 18, 2020.

The damage to the library was the destruction of part of its unique domed roof. The roof has now been repaired, which involved reconstruction of part of the domed roof. Our school still is conducting classes remotely, and has been since March of 2020. Thus, the library has not been opened for use. Some clean-up of the library is still needed before it opens for use. The donation was only enough for the repair and reconstruction, not for the purchase of books. We do have the very large majority of the specified hardbound books, but not all of them or our book subscriptions. Currently our plan is to request an extension of time to comply with the hardbound library provisions, to December 2021, the same time to which the waiver of the requirement for in-person instruction was extended by the Committee of Bar Examiners.

We do still believe that the hardbound library requirement, which does not apply to other categories of California law schools, should not be applied to our category, as we have explained previously.

PCL's Addendum of June 2022

The library has been restored to usable condition. We do still believe that the hardbound library requirement, which does not apply to other categories of California law schools, should not be applied to our category, as we have explained previously. Very, very few lawyers use paper books for legal research – nearly all use electronic research.

In recent years the State Bar has allowed us to designate the Los Angeles County Law Library as our library. Our school is 3 miles from the County library. It is the second largest law library in the United States, behind only the Library of Congress. We ask that we be permitted to continue designating it as our library.

However, failing that, and if the hardbound library requirement remains in place, we will have to expend a very large amount of money to reinstate subscriptions to hardbound books, which will serve no good purpose for our students studying to practice law as it is practiced in California today.

18. Guidelines 7.1 and 7.2

Bar's Inspection Report

"To bring itself into full compliance, the school should maintain essential and permanent hard-copy records in fire-safe lockable cabinets, maintain all electrical equipment in working order, and provide digital projection equipment adequate to meet the needs of faculty and students. Subsequent to the inspection, the school transferred files to lockable, fire-safe cabinets; projectors were replaced with other options."

PCL's Progress Report of May 2021

PCL purchased four matching, locking, letter-size Fireking fireproof file cabinets. We took delivery of them at our building and locked our paper files in them.

PCL's Addendum of June 2022

The matching, locking, letter-size Fireking fireproof file cabinets are still in use.

19. Guideline 9.1

Bar's Inspection Report

"To bring itself into full compliance, the school should adopt and implement a policy to ensure that records are fully compliant with Guideline 9.1, that the law school has adopted written procedures, including oversight provisions, of record-keeping processes and record retention requirements, and that it has adopted a written policy on transcript changes, as required by Guideline 9.1(D). Subsequent to the inspection, the school adopted compliant policies and provided the State Bar with copies of those policies."

PCL's Progress Report of May 2021

Our Registrar/Administrator reported as follows to the Bar and the Committee:

New Student Information System

To streamline and organize student records, faculty records, and other required organizational documentation, Peoples College of Law is transitioning to Populi, a web-based Student Information System (SIS) to electronically maintain and store school records in a secure and confidential environment.]

Our SIS is manages and stores student transcripts, student attendance (for online and in-class instruction) & participation records, academic programs & courses, course mapping for students and course rosters as well as provides reporting analytics to give perspectives on student data through particular data sets. The SIS also tracks a prospective student's application process and generates applicant reports for accepted and rejected applications. Once a student is enrolled, student agreements, billing (including invoices, payments, transactions, deposits, and tax forms) are also stored electronically. Faculty, Admin, and Registrar will have detailed information on students' grades and attendance in courses, with student course summaries and reports.

Our SIS system also has group sections that will accommodate our committees and store committee documents including minutes & agendas. Hardcopies of board minutes and Faculty minutes will also be kept in the administrator's office.

In addition to the SIS, the administrator will also maintain hardcopy files for students, administrative personnel, and faculty in fireproof, securely locked file cabinets.

We are currently transitioning to our new SIS. Our phase one phase has begun. We are integrating our historical and past data into our SIS and we will be entering student records for the past ten years, faculty information & records for the past five years, personnel records for the past ten years, and course information. We anticipate phase one will be completed by August. Phase 2 will involve entering historical student records and personnel records dating back to 2005. Historical permanent records dating back before 2005 will be electronically scanned and stored securely in the cloud as a back-up to the existing hardcopy files that are kept in fireproof, securely locked file cabinets.

PCL Files and Records

In preparation for the State Bar of California inspection, the administrator completed a thorough assessment of the school's files and records that fall under Rule 9.1 in the Guidelines for Unaccredited Law School Rules. Much of the reason that the school's records and files were out of compliance at that time was because there has not been a systematic uniform process set for each administrator who has worked at the school over the past several years.

For files and records that the administrator found to be out of compliance, best efforts were made to reconcile them prior to the inspection in January.

Files and records that were not compliant post inspection, the administrator continued to reconcile the deficiencies to complete the records.

Currently, the remaining noncompliant files under the Unaccredited Law School Rules Division 9.1 requirements are: faculty files, administrative personnel, and the file of all examinations given in the last (5) years.

Faculty Files: Approximately 1/3 of the faculty files for the past (5) years are missing law school transcripts. Administrator is actively contacting current and past instructors and requesting the missing law school transcripts. To prevent noncompliance within the faculty records, our Faculty & Curriculum Committee are developing policy to request transcripts prior to hiring interviews or requiring them during new faculty onboarding.

Administrative Personnel Files: Several administrative personnel files are missing all or part of the required personal histories giving undergraduate education, graduate education, and law school education (if any) listing years attended, degrees conferred and summaries of professional careers and qualifications for being administrative personnel. The administrator is currently going through archived materials for older administrative personnel files. The administrator has requested information from current administrative personnel who have files missing the required information and will continue to follow up with those persons who are still missing some of their personal history.

File of Examinations: As required under 9.1(F), all examinations given in the last five years are to be kept in a file for inspection by the Committee. The administrator has been making best efforts to compile administered midterm and final exams for the past five years. For exams given in the 2019-2020 academic year, administrator has created a hard copy file and has actively been adding exams as they are administered. Our student information system (which we will implement for faculty this upcoming 2020 Fall Quarter) facilitates the creation of tests by instructor that are saved electronically per course as well as permits uploading of exams created outside of the SIS. Further, administrator is developing protocols to collect the hard copies of the exams as part of the administrator's checklist re: maintenance of required records.

Record Retention and Disposal Policy:

The school is also developing a policy for record retention and disposal and a retention schedule to ensure we keep records according to the State Bar Rules and Guidelines.

New Policy on Changes to Entries in Transcripts

PCL has adopted the following new policy on changes to entries in transcripts:

Changes to entries on a PCL transcript may be made only upon a showing of good cause. However, a contention or possibility that a grade given by an instructor was not justified shall not be good cause or an acceptable reason for a transcript change. If a present or former student wishes a change to an entry on the person's transcript, the following procedures apply

1. The present or former student must submit a written application to the Dean, specifying the change requested and the reasons for it. The application must include any documentation or evidence supporting the application.
2. The Dean must investigate the facts and circumstances pertinent to the application. In doing so, the Dean must read the entire application and materials submitted with it. The applicant shall have the right to speak with the Dean in support of the application, and to

have an attorney or other representative do so as well. If the applicant requests the Dean to listen to any other person with information pertinent to the application, the Dean shall do so, but the Dean need not listen to an excessive number of such persons. The Dean may also communicate any person who may have information pertinent to the application, including but not limited to any present or former faculty member. The Dean may also speak with the Registrar, the Administrator and any other person with information pertinent to the application. The Dean may also consult any person outside PCL who has expertise on the subject of transcripts, but shall maintain the confidentiality of the student's information by not disclosing the identity of the applicant. Before the Dean transmits to the applicant the Dean's decision on the application, the applicant may submit additional materials to the Dean, who must read them if time permits.

3. Within thirty days after receiving the application, the Dean must render a written decision on it and transmit the decision to the applicant. The Dean shall cause the application and decision and any materials the Dean read or considered in connection with the application to be placed in the applicant's student file. If the decision is that a change is to be made, the decision must specify the change, and if the applicant has not requested an appeal within the fourteen days to appeal, Dean shall transmit the decision to the Registrar, who shall make the specified change on the transcript, and place on the transcript a notation of the reason(s) for the change.

4. The applicant may appeal the decision of the Dean to the Community Board, but may do so only by transmitting to the Chair of the Board a request for appeal within fourteen days of receiving the Dean's decision. In the request, the applicant must state whether the applicant consents to participation in the appeal by student members of the Community Board. The Community Board may delegate the appeal to the Executive Committee. Within thirty days after the Chair receives the request for appeal, the Community Board or the Executive Committee, as the case may be, shall render a written decision on the appeal, and transmit it to the applicant. The Chair shall cause the request for appeal and any materials read or considered in connection with the appeal to be placed in the applicant's student file. If the decision on appeal is that a change is to be made, the decision must specify the change, and the Chair shall transmit the decision to the Registrar, who shall make the specified change on the transcript, and place on the transcript a notation of the reason(s) for the change.

5. No student member of the Community Board or the Executive Committee shall participate in the appeal unless the applicant consents in writing to participation by students.

PCL's Addendum of June 2022

The new Student Information System, policies and practices on files and records, and new policy on changes to entries in transcripts, all described at length above, remain in place and in use.

RECOMMENDED SUGGESTIONS IN 2020 INSPECTION REPORT

1. Bar's Inspection Report

“Pursuant to Guideline 2.9(C) and 5.13, it is suggested that the school require faculty to use a standard syllabus template to promote consistent communication of course requirements.”

PCL's Progress Report of May 2021

As we have said, PCL's new Student Information System has electronic features that enable the school to create global rubrics for use in any or all the courses. Those features can also be used to create a standard syllabus template.

PCL's Addendum of June 2022

In addition to the features of Populi described above, PCL makes available to new instructors the best syllabus of previous instructors of the same course. The new instructors request them. The new instructors do use those previous syllabi.

2. Bar's Inspection Report

“Pursuant to Guidelines 2.11, 7.1, and 9.1, it is suggested that the school base its data security policies and procedures upon the recommendations of generally accepted industry standards, consulting with an expert if the expertise is not available within the school.”

PCL's Progress Report of May 202

As we report above, our data security is provided by the security protections of our new Student Information System, Populi. Populi's website states the following, among other things, concerning its security protections:

“Populi's servers are stored in an SSAE 16 Type II compliant data center that is physically secured behind a battery of compartmentalized security zones with biometric access controls. Numerous security, power supply, and infrastructure redundancies layer on additional safeguards.

“We built Populi on the open-source “LAMP” stack (Linux, Apache, MySQL, PHP), availing you of the same powerful, secure technology undergirding web companies like Google, Vimeo, Facebook, and Amazon.”

PCL's Addendum of June 2022

We continue to use the security protections in Populi described above.

3. Bar's Inspection Report

“Pursuant to Guidelines 5.14 through 5.16 and 5.25, it is suggested that the school adopt and implement a procedure requiring that examination questions, accompanied by issue outlines or model answers, must be reviewed and approved by the Dean or other legal educator before being administered.”

PCL's Progress Report of May 2021

Our Faculty-Curriculum Committee and Dean formulated a procedure as stated above, requiring that examination questions, accompanied by issue outlines or model answers, must be reviewed and approved by the Dean or other legal educator before being administered. It was furnished to State Bar staff. Adoption of a procedure on this subject is scheduled to be considered at the next meeting of our board of directors.

PCL's Addendum of June 2022

Our Faculty-Curriculum Committee and Dean formulated a procedure as stated above, requiring that examination questions, accompanied by issue outlines or model answers, must be reviewed and approved by the Dean or other legal educator before being administered. It was furnished to State Bar staff.

4. Bar's Inspection Report

“Pursuant to Guidelines 5.17, 5.18, and 5.25, it suggested that the school adopt and implement a procedure requiring that grades and student examinations papers must be reviewed and approved by the Dean or other legal educator before being posted.”

PCL's Progress Report of May 2021

In the summer of 2020, we adopted a procedure requiring that grades and must be reviewed and approved by the Dean or other legal educator before being posted. After implementing it in the fall quarter, we have been evaluating and revising it. Our Faculty-Curriculum Committee and Dean formulated a revision and furnished it to State Bar staff. The revision adds the requirement that student examinations papers, as well as grades, must be reviewed and approved by the Dean or other legal educator before grades are posted. Adoption of a revision is scheduled to be considered at the next meeting of our board of directors.

PCL's Addendum of June 2022

We must report that we have not yet implemented this policy.