



**OPEN SESSION
AGENDA ITEM O-403
AUGUST 2022
COMMITTEE OF BAR EXAMINERS**

DATE: August 19, 2022

TO: Members, Committee of Bar Examiners

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

SUBJECT: Action on Response to Notice of Noncompliance – Peoples College of Law

EXECUTIVE SUMMARY

Peoples College of Law timely responded to both the Notice of Noncompliance issued by the Committee and further staff questions. (Attachments A-C). The Committee will now review the response to determine whether compliance has been established, or an inspection should take place.

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 specifically focuses 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 periodic inspections to confirm continuing compliance with the Rules for Unaccredited Law Schools and their guidelines. These inspections generally take place every five years unless circumstances require more frequent inspections.

During the 2020 inspection, the State Bar's consultant discovered an unusually large number of compliance issues. After the inspection, the law school quickly remedied the issues and was able to document this when the inspection report was presented to the Committee.

Based on the school's showing in response to the audit, the Committee renewed the law school's registration as an unaccredited fixed-facility law school.

The Committee also found it important to impose conditions to ensure continued compliance, based on the law school's history. The prior two inspections also demonstrated a pattern in which the State Bar identified issues, the law school fixed them quickly, and then those or other significant issues were observed at the next inspection.

Due to the number of issues and the history of repeat noncompliance, the Committee made its renewal of registration of this law school subject to conditions designed to promote continuing and consistent compliance. First, the Committee directed that the law school be inspected again in 2022, rather than waiting the standard five years. Next, the Committee directed that "the school provide in each Annual Report a detailed update as to its compliance status with respect to each of the recommendations set forth in the 2020 inspection report, with the understanding that failure to demonstrate continuing compliance will result in the issuance of a Notice of Noncompliance." (See [Item O-406, Committee of Bar Examiners Meeting, Aug. 21, 2020](#)). In so doing, the Committee emphasized the need for the law school to show that it could consistently maintain a compliant status.

In its 2020 progress report, further updated in May 2021, the law school documented continuing compliance. The Committee accepted that report and 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.

In fall 2021, however, the circumstances changed. The law school's progress report was filed several weeks late, the law school's required disclosures were not posted for over six months despite State Bar reminders, the law school's student catalog was posted in draft format and in need of revision, and inquiries from the State Bar were not addressed or were not addressed promptly.

At its 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 to the law school by the Committee, despite reminders from staff in addition to the letter. The law school ultimately filed an amended progress report and additional materials just prior to the June Committee meeting, along with several updates also reviewed by Committee at its June 2022 meeting.

At its June 2022 meeting, the Committee issued a Notice of Noncompliance to the law school as set forth in Attachment A after noting that the law school had not filed a timely response, and

reviewing the late responses provided.(See [Item O-406, Committee of Bar Examiners Meeting, Jun. 17, 2022](#)).

In July 2022, the law school filed a timely response to the Notice of Noncompliance as set forth in Attachment B. Consistent with standard practice, staff requested additional detail to assist the Committee in evaluating the response. The law school responded timely to those questions. (Attachment C).

Today, the Committee will review the law school's responses. "If the Committee deems the response satisfactory, it will notify the law school." (Rule 4.261(A)). "If the Committee deems the response unsatisfactory, it must schedule an inspection within 30 days." (Rule 4.161(B)).

If an inspection is conducted, the Committee will review the resulting report. If the Committee determines that the law school is not or is not likely to be in compliance with the rules, the Committee will notify the law school that it recommends probation or withdrawal of registration. (Rule 4.263).

DISCUSSION

After its 2020 inspection, the Committee required the law school to take steps not only to demonstrate compliance, but maintain that compliance and document it through periodic status updates. While the law school did so in 2020, by 2021, the law school's prior patterns emerged, and compliance issues were suspected. When the Committee reviewed the law school's 2021 report, it found that the law school's responses required further inquiry and requested an update within 30 days. The law school did not respond, despite staff reminders, but paid the accompanying invoice.

This course of action appeared to repeat the law school's prior pattern of responding, but then failing to proactively maintain compliance.

Staff set a follow up meeting with the law school in May to determine the law school's status after it did not respond, and a second follow up meeting in June.

Though it had not responded to prior Committee or staff requests, the law school finally reviewed its policies for compliance, updated its statutorily required disclosures, began making policy changes, and responded to outstanding staff questions.

The law school's reaction addressed issues that implicated eight of the nineteen recommendations in the law school's inspection report, as follows: 2-Refund Policy needed updating and adequate staffing to avoid use of personal email; 4-Posting Current Statutorily Required Disclosures that were six months late; 5-Catalog significantly outdated and in draft form; 6-Several courses lack syllabi; 10-Sufficient Administrative Capacity to fulfill compliance obligations; 14-Further efforts needed to prevent grade inflation and ensure grades are issued timely; 15-Compliant policies for academic advancement, notifying students when a term may not be compliant; 19-Accurate Transcripts with correct credit calculation.

In particular, the law school continues to appear to have less staff or consistent volunteer help than is needed to proactively comply. Turnover is also frequent. After the initial inspection, the law school increased the hours of the one paid administrator in 2020. Only now, as the law school is responding to a Notice of Noncompliance, is it planning to add additional staff. It is unclear whether the law school has the intent or capacity to maintain compliance without application of significant effort from staff and the Committee.

While the law school's recent efforts are appreciated, the law school's task was to demonstrate proactive compliance. The law school was unable to turn in a timely annual report, did not post updated disclosures for six months, did not respond to State Bar requests sent to all school leadership, and posted a catalog that was in draft format and required policy changes such as those listed above. This took place while the law school understood it was be monitored to ensure continued compliance.

When describing why this happened, the law school identified staff challenges and family emergencies as contributing to its current status. The law school must monitor its plan to ensure sufficient staffing and staff experience to address foreseeable issues such as vacation, family emergency, or staff training or performance issues. If the law school continues to operate with significant volunteer participation, its plan must also take into account the competing priorities of volunteers and ensure that sufficient volunteer help is recruited. To the extent that student participation continues, student privacy must be protected, and conflicts of interest must be avoided.

While the law school's steps taken since May are appreciated, the law school's performance over the past year demonstrated difficulty in maintaining compliance, and its new plan proposed is untested. Therefore, further support from the Committee may be appropriate. It appears that the law school needs additional oversight to proactively understand the rules and to take steps to maintain compliance.

RECOMMENDATIONS

Staff recommends that the Committee find the law school's response to be unsatisfactory and direct staff to schedule a remote inspection pursuant to rule 4.263. It is further recommended that the law school be directed to bring to that inspection any individuals or information it needs to fully address the issues raised in the Notice of Noncompliance issued to the law school and establish the law school's compliance with the Rules for Unaccredited Law Schools and their guidelines.

PROPOSED MOTION

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

MOVE, that the Committee of Bar Examiners find that Peoples College of Law's response to the Notice of Noncompliance issued by the Committee is unsatisfactory.

FURTHER MOVE, that the Committee directs staff to schedule a remote inspection of Peoples College of Law to offer a final opportunity to the law school to address its compliance status, and that the law school be directed to bring to that inspection any individual or information needed to fully establish its compliance with the Rules for Unaccredited Law Schools and their guidelines.

ATTACHMENTS LIST

- A. Notice of Noncompliance Issued to Peoples College of Law
- B. Peoples College of Law's Response to Notice of Noncompliance from Peoples College of Law
- C. Peoples College of law's Further Response to Staff Questions

NOTICE OF NONCOMPLIANCE
AND
NOTICE PURSUANT TO UNACCREDITED LAW SCHOOL RULE 4.263
TO
PEOPLES COLLEGE OF THE LAW
JULY 1, 2022

NOTICE OF NONCOMPLIANCE

Pursuant to Rule 4.260, of the State Bar of California's Unaccredited Law School Rules ("Rules"), the Committee of Bar Examiners ("Committee" or "CBE") finds that Peoples College of Law ("Peoples College" or "PCL"), a registered unaccredited fixed facility law school, is not in compliance with Rules and the Guidelines for Unaccredited Law School Rules ("Guidelines"):

1. Guideline 1.9 and 2.10: 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 privacy policy.
2. Guideline 2.2(B): To bring itself into full compliance, the school should demonstrate that its refund policies have been stated clearly and consistently in its publications.
3. Guideline 2.3(B): 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.
4. Guideline 2.3(D): 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.
5. Guidelines 2.9(A)-(B) and 5.24: 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.
6. Guideline 2.9(C): 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.

7. Guideline 2.9(D): 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.
8. Guidelines 2.10 and 5.17: To bring itself into full compliance, the school should review, revise, and republish its grade review policy to meet guideline requirements.
9. Guidelines 2.11, 7.1, and 9.1: To bring itself into full compliance, the school should adopt policies and procedures that are adequate to protect the school's digital records.
10. Guideline 3.1: 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.
11. Guidelines 4.8 and 4.9: To bring itself into full compliance, the school must adopt and implement a faculty evaluation policy that meets guideline requirements.
12. Guidelines 5.3(A)(1) and 5.9: 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.
13. Guideline 5.8: 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.
14. Guidelines 5.17, 5.18, and 5.25: 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.
15. Guidelines 5.18–5.20: 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.
16. Guideline 5.24: To bring itself into full compliance, the school should revise and republish its course repetition policy to meet all requirements of the guideline.

17. Guidelines 6.2–6.4: 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.
18. Guidelines 7.1 and 7.2: 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.

APPLICABLE AUTHORITY

A copy of the applicable Rules and Guidelines are enclosed with this notice. Additionally, the Rules and Guidelines may be accessed on the State Bar’s website.

The applicable Rules are available on the State Bar’s website at:

https://www.calbar.ca.gov/Portals/0/documents/rules/Rules_Title4_Div3-UnAcc-Law-Sch.pdf.

The applicable Guidelines are available on the State Bar’s website at:

<https://www.calbar.ca.gov/Portals/0/documents/admissions/GuidelinesforUnaccreditedLawSchoolRules.pdf>

FINDING OF NONCOMPLIANCE

The Committee’s finding of noncompliance is supported by the Periodic Inspection Report resulting from the January 14-16, 2020 inspection, Peoples College’s July 20, 2020 response to the inspection report, 2020 Progress Update, 2020 Annual Report, Amendment to Annual Report May 2020, December 4, 2021 Progress Report and Annual Report, and the June 2022 Progress Report, as well as additional written submissions made between May 23, 2022 and June 7, 2022.

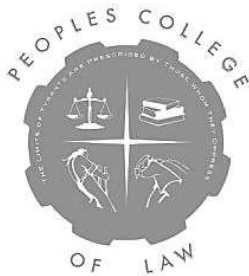
Pursuant to Rule 4.261, a law school that receives a Notice of Noncompliance must file a written response within fifteen days of the Notice of Noncompliance demonstrating that it is in compliance, or is taking steps to achieve compliance, with the Rules, along with the required deposit of \$924. (Rule 4.261.) Should the law school acknowledge that it is not in compliance, the Committee asks that the law school’s response detail the school’s intent, capacity, method, and best effort as to timing to return to compliance. Following receipt and review of the law school’s response, the Committee must either notify the school within thirty days that the

response is deemed satisfactory, or if the Committee deems the response unsatisfactory, it must schedule an inspection within thirty days. (Rule 4.262.)

If the Committee believes that the inspection report demonstrates that the law school is not or is not likely to be in compliance with the Rules, the Committee will notify the law school that it recommends probation or withdrawal of registration. (Rule 4.263.) The law school may request a hearing before the Committee within fifteen days of being sent a notice that the Committee is recommending probation or withdrawal of registration. (Rule 4.264.) Within sixty days of receiving a timely request for hearing, the Committee will schedule a hearing at a time that is mutually agreeable to the Committee and the law school. (Rule 4.265(A).) Following the hearing, based on the entire record, the Committee will determine whether the law school is in compliance with the Rules. (Rule 4.266(A).) The Committee may take any action affecting the law school's registration that it considers appropriate, including termination of registration. (Rule 4.266(B).) If the Committee determines that the law school is not in compliance or has not taken adequate steps to comply with the Rules but has made "perceptible progress toward compliance," the Committee may place the law school on probation and impose probation conditions on the law school. (Rule 4.267.)

NOTICE PURSUANT TO UNACCREDITED LAW SCHOOL RULE 4.263

On June 17, 2022, the Committee moved to provide notice to Peoples College of the Law that it intends to pursue probation or termination of registration unless the law school can demonstrate compliance in its timely response pursuant to Unaccredited Law School Rule 4.263. Peoples College of the Law is not required to submit a separate response to the notice under Rule 4.263.



People's College of Law

660 S. Bonnie Brae, L.A., CA 90057 Tel.:

213 483-0083 Fax: 213 483-2981

E-mail: dean@peoplescollegeoflaw.edu

"Over 48 Years of Educating People's Lawyers"

July 18, 2022

Sent via Email to
lawschoolregulation@calbar.ca.gov

Committee of Bar Examiners
State Bar of California

RE: People's College of Law's Response to CBE Notice of Non-Compliance

Dear Committee of Bar Examiners:

The People's College of Law (PCL) is in receipt of the Notice of Non-Compliance dated July 1, 2022. Please consider this letter our response to the Notice of Non-Compliance. The fee of \$924 as requested in the Notice was previously sent to the Bar.

In order to demonstrate PCL's commitment to ensure compliance with the Committee of Bar Examiners (CBE) law school requirements, the PCL Board of Directors, myself as Dean, and the PCL President have taken the necessary steps to demonstrate compliance with the CBE, and will remedy, if any, all remaining outstanding non-compliance issues.

We will address each item individually below.

DocuSigned by:

DF06B0AFF3AF43F...

Juan Sariñana

Dean, People's College

PCL's RESPONSE'S TO CBE NOTICE OF NONCOMPLIANCE

Notice of Noncompliance

1. Guideline 1.9 and 2.10: 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 privacy policy.

PCL's Response:

PCL has drafted and published a form request for reasonable accommodations (see attachment 1). The form is uploaded and made available to PCL students on our Student Information System, POPULI, and on the PCL website. It is also available to PCL Students upon request to the Administrator/Registrar. The applications are then saved in each student's file. The student files are kept under lock and key in fireproof cabinets, thereby securing them against unauthorized disclosure in compliance with PCL's privacy policy.

Notice of Noncompliance

2. Guideline 2.2(B): To bring itself into full compliance, the school should demonstrate that its refund policies have been stated clearly and consistently in its publications.

PCL's Response

As noted in the 2020 Inspection Report & 2021 Update, PCL adopted a compliant policy in 2020 and continues to remain compliant. This policy is 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 this, PCL revised a warning in the refund policy, Section VIII, paragraph 9(b) of the Handbook. The warning now reads:

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.**

Notice of Noncompliance

3. Guideline 2.3(B): 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.

PCL's Response

PCL has reviewed the Catalog and removed all electives that are not offered in the past three years or are not expected to be offered in the next two years. PCL has included in the Handbook a bolded lettering that reads "**Electives are not taught every year, but are offered from time to time based on student interest and instructor availability.**"

Notice of Noncompliance

4. Guideline 2.3(D): 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.

PCL's Response

PCL came into compliance, as stated in PCL's Addendum of June 2022, by correcting, revising, and implementing the aforementioned disclosures in June 2022. The disclosures are located in both the Tuition and Enrollment Agreements signed by each student at the start of the academic school year and on the PCL Website. 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 section 6061.7 disclosure for 2021 nearly on time, but it has now been done. It is on the website and submitted herewith (**see attachment 2**).

Notice of Noncompliance

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

PCL's Response

As mentioned in our June 2022 Addendum, in 2020 PCL came into compliance by revising these policies as required. The changes included (a) prohibiting student participation in proceedings regarding possible academic disqualification of other

students without the consent of the other student; (b) prohibiting students from participating in academic grievance proceedings without the consent of the student who made the grievance. These policies were initially implemented in 2020 and have remained in effect to the present.

Notice of Noncompliance

6. Guideline 2.9(C): 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.

PCL's Response

As noted in our May 2021 Progress Report, PCL came into compliance with Guideline 2.9(C) by revising the policies as set out below in the part of the Handbook dealing with Exams, Section 13, which reads:

Faculty Comment and Advice to Students: Faculty members must give written or oral comments to students on their individual performance on exams, in addition to grades. For example, the comments could be notations on a student's exam answers, or by emails to the student, or by a telephone call with the student. Comments should address major shortcomings in the student's performance if any. Faculty members must provide means for students to communicate with them in addition to the classroom, such as email, chat rooms, telephone or regular office hours.

Notice of Noncompliance

7. Guideline 2.9(D): 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.

PCL's Response

PCL will adopt and implement policies and procedures for in-class exams:

POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK

Exams: All Midterm and Final Exams must be given using TestInvite. If the exam is given remotely, the monitoring function of TestInvite must be used. If the exam is given in the classroom, the instructor, administrator or 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 TestInvite on a computer must have all their other electronic devices turned off. Exam integrity will be secured by TestInvite's webcam video and screen recording, and its safe exam browser, which locks the screen. TestInvite also offers the option of online exam proctoring.

During remote exams, all students must have their video activated during the entire exam, so that TestInvite can monitor each student via the above exam security measures. Exceptions are allowed for students who encounter technical problems that result in the student not being able to have their video activated.

The PCL Board of Directors will vote at its July 17, 2022 board meeting to purchase and begin training, use and implementation of TestInvite.

Notice of Noncompliance

8. Guidelines 2.10 and 5.17: To bring itself into full compliance, the school should review, revise, and republish its grade review policy to meet guideline requirements.

PCL's Response

PCL began implementing our administrative grade review policy in August 2020. It was reviewed and revised again in 2021. Our current administrator conducted the Administrative Grade Review in the winter and spring quarters of 2022, it resulted in professors revising some grades downward. PCL has added the revised Administrative Grade Review Policy to the Student Handbook (**see attachment 3**).

Notice of Noncompliance

9. Guidelines 2.11, 7.1, and 9.1: To bring itself into full compliance, the school should adopt policies and procedures that are adequate to protect the school's digital records.

PCL's Response

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

Additionally, in regard to online data protection, PCL utilizes Norton 360 for malware and virus protection which has identity theft protection and fraud alert. We also utilize Lastpass for password storage, which also generates stronger passwords.

PCL also utilizes two-factor authentication in all our confidential accounts, used primarily on the main PCL computer.

Notice of Noncompliance

10. Guideline 3.1: 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.

PCL's Response

PCL will include a written job description for the PCL Dean, (**see attachment 4**). However, since PCL merged the Registrar and Administrator positions in into a single role in 2021 we will attach a copy of our Administrator/Registrar job description (**see attachment 5**). To address the issues of capacity, PCL 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 Administrator/Registrar is responsible for the majority of the day-to-day tasks at PCL, these 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 deals 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 to PCL, and the position may expand if additional grant money is awarded.
- 4) PCL contracts are 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 our capacity and create more full-time positions, which will help free up the capacity of the Administrator/Registrars and the Faculty and Curriculum Committee, a key committee at PCL. In recent internal conversations, PCL has discussed bifurcating the Administrator/Registrar position into two separate positions. We will update the CBE if this comes to fruition.

Our new Administrator began full-time in April, 2022. She has improved our response time significantly with the State Bar of California and all major tasks at PCL. The Administrator has improved overall communication with the PCL Board of Directors. She has also helped coordinate alumni and Board support with regard to PCL committee work such as the Faculty and Curriculum Committee, Admissions Committee, Building Committee and Accountability and Development.

Furthermore, this past year our Development and Fundraising Committee, comprised of alumni, current board members, and former Dean Ira Spiro, 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, along with our professional fundraiser, has submitted several grant applications this past year. We have been awarded two grants so far.

As stated in the PCL Administrator/Registrar job description, beginning in April 2022 PCL raised our Administrator/Registrar's pay to \$60,000 per year. Benefits include two weeks of vacation per year, along with federal holidays, additional paid days off, and paid sick time. The PCL Board also plans on having a major fundraiser in the winter to raise funds to pay a full-time dean, see job description for PCL Dean (**see attachment 4**), and Registrar, (**see attachment 5**).

Notice of Noncompliance

11. Guidelines 4.8 and 4.9: To bring itself into full compliance, the school must adopt and implement a faculty evaluation policy that meets guideline requirements.

PCL's Response

As stated, before we continue to conduct instructor evaluations, see attached evaluation form. However, we do not receive many evaluations from students. This calendar year the Administrator/Registrar sent out the evaluation requests but received only one evaluation returned to us by a student. In order to bring PCL into full compliance PCL will make it mandatory that students submit evaluations (**see attachment 6**). However, we do so with great hesitation since 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: 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.

PCL's Response

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 Administrator/Registrar so they may be recorded on Populi.

Further, to bring PCL into full compliance under Guidelines 5.3(A)(1) and 5.9 see revised bolded Student Handbook which reads as follows:

If the Disqualifying Circumstance is something other than the above 80% attendance requirement, the assignment can include taking a new final exam (but not re-taking any exam the student previously took), writing an essay, or some other work. If the Disqualifying Circumstance was caused by a poor grade on an exam or other work, the assignment must be an exam or other work that, in the judgment of the Instructor and the FCC, is at least as difficult as the exam or other work on which the student received the poor grade. **If the reason for the student's petition was missed class(es), the assignment must be a make-up class. Under no circumstance, may PCL offer students the opportunity to make up absences from regularly scheduled class hours with alternative activities.**

13. Guideline 5.8: 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.

PCL's Response

As noted in the May 2021 Progress report we have continued to maintain records of each student who takes on clinical course work. Please see attached redacted internship timesheet along with a general summary that demonstrates the benefits to the participating student (**see attachment 7**).

PCL has continued to apply the policies and requirements stated in the former Dean's May 2021 Progress Report. PCL continues to maintain records, including attendance, grades, and syllabi for all student clinical courses via POPULI, our student information system. PCL plans to continue using POPULI to maintain its records for each student enrolled in all clinical courses for the foreseeable future.

14. Guidelines 5.17, 5.18, and 5.25: 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.

PCL's Response

PCL has implemented a number of improvements to address exam and grading policies and procedures including policies to curb grade inflation and to ensure that students receive adequate feedback on exam performance.

In 2021 PCL implemented the Administrative Grade Review Policy, which the PCL Administrator/Registrar has conducted for the Winter and Spring of 2022. This review resulted in professors revising some grades downwards. In the 2021-2022 academic school year the Faculty and Curriculum Committee (FCC) hosted two faculty meetings where they met with professors to reinforce exam grading policies and procedures intended to improve the quality of education at PCL. For instance, in the Summer of 2020, the former PCL Dean implemented a policy to require that students receive adequate and substantial feedback on their exam performance, see below Section 13 language of the Student Handbook:

Faculty Comment and Advice to Students: Faculty members must give written or oral comments to students on their individual performance on exams, in addition to grades. For example, the comments could be notations on a student's exam answers, or by email to the student, or by a telephone call with the student. Comments should address major shortcomings in the student's performance if any. Faculty members must provide means for students to communicate with them in addition to the classroom, such as email, chat rooms, telephone or regular office hours.

15. Guidelines 5.18–5.20: 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.

PCL's Response

As explained in our 2020 Inspection Report, and in the May 2021 update, and also in our June 2022 Addendum, 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 the consent of the other student; (b) prohibiting students from participating in academic grievance proceedings without the consent of the student who made the

grievance. These policies were initially implemented in 2020 and have remained in effect to the present.

16. Guideline 5.24: To bring itself into full compliance, the school should revise and republish its course repetition policy to meet all requirements of the guideline.

PCL's Response

PCL will comply with this request and will remove the below language from the PCL Student Handbook which we believe is irreconcilable with Guideline 5.24.

Requests to Repeat: If a student wishes to repeat any course or quarter of a course, or the entire course, the student must make a written request to the Dean no later than fourteen days before the start of the quarter in which the quarter or course is given again, and may repeat only if the Dean gives permission in writing for the student to do so. Duplicate credit will not be given, but if the student takes the duplicated course or quarter for a grade (as opposed to auditing), the grade that will count towards the student's grade point average will be the higher of the grade in the repetition and the earlier grade. Students must bear in mind that courses and quarters are not given more than once in an academic year, some courses are not given every academic year, and some elective courses not tested on the Bar Exam are not given in future years at all.

Repetition to Attempt to Avoid Academic Disqualification: As stated above in the section on Academic Disqualification, under unusual and special circumstances, a student subject to academic disqualification may be permitted to advance to the next quarter under probationary conditions, and the conditions may include repeating one or more quarters of one or more courses. If so, the repeating is mandatory. Duplicate credit will not be given, but the grade that will count towards the student's grade point average will be the higher of the grade in the repetition and the earlier grade.

17. Guidelines 6.2–6.4: 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.

PCL's Response

The PCL library has been restored to usable condition. We 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. 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.

That said, PCL will devise a plan and timeline to return to compliance regarding the library by owning and maintaining its own hard copy library as required under Guideline 6.2. PCL requests that the CBE grant PCL 90 days, or until October 16, 2022 to allow PCL time to purchase the library holdings required under Guideline 6.2.

18. Guidelines 7.1 and 7.2: 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.

PCL's Response

PCL purchased four matching, locking, letter-size fireproof file cabinets in 2020. We took delivery of the fireproof cabinets and placed them in our archive room and locked our paper files in them. The archive door is secured with two deadbolt locks and the door is made of thick sturdy metal. PCL keeps all projectors and multimedia devices in the archive room to ensure it is safe and secure.

**ATTACHMENTS TO RESPONSE TO NOTICE OF
NONCOMPLIANCE OF PEOPLES COLLEGE OF LAW**

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People's College of Law

660 S. Bonnie Brae, L.A., CA 90057 Tel.:
213 483-0083 Fax: 213 483-2981
E-mail: president@peoplescollegeoflaw.edu

"Over 48 Years of Educating People's Lawyers"

SPECIAL ACCOMODATIONS REQUEST

SUBMIT THIS FORM TO THE REGISTRAR NO LATER THAN 45 DAYS PRIOR TO THE FIRST DAY OF THE EXAMINATION

NOTE: TESTING ACCOMODATIONS GRANTED AT PEOPLES COLLEGE OF LAW MAY NOT BE THE SAME AS THOSE ALLOWED BY THE COMMITTEE OF BAR EXAMINERS OF THE STATE OF CALIFORNIA. FOR FURTHER INFORMATION ON THEIR POLICIES, PLEASE CONTACT THE CBE.

Student's Name: _____

Address: _____

Home Telephone: _____ Alternate Telephone: _____

1. Disability Status

a. Are you (check all that apply):

☐ Physically Disabled ☐ Learning Disabled ☐ Psychologically Disabled ☐ Other Disability

b. When did your disability start? _____

c. Did you have testing accommodations for LSAT? _____ CLEP? _____ If yes, please describe: _____

2. Please describe the specific nature of your disability and how it affects you as a PCL student, in your studies, exams, or some other way _____

3. Please describe any academic and/or exam accommodations you have received in a post-secondary institution or in the workplace:

4. Describe the special accommodations you are requesting and state why they are reasonable and necessary:

5. Attach current or recent documentation from a physician, psychologist, or other appropriate professional certifying your disability you have. (Required)

I certify the above information is true and correct.

Signature of Student

Date: _____

**January 2022 Annual Disclosure by California Unaccredited Law Schools
Under California Business and Professions Code Section 6061.7(a)**

Name of Law School: Peoples College of Law

Primary Address: 660 South Bonnie Brae Street
Los Angeles, CA 90057

Additional Branch/Satellite Campus(s):
n/a

Law schools that are registered or accredited in the State of California but are not approved by the American Bar Association must file this disclosure at the start of each calendar year pursuant to California Business & Professions Code 6061.7(a). The data in this report is current as of the 52 weeks ending September 15, 2021 unless otherwise noted. The State Bar of California's website contains a [list](#) of all schools that are registered or accredited in California.

1) Admissions Data:

- | | | |
|--|-----------|--|
| a) Total number of first-year applications received: | <u>16</u> | PCL Admitted 12 students plus 2 from the prior year who repeated their 1st year. |
| b) Total number of first-year students admitted: | <u>14</u> | |
| c) Total number of first-year students enrolled: | <u>12</u> | |
| d) Undergraduate Grade Point Average (GPA) for all first-year students enrolled: | | |
| i) 75th Percentile: <u>3.39</u> | | |
| ii) 50th Percentile: <u>2.693</u> | | |
| iii) 25th Percentile: <u>2.37</u> | | |
| e) Law School Admissions Test (LSAT) numerical score for all first-year students enrolled (if LSAT is required for admission): | | |
| Reported Numerical Score: | | |
| i) 75th Percentile: <u>n/a</u> | | |
| ii) 50th Percentile: <u>n/a</u> | | |
| iii) 25th Percentile: <u>n/a</u> | | |

2) Time and Charges to Earn a JD degree as of September 15, 2021

- | | |
|--|---------------|
| a) Total number of units required to earn a JD degree: | <u>72</u> |
| b) Estimated total tuition charged to complete a JD degree: \$ | <u>22400</u> |
| c) Estimated total fees charged to complete a JD degree: | <u>22,400</u> |

3) Financial Aid Available to First-Year Students (if qualified):

- ☐ Federally Guaranteed Loans
- ☐ Private Student Loans
- ☐ Loans Veterans Education Benefits
- ☐ California Department of Rehabilitation Benefits
- ☐ Unrestricted Scholarships/Grants/Discounts:
- Total number and dollar amount awarded:
- \$
- ☐ Conditional Scholarships/Grants:

4) Enrollment Data

- a) Total number of students enrolled per class in the law school's JD degree program during the 52 weeks ending September 15 of the year indicated below:

	2018	2019	2020	2021
1st Year	14	17	17	14
2nd Year	2	4	9	2
3rd Year	2	2	5	4
4th Year	3	2	1	3
Total JD enrollment	21	25	32	23

- b) Total number of students who transferred to or from the JD program during the 52 weeks ending September 15 of the year indicated below:

	2018	2019	2020	2021
Transfers (to)	0	0	0	1
Transfers (from)	0	1	0	1

- c) Total number of students who did not remain enrolled in the JD program, on either a voluntary or involuntary basis, during the 52 weeks ending September 15 of the year indicated below:(includes those who transferred to other schools):

	2018	2019	2020	2021
Total Attrition (#)	4	10	7	6

5) Law School Administrators, Faculty, and Librarians as of September 15, 2021:

- a) Number of full-time faculty: 0
 b) Number of part-time faculty: 15
 c) Number of full-time administrators: 1
 d) Number of part-time administrators: 0
 e) Number of trained and degreed librarians (full- or part-time): 0

6) Required Courses and Clinical Courses as of September 15, 2021:

- a) Number of required courses for JD degree: 38
 b) Average class size for required courses: 6.3
 c) Number of school-sponsored clinical programs offered for credit: 2

7) Employment Outcomes:

The percentage of students graduating in 2018 who were employed in 2019, 2020, or 2021
 a) jobs that require a JD degree; or b) jobs in which holding a JD degree is an advantage:

Total number of 2018 JD graduates: 7
 Total number of survey responses received: 7
 Survey response rate: 100 %

Employment Status of 2018 Grads in:	2019	2020	2021
JD degree required	14.2 %	42.8 %	42.8 %
JD degree advantage	71.4 %	71.4 %	71.4 %

* Applies to the employment status of the law school's 2018 JD graduates of the above referenced law school only.

8) California Bar Examination Cumulative Five-Year Passage Data

- a) Number of JD graduates who took the bar exam at least once from January 1, 2016-December 31, 2020: 27
 b) Number of JD graduates who passed the bar exam during January 1, 2016-December 31, 2020: 8
 c) Cumulative bar exam five-year passage rate: 29 %

9) Noncompliance Disclosure

People's College of Law (PCL) was issued a Notice of Noncompliance by the Committee of Bar Examiners based on the need to review staffing levels, procedures, required deliverables, and timelines to ensure compliance on July 1, 2022. PCL is taking steps to achieve compliance and remedy all issues brought up by the CBE.

Administrative Grade Review Revised Policy – Approve by the PCL Board
September 19, 2021

The Committee of Bar Examiners (CBE) has notified Peoples College of Law (PCL) and many other law schools to guard against grade inflation. This has led to an administrative grade review policy as described below.

1. Before exams are administered, faculty will need to submit their exams and rubrics/issues outlines/model answers to the Faculty and Curriculum Committee (FCC) to review. The FCC will then assign reviewers, which can include the Dean, and other members of the FCC to review the exams and rubrics/issues outlines/model answers. Current faculty or student members of FCC cannot review their own exams and rubrics/issues outlines/model answers. Faculty will be informed of this policy at the orientation, and/or upon coming on board as a PCL faculty member.
2. Faculty will be provided a copy of the grading policy, and will be reminded of the grading policy for exams to be anonymous. Prior to grades being due, the faculty will once again be sent a reminder of the school's grading policies and to be mindful of grade inflation.
3. Once final exams have been conducted and after grades are entered in Populi, but before they are published (Populi calls this "finalizing"), the Administrator will review the grades to ensure they adhere to PCL grading policies, that grades are not inflated, and that there is no wide disparity in the grades among several instructors teaching the same group of students. The Administrator can use the grading matrix below as a general guide when considering grade inflation. The Administrator will notify the Dean and the FCC if there are grades that appear to have been inflated and if there is such a disparity so the committee can review.
4. The reviewers would include members of the FCC, the Dean, and former faculty members, but faculty would not, review their own grades.
5. If an instructor's grades appear to be inflated, the instructor will be sent a courteous letter asking them to review and reconsider their grades. This courtesy letter should be sent along with the same grade inflation notice that was sent prior to grade submission regarding grade inflation.
6. The instructor will review their grades and notify the FCC of any grade changes following their own review. If the instructor does not find any changes to be made, they will be asked to provide a short narrative explaining why they determined grade inflation is not present, or confer with the FCC and the Dean regarding the revisions. The reviewers will respect the faculty's professional judgment and may not override the grades, unless it is such a substantial departure from accepted academic norms as to demonstrate that the faculty did not actually exercise professional judgment.
7. Once the grades have been decided, they will then be sent to the Administrator to be published/finalized in Populi, and sent to the students.

Faculty must use the grading matrix set out below. The matrix provides considerable flexibility. We are also providing a sample grading rubric for the exams to all faculty as a template.

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 is usually under 15% of the grades, occasionally as much as 15%, but in classes with a small number of students, it can exceed 15%.
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 is usually under 25% of the grades, occasionally as much as 25%, but in classes with a small number of students, it can exceed 25%.
73 – 79 (C+ and C)	Grades in this range usually comprise the largest share of the grades, sometimes higher than 50% but sometimes it is not the largest share. In classes with a small number of students, it is often not the largest share. 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 sometimes comprises 15% to 20% of the grades, sometimes higher than 20%, but sometimes lower than 15%. In classes with a small number of students, it can be less than 15%.
59 and below (F)	Failing. Unfortunately, there will sometimes 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.



People's College of Law

660 S. Bonnie Brae, L.A., CA 90057 Tel.:

213 483-0083 Fax: 213 483-2981

E-mail: administrator@peoplescollegeoflaw.edu

"Over 48 Years of Educating People's Lawyers"

July 11, 2022

RE: PCL Dean Job Description

The People's College of Law seeks an exceptional individual to become the dean of its School of Law. This position is currently an unpaid volunteer position, however, there is potential for funding in the future.

The next dean should be an innovative thinker and approachable leader who welcomes the opportunity to articulate a vision for the growth of the law school that builds on its 48-year history of preparing social justice lawyers.

The People's College of Law, PCL was founded in 1974 as a non-profit 501(c)3 under the name *The Guild Law School*. The school exists to bring legal resources to under-represented communities and to train legal advocates dedicated to securing progressive social change and justice in society.

Centrally located near Los Angeles' famed MacArthur Park, PCL is close to public research universities, close to state and federal courts, major corporate headquarters, and a community historically underrepresented by, and with limited access to, legal representation.

Scope of Work

Reporting to the Executive Committee of our Community Board of Directors and working closely with the school Administrator, the Dean is the School of Law's chief academic, advancement, and administrative officer, with overall responsibility for its **academic programs, operating budget, personnel management, strategic planning, public relations, and fundraising. The Dean is also the School of Law's principal representative to the College, alumni, and the legal community.**

The next dean will be presented with the opportunity not only to propel PCL to higher levels of prominence and distinction, but also to stabilize and grow the school's academic programs.

The Dean's leadership skills will be essential to taking on the following opportunities and challenges:

- Developing and executing a comprehensive and proactive strategic plan for the School of Law that meets the challenges of a highly competitive market and aligns with the broader objectives of the College's strategic plan;
- Nurturing and expanding interdisciplinary relationships between PCL and other College programs;
- Garnering additional private and public resources that will enable the School of Law to make continued advances in its programs and facilities, as well as the caliber of its faculty and students;

- Taking aggressive steps to better anticipate the needs of the external legal community in order to cultivate stronger relationships and forge collaborative partnerships in a city that is experiencing growth and transformation;
- Maintaining and enhancing PCL's strong sense of community among its principal constituents, including faculty, staff, students, alumni, other schools, and College administration;
- Continuously improving student outcomes—including bar passage, job placement, and other quantitative and qualitative measures—and maintaining and enhancing the school's student-centered environment; and
- Advancing the law school's commitment to social justice, access to justice, and equality before the law.

The People's College of Law

The People's College of Law School of Law was officially founded in 1974, making it the oldest law School with a specific focus on social justice in the nation.

Faculty

PCLS's diverse, collegial, and internationally accomplished faculty is currently, and has always been, all-volunteer; there are currently 12 adjunct professors.

PCL alumni and faculty make policy as well as write about it. They are active leaders in national organizations engaged in the study and application of law, such as the American Bar Association, and National Lawyers Guild.

There is a burgeoning, but sophisticated, faculty development process that includes peer and student evaluations, as well as regular faculty workshops focused on teaching.

Students & Alumni

The PCL student body currently consists of approximately 25 students, the majority from non-traditional educational backgrounds prior to attendance at PCL. The quality and diversity of the student body are key components of the educational experience at PCL. The school is proud of the supportive environment it provides to all students, including women, minority students, older students, LGBTQ students, and students from nontraditional backgrounds. Admissions are selective, with an ~40% acceptance rate, and are conducted on a rolling basis.

PCL's alumni serve as judges, commissioners, politicians, and public interest leaders.

A strong network of 120 alumni affords excellent career prospects for PCL's graduates in private practice, academia, business, government, and public interest.

Curriculum

The School of Law offers the Juris Doctor (JD) degree as a four (4) year part-time study program.

As an unaccredited institution, our students must take, and pass, the CalBar's First Year Law Student Examination after completion of their first year; consequently, special course offerings designed to prepare our students for the rigors of the exam are offered during the first year of study.

Unique to PCL

Di Suvero Law Library

The School of Law has recently renovated our library, which houses approximately 2,000 volumes. The library serves as the "laboratory" for the work of both students and faculty and is an important information center for practicing lawyers and for scholars from other disciplines.

A recent 2021 endowment from the Estate of Hank Di Suvero, a PCL founder, paid for the repair of the library roof, damaged by fire a few years ago.

Staff

The School of Law enjoys a highly experienced and dedicated Administrator. A search for a new Administrator is happening concurrently with our search for a new dean.

The Administrator will serve as a valuable resource for the incoming dean.

Qualifications and Characteristics

PCL seeks a visionary dean with exceptional leadership credentials to meet the opportunities and challenges outlined above and to lead the law school into the future. The position requires an individual who can lead effectively and manage a small but complex school in the California regulatory environment.

Candidates will preferably have credentials appropriate for a tenured appointment at the rank of professor.

Leadership

Senior-level experience with responsibility for strategic management of personnel, programs, and resources is strongly desired. Willingness to engage in institutional advancement is critical; demonstrated experience is preferable.

The ideal candidate will provide strategic vision to inspire and lead PCL to a new level of stability and community relevance, leveraging the strengths of PCL's faculty and programs.

The ideal candidate will also demonstrate:

- A commitment to innovation in legal education and a broad knowledge of the legal profession and emerging trends in the practice of law and social justice;
- Strong fundraising skills, including the ability to engage alumni, foundations, the legal community, and other donors in the school's mission;
- The entrepreneurial ability to recognize and develop opportunities to enhance revenues from contracts, grants, non-J.D. programs, and other sources in light of the changing market for legal education;
- The ability to lead fiscally conservative budgeting in conjunction with planned enrollment growth;
- A commitment to fostering the College's core values of diversity and inclusion at PCL and in the legal profession; and
- Outstanding interpersonal skills, leadership skills, emotional intelligence, personal ethics, and professional integrity.

The People's College of Law

Since its founding in 1974, the People's College of Law has established itself as a leader in the field of social justice education.

Applications, Nominations, and Inquiries

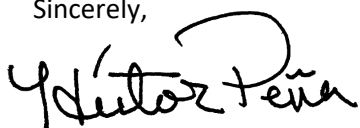
All correspondence, including applications, nominations, and inquiries should be emailed to the Dean

Search Committee c/o deansearch@peoplescollegeoflaw.edu

A complete application will include a letter of interest and a current CV. Candidate materials will be reviewed on an ongoing basis up to the application deadline of October 1, 2022. All correspondence will be held in strict confidence. The anticipated start date is October 2, 2022.

The People's College of Law values equality of opportunity, human dignity, and diversity.

Sincerely,

A handwritten signature in black ink, appearing to read "Héctor Peña". The signature is stylized with a large, looping "H" and a cursive "Peña".

Héctor Candelario Peña Ramírez, J.D.

(Pronouns: He/Him/His)

President

People's College of Law

660 South Bonnie Brea Street

Los Angeles, CA 90057

(562) 777-6207 (cell)

(213) 483-0083 (main)

president@peoplescollegeoflaw.edu

www.peoplescollegeoflaw.edu

Job Posting

Administrator/Registrar, Peoples College Law

The Administrator/Registrar of Peoples College of Law (PCL) is a full-time, salaried (exempt) position based in Los Angeles, CA. The Administrator/Registrar performs the bulk of the day-to-day work of PCL, and therefore is a key contributor to achieving PCL's mission to bring legal resources to under-represented communities by training legal advocates dedicated to securing progressive social change and justice in society. PCL is a small, nonprofit, fully licensed law school in Los Angeles, CA authorized to grant the Juris Doctor (J.D.) degree, which qualifies its graduates to take the California Bar Exam. Classes take place in the evening to accommodate working students.

The Administrator/Registrar reports to the PCL Board of Directors and the Officers of PCL (Chair, Vice-Chair, Secretary, Treasurer and Dean). The Administrator/Registrar customarily and regularly exercises discretion and independent judgment and works under general supervision of the Officers, including the Dean.

The position requires transparency, as well as consultation and collaboration with PCL's students, faculty, committees, alumni, Dean, Board of Directors, Officers, and other community members. **Expected start date is May 10, 2021, but flexible.**

Salary Range: \$58,240 to \$60,000 depending on experience and qualifications

Responsibilities include, but are not limited to:

- Carry out the day-to-day business and administrative affairs of PCL
- Act as the primary contact person and representative of PCL via telephone, mail, and email
- Be present at the school Monday through Friday from 12:30 p.m. to 8:30 p.m. from September through May and occasionally for a few hours on the weekends to assist with open house events (during the COVID-19 emergency, presence is by remote electronic means)
- Collect tuition and other fees and monies from students and manage corresponding records
- Manage and update PCL's Student Information System (Populi)
- Manage and update student and faculty records and files in both paper and digital formats
- Manage and maintain the school's finances and bookkeeping, including accounts payable and accounts receivable and develop budgets; work with the bookkeeper, accountant, and Treasurer to achieve this
- Attend PCL board meetings once per month on Sunday and be prepared to: present a financial report, an Administrator's Report and other reports as needed
- Become familiar with PCL's bylaws, policies, rules and handbooks.

Job Posting

Administrator/Registrar, Peoples College Law

- Be familiar with the laws and rules of the State Bar of California that govern the school; work with the Dean, Board of Directors, and Officers to maintain and improve PCL's compliance with applicable laws and rules
- Work with the Dean and others on the inspections by the State Bar and the self-study reports required for them. The next inspection is in November, 2021.
- Provide information to and support students, faculty, and other community members in accessing the school's resources and in complying with the school's community agreements
- Manage and update the academic calendar, course schedule, student handbook and other documents in collaboration with the Dean, Board of Directors and Officers
- Maintain student attendance records and supervise student and faculty compliance with attendance record requirements
- Respond in a timely manner to official requests for student records and transcripts while upholding the school's privacy policy
- Support and assist PCL's committees in the areas of fundraising and development, admissions and recruitment, communications, and implementation of committee programs
- Support and assist with management of PCL's website
- Support and assist with establishing relationships with community organizations, unions, cooperatives, and like-minded organizations for the advancement of PCL and the surrounding communities

Qualifications

- Juris Doctor (J.D.) degree from (1) an American Bar Association-approved law school or (2) a law school accredited or registered by the Committee of Bar Examiners of the State Bar of California. (the Administrator need not be an attorney or Bar member)
- Three years experience as an administrator or executive director on behalf of organizations seeking progressive social, political, or legal change
- One year prior experience working in an administrative capacity at a graduate level (or higher) educational institution
- Three years experience as a community organizer or advocate for a progressive political agenda, and commitment to it, including support for civil liberties, workers' rights, and social justice
- Ability to work cooperatively and courteously with our various constituents, including coworkers, volunteers, board directors, officers, and supervisors
- Ability to work under pressure and maintain professionalism under stress
- Excellent organizational skills and attention to detail
- Strong written and verbal communication skills

Job Posting

Administrator/Registrar, Peoples College Law

- Experience in strategic planning and management of programs and budgets
- Experience in public relations and development/fundraising
- Experience with Microsoft Office, Excel, and other standard computer programs; must be able to create and manage spreadsheets and bookkeeping programs
- Grant writing experience a plus
- Program development and student/faculty/volunteer recruitment experience a plus
- Spanish language proficiency a plus

**PEOPLES COLLEGE OF LAW
INSTRUCTOR AND COURSE EVALUATION FORM**

Subject: _____ Instructor's Name: _____

Semester/Quarter and Year: _____ Date Form Filled Out: _____

Form filled in by: ☐ Student ☐ Dean ☐ Other Faculty Member ☐ Community Board Member ☐ Non-Student FCC Member ☐ Self-Eval

1. Describe the instructor's attendance:

Excellent Good Average Poor

Comments: _____

2. Describe her/his attitude towards teaching:

Enthusiastic Satisfactory Indifferent Negative

Comments: _____

3. The instructor's education, knowledge, and experience in the subject matter:

Excellent Good Average Poor

Comments: _____

4. The instructor's competence in the classroom or in other instructional activities:

Excellent Good Average Poor

Comments: _____

5. The instructor's teaching skills given the technology and methodology used in instruction, and the quality of participatory experiences employed:

Excellent Good Average Poor

Comments: _____

6. The instructor's organization of the course as demonstrated by outlines or syllabi:

Excellent Good Average Poor

Comments: _____

7. The quality, nature, and type of examinations, and other assignments and the quality of grading:

Excellent Good Average Poor

Comments: _____

8. The relation between the field of instruction and the area of specialization, if any, of the instructor in private practice:

Excellent Good Average Poor

Comments: _____

9. The years of experience, both in teaching and in practice :

Excellent Good Average Poor

Comments: _____

10. Describe her/his ability to communicate ideas and concepts clearly:
 Excellent Good Average Poor

Comments: _____

11. Describe the level of responsiveness to your questions:
 Excellent Good Average Poor

Comments: _____

12. Describe the instructor's concerns that students learn and understand the law:
 Excellent Good Average Poor

Comments: _____

13. Describe the instructor's ability to handle criticism:
 Excellent Good Average Poor

Comments: _____

14. Does the instructor display any overt or latent racism, sexism, ageism, ableism, classism, etc. which made it difficult for you to attend class? Yes No

Please Explain: _____

15. Did the instructor display any hostility or anger towards any student? Yes No

Please Explain: _____

16. Is the instructor available outside the classroom for consultation? ☐ Yes No

Comments: _____

17. Please comment on the instructor's overall performance:

18. Would you recommend that we rehire the instructor?

☐ Yes ☐ Yes, with reservations ☐ No ☐ No, with reservations

Comments: _____

19. Any other comments that might help the instructor meet your learning needs?

20. Do you have any recommendations or referrals for instructors in any area of the law?

Instructor Name and Subject Area: _____

Thank you for your participation! We appreciate your comments!

PEOPLES COLLEGE OF LAW

1) Brief Description of the Organization

The [REDACTED] provides family law and domestic violence assistance to low-income families in Los Angeles through the efforts of over 250 volunteer lawyers, paralegals, students, and other professionals. Center regularly serves over 1500 clients per year.

The mission of the Center is to assure these families access to the courts, reduce poverty among children and single parents, and stop abuse directed towards women and children. Self-empowerment of low-income persons is a key objective of the Center with an emphasis on building skills and increasing self-esteem. The Center aims to teach self-advocacy by preparing individuals to represent their own interests within the legal system.

2) A Short Summary of the Applicant's Job Description and Work Activities

The student, under the guidance of [REDACTED] attorneys, spends a 10-week summer period interviewing clients, analyzing legal issues, preparing pleadings, writing declarations, memoranda and other legal documents, engaging in research, limited discovery and a host of other tasks related to the practice of law.

In addition to hands on interaction with clients, the student experiences daily life in a non-profit environment, and meets students and staff from other legal services programs in the local area.

Student Name: [REDACTED]

Supervising Faculty: [REDACTED]

Weekly Brief Summary: Students Actions While Interning

Date	Amount of Time	Summary of [REDACTED] Internship
6/1-5/20	40 hours	[REDACTED] was trained by staff attorneys for: community property, custody and visitation, divorce, legal research, legal writing, client interviews, who the center serves, administration, and technology.
6/8-12/20	39 hours, 15 mins	[REDACTED] was assigned [REDACTED] first case, researched how many days does a respondent have to respond to a TRO, helped a client get a failed proof of service from the sheriff's department, locate a client's husband, find out when sheriff's service options will continue in prisons. Filled out his hours.
6/15-19/21	48 hours	Communicated with clients, gathered information, organized client files, prepared a client for permissive withdrawal, prepared to start a new case with a client, and wrote two case memos, and started Memorandum and Points of Authorities for Monitored Child Visitation. Filled out his hours.
6/22-26/20	24 hours 45 minutes	Research and wrote memorandum of points and authorities, did a client intake interview, did phone screenings, drafted and filed Domestic Violence Restraining Order, drafted and filed a Civil Harassment Order, Researched Ex-parte Motions. Filled out his hours
6/29/20-7/3/20	20 hours 15 minutes	Learned how to use the Assessor in conjunction with the Records office to buy a deed to find the identity of the property owner, learned how to track down individuals through DMV with just license plate,
7/6-10/20	22 hours 45 minutes	Client interviews, Case memos, Case Preparation, Client File Organization, double check if sheriffs' will serve in prison, and trained on form FL-150 financial disclosures.
7/13-17/20	24 hours	Disso 1, Disso 2 preparation, Criminal background check training, researched termination of parental rights, and worked on P&As.
7/20-26/20	33 hours 30 minutes	Interviewed Client, improved phone call under translation, filled out Disso 1, Disso 2 forms, worked on P&As, attended domestic violence council meeting, drafted a case memo.
7/27-31/20	25 hours 30 minutes	Finished 2 nd P&As draft, filled out FL-140, FL-150, FL-160 with client, Case Memo
8/3-7/20	15 hours 15 minutes	Edited a declaration, organized files, and emailed final timesheet.

		– Intern/Volunteer Timesheet
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Volunteer Name:				Period Ending:			
Volunteer Hours							
Date		Time In	Lunch Out	Lunch In	Time Out	Total Hours	Staff Only Entered
1 <input type="checkbox"/>	16 <input type="checkbox"/>	Enter Start Time	n/a	n/a	Enter Out Time	Enter Hrs.	
2 <input type="checkbox"/>	17 <input type="checkbox"/>	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
3 <input type="checkbox"/>	18 <input type="checkbox"/>	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
4 <input type="checkbox"/>	19 <input type="checkbox"/>	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
5 <input type="checkbox"/>	20 <input type="checkbox"/>	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
6 <input type="checkbox"/>	21 <input type="checkbox"/>	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
7 <input type="checkbox"/>	22 <input type="checkbox"/>	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
8 <input checked="" type="checkbox"/>	23 <input type="checkbox"/>	11:15 AM	Enter	Enter	1:30 PM	2 hours 15 min	
9 <input checked="" type="checkbox"/>	24 <input type="checkbox"/>	9:00 AM	1:15	2:30 PM	6:15 PM	8 hours	
10 <input checked="" type="checkbox"/>	25 <input type="checkbox"/>	9:00 AM	12:00 PM	1:00 PM	5 PM	7 hours	
11 <input checked="" type="checkbox"/>	26 <input type="checkbox"/>	9:00 AM	12:00 PM	1:00 PM	5:00 pm	7 hours	
12 <input checked="" type="checkbox"/>	27 <input type="checkbox"/>	9:00 AM	1:00 PM	2:00 pm	5:00 PM	7 hours	
13 <input type="checkbox"/>	28 <input type="checkbox"/>	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
14 <input type="checkbox"/>	29 <input type="checkbox"/>	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
15 <input checked="" type="checkbox"/>	30 <input type="checkbox"/>	9:00 AM	12:00 PM	1:00 PM	6:00 PM	8 hours	
	31 <input type="checkbox"/>	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
Total:						39 hours 15 min	

Client Number: **Volunteer Signature:** _____

Name of Client: **Date Completed:** _____

Type of Delivery (C) Individual **Type of Volunteer:** ☒ Paralegal Intern ☐ Attorney Intern

Type of Service: (C) Counsel and/or Advice ☐ Admin Intern

Type of Legal Problem: (39) other Family

PCL'S ANSWERS TO STAFF FOLLOW-UP QUESTIONS OF JULY 19, 2022

Natalie, in response to the Staff's follow up questions, PCL responds as follows:

Item 1

State Bar

Testing Accommodations:

Thank you for providing the updated form, and documenting a secure storage solution. Has the process been reviewed to ensure compliance with current law, and are decisions being documented properly?

PCL

As far as a review to ensure compliance with current law, PCL's testing accommodations process was written so as to comply with the Americans with Disabilities Act, even though PCL is not subject to the Act. Relevant portions of the Act were copied into the process.

As far as the documentation procedures, they are as follows. PCL has created a form for students to use to make the requests for accommodation. The administrator forwards the request for accommodation and supporting documentation submitted by the student to the Dean. The Dean then reports back to the administrator with a decision in writing. The decision is then sent to the student. Hard copies of the requests, documentation and decision are placed in the student's file. Electronic versions are placed in PCL's Student Information System.

Item 4

State Bar

Updating Web and Publications:

The report documents that these materials were updated in late May or early June. Can the law school describe the steps taken to ensure sufficient staffing and plans to timely update these materials in the future?

PCL

With regarding to staffing concerns, please see Item 10 below. The dates for web updates, disclosures, reports and publications have been calendared on the Administrator's Calendar, with reminders. The PCL President will complete entries of the same type on his calendar after the Bar Exam.

Item 7

State Bar

Implementing Testing Monitoring system: May we confirm whether the PCL board took action on June 17, 2022 and when the system will begin to be utilized? Would you mind reminding the Committee how the work has been authenticated during 2021 and 2022?

PCL

Yes, at its most recent meeting the board decided to purchase and begin training, use and implementation of TestInvite. (The meeting was on July 17, not June 17. July 17 was the date stated in PCL's July report.) PCL will begin using the system in the upcoming Fall Quarter

2022-2023 (there are no exams until then). Below is how it was done in 2021 and 2022, as we reported in our progress report of June, 2022, in which we repeated portions of our Progress Report of May, 2021, followed by an Addendum of June 2022:

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.

Item 10

State Bar

Staffing: It would be helpful to understand how compliance obligations and communications will be handled. The law school's response does not address how the overall necessary tasks were identified and staff/volunteers provided to fulfill those duties, and the new positions do not appear to address the areas that resulted in late filings last year. Also, though the law school indicates that staffing concerns limited productivity last year, most State Bar communications were copied to multiple individuals, yet response was not received. What will be the best way to proceed in the future? Best of luck with the grant applications.

PCL

Shortly after the new Administrator began her job, she studied the Unaccredited Law School Rules, the Guidelines for Unaccredited Law School Rules, the pertinent provisions of the Business and Professions Code, PCL's 2020 Annual Compliance Report and the PCL Handbook, all in order to identify and familiarize herself with the required compliance obligations and communications. The identification of required compliance obligations and communications had previously been done by Dean Emeritus Ira Spiro while he was Dean. In emails and conversations he conveyed to the Administrator his knowledge about them. The PCL President has done much the same. The President and the Dean Emeritus have been working with the new Administrator on compliance obligations and communications. In addition, Faculty and Committee member, attorney Robert D. Skeels, manages most of the website updates. It is true that the new positions described in PCL's June 2022 Progress Report do not specifically address the areas that resulted in late filings, but as stated in the report, the new positions perform a good deal of the work that the Administrator or President would otherwise have to perform, and thus greatly assist the Administrator's and President's capacity to make timely filings and timely respond to State Bar communications.

As far as the best way to proceed in the future, PCL asks that all communications from the State Bar to PCL be sent both to the administrator at administrator@peoplescollegeoflaw.edu and the president of PCL at president@peoplescollegeoflaw.edu.

Item 11

State Bar

Faculty Evaluations: A question of internal consistency. The State Bar had inquired about the burden of imposing a participation requirement or fee on the students, and the law school did not express concern, but does express concern as to filling out faculty evaluations that could ensure or enhance teaching effectiveness.

PCL

PCL is considering requiring that its students complete and turn in their faculty evaluations in order to: (1) receive class participation credit towards their course grade and/or (2) in order to receive credit for their third quarter studies.

Item 12

State Bar

Attendance: The guidelines do not expressly contemplate makeup classes. At the inspection, alternate activities or conversations that did not reflect the class were observed. Attendance is required.

PCL

PCL changed the Handbook for this purpose. It now states as follows:

“Any student who has any Disqualifying Circumstance is considered to be on probation. In order to endeavor to avoid Academic Disqualification, the student must submit a written petition ...

“If the Disqualifying Circumstance is the 80% attendance requirement ... the time must be made up in an additional class session with some instructor, if PCL can arrange for some instructor to teach the make-up class. PCL does not require the faculty member who taught the course to conduct the make-up class, although we may ask if the instructor is willing. PCL does at times succeed in arranging for another instructor to conduct a make-up session

*If the reason for the student’s petition was missed class(es), the assignment must be a make-up class. **Under no circumstances, may PCL offer students the opportunity to make up absences from regularly schedules class hours with alternative activities.”***

Item 14

State Bar

Administrative Grade Review: Thank you for describing how this process has been implemented. Are faculty being given guidance in advance? And is a plan in place to continue to correlate grades with performance on State Bar Exams?

PCL

The PCL Faculty are informed of the Administrative Grade Review process in the Faculty Handbook, which is distributed to them before the fall quarter begins. They are also informed

about it during the Faculty Orientation, which takes place before the fall quarter begins. The Faculty Handbook reads as follows with regard to Administrative Grade Review, at pages 4-5:

In August, 2020, the PCL Community Board adopted this 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.

GRADE SCALE

Students' ideas about their chances on the First Year Law Students Exam (FYLSX) and the Bar Exam are very likely influenced by their law school grades. If a student receives high grades, those grades are likely to raise the student's expectations of passing the FYLSX and the Bar Exam, but because of the low pass rates on those exams, the heightened expectations could well be unrealistic, and could lead the student to be overconfident and thus study less than necessary for the FYLSX and Bar Exam. Thus PCL has adopted the following 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.

Item 16

State Bar

Course Repetition Policy: Does this course repetition policy describe its effect on the requirements and limitations imposed by B&P Code 6060? Allowing a repetition could affect the students progression toward bar eligibility. It may make sense to review this with State Bar Eligibility. Regarding the academic disqualification policy, would this be used to continue a student after failing to successfully complete a year of probation, or would this be the probationary course?

PCL

Yes, the course repetition policy does describe its effect on the requirements and limitations imposed by B&P Code 6060. PCL's Course Repetition Policy, which is in the PCL Handbook, is as follows:

Section 11. Repeating Courses and Quarters:

No Duplicate Credit: Duplicate credit will not be given for repeating the same or substantially the same course or quarter, whether the courses or quarters are both taken at PCL or at another school, or partly at PCL and partly at another school.

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

(Note that failing a course might not result in failing to successfully complete 270 hours in an academic year, if during the academic year the student completed courses whose total hours exceed 270. As of 2020, PCL normally offers exactly 270 hours of classes for 2L, 3L, and 4L students, but 330 hours for 1L students.)