



**OPEN SESSION**  
**AGENDA ITEM O-402**  
**MARCH 2023**  
**COMMITTEE OF BAR EXAMINERS**

**DATE:** March 24, 2023

**TO:** Members, Committee of Bar Examiners

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

**SUBJECT:** Review of Probation Progress Report – Peoples College of Law

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**EXECUTIVE SUMMARY**

The Committee of Bar Examiners (committee) placed Peoples College of Law (PCL) on probation effective December 2, 2022 and directed the law school to file monthly progress reports throughout the probationary period, scheduled to conclude on May 30, 2024. PCL's three timely progress reports are attached for committee review. In addition, in response to PCL's assertion that it needs additional clarity as to the ways in which it was found to be noncompliant and what it needs to do to demonstrate compliance, the agenda item also sets out a summary of the committee's findings to date and required actions. (See Attachment E.)

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**BACKGROUND**

Peoples College of Law is a registered, unaccredited fixed-facility law school founded in 1974 in Los Angeles, California. It is a stand-alone law school and solely offers a JD program. Volunteer faculty teach the students in a building owned by the law school.<sup>1</sup> (PCL 2022 Annual Report.) As of September 15, the law school enrolled 21 students. (8 1L; 9 2L; 2 3L; and 1 4L.) PCL's cumulative five-year bar exam pass rate is 14 percent. ([Jan. 2023 Ca. Bus. & Prof. Code section 6061.7\(a\) disclosure.](#))

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<sup>1</sup> Classes have been taking place online since Spring 2020 under an emergency waiver approved by the committee due to the pandemic. This waiver expires in August 2023.

The committee placed the law school on probation on December 2, 2022 for an 18-month period scheduled to conclude on May 30, 2024. The committee imposed probation after observing numerous compliance issues in 2022, during a time when the law school was operating under a specific committee directive to demonstrate sustained compliance. That directive was issued based on the large number of recommendations adopted after each of its three most recent periodic inspections. ([Item O-400](#), Committee of Bar Examiners Meeting, Dec. 2, 2022.)

Since the committee's last meeting, staff has also received information demonstrating that the law school does not appear to be consistently following the process for providing the disclosures set forth in California Business and Professions Code section 6061 and Unaccredited Rule 4.241. The law school was reminded to do so in its January 2020 inspection through inspection recommendation number 4. In December 2022, the committee also directed the law school to attach its order of probation to the disclosure. A law school that does not comply must refund all fees, including tuition, paid by a student who did not receive the disclosure statement, and noncompliance constitutes cause for withdrawal of registration. (Rule 4.241(E); Ca. Bus. & Prof. Code section 6061.) This required disclosure informs law students of the responsibilities and possible limitations of attending an unaccredited law school, the resources available at the law school, and the law school's performance and status.

## **DISCUSSION**

This item updates the committee as to the law school's status and addresses the law school's request for a restatement of its compliance obligations.

Key observations are summarized here, while the law school's full probationary progress reports are set forth in Attachments A, B and C.

## **ADMINISTRATIVE UPDATES**

Staffing:

- In February 2023, PCL's registrar/administrator resigned after approximately 10 months in the position. PCL graduate and Torts professor John Duane has been serving as interim administrator/registrar since February 2023. Mr. Duane does not have prior experience as a registrar. The law school has posted the permanent administrator/registrar job on at least two job boards.
- Since 2020, the law school has had four different deans and four different registrars. While the Unaccredited Rules and Guidelines do not prohibit staff attrition, given the significant turnover, the law school must be vigilant to transfer institutional knowledge to ensure sustained compliance with the Unaccredited Rules and Guidelines.

Probation progress reports:

The law school has filed all three monthly probationary progress reports timely, and they are set forth in Attachments A, B, and C:

- January 1, 2023 report filed on December 31, 2022
- February 1, 2023 report filed on January 31, 2023
- March 1, 2023 report filed on March 1, 2023

Student complaints:

- Since the Committee's December 2022 meeting, three student complaints have been submitted to the State Bar alleging concerns with student support, testing accommodations, and equal opportunity. The law school is being provided an opportunity to respond to the information received that could implicate the law school's compliance.

### **COMPLIANCE ISSUE RELATED TO DISCLOSURES**

After the committee met in December 2022, staff received information indicating that PCL appears to be out of compliance with the disclosure mandates of Rule 4.241 and California Business and Professions Code section 6061. In January 2020, PCL was cited in its inspection report for issues related to disclosures in the report's recommendation 4. Each year since that time the law school has attested in its annual report that it was in compliance with the disclosure requirements, but this is not consistent with recent observations.

Rule 4.241 and California Business and Professions Code section 6061 require unaccredited law schools to provide specific comprehensive disclosures to each student before that student pays fees for any academic term; the student must sign the statement, and the law school must return a signed copy to the student as a receipt. The disclosures summarize the law school's status, performance, noncompliance issues, and limitations related to attending a registered, unaccredited law school. A law school that does not comply with this rule must refund all fees, including tuition, paid by a student who did not receive the disclosure statement. (Rule 4.241(E).) Noncompliance constitutes cause for withdrawal of registration. (Rule 4.241(E).) While the law school has certified in its annual reports that it has complied with this requirement, information provided by the law school suggests otherwise.

Staff began the current inquiry by sending a communication on December 8, 2022, seeking confirmation that a particular student had properly received signed disclosures for each of the terms during their three years of study. These sorts of files are the type that should be readily available to the State Bar as required by Guideline 9.1.

On December 30, 2022, PCL responded that it had only one disclosure for one term, and it appeared to be unsigned. As a result, on January 6, staff asked for clarification and confirmation of refund to the student for all other terms by January 13. The law school did not respond in any manner. As a result, staff wrote on January 18 to renew its original request, and expanded the inquiry to determine whether all students enrolled during the current 2022-2023 school year had

properly received signed disclosures. In total, staff has met with the law school on one occasion, and followed up in writing six times, but the information provided remains incomplete.

By February 13, PCL found additional signed disclosures from the original student for all but one term and sent them to the staff. On that date, PCL also provided a spreadsheet containing the following charts: 1) a chart indicating the date on which each enrolled students signed a fall or winter quarter disclosure, or a blank if they did not do so; 2) two additional spreadsheets that indicated payments made by each student. No information was provided as to when the disclosures were distributed, and some of the payment information is challenging to understand due to the law school's flexible payment plans. The law school agreed to provide an update, and was reminded to do so on February 21 and March 16, but none has been received.

PCL's spreadsheet documents at least twelve instances during the 2022-2023 school year when a student did not sign a disclosure for a particular term, as follows:

- Fall 2022: Six students did not sign a disclosure at all
- Spring 2023: Six students did not sign a disclosure at all

In addition, the timing of the documents that were signed appears to be an issue. PCL's documents demonstrate that for the fall 2022 term, of 14 total students who signed a disclosure, 13 students signed disclosures in December or January, well after the start of the fall term, and likely after they had made payments for the fall term. The law school asserts that the disclosures were sent timely, though not all were signed.

For the winter 2022 term, PCL's charts indicated that of 14 students who signed a disclosure, thirteen of them signed the disclosure prior to signing the fall disclosure, and between September and December 2, 2022. This means the disclosure was signed while the committee was considering whether to terminate the school's registration, and before it made a determination. Additionally, many of the winter 2022 term disclosures were signed before the fall 2022 term disclosures.

The law school also verbally indicated at a meeting on February 13, 2023 that it had implemented a new procedure in January 2023 to improve compliance with the disclosure requirements. PCL's data, however, show that six students did not sign disclosures for the term.

Staff seeks support from the Committee to direct the law school to demonstrate whether PCL complied with the disclosure requirements for each student in attendance between August 2022 and the present. PCL must document whether it: 1) distributed a compliant disclosure prior to the student's first payment for each quarter; and 2) returned a signed copy of the disclosure to the student. If the school cannot demonstrate that it complied with this requirement, the school must issue a refund to each student for each quarter the school failed to comply with the disclosure requirements. PCL must provide documentation to the State Bar, demonstrating compliance with the disclosure requirements for each student for each term for the period of August 2022 through April 1, 2023, as well as to compliance with the disclosure requirements for the original student for the spring 2020 term as requested in December.

## **REQUEST FOR CLARIFICATION**

PCL attached a letter to its March 2023 Progress Report seeking clarification of the committee's finding regarding PCL's compliance and the actions the law school is being asked to take. (See Attachment D.)

To address the law school's question, staff has prepared an annotated restatement and summary of the probationary order issued in December 2022 set forth in Attachment E. This document summarizes the committee's order, the committee's previous findings of noncompliance, the updates received through progress reports and responses to staff requests, and the actions that PCL is required to take.

State Bar staff will also continue to communicate with the law school regarding its compliance obligations, as it has been doing. Staff has scheduled orientation meetings with new PCL staff, documented compliance issues in writing, provided courtesy reminders when deadlines are upcoming or missed or when responses are nonresponsive or incomplete, and responded to the progress reports with helpful questions and information. Staff has also met with PCL on several occasions. Most recently, staff summarized outstanding staff requests issues to the law school on February 21, 2023 via email.

## **RECOMMENDATIONS**

It is recommended that the Committee of Bar Examiners receive and file the probationary progress reports provided by Peoples College of Law in January, February, and March 2023.

It is also recommended that staff transmit the annotated summary and restatement of probationary order set forth in Attachments E to Peoples College of Law.

It is also recommended that the law school be directed to take prompt action to establish full compliance, take the actions noted in Attachment E, as well as all steps necessary to avoid noncompliance with any other Rule or Guideline, and provide an update and documentation in its April 2023 progress report. If the law school cannot demonstrate and document compliance in a particular area, it is recommended that the law school must provide an explanation and a detailed, documented timeline and action plan as to when compliance is expected to be achieved.

It is also recommended that Peoples College of Law must clearly and fully document compliance with Rule 4.241 and California Business and Professions Code section 6061 in its April 2023 progress report by providing evidence that the procedures set forth in California Business and Professions Code 6061 and Rule 4.241 were followed or that refunds were issued. Failure to do so will be taken as evidence of noncompliance and the Committee may move to terminate registration.

## **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 receive and file the probationary reports filed by Peoples College of Law in January, February, and March 2023.

**FURTHER MOVE**, that in response to Peoples College of Law's March 2023 letter seeking information as to its compliance status and required actions, that staff transmit to the law school the annotated summary and restatement of the probationary order set forth in Attachments E.

**FURTHER MOVE**, that Committee direct the law school to take prompt action to establish full compliance and take the actions noted in Attachment E, as well as any other steps necessary to avoid noncompliance with any other Rule or Guideline, and to provide an update and documentation in its April 2023 progress report. If the law school cannot document compliance in a particular area, the law school must provide an explanation and detailed, documented timeline and action plan as to when compliance is expected to be achieved.

**FURTHER MOVE**, that Peoples College of Law must clearly and fully document compliance with Rule 4.241 and California Business and Professions Code section 6061 in its April 2023 progress report by providing evidence that the procedures set forth in California Business and Professions Code 6061 and Rule 2.241 were followed or that refunds were issued. Failure to do so will be taken as evidence of noncompliance and the Committee may move to terminate the law school's registration.

## **ATTACHMENTS LIST**

- A. January 1, 2023 Peoples College of Law Probation Progress Report
- B. February 1, 2023 Peoples College of Law Probation Progress Report
- C. March 1, 2023 Peoples College of Law Probation Progress Report
- D. March 1, 2023 Letter from Peoples College of Law
- E. Proposed Annotated Summary and Restatement of Peoples College of Law Probation Status



## People's College of Law

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*"Over 48 Years of Educating People's Lawyers"*

July 18, 2022

Sent via Email to  
[lawschoolregulation@calbar.ca.gov](mailto: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.

lcDocuSigned by:

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Juan Sarinana

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.

### **State Bar's questions and PCL's Answers to Staff Follow-up Questions of 7/19/22:**

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 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.

### **PCL's Updated progress report as of 11/15/22:**

PCL has reviewed the accommodations process to ensure compliance with current law and as such has revised the policy to further include appeals process and protection of PHI (Personal Health Information). The newly revised policy and procedure is attached and will be updated on the website.



**PCL is in compliance with this item # 1.**

**PCL's updated progress report as of 1/1/23:**

The accommodations policy has finished its drafting stage and is now in the process of seeking approval from the school's counsel and the Board.

With the hiring of an outsourced IT department, a link to apply for accommodations will be added to the website. The accommodations page will also explain the appeals process and the explanation of further protecting PHI (Personal Health Information).

**Notice of Noncompliance**

2. Guideline 2.2(8): 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.**

**PCL's Updated progress report as of 11/15/22:**

PCL's revised warning remains in the refund policy, Section VIII, paragraph 9(b) of the Handbook.

**PCL is in compliance with this item #2.**

**PCL's Updated progress report as of 1/1/23:**

PCL's revised warning remains in the refund policy, Section VIII, paragraph 9 (b) of the handbook.

**Notice of Noncompliance**

3. Guideline 2.3(8): 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."**

**PCL's Updated progress report as of 11/15/22:**

PCL is compliant with item # 3.

**PCL's updated progress report as of 1/1/23:**

PCL has remained in compliance with item #3.

**Notice of Noncompliance**

4. Guideline 2.3(0): To bring itself into full compliance, the school should demonstrate that the disclosure statements required by Guideline 2.3(0)(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**).

**PCL's Answers to Staff follow-up questions of July 19, 2022**

### **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 regard 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.

### **PCL's Updated progress report as of 11/15/22:**

In addition to the above, the new Dean has calendared those reminders in the master school administration calendar and reoccurring reminders in the dean's school email calendar. Once the reminders are sent the dean will then coordinate with IT (a PCL faculty member) who will update the website. Please see PCL's organizational chart and accompanying job descriptions to ensure confidence in the State Bar that these items will be updated on a timely basis.

### **PCL's Updated progress report as of 1/1/23:**

Since the last report, updating the website has been a significant task because we have to rely on a volunteer faculty member to make those updates. To make those updates in a timely manner, PCL has decided to hire an outside IT person to make those updates. The hiring is taking place in late December 2022.

The Dean continues to calendar those reminders in the master school administration calendar and reoccurring reminders in the dean's school email calendar.

### **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.

### **PCL's Updated progress report as of 11/15/22:**

The policy changes remain in effect and are being followed.

### **PCL's Updated progress report as of 1/1/23:**

The policy changes remain in effect and are being followed.

### **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.

### **PCL's Updated progress report as of 11/15/22:**

Additionally, PCL has adopted consistency in grading by aligning its course objectives with its assessment rubric, which will be included and delineated in each syllabus. A sample syllabus is attached with the newly updated alignment. With the recent appointment of a new dean, oversight provisions will be in place.

First, oversight provisions will include continuous professional development of faculty members. As such, every new faculty member and current faculty members will have an orientation session with the dean that will cover school policies, methods of assessment, development of rubrics and alignment to the learning outcomes.

Secondly, faculty meetings will be scheduled once a month on various educational topics: androgony of adult-learners (in particular from underserved populations), topics in formative and summative assessment, curriculum alignment and topics in methods to differentiate the curriculum.

Third, weekly newsletters will be sent out at the beginning of the week to maintain faculty informed regarding deadlines pertaining to grade (i.e. grade submission), teaching tips and school community events.

Fourth, faculty will undergo both informal and formal assessments to serve in evaluating the effectiveness of their delivery of instruction.

PCL is now in compliance with item # 6.

#### **PCL's Updated progress report as of 1/1/23:**

Since the last progress report the Dean has been working with the FCC (Faculty Curriculum Committee) to assist with the oversight provisions.

The FCC conducts new faculty orientations at the beginning of the year. Every new faculty member and current faculty members will have an orientation session that will cover school policies, methods of assessment, development of rubrics and alignment to the learning outcomes.

The syllabus will cover written statements of the components of the course grades.

#### **Notice of Noncompliance**

7. Guideline 2.9(D): To bring itself into full compliance, the school should adopt, publish, and implement a policy on the 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.

## **PCL's Answers to Staff Follow-up Questions of July 19,2022**

### **Implementing Testing Monitoring System:**

State Bar: 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's Response:**

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:

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### ***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***

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.)***

**A. 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**

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 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.

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.

#### **PCL's Updated progress report as of 11/15/22:**

In a recent TestInvite demonstration by a company's sales representative PCL's concern was that the software did not have a lock down safe browser protection. In an effort to achieve compliance, PCL again revisited the quote by Exam Soft, the software used by the State Bar, but the software was \$7,000 for the license plus a one-time set up fee plus an additional \$1,750, with a minimum commitment of 2.5 years. This was a concern due to our small student enrollment.

PCL entered into a contract to purchasing Mettl, to ensure the exam security. The cost is \$4,000 for a one time set up fee and charges \$20 per student per test administration.

Mercer/Mettl is GDPR compliant, ISO 27001 Certified and ISO 9001 Certified and GDPR compliant. It allows for security controls that include a lock-down browser and remote proctoring options with various levels of security. Information on Mercer/Mettl is attached as an exhibit.

Authentication of student work: Before the exam there is a 3-point candidate authentication system. This consists of: email authentication, mobile authentication through OTP and ID card authentication. During the exam, the software has flagship facial recognition technology. The student's authorized image is compared with the images taken at regular intervals during the test. Student impersonation suspected' flag is raised if the student is found to be different.

The proctored exam environment can be effectively regulated with the secure exam browser. Several features can be disabled such as: browsers and tabs, screen sharing and virtual machines, cut, copy and past, search engines and other websites, external ports and printing and data sharing.

Final exams will be administered utilizing Mercer/Mettl for the 2022-2023 Academic year.

PCL is now in compliance with item # 7.

#### **PCL's Updated progress report as of 1/1/23:**

After the last progress report, Mercer/Mettl informed PCL that they regretted the inconvenience but that their parent company was not able to service our area due to the numerous litigation issues regarding test proctoring software in California.

Fortunately, PCL had a backup plan, Test Invite. Test invite programmers set up the exams rather quickly. Our concern was exam integrity and Test Invite's inability to have a lock down keyboard. However, Test invite representatives demonstrated and reassured PCL that it had several features built in that would provide the same protection. For instance, PCL could set up a flag in the event of any infractions ( i.e. an attempt to leave the testing screen). That flag would be able to automatically terminate the exam. The system had various options allowing PCL to set up several flags. We opted at 2 flags and purchased the option of live recordings to monitor the screens. During administration we found out that if the system was trying to update it would flag Test Invite.

There was also a customer support chat button in which the students could communicate with a PCL live staff member in case of any technical issues. With all this support and extensive training by Test Invite PCL conducted live remote proctoring and had one of our staff members available for technical issues, each night that the exam was taking place. The staff member was able to quickly troubleshoot minor issues and provide a quick resolution. Overall, we had very few minor issues.

PCL will continue to utilize Test Invite, as they had a high- level of personalized customer service for the school. Test Invite is customer service oriented and did everything for PCL from programming the exams into the system, to guiding us in proctoring, to downloading the exams. They were truly amazing which is why we had such minor issues, and we were prepared to answer those issues as they arose because Test Invite provided the training.

#### **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**).

#### **PCL's Updated progress report as of 11/15/22:**

PCL continues to utilize the grade review policy found in the Student Handbook (please see attachment).



PCL has meant compliance in item # 8

**PCL's Updated progress report as of 1/1/23:**

PCL continues to utilize the grade review policy in the student Handbook. Instructors underwent one on one coaching with implementing the grading policy to make sure our grading standards were in alignment. All grades were completed in a timely manner and published on 12/16.

**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.

**PCL's Updated progress report as of 11/15/22:**

PCL continues to utilize the above-utilized security measures.

PCL has meant compliance in item # 9

**PCL's Updated progress report as of 1/1/23:**

PCL continues to utilize the above-listed security measures.

**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 XXXXXXX for PCL's May 2021 annual fundraiser, a very large amount compared to our budget and fundraising history. PCL will strive to surpass that XXXXXXX mark, with a goal of XXXXXXX 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 XXXXXXX 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**).

### **PCL's Updated progress report as of 11/15/22:**

PCL continues to build capacity. PCL hired a new dean on September 27, 2022 and since then has been working in a full-time capacity to remedy organizational change for effective operations.

PCL will be conducting a search for an experienced enrollment specialist for this upcoming recruitment season. This will be a seasonal position from late May 2023 to early September 2023. PCL has approved 10-13 hours per week for this position.

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. At the moment PCL is currently interviewing for this position and a new hire is expected within the next two weeks.

### **PCL's Updated progress report as of 1/1/23:**

Since the last report, PCL continues to build capacity and reorganize its resources. At the moment, PCL has not hired someone to fill the legal coordinator position because PCL has reached out to Higher Education programs in the Los Angeles Area hoping to get a candidate experienced and trained in Higher Education. Several of the candidates we have been getting have general skills. However, after the holidays I will reach out to the schools again and see if they can put our listing on a listserv within the student body.

In the meantime, we have an outsourced development assistant that coordinates the legal clinic and the Dean has been supervising the staff, volunteers and clients.

The administrator/registrar continues to work closely with the dean to organize the business processes and procedures within the organization. We have implemented Asana, project management to keep up to date with various projects.

John Duane, our Resource coordinator has also been working closely with the dean to create a strong bar preparation program for the first year law school exam.

### **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.

### **PCL's Updated progress report as of 11/15/22:**

To improve our data collection PCL has utilized Qualtrics in the data collection of its annual report and was a success. Qualtrics can be programmed to send reminders which will remind the students to complete the survey since their voice is valuable for program improvement. The survey can be conducted on the phone because it is web-based and will be designed to keep the student's busy schedule in mind.

### **PCL's Updated progress report as of 1/1/23:**

At the end of every quarter, the school will utilize Qualtrics or Redcap in collecting the data for the faculty evaluations. In the Fall quarter, preliminarily we only had 4 responses in total. PCL was not satisfied and sent out a second request to complete the surveys. A contest was created in which the first three classes that had 100% participation could earn school spirit merchandise. The responses are still coming in.

A report will be created from the data and sent to the FCC committee and used as one of the components of evaluating the professors.

### **Non-Compliance:**

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.**

**PCL's updated Items of non-compliance 1/1/23:**

Instructors are required to take attendance on Populi, our student information system. The system will flag an entry that falls below the 80% mark. We have discontinued the practice of allowing the students to make up absences from regularly scheduled classes.

**Non-compliance Item**

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.

**PCL's updated Items of non-compliance 1/1/23:**

PCL continues its practice as listed above in PCL's response.

**Non-compliance Item:**

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.

**PCL's updated Items of non-compliance 1/1/23:**

Faculty were coached in regard to the implementation of the grading policy for the fall quarter. This was in addition to the training received by the FCC at the beginning of the year. The grading policy was implemented adequately and appropriate feedback was provided for the exams. The final exams were then returned to students after the grades were finalized. Instructors and students then had an opportunity to discuss their grades.

**Non-compliance Item:**

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.

**PCL's updated Items of non-compliance 1/1/23:**

PCL's revised policies have remained in effect to the present.

**Non-compliance Item:**

9. 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, 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.

## **PCL's updated Items of non-compliance 1/1/23:**

Current PCL handbook regarding repeating courses can be found on page 29 of the handbook and has removed the language indicated above. The policy on repeating courses is pasted below.

## **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 FLSX 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.)

**Non-compliance item:**

10. 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.

**PCL's updated Items of non-compliance 1/1/23:**

PCL is operating under a waiver until August 2023. PCL is starting to have a conversation as to whether it will choose to apply for a Distance learning option.

**Non Compliance Item:**

9. 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.

**PCL's updated Items of non-compliance 1/1/23:**

The school continues to maintain its security procedures as described above.



**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](mailto: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: 16
- b) Total number of first-year students admitted: 14
- c) Total number of first-year students enrolled: 12
- d) Undergraduate Grade Point Average (GPA) for all first-year students enrolled:
- i) 75th Percentile: 3.39
- ii) 50th Percentile: 2.693
- iii) 25th Percentile: 2.37
- 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: n/a
- ii) 50th Percentile: n/a
- iii) 25th Percentile: n/a

**PCL Admitted 12 students plus 2 from the prior year who repeated their 1st year.**

**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: 72
- b) Estimated total tuition charged to complete a JD degree: \$ 22400
- c) Estimated total fees charged to complete a JD degree: 22,400

**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: ..s.d. 2  
 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 in: 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 courtesy 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](mailto: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**

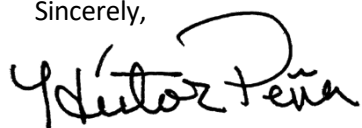
All correspondence, including applications, nominations, and inquiries should be emailed to the Dean

Search Committee c/o [deansearch@peoplescollegeoflaw.edu](mailto: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 fluid and cursive, with the first name "Héctor" written in a larger, more prominent script than the last name "Peña".

Héctor Candelario Peña Ramírez, J.D.

(Pronouns: He/Him/His)

President

People's College of Law

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## 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-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 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 stated 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	20hours 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	24hours	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 2nd 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.

- InternNolunteer Timesheet

Volunteer Name: _____		I Period Ending: _____					
Volunteer Hours							
Date		Time In	Lunch Out	Lunch In	Time Out	Total Hours	Staff Only Entered
10	160	Enter Start Time	n/a	n/a	Enter Out Time	Enter Hrs.	
20	170	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
30	180	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
40	190	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
50	200	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
60	210	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
70	220	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
8181	230	11:15 AM	Enter	Enter	1:30 PM	2 hours 15 mi	
9181	240	9:00AM	1:15	2:30PM	6:15PM	8 hours	
10181	250	9:00AM	12:00PM	1:00PM	5PM	7 hours	
11181	260	9:00AM	12:00PM	1:00Pm	5:00 pm	7 hours	
12181	270	9:00AM	1:00PM	2:00 pm	5:00PM	7 hours	
130	280	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
140	290	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
15181	300	9:00AM	12:00Pm	1:00PM	6:00PM	8 hours	
	310	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: 181 Paralegal Intern D Attorney Intern

Type of Senrice: (C) Counsel and/01· Advice

D Admin Intern

Type of Legal Problem: (39) othel· Family

### **Additional Follow-up Questions and Responses by PCL**

**--Courtesy reminder that the law school's 4.241 disclosures for law schools should be updated before any students pay for classes in 2023. The State Bar is available to review the disclosure if it is helpful.**

We are in the process of updating the disclosures on our enrollment forms and will be updated before students pay for classes in 2023.

**--(November) A corrected version of the 6061 disclosure that is part of the annual report, which is targeted for posting in November and required for posting in January.**

We are in the process of updating the disclosures on our enrollment forms and will be updated in January 2023.

**--(November) Correction of the law school's web and student communications and disclosures under 4.241 to inform students fully as to the terms of probation (was Notice of Noncompliance at the time of the original communications) as requested in prior State Bar communications. Currently this information is listed under a State Bar Motion tab that does not appear to transparently communicate the law school's status. This morning the website seemed to be down, so I could not verify status. This is an urgent matter, and no response has been received from the law school.**

I have responded twice already to this issue. The State Bar Motion tab will be removed within a few days once we onboard the new IT contractor. We are trying to organized for the new year.

**--(November) A timetable as to when the law school will be able to offer a program of 270 hours to STUDENT and the courses proposed. A prior request on this topic provided significant detail, but did not demonstrate that the law school could offer a 270 hour compliant program despite multiple follow up requests. When can STUDENT reasonably expect to re-enroll and complete his final year? An extensive summary was provided, but it did not contain this information.**

The dean is currently working with the FCC committee to devise a curriculum for STUDNT We will need at least a few more months (about mid March) to be able to finalize a curriculum. I will continue to update the State Bar monthly regarding STUDETN Curriculum.

**--(November) An update on the issues related to problems with the law school's testing vendor and how this was communicated and resolved (initial summary provided)**

Please see the progress report attached for an explanation.

**--(12-6-22) A response to the State Bar's email regarding demographic data**  
I believe this question was already answered by Adriana.

**--(12-8-22) Recently forwarded request as to the disclosures STUDENT has signed** The only disclosures that STUDENT has signed were in 2019. Those are attached to this email.

## **GUIDELINES FOR DOCUMENTATION**

Peoples College of Law seeks to accommodate students with documented disabilities to allow equal standing in educational endeavors.

The Americans with Disabilities Act (ADA), along with Section 504 of the Rehabilitation Act, were enacted to provide a clear and comprehensive mandate for the elimination of discrimination against individuals with disabilities.

In compliance with these laws, Peoples College of Law is dedicated to maintaining an environment that guarantees students with disabilities full access to its educational programs, activities, and facilities. Accommodations are designed to level the playing field for students with disabilities, while maintaining the integrity and standards of the College's academic programs.

Accommodations take time to implement. The student must complete the registration and approval process at least three weeks prior to the start of classes in order to best facilitate the logistics of any academic accommodation. If the approval process is completed with less than three weeks prior to the start of classes we will not be able to guarantee access to the class.

### **ADA Compliance**

Peoples College of Law complies with the Americans with Disabilities Act, section 504 of the Rehabilitation Act, and state and local regulations regarding students and applicants with disabilities. Pursuant to these laws, no qualified individual with a disability, or

those regarded as having a disability, shall unlawfully be denied access to or participation in any services, programs, or activities of Peoples College of Law.

In carrying out this policy, we recognize that disabilities include mobility, sensory, health, psychological, and learning disabilities. It is our intent to provide reasonable accommodations to qualified individuals with disabilities. We are unable, however, to make accommodations that are unduly burdensome or that fundamentally alter the nature of the service, program, or activity.

## **I. Disability Defined**

A disability is a physical or mental impairment that substantially limits one or more of the major life activities of the individual.

Major life activities: normal functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, eating, standing, bending, reading, concentrating, thinking, communicating, learning, and working. It also includes operation of major bodily function, such as the immune system, normal cell growth, digestive, bowel, bladder, brain, respiratory, circulatory, endocrine and reproductive functions.

Physical impairment: any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory and speech organs, cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin and endocrine.

Mental impairment: any mental or psychological disorder such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Learning disabilities: a generic term that refers to a heterogeneous group of disorders manifested by significant difficulties in the acquisition and use of listening, speaking, reading, writing, reasoning, or mathematical abilities.

## **II. Admission of Students with Disabilities**

The College will make admission decisions using criteria that do not consider an individual's disability, but rather the student's individual qualifications to meet the essential elements of the program, service, or activity being offered, assuming incorporation or use of the proper academic adjustment and/or auxiliary aids, if necessary. The College believes that this carries out the intent of the Americans with Disabilities Act and section 504 of the Rehabilitation Act.

Students with disabilities desiring to enroll in any program, service, or activity of Peoples College of Law must be able to meet the minimal standards of the college.

PCL does not engage in any affirmative action programs for students with disabilities, nor does it consider a student's disability in evaluating admission criteria. It is, of course, within the student's discretion to inform the respective school's Admissions Committee of a disability if they wish. If this choice is made, the College will not discriminate against the student on the basis of the disability and will make reasonable accommodations, when necessary.



### **III. Students Requesting Accommodations**

Students with disabilities may request accommodations at any time. However, the College must have time to review and approve the request before making accommodations. In addition, some accommodations take more time to provide than others. Therefore, students are encouraged to contact Peoples College of Law as soon as possible after they have filed their intent to enroll with the College.

A staff member will assist the student in understanding the process for putting together a disability related documentation packet for review (see Guidelines for Documentation of a Disability) and will set up an intake interview for the student with an administrator or dean in order to assess the student's needs. The documentation should be sent to Peoples College of Law as soon as possible before the student's first day of enrollment at Peoples College of Law. Students should not assume that the Peoples College of Law knows any information about his or her disability because it was included in the student's application for admission. If the student does not have documentation, or if the documentation is insufficient, a staff member can refer the student to an appropriate professional for evaluation.

Students requesting accommodations must provide documentation from a qualified professional verifying their disability. The opinions and recommendations of a qualified professional will be considered in developing a suitable accommodation plan. A temporary impairment (e.g., a broken bone) is a disability only if its severity is such that it results in a substantial limitation of one or more major life activities for an extended period of time. Whether a temporary

impairment is substantial enough to be a disability must be determined on a case-by-case basis, taking into consideration the duration (or expected duration) of the impairment, the extent to which it actually limits a major life activity, and the assessment of a qualified professional.

Physical and mental disabilities: a student with a physical disability must provide verification certified by a licensed physician, audiologist, speech pathologist, physical therapist, rehabilitation counselor, or other professional healthcare provider who is qualified in the diagnosis of the disability. The verification must reflect the student's present level of functioning of the major life activity affected by the impairment. The cost of obtaining the professional verification shall be incurred by the student.

If the initial verification is incomplete or inadequate to determine the present extent of the disability and necessary accommodations, the College shall have the discretion to require a supplemental assessment of the disability.

Learning disabilities: a student with a learning disability must provide professional testing and evaluation results which reflect the individual's present level of processing information and present achievement level. Documentation verifying the learning disability must be prepared by a professional qualified to diagnose a learning disability including, but not limited to, a licensed physician or learning disability specialist. This documentation should be no more than three years old.

#### **IV. Implementation of Approved Accommodations**

A staff member has the responsibility to review each student's documentation conscientiously and diligently in carefully considering the student's request for accommodation. When the administrator or dean has completed the evaluation and has determined that the student's disability has a current functional impact on his or her academic work or ability to participate in Peoples College of law programs, the administrator or dean will work with the student to determine what accommodations are reasonable and appropriate.

Peoples College of Law will consider the student's disability-related needs, the nature of the approved accommodation, the basis for the faculty member's objection, whether the accommodation would alter or waive essential academic requirements or constitute a fundamental alteration, and whether an effective alternative accommodation is available. No faculty member may unilaterally usurp the duties and obligations of the staff including, but not limited to, making determinations as to whether a student has a disability, the extent of a student's disability, or the appropriateness of an approved accommodation.

## **V. Disability Accommodation Complaint and Appeal Procedure**

In the event that there is a disagreement between the student and the College regarding the outcome of the administrator and dean's evaluation of the student's request for disability accommodation(s) (including whether the student is a qualified individual with a disability, the adequacy of the student's documentation regarding the student's disability, and decisions regarding the student's academic adjustment or auxiliary aid, including denial of requested and/or approved services) and the student is not able to

successfully resolve the disagreement informally with the PCL administrator, the student may submit a written complaint to the Office of the Dean. This written complaint should be submitted as soon as possible after the student knows of the subject problem. The complaint should specify the Peoples College of Law policy, procedure, or norm violated and specifically set forth all relevant factual details (including relevant supporting documentation). A student may elect to withdraw a complaint at any time; however, Peoples College of Law reserves the right to investigate all complaints where necessary to protect the interests of the PCL community.

Within ten (10) business days of a receipt of the written complaint, the grievance officer shall make a decision by a preponderance of the evidence based on the written complaint and any other information the grievance officer determines is relevant. The decision shall be in writing and consist of factual findings, conclusions, and a remedy if one is appropriate. The grievance officer will provide a copy of the decision to the student and the PCL administrator

## **VI. Students Desiring Additional Information**

Students and applicants who desire information beyond what is written in College publications may contact the Office of Student Accessibility. If after contacting this office there remains a desire for additional information, students may contact the University's Equal Opportunity Officer.

## **VII. Authority**

This policy was adopted from Title III of the Americans with Disabilities Act, 42 U.S.C.A. § 12181 et seq. (1993), 28 C.F.R. § 36.101 et seq. The National Joint Committee on Learning Disabilities, Journal of Learning Disabilities, Volume 22, Number 2, February 1987, Pages 109-112; and The University of Houston Law Center Handbook For Students And Applicants With Disabilities, August, 1993.

### **Notice of Updated Privacy Practices**

Peoples College of Law respects that the privacy of your Personal Health Information ("PHI") is important to you. Therefore, effective October 22, 2022 we have updated our Notice of Privacy Practices ("NPP"). This NPP describes the collection, maintenance, and use of your PHI in the course of our business operations. (Hippa policy to be attached).

# Peoples College of Law

*Educating People's Lawyers Since 1974*

660 S. Bonnie Brae, L.A., CA 90057 - Tel.: 213 483-0083

administrator@peoplescollegeoflaw.edu

## Student Tuition, Enrollment & Registration Agreement

Revised May, 2019

Student's Name:

Redacted

Telephone Numbers (cell, home, others you choose to  
give:

Redacted

Email Address for Emails from PCL

Redacted

Mailing Address for Mailings from PCL

Redacted

Redacted

Student's Year in School as of Fall 2019 -- (FI L IN 1L, 2L, 3L or 4

Redacted

**Read this entire agreement carefully!**

**It has important information about requirements  
of the State Bar and Peoples College of Law (PCL).**

### **SOME IMPORTANT REQUIREMENTS AND OBLIGATIONS**

1. **BINDING CONTRACT:** This agreement is a legally binding contract when signed by the student and by Peoples College of Law.
2. **PAYMENTS TO PCL MUST BE CURRENT:** A student must have paid all amounts owed to PCL in full, or be current in a written payment plan (i.e. a payment agreement) signed by an officer of PCL or the Registrar or the Administrator, in order to do any of the following:
  - a. advance to the next quarter or semester
  - b. be certified by PCL to take the First Year Law Student's Exam
  - c. be certified by PCL to take the California Bar Exam
  - d. graduate from PCL and receive a J.D. degree or any other degree from PCL
  - e. attend classes and receive instruction
  - f. receive grades for exams and classes

**The State Bar will not allow a person to take the First Year Law Students Exam or the Bar Exam if the person's school does not certify the person to take the exam.**

the Bar's website. The Bar charges several hundred dollars for this registration, and additional fees for late registrations, and there is a deadline after which not even late registrations will be accepted. (In 2016 the fee was \$624 and it might be higher when you register.) Therefore, students should begin early saving up enough money to pay the fee.

11. **SEPARATE REGISTRATION REQUIRED FOR GENERAL BAR EXAM:** Similarly, students who intend to take General California Bar Exam must make a separate registration with the State Bar to take it. The deadline to register is on the Bar's website. The Bar charges several hundred dollars for this registration, and additional fees for late registrations, and there is a deadline after which not even late registrations will be accepted. (In 2016 the fee was \$677 and it might be higher when you register.) Therefore, students should begin early saving up enough money to pay the fee.
12. **GRADE AND ATTENDANCE REQUIREMENTS:** A student must satisfy minimum grade and attendance requirements of the State Bar and PCL, in order to do any of the following:
  - a. advance to the next quarter or semester
  - b. be certified by PCL to take the First Year Law Student's Exam
  - c. be certified by PCL to take the California Bar Exam
  - d. graduate from PCL and receive a J.D. degree or any other degree from PCL
  - e. attend classes and receive instruction
  - f. receive grades for exams and classes

**The State Bar will not allow a person to take the First Year Law Students Exam or the Bar Exam if the person's school does not certify the person to take the exam.**

**GRADE AND ATTENDANCE REQUIREMENTS FOR ALL STUDENTS:**

- The student must attend 80% of the class sessions in each course, and the class sessions must total at least 270 hours for the academic year. Final exam sessions are not counted for these calculations. (For example, for a three-quarter course, this means the student must attend 80% of all the class sessions combined for that subject for the three quarters, calculated without counting the final exam sessions. For a one-quarter course, the student must attend all the class sessions in that subject for the single quarter without regard to the final exam.) If these requirements are not met, make-up classes may be required.
- The student must pass all courses. In other words, have no Fs or incompletes as final grades.
- The student must have grade point average of C or higher for all classes combined.

**ADDITIONAL GRADE REQUIREMENTS FOR FIRST YEAR STUDENTS:**

- The student must have not more than one final quarter grade below C minus (below 70).

13. **APPLY FOR MORAL CHARACTER DETERMINATION:** Every person applying for admission to the California Bar (i.e. to become a licensed California attorney) must apply for and satisfy the Bar's Moral Character Determination. Normally, PCL recommends that students apply early to the Bar for the determination, as early as their first year. The determination takes many months, even longer for applicants who have a criminal conviction or some other situation that the Bar regards as significant for these determinations.



## **CANCELLATION AND REFUNDS**

5. At any time beginning with the start of the fall quarter covered by this agreement, the student may cancel this agreement and receive a prorata refund calculated on the basis of a 9 month "refund year," defined as the fall, winter and spring quarters (i.e. excluding summer sessions, if any). For example, if a first year student has paid all amounts for the academic year and cancels this agreement at the end of the second month of the fall quarter, there would be seven months left in the refund year. Seven months is 7/9 of the refund year. Thus, the refund will be 7/9 of the amount the student has paid. But the application fee is not refundable.
6. 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 classes and receive a prorata refund calculated using the same framework as in the preceding paragraph. For example, if the total a student has paid is for one quarter, and the student is taking three courses of 3 units each that quarter, and the student withdraws from one course half way through the quarter, then the refund will be 1/6 of the amount the student has paid for the first quarter. But the application fee is not refundable. **NOTE, however, that withdrawing from less than all classes can jeopardize the ability of a student to complete their PCL education within four years and could result in increased tuition costs for the student.**
7. All cancellations must be stated in writing, must be signed by the student who is cancelling, and must be delivered and to the PCL Administrator, Registrar or Dean, whose signature must appear on the cancellation, indicating that it has been delivered.
8. No refunds are allowed except those described in the three paragraphs immediately above. Refunds will be paid within 30 days after cancellation. The application fee of is non-refundable.

## **IMPORTANT NOTICES AND DISCLOSURES**

9. **STUDENTS MUST HAVE PAID ALL AMOUNTS OWED TO PCL IN ORDER TO ATTEND CLASSES, RECEIVE INSTRUCTION AND GRADES, TAKE THE BAR EXAM OR FYLSX, GRADUATE, OR RECEIVE ANY DEGREE: If a student has not paid all amounts owed to PCL in full as required by this agreement or by a written payment plan (i.e. a payment agreement) signed by an officer of PCL or the Registrar or the Administrator, the student shall not be entitled to attend classes, receive instruction, receive grades for exams or classes, be certified by PCL to take the California Bar Exam or First Year Law Students Exam, graduate from PCL, or receive any degree from PCL. In addition, PCL will not confer a degree on any student if, by the end of the last quarter of study as a 4L student, the student has not paid all amounts owed to PCL in full.**



## 15.STATE BAR GUIDELINES ON FYLSX AND CREDIT FOR LAW

**SCHOOL CLASSES:** Following are the State Bar's mandatory Guidelines about the relationship between the FYLSX and whether a student can continue with law school classes and get credit for them. To make the Guidelines easier to read, we have added bolding and subdivisions in brackets like this: [A], [B], [C]. NOTE: 5.20 through 5.22 largely repeat 1.3.

### **State Bar Guideline 1.3 First Year Law Students' Examination.**

The First-Year Law Students' Examination, as referred to in the *Unaccredited Law School Rules*, is the examination specified in California Business and Professions Code § 6060(h) and Rule VIII of the *Rules Regulating Admission to Practice Law in California*. Students attending unaccredited law schools intending to qualify to take the California Bar Examination must take the examination upon successful completion of their first year of law study. [A] Students who **pass the examination within the first three administrations** of the examination after first becoming eligible to take it will **receive law study credit up to the time of passage of the examination**. [B] Students who **pass the examination on an attempt following the third administration** of the examination after their first becoming eligible to take it **will only receive credit for one year of law study toward qualifying to take the California Bar Examination**.

### **State Bar Guideline 5.20 Evaluation of Students for Advancement and Retention.**

A law school must evaluate students for advancement and retention at least as often as the end of each academic year. [C] Students who have not maintained the grade average required for advancement or graduation or who **have failed to pass the First-Year Law Students' Examination within the required time frame must be promptly disqualified from the law school's J.D. degree program**.

### **State Bar Guideline 5.21 First-Year Law Students' Examination.**

[D] An applicant who is required to take the First-Year Law Students' Examination **will not receive credit from the Committee for any law study until he or she has passed the examination**. [E] Students successfully completing their first year of law study at an unaccredited law school **must take and pass the First-Year Law Students' Examination within three (3) administrations** after first becoming eligible to take it. [F] **Only one year of law study will be granted if the examination is passed on an attempt later than within three (3) administrations** of the examination after the student becomes eligible to take it.

### **State Bar Guideline 5.22 Disqualification of Students for Failure to Pass the First-Year Law Students' Examination.**

[G] A student who **does not pass the First-Year Law Students' Examination within three (3) administrations** after first becoming eligible to take the examination **must be promptly disqualified** from a law school's J.D. program. [H] A student who **passes the First-Year Law Students' Examination within three (3) administrations** after first becoming eligible to take it **will receive credit for all legal studies completed to the time the examination is passed**. [I] A student who does **not pass within the three (3) administrations** after first becoming eligible to take it, but who **subsequently passes, is eligible for re-enrollment** in the law school's J.D. program, **but will receive credit for only one year of legal study**.

C. The number and percentage of students who have taken and passed the First Year Law Exam in the previous 5 years is as follows. *NOTE that for each exam listed, the number of takers includes all PCL students who took that exam, whether they finished their first year just before the exam or up to a year before. Also, if a person takes the exam on, for example, three different occasions, the person is counted as a taker on all three occasions. Thus, the total “Takers” in this chart is not equal to the total of all PCL students who took the exam in the past five years – the total of “Takers” is a larger number because some students took the exam more than once in those five years.*

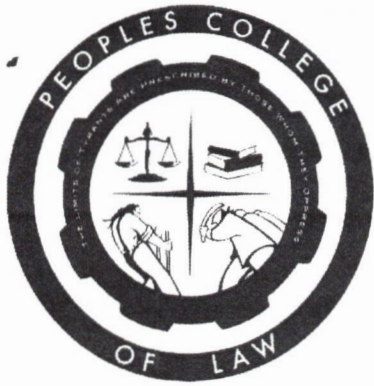
<i>Exam Year</i>	<i>Takers</i>	<i>Passed</i>	<i>%</i>
October 2018	5	0	0%
June 2018	13	2	15.4%
October 2017	8	2	25%
June 2017	12	2	16.7%
October 2016	10	1	10%
June 2016	18	2	11%
October 2015	11 □	2	18.8%
June 2015	18	4	22%
October 2014	13	3	24%
June 2014	21	5	24%
October 2013	9	0	0%
June 2013	14	3	21%

D. The number and percentage of students who have taken and passed the General Bar Examination in the previous 5 years is as follows. *NOTE that for each exam listed, the number of takers includes all graduates of PCL who took that exam no matter what year they graduated, whether very recently before the exam or many years before. Also, if a person takes the exam on, for example, three different occasions, the person is counted as a taker on all three occasions. Thus, total “Takers” in this chart is not equal to the total of all PCL graduates who took the exam in the past five years – the total of “Takers” is a larger number because some graduates took the exam more than once in those five years. **THUS, this chart does not show PCL’s Bar Exam pass rate as calculated by the State Bar for purposes of accrediting law schools, which, in May 2019, was over 35%. (PCL is NOT an accredited law school.)***



- G. The Ratio of Faculty to students for the previous 5 years is approximately one instructor to eight students.
- H. The education and degree provided by Peoples College of Law may not satisfy the requirements of other jurisdictions for the practice of law and applicants should contact the jurisdiction in which they may wish to practice for that jurisdiction's requirements.
- I. The School has **not** been issued a Notice of Noncompliance by the Committee of Bar Examiners (a committee of the State Bar of California).
- J. Following are Attrition Rates of Enrolled Students in Subsequent Years of Law Study for the preceding 5 years. In accordance with Guideline 5.22 of the Guidelines for Unaccredited Law School Rules: "A student who does not pass the First-Year Law Students' Examination within three (3) administrations after first becoming eligible to take the examination must be promptly disqualified from a law school's J.D. program." Other reasons for student attrition vary and include, but are not limited to, students voluntarily withdrawing from law school due to personal, family, business, career or financial issues and students who may have been dismissed by the law school because the students did not maintain academic good standing or who were unable to complete the mandatory curriculum requirements to earn a Juris Doctor degree.

Student Count as of:	First Year	Second Year	Third Year	Fourth Year
9/15/14	8	8	5	4
9/15/15	13	7	8	6
9/15/16	13	6	7	8
9/15/17	6	5	3	7
9/15/18	14	2	2	3
8/8/19	8	10	2	2



## PEOPLES COLLEGE OF LAW

660 South Bonnie Brae St.

Los Angeles, CA 90057

Telephone 213-483-0083

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*Training Peoples Lawyers Since 1974*

October 8, 2019

Re: Peoples College of Law Disciplinary Code

### **TO ALL PCL STUDENTS**

Enclosed is the new Disciplinary Code adopted by the PCL Community Board on September 19, 2019. It has also been emailed to you by Dean Spiro and made available on Basecamp.

Please familiarize yourself with the Code: the conduct of every Community member will be held to its standards, for the safety, well-being, and progress of the Community.

Thank you.

Sincerely,

Liz Tang  
Administrator



# 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](mailto:dean@peoplescollegeoflaw.edu)

*"Over 48 Years of Educating People's Lawyers"*

July 18, 2022

Sent via Email to  
[lawschoolregulation@calbar.ca.gov](mailto: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.

lcDocuSigned by:

**L**

Juan Sarinana

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.

### **State Bar's questions and PCL's Answers to Staff Follow-up Questions of 7/19/22:**

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 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.

### **PCL's Updated progress report as of 11/15/22:**

PCL has reviewed the accommodations process to ensure compliance with current law and as such has revised the policy to further include appeals process and protection of PHI (Personal Health Information). The newly revised policy and procedure is attached and will be updated on the website.

**PCL is in compliance with this item # 1.**

**PCL's updated progress report as of 1/1/23:**

The accommodations policy has finished its drafting stage and is now in the process of seeking approval from the school's counsel and the Board.

With the hiring of an outsourced IT department, a link to apply for accommodations will be added to the website. The accommodations page will also explain the appeals process and the explanation of further protecting PHI (Personal Health Information).

**PCL'S Updated progress report as of 2/1/23:**

The accommodations policy is in revisions and will be approved just as IT is transferring the website to Squarespace.

There was a delay with IT outsourcing during holiday break but the new IT company will start transfer of the website to a modern platform (Squarespace), so that we can streamline the accommodations process for the students.

**Notice of Noncompliance**

2. Guideline 2.2(8): 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.**

**PCL's Updated progress report as of 11/15/22:**

PCL's revised warning remains in the refund policy, Section VIII, paragraph 9(b) of the Handbook.

**PCL is in compliance with this item #2.**

**PCL's Updated progress report as of 1/1/23:**

PCL's revised warning remains in the refund policy, Section VIII, paragraph 9 (b) of the handbook.

**PCL's Updated progress report as of 2/1/23:**

PCL's revised warning remains in the refund policy, Section VIII, paragraph 9 (b) of the handbook.

#### **Notice of Noncompliance**

3. Guideline 2.3(8): 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."**

**PCL's Updated progress report as of 11/15/22:**

PCL is compliant with item # 3.

**PCL's updated progress report as of 1/1/23:**

PCL has remained in compliance with item #3.

**PCL's updated progress report as of 2/1/23:**

PCL has remained in compliance with item #3.

#### **Notice of Noncompliance**

4. Guideline 2.3(0): To bring itself into full compliance, the school should demonstrate that the disclosure statements required by Guideline 2.3(0)(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**).

### **PCL's Answers to Staff follow-up questions of July 19, 2022**

#### **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 regard 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.

#### **PCL's Updated progress report as of 11/15/22:**

In addition to the above, the new Dean has calendared those reminders in the master school administration calendar and reoccurring reminders in the dean's school email calendar. Once the reminders are sent the dean will then coordinate with IT (a PCL faculty member) who will update the website. Please see PCL's organizational chart and accompanying job descriptions to ensure confidence in the State Bar that these items will be updated on a timely basis.

#### **PCL's Updated progress report as of 1/1/23:**

Since the last report, updating the website has been a significant task because we have to rely on a volunteer faculty member to make those updates. To make those updates in a timely manner, PCL has decided to hire an outside IT person to make those updates. The hiring is taking place in late December 2022.

The Dean continues to calendar those reminders in the master school administration calendar and reoccurring reminders in the dean's school email calendar.

#### **PCL's Updated progress report as of 2/1/23:**

To ensure deadlines to publications, such as the website are done in a timely manner the school has decided to move the wordpress website into a Squarespace platform to make those updates in a timely manner. Squarespace gained an increased popularity in its accessibility to the lay person. People without any website building experience can make those updates to the website without waiting for IT people or volunteers to make those website changes. In this manner, the hiring of an outside IT person was delayed because we had to find an IT person that would have the skills to transfer the website to Squarespace.

The Dean continues to calendar those reminders in the master school administration calendar and reoccurring reminders in the dean's school email calendar.

### **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.

### **PCL's Updated progress report as of 11/15/22:**

The policy changes remain in effect and are being followed.

### **PCL's Updated progress report as of 1/1/23:**

The policy changes remain in effect and are being followed.

### **PCL's Updated progress report as of 2/1/23:**

The policy changes remain in effect and are being followed.

### **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.

**PCL's Updated progress report as of 11/15/22:**

Additionally, PCL has adopted consistency in grading by aligning its course objectives with its assessment rubric, which will be included and delineated in each syllabus. A sample syllabus is attached with the newly updated alignment. With the recent appointment of a new dean, oversight provisions will be in place.

First, oversight provisions will include continuous professional development of faculty members. As such, every new faculty member and current faculty members will have an orientation session with the dean that will cover school policies, methods of assessment, development of rubrics and alignment to the learning outcomes.

Secondly, faculty meetings will be scheduled once a month on various educational topics: androgony of adult-learners (in particular from underserved populations), topics in formative and summative assessment, curriculum alignment and topics in methods to differentiate the curriculum.

Third, weekly newsletters will be sent out at the beginning of the week to maintain faculty informed regarding deadlines pertaining to grade (i.e. grade submission), teaching tips and school community events.

Fourth, faculty will undergo both informal and formal assessments to serve in evaluating the effectiveness of their delivery of instruction.

PCL is now in compliance with item # 6.

**PCL's Updated progress report as of 1/1/23:**

Since the last progress report the Dean has been working with the FCC (Faculty Curriculum Committee) to assist with the oversight provisions.

The FCC conducts new faculty orientations at the beginning of the year. Every new faculty member and current faculty members will have an orientation session that will cover school policies, methods of assessment, development of rubrics and alignment to the learning outcomes.

The syllabus will cover written statements of the components of the course grades.

**PCL's Updated progress report as of 2/1/23:**

The Dean continues to work with an active FCC (Faculty Curriculum Committee) in monthly sessions to collaborate on curriculum and faculty oversight provisions, as in the previous answer.

### **Notice of Noncompliance**

7. Guideline 2.9(D): To bring itself into full compliance, the school should adopt, publish, and implement a policy on the 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.

### **PCL's Answers to Staff Follow-up Questions of July 19,2022**

#### **Implementing Testing Monitoring System:**

State Bar: 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's Response:**

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***

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.)***

**A. 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**

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 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.

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.

#### **PCL's Updated progress report as of 11/15/22:**

In a recent TestInvite demonstration by a company's sales representative PCL's concern was that the software did not have a lock down safe browser protection. In an effort to achieve compliance, PCL again revisited the quote by Exam Soft, the software used by the State Bar, but the software was XXXXX for the license plus a one-time set up fee plus an additional \$XXX, with a minimum commitment of 2.5 years. This was a concern due to our small student enrollment.

PCL entered into a contract to purchasing Mettl, to ensure the exam security. The cost is XXXXXX for a one time set up fee and charges XXX per student per test administration.

Mercer/Mettl is GDPR compliant, ISO 27001 Certified and ISO 9001 Certified and GDPR compliant. It allows for security controls that include a lock-down browser and remote proctoring options with various levels of security. Information on Mercer/Mettl is attached as an exhibit.

Authentication of student work: Before the exam there is a 3-point candidate authentication system. This consists of: email authentication, mobile authentication through OTP and ID card authentication. During the exam, the software has flagship facial recognition technology. The student's authorized image is compared with the images taken at regular intervals during the test. Student impersonation suspected' flag is raised if the student is found to be different.

The proctored exam environment can be effectively regulated with the secure exam browser. Several features can be disabled such as: browsers and tabs, screen sharing and virtual machines, cut, copy and past, search engines and other websites, external ports and printing and data sharing.

Final exams will be administered utilizing Mercer/Mettl for the 2022-2023 Academic year.

PCL is now in compliance with item # 7.

#### **PCL's Updated progress report as of 1/1/23:**

After the last progress report, Mercer/Mettl informed PCL that they regretted the inconvenience but that their parent company was not able to service our area due to the numerous litigation issues regarding test proctoring software in California.

Fortunately, PCL had a backup plan, Test Invite. Test invite programmers set up the exams rather quickly. Our concern was exam integrity and Test Invite's inability to have a lock down keyboard. However, Test invite representatives demonstrated and reassured PCL that it had several features built in that would provide the same protection. For instance, PCL could set up a flag in the event of any infractions ( i.e. an attempt to leave the testing screen). That flag would be able to automatically terminate the exam. The system had various options allowing PCL to set up several flags. We opted at 2 flags and purchased the option of live recordings to monitor the screens. During administration we found out that if the system was trying to update it would flag Test Invite.

There was also a customer support chat button in which the students could communicate with a PCL live staff member in case of any technical issues. With all this support and extensive training by Test Invite PCL conducted live remote proctoring and had one of our staff members available for technical issues, each night that the exam was taking place. The staff member was able to quickly troubleshoot minor issues and provide a quick resolution. Overall, we had very few minor issues.

PCL will continue to utilize Test Invite, as they had a high- level of personalized customer service for the school. Test Invite is customer service oriented and did everything for PCL from programming the exams into the system, to guiding us in proctoring, to downloading the exams. They were truly amazing which is why we had such minor issues, and we were prepared to answer those issues as they arose because Test Invite provided the training.

#### **PCL's Updated progress report as of 2/1/23:**

PCL continues to use Test Invite and seems to be working very well. There are minimal technical issues and those are handled quickly. Students have become accustomed to this testing software. PCL will continue to use Test Invite for the foreseeable future.

#### **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**).

#### **PCL's Updated progress report as of 11/15/22:**

PCL continues to utilize the grade review policy found in the Student Handbook (please see attachment).

PCL has meant compliance in item # 8

**PCL's Updated progress report as of 1/1/23:**

PCL continues to utilize the grade review policy in the student Handbook. Instructors underwent one on one coaching with implementing the grading policy to make sure our grading standards were in alignment. All grades were completed in a timely manner and published on 12/16.

**PCL's Updated progress report as of 2/1/23:**

PCL continues to utilize the grade review policy in the student handbook. With the transfer of the website to Squarespace, the gradeview process for students will be more readily accessible.

**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.

**PCL's Updated progress report as of 11/15/22:**

PCL continues to utilize the above-utilized security measures.

PCL has meant compliance in item # 9

**PCL's Updated progress report as of 1/1//23:**

PCL continues to utilize the above-listed security measures.

**PCL's Updated progress report as of 2/1//23:**

PCL continues to utilize the above-listed security measures.

**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 XXXXXXXX for PCL's May 2021 annual fundraiser, a very large amount compared to our budget and fundraising history. PCL will strive to surpass that XXXXXX mark, with a goal of XXXXXXXX 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 XXXXXXXX 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**).

### **PCL's Updated progress report as of 11/15/22:**

PCL continues to build capacity. PCL hired a new dean on September 27, 2022 and since then has been working in a full-time capacity to remedy organizational change for effective operations.

PCL will be conducting a search for an experienced enrollment specialist for this upcoming recruitment season. This will be a seasonal position from late May 2023 to early September 2023. PCL has approved 10-13 hours per week for this position.

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. At the moment PCL is currently interviewing for this position and a new hire is expected within the next two weeks.

### **PCL's Updated progress report as of 1/1/23:**

Since the last report, PCL continues to build capacity and reorganize its resources. At the moment, PCL has not hired someone to fill the legal coordinator position because PCL has reached out to Higher Education programs in the Los Angeles Area hoping to get a candidate experienced and trained in Higher Education. Several of the candidates we have been getting have general skills. However, after the holidays I will reach out to the schools again and see if they can put our listing on a listserv within the student body.

In the meantime, we have an outsourced development assistant that coordinates the legal clinic and the Dean has been supervising the staff, volunteers and clients.

The administrator/registrar continues to work closely with the dean to organize the business processes and procedures within the organization. We have implemented Asana, project management to keep up to date with various projects.

John Duane, our Resource coordinator has also been working closely with the dean to create a strong bar preparation program for the first year law school exam.

### **PCL's Updated progress report as of 2/1/23:**

PCL continues to build capacity as such, we have just recently hired a legal clinic coordinator. Daniela Terrones is a student at UCLA, pre-law program. She has a fair amount of legal experience having worked for a law firm while going to school. She works 10 hours a week and is responsible for setting up the legal clinics, gathering volunteers, coordinating the supervisors, and marketing for the legal clinic. Her social media experience will also serve useful for PCL to aid in the school's marketing efforts.

### **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.

### **PCL's Updated progress report as of 11/15/22:**

To improve our data collection PCL has utilized Qualtrics in the data collection of its annual report and was a success. Qualtrics can be programmed to send reminders which will remind the students to complete the survey since their voice is valuable for program improvement. The survey can be conducted on the phone because it is web-based and will be designed to keep the student's busy schedule in mind.

### **PCL's Updated progress report as of 1/1/23:**

At the end of every quarter, the school will utilize Qualtrics or Redcap in collecting the data for the faculty evaluations. In the Fall quarter, preliminarily we only had 4 responses in total. PCL was not satisfied and sent out a second request to complete the surveys. A contest was created in which the first three classes that had 100% participation could earn school spirit merchandise. The responses are still coming in.

A report will be created from the data and sent to the FCC committee and used as one of the components of evaluating the professors.

### **PCL's Updated progress report as of 2/1/23:**

The contest did not work, as such, the school is considering a policy where responses to the faculty evaluations will be required before they become eligible for registration of classes.

### **Non-Compliance:**

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.**

**PCL's updated Items of non-compliance 1/1/23:**

Instructors are required to take attendance on Populi, our student information system. The system will flag an entry that falls below the 80% mark. We have discontinued the practice of allowing the students to make up absences from regularly scheduled classes.

**PCL's updated Items of non-compliance 2/1/23:**

The same policy is in place this month.

**Non-compliance Item**

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.

**PCL's updated Items of non-compliance 1/1/23:**

PCL continues its practice as listed above in PCL's response.

**PCL's updated Items of non-compliance 2/1/23:**

PCL continues its practice as listed above in PCL's response.

**Non-compliance Item:**

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.

**PCL's updated Items of non-compliance 1/1/23:**

Faculty were coached in regard to the implementation of the grading policy for the fall quarter. This was in addition to the training received by the FCC at the beginning of the year. The grading policy was implemented adequately and appropriate feedback was provided for the exams. The final exams were then returned to students after the grades were finalized. Instructors and students then had an opportunity to discuss their grades.

**PCL's updated Items of non-compliance 2/1/23:**

The same policy remains this month as in the past month.

**Non-compliance Item:**

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.

**PCL's updated Items of non-compliance 1/1/23:**

PCL's revised policies have remained in effect to the present.

**PCL's updated Items of non-compliance 2/1/23:**

PCL's revised policies have remained in effect to the present.

**Non-compliance Item:**

9. 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, 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.

### **PCL's updated Items of non-compliance 1/1/23:**

Current PCL handbook regarding repeating courses can be found on page 29 of the handbook and has removed the language indicated above. The policy on repeating courses is pasted below.

### **PCL's updated Items of non-compliance 2/1/23:**

Current PCL handbook regarding repeating courses can be found on page 29 of the handbook and has removed the language indicated above. The policy on repeating courses is pasted below.

## **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.)

**Non-compliance item:**

10. 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.

**PCL's updated Items of non-compliance 1/1/23:**

PCL is operating under a waiver until August 2023. PCL is starting to have a conversation as to whether it will choose to apply for a Distance learning option.

**PCL's updated Items of non-compliance 2/1/23:**

PCL is operating under a waiver until August 2023. PCL is underway with conversation as to whether it will choose to apply for a distance learning option.

**Non Compliance Item:**

9. 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.

**PCL's updated Items of non-compliance 1/1/23:**

The school continues to maintain its security procedures as described above.

**PCL's updated Items of non-compliance 2/1/23:**

The school continues to maintain its security procedures as described above.

**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](mailto: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: 16
- b) Total number of first-year students admitted: 14
- c) Total number of first-year students enrolled: 12
- d) Undergraduate Grade Point Average (GPA) for all first-year students enrolled:
- i) 75th Percentile: 3.39
- ii) 50th Percentile: 2.693
- iii) 25th Percentile: 2.37
- 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: n/a
- ii) 50th Percentile: n/a
- iii) 25th Percentile: n/a

**PCL Admitted 12 students plus 2 from the prior year who repeated their 1st year.**

**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: 72
- b) Estimated **total** tuition charged to **complete** a JD degree: \$ 22400
- c) Estimated **total** fees charged to **complete** a JD degree: 22,400

**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: ..\$.d.
- 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 in: 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 courtesy 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

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*"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.

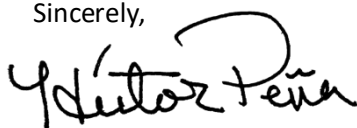
**Applications, Nominations, and Inquiries**

All correspondence, including applications, nominations, and inquiries should be emailed to the Dean Search Committee c/o [deansearch@peoplescollegeoflaw.edu](mailto: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 fluid and cursive, with the first name "Héctor" and the last name "Peña" clearly distinguishable.

Héctor Candelario Peña Ramírez, J.D.

(Pronouns: He/Him/His)

President

People's College of Law

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## 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-Internship
6/1-5/20	40 hours	[REDACTED] was trained by staff attorneys for: community propertiy, 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 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 staited 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	20hours 15 minutes	Learned how to use the Assessor in conjunction with the Records office to buy a deed to find the identity of the propertiy owner, leained how to track down individuals throu h DMV with out 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 f01m FL-150 financial disclosures.
7/13-17/20	24hours	Disso 1, Disso 2 preparation, Criminal background check training, researched teimination 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 2nd 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.

		<b>- InternNolunteer Timesheet</b>
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Volunteer Name: —			I Period Ending:				
Volunteer Hours							
Date		Time In	Lunch Out	Lunch In	Time Out	Total Hours	Staff Only Entered
10	160	Enter Start Time	n/a	n/a	Enter Out Time	Enter Hrs.	
20	170	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
30	180	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
40	190	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
50	200	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
60	210	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
70	220	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
8181	230	11:15 AM	Enter	Enter	1:30 PM	2 hours 15 mi	
9181	240	9:00AM	1:15	2:30PM	6:15PM	8 hours	
10181	250	9:00AM	12:00PM	1:00PM	5PM	7 hours	
11181	260	9:00AM	12:00PM	1:00Pm	5:00 pm	7 hours	
12181	270	9:00AM	1:00PM	2:00 pm	5:00PM	7 hours	
130	280	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
140	290	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
15181	300	9:00AM	12:00Pm	1:00PM	6:00PM	8 hours	
	310	Enter Start Time	Enter	Enter	Enter Out Time	Enter Hrs.	
<b>Total:</b>						39 hours 15 min	

Client Number:      Volunteer Signature: \_\_\_\_\_

Name of Client:      Date Completed: \_\_\_\_\_

Type of Delivery      (C) Individual      Type of Volunteer:      181 Paralegal Intern      D Attorney Intern

Type of Senrice:      (C) Counsel and/01· Advice      D Admin Intern

Type of Legal Problem:      (39) othe1· Family



**PCL PROGRESS REPORT TO MEET COMPLIANCE STANDARDS    March 1, 2023**

To keep the continuity in communication. PCL merged the items of non-compliance with previous responses to the State Bar. Below each item of non-compliance, a notation of PCL's current progress is attached. The attachments are not included to avoid duplicity.

**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.

**State Bar's questions and PCL's Answers to Staff Follow-up Questions of 7/19/22:****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 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.

**PCL's Updated progress report as of 11/15/22:**

PCL has reviewed the accommodations process to ensure compliance with current law and as such has revised the policy to further include an appeals process and protection of PHI (Personal Health Information). The newly revised policy once approved by the board will be posted on PCL's website.

PCL is in compliance with this item # 1.

**PCL's updated progress report as of 1/1/23:**

The accommodations policy has finished its drafting stage and is now in the process of seeking approval from the school's counsel and the Board.

With the hiring of an outsourced IT department, a link to apply for accommodations will be added to the website. The accommodations page will also explain the appeals process and the explanation of further protecting PHI (Personal Health Information).

PCL'S Updated progress report as of 2/1/23:

The accommodations policy is in revisions and will be approved just as IT is transferring the website to Squarespace. There was a delay with IT outsourcing during holiday break but the new IT company will start transfer of the website to a modern platform (Squarespace), so that we can streamline the accommodations process for the students.

PCL'S Updated progress report as of 3/1/23:

PCI is waiting to be scheduled with the outsourced IT company for March 2023. We have tendered a deposit and we are waiting for a proposed project completion date from the IT company. Since the project was delayed in the winter, I am now requesting an expected completion date from the company, and will also oversee this project.

The technology upgrade to Squarespace will remedy many of the process problems the organization has had in the past. Once Squarespace is upgraded members of our organization will be able to edit the website without the need for programming experience, or delays of waiting for programmers to update the website. Squarespace is user-friendly and designed as a do-it-yourself platform.

Once Squarespace is implemented, we plan to have a student services page where students can obtain information on how to access peer-to-peer tutoring, applying for disability accommodations (with timelines, forms required, data protection policies, etc), baby bar preparation program, enrolling for classes, etc.

Improving the delivery of information via Squarespace will be tremendously impactful for our organizational process improvement. This will eliminate the time spent on answering emails about the process, where the information can be easily made accessible on the website.

Given that PCL has had problems with the information to students not being readily accessible. The plan is to integrate a secured electronic form on the website in which students can apply for accommodations. Upon submitting the form, the students can expect an automated email that will have the expected timeline from which they can receive a determination.

A well-implemented technology plan will help maintain an orderly and more efficient working environment.

### **Notice of Noncompliance**

**2. Guideline 2.2(8): 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.

PCL's Updated progress report as of 11/15/22:

PCL's revised warning remains in the refund policy, Section VIII, paragraph 9(b) of the Handbook.

PCL is in compliance with this item #2.

PCL's Updated progress report as of 1/1/23:

PCL's revised warning remains in the refund policy, Section VIII, paragraph 9 (b) of the handbook.

PCL's Updated progress report as of 2/1/23:

PCL's revised warning remains in the refund policy, Section VIII, paragraph 9 (b) of the handbook.

PCL's Updated progress report as of 3/1/23:

PCL's revised warning remains in the refund policy, Section VIII, paragraph 9 (b) of the handbook.

### **Notice of Noncompliance**

**3. Guideline 2.3(8): 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."

PCL's Updated progress report as of 11/15/22:

PCL is compliant with item # 3.

PCL's updated progress report as of 1/1/23:

PCL has remained in compliance with item #3.

PCL's updated progress report as of 2/1/23:

PCL has remained in compliance with item #3.

PCL's updated progress report as of 3/1/23:

PCL has remained in compliance with item #3.

#### **Notice of Noncompliance**

**4. Guideline 2.3(0): To bring itself into full compliance, the school should demonstrate that the disclosure statements required by Guideline 2.3(0)(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).

PCL's Answers to Staff follow-up questions of July 19, 2022

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 regard 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.

PCL's Updated progress report as of 11/15/22:

In addition to the above, the new Dean has calendared those reminders in the master school administration calendar and reoccurring reminders in the dean's school email calendar. Once the reminders are sent the dean will then coordinate with IT (a PCL faculty member) who will

update the website. Please see PCL's organizational chart and accompanying job descriptions to ensure confidence in the State Bar that these items will be updated on a timely basis. PCL is in compliance with # 4.

PCL's Updated progress report as of 1/1/23:

Since the last report, updating the website has been a significant task because we have to rely on a volunteer faculty member to make those updates. To make those updates in a timely manner, PCL has decided to hire an outside IT person to make those updates. The hiring is taking place in late December 2022.

The Dean continues to calendar those reminders in the master school administration calendar and reoccurring reminders in the dean's school email calendar.

PCL's Updated progress report as of 2/1/23:

To ensure deadlines to publications, such as the website are done in a timely manner the school has decided to move the wordpress website into a Squarespace platform to make those updates in a timely manner. Squarespace gained an increased popularity in its accessibility to the lay person. People without any website building experience can make those updates to the website without waiting for IT people or volunteers to make those website changes. In this manner, the hiring of an outside IT person was delayed because we had to find an IT person that would have the skills to transfer the website to Squarespace.

The Dean continues to calendar those reminders in the master school administration calendar and reoccurring reminders in the dean's school email calendar.

PCL's Updated progress report as of 3/1/23

In addition to the above efforts, Jostle, a technology tool is also being utilized to memorialize school operations and procedures, important deadlines, and important events.

#### **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.

PCL's Updated progress report as of 11/15/22:

PCL's policies continue to remain in effect as implemented in 2020 and have remained in effect to the present.

PCL's Updated progress report as of 1/1/23:

The policy changes remain in effect and are being followed.

PCL's Updated progress report as of 2/1/23:

The policy changes remain in effect and are being followed.

PCL's Updated progress report as of 3/1/23:

The policy changes remain in effect and are being followed.

### **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.

PCL's Updated progress report as of 11/15/22:

Additionally, PCL has adopted consistency in grading by aligning its course objectives with its assessment rubric, which will be included and delineated in each syllabus. A sample syllabus is attached with the newly updated alignment. With the recent appointment of a new dean, oversight provisions will be in place.

First, oversight provisions will include continuous professional development of faculty members. As such, every new faculty member and current faculty members will have an orientation session with the dean that will cover school policies, methods of assessment, development of rubrics and alignment to the learning outcomes.

Secondly, faculty meetings will be scheduled once a month on various educational topics: androgony of adult-learners (in particular from underserved populations), topics in formative and summative assessment, curriculum alignment and topics in methods to differentiate the curriculum.

Third, weekly newsletters will be sent out at the beginning of the week to maintain faculty informed regarding deadlines pertaining to grade (i.e. grade submission), teaching tips and school community events.

Fourth, faculty will undergo both informal and formal assessments to serve in evaluating the effectiveness of their delivery of instruction.

PCL is now in compliance with item # 6.

PCL's Updated progress report as of 1/1/23:

Since the last progress report the Dean has been working with the FCC (Faculty Curriculum Committee) to assist with the oversight provisions.

The FCC conducts new faculty orientations at the beginning of the year. Every new faculty member and current faculty members will have an orientation session that will cover school policies, methods of assessment, development of rubrics and alignment to the learning outcomes.

The syllabus will cover written statements of the components of the course grades.

PCL's Updated progress report as of 2/1/23:

The Dean continues to work with an active FCC (Faculty Curriculum Committee) in monthly sessions to collaborate on curriculum and faculty oversight provisions, as in the previous answer.

PCL's Updated progress report as of 3/1/23:

The Dean continues to work with an active FCC (Faculty Curriculum Committee). The meetings are scheduled on a monthly basis as an oversight measure for continuous curriculum improvement.

Additionally, this year Pcl is integrating curriculum alignment faculty meetings with the 1L faculty. The purpose of the meeting was to support the first-year exam preparation efforts taking place on Saturday, with our resource coordinator, and the academic preparation in the classroom. In the meeting held on February 24, 2023, academic pacing plans were discussed, as instructional methodologies and feedback support.

#### **Notice of Noncompliance**

**7. Guideline 2.9(0): 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.

PCL's Answers to Staff Follow-up Questions of July 19, 2022

Implementing Testing Monitoring System:

State Bar: 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's Response:

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**

- 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.)

- 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

- 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

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.

- 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.

PCL's Updated progress report as of 11/15/22:

In an effort to achieve compliance, PCL again revisited the quote by Exam Soft, the software used by the State Bar, but the software was \$XXXX for the license plus a one-time set up fee plus an additional \$XXXX, with a minimum commitment of 2.5 years. This was a concern due to our small student enrollment.

PCL entered into a contract to purchasing Mettl, to ensure the exam security. The cost is \$xxxxx for a one time set up fee and charges \$xx per student per test administration.

Mercer/Mettl is GDPR compliant, ISO 27001 Certified and ISO 9001 Certified and GDPR compliant. It allows for security controls and remote proctoring options with various levels of security.

During the implementation stage Mercer/Mettl informed us the they it could no longer service our account because Mercer, the parent company pulled out from California, as its service area.

PCL then administered the final exams with Test invite. PCL worked with the Test programmer to develop and implement the exams. One of our staff members was trained and proctored the exam along with the administrators.

PCL is now in compliance with item # 7.

PCL's Updated progress report as of 1/1/23:

After the last progress report, Mercer/Mettl informed PCL that they regretted the inconvenience but that their parent company was not able to service our area due to the numerous litigation issues regarding test proctoring software in California.

Fortunately, PCL had a backup plan, Test Invite. Test invite programmers set up the exams rather quickly. Our concern was exam integrity and Test Invite's inability to have a lock down keyboard. However, Test invite representatives demonstrated and reassured PCL that it had several features built in that would provide the same protection. For instance, PCL could set up a flag in the event of any infractions ( i.e. an attempt to leave the testing screen). That flag would be able to automatically terminate the exam. The system had various options allowing PCL to set up several flags. We opted at 2 flags and purchased the option of live recordings to monitor the screens. During administration we found out that if the system was trying to update it would flag Test Invite.

There was also a customer support chat button in which the students could communicate with a PCL live staff member in case of any technical issues. With all this support and extensive training by Test Invite PCL conducted live remote proctoring and had one of our staff members available for technical issues, each night that the exam was taking place. The staff member was able to quickly troubleshoot minor issues and provide a quick resolution. Overall, we had very few minor issues.

PCL will continue to utilize Test Invite, as they had a high- level of personalized customer service for the school. Test Invite is customer service oriented and did everything for PCL from programming the exams into the system, to guiding us in proctoring, to downloading the exams. They were truly amazing which is why we had such minor issues, and we were prepared to answer those issues as they arose because Test Invite provided the training.

PCL's Updated progress report as of 2/1/23:

PCL continues to use Test Invite and seems to be working very well. There are minimal technical issues and those are handled quickly. Students have become accustomed to this testing software. PCL will continue to use Test Invite for the foreseeable future.

PCL's Updated progress report as of 3/1/23:

PCL continues to use Test Invite and seems to be working very well. There are minimal technical issues and those are handled quickly. Students have become accustomed to this testing software. PCL will continue to use Test Invite for the foreseeable future, unless the CBE suggests otherwise.

PCL is considering migrating to Exam Soft, but requires further clarification on the criteria for choosing a vendor that would provide the requisite security features as required by the CBE. While it is understood that the CBE cannot recommend vendors, criteria to select a test vendor would be very helpful. In the alternative, an approval that Test Invite meets the CBE



criteria for exam security would be helpful as well, in determining if we are in compliance in this area.

#### **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).

PCL's Updated progress report as of 11/15/22:

PCL continues to utilize the grade review policy found in the above referenced handbook.

PCL has met compliance in item # 8

PCL's Updated progress report as of 1/1/23:

PCL continues to utilize the grade review policy in the student Handbook. Instructors underwent one on one coaching with implementing the grading policy to make sure our grading standards were in alignment. All grades were completed in a timely manner and published on 12/16.

PCL's Updated progress report as of 2/1/23:

PCL continues to utilize the grade review policy in the student handbook. With the transfer of the website to Squarespace, the gradeview process for students will be more readily accessible.

PCL's Updated progress report as of 3/1/23:

PCL continues to utilize the grade review policy in the student handbook. With the transfer of the website to Squarespace, the gradeview process for students will be easily accessible under the student section of the website.

The technology plan includes a section for students to find readily available information such as the grade review policies, forms for such procedures, timelines that include automated confirmation of submission.

#### **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.

PCL's Updated progress report as of 11/15/22:

PCL continues to utilize the above-utilized security measures, though PCL is currently working on a cybersecurity plan that will strengthen this practice of protecting its digital records.

PCL has meant compliance in item # 9

PCL's Updated progress report as of 1/1//23:

PCL continues to utilize the above-listed security measures.

PCL's Updated progress report as of 2/1//23:

PCL continues to utilize the above-listed security measures.

PCL's Updated progress report as of 3/1//23:

PCL continues to utilize the above-listed security measures.

### **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:

- 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.
- 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.
- 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.

- 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 \$xxxxxx for PCL's May 2021 annual fundraiser, a very large amount compared to our budget and fundraising history. PCL will strive to surpass that XXXXXX mark, with a goal of XXXXXXXX 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 XXXXXXXX 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).

PCL's Updated progress report as of 11/15/22:

PCL continues to build capacity. PCL hired a new dean on September 27, 2022 and since then has been working in a full- time capacity to remedy organizational change for effective operations.

PCL will be conducting a search for an experienced enrollment specialist for this upcoming recruitment season. This will be a seasonal position from late May 2023 to early September 2023. PCL has approved 10-13 hours per week for this position.

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. At the moment PCL is currently interviewing for this position and a new hire is expected within the next two weeks.

PCL's Updated progress report as of 1/1/23:

Since the last report, PCL continues to build capacity and reorganize its resources. At the moment, PCL has not hired someone to fill the legal coordinator position because PCL has reached out to Higher Education programs in the Los Angeles Area hoping to get a candidate experienced and trained in Higher Education. Several of the candidates we have been getting have general skills. However, after the holidays I will reach out to the schools again and see if they can put our listing on a listserv within the student body.

In the meantime, we have an outsourced development assistant that coordinates the legal clinic and the Dean has been supervising the staff, volunteers and clients.

The administrator/registrar continues to work closely with the dean to organize the business processes and procedures within the organization. We have implemented Asana, project management to keep up to date with various projects.

John Duane, our Resource coordinator has also been working closely with the dean to create a strong bar preparation program for the first year law school exam.

PCL's Updated progress report as of 2/1/23:

PCL continues to build capacity as such, we have just recently hired a legal clinic coordinator. Daniela Terrones is a student at UCLA, pre-law program. She has a fair amount of legal experience having worked for a law firm while going to school. She works 10 hours a week and is responsible for setting up the legal clinics, gathering volunteers, coordinating the supervisors, and marketing for the legal clinic. Her social media experience will also serve useful for PCL to aid in the school's marketing efforts.

PCL's Updated progress report as of 3/1/23:

PCL continues to search for a permanent administrator/registrar. Currently, the position is being filled by John Duane, our resource coordinator. We have listed the position in [higheredjobs.com](https://www.higheredjobs.com) and the Idealist.

### **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.

PCL's Updated progress report as of 11/15/22:

- To improve our data collection PCL has utilized Qualtrics in the data collection of its annual report and was a success. Qualtrics can be programmed to send reminders which will remind the students to complete the survey since their voice is valuable for program improvement. The survey can be conducted on the phone because it is web-based and will be designed to keep the student's busy schedule in mind.

PCL's Updated progress report as of 1/1/23:

At the end of every quarter, the school will utilize Qualtrics or Redcap in collecting the data for the faculty evaluations. In the Fall quarter, preliminarily we only had 4 responses in total. PCL was not satisfied and sent out a second request to complete the surveys. A contest was created in which the first three classes that had 100% participation could earn school spirit merchandise. The responses are still coming in.

A report will be created from the data and sent to the FCC committee and used as one of the components of evaluating the professors.

PCL's Updated progress report as of 2/1/23:

The contest did not work, as such, the school is considering a policy where responses to the faculty evaluations will be required before they become eligible for registration of classes.

PCL's Updated progress report as of 3/1/23:

With the end of the winter quarter, the school will send out the winter faculty evaluations this week before the beginning of the next quarter. In order to consider a policy that requires students to submit faculty evaluations before they can register the following quarter, it must be submitted to the Board. This issue will be set for the April board meeting.

**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.

PCL's Answers to Staff Follow-up Questions of July 19,2022

State Bar Questions

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."

PCL's Updated progress report as of 11/15/22:

PCL continues to adhere to this policy.

PCL's updated Items of non-compliance 1/1/23:

Instructors are required to take attendance on Populi, our student information system. The system will flag an entry that falls below the 80% mark. We have discontinued the practice of allowing the students to make up absences from regularly scheduled classes.

PCL's updated Items of non-compliance 2/1/23:

The same policy is in place this month.

PCL's updated Items of non-compliance 3/1/23:

The same policy is in place this month.

**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.

PCL's Updated progress report as of 11/15/22:

PCL continues to utilize Populi as its student information system and all student communication is kept within Populi.

PCL's updated Items of non-compliance 1/1/23:

PCL continues its practice as listed above in PCL's response.

PCL's updated Items of non-compliance 2/1/23:

PCL continues its practice as listed above in PCL's response.

PCL's updated Items of non-compliance 3/1/23:

PCL continues its practice as listed above in PCL's response.

**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.

PCL's Updated progress report as of 11/15/22:

PCL is in the process of creating a faculty development plan incorporating the needs of the organization in regards to the administering a sound educational curriculum.

PCL's updated Items of non-compliance 1/1/23:

Faculty were coached in regard to the implementation of the grading policy for the fall quarter. This was in addition to the training received by the FCC at the beginning of the year. The grading policy was implemented adequately and appropriate feedback was provided for the exams. The final exams were then returned to students after the grades were finalized. Instructors and students then had an opportunity to discuss their grades.

PCL's updated Items of non-compliance 2/1/23:

The same policy remains this month as in the past month.

PCL's updated Items of non-compliance 3/1/23:

The policy remains the same.

**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.

PCL's Updated progress report as of 11/15/22:

PCL continues to be following the policies initially implemented in 2020.



PCL's updated Items of non-compliance 1/1/23:  
PCL's revised policies have remained in effect to the present.

PCL's updated Items of non-compliance 2/1/23:  
PCL's revised policies have remained in effect to the present.

PCL's updated Items of non-compliance 3/1/23:  
PCL's revised policies 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.

PCL's Updated progress report as of 11/15/22:  
PCL continues to be in compliance with the course repetition policy does describe its effect on the requirements and limitations imposed by B&P Code 6060.

PCL's updated Items of non-compliance 1/1/23:  
Current PCL handbook regarding repeating courses can be found on page 29 of the handbook and has removed the language indicated above. The policy on repeating courses is pasted below.

PCL's updated Items of non-compliance 2/1/23:

Current PCL handbook regarding repeating courses can be found on page 29 of the handbook and has removed the language indicated above. The policy on repeating courses is pasted below.

#### 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 FLSX 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.)

PCL's updated Items of non-compliance **3/1/23:**

PCL has continually maintained the policy as stated in the previous months.

**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.

PCL's Updated progress report as of 11/15/22:

Please see Guideline 6.3 in the annual report.

PCL's updated Items of non-compliance 1/1/23:

PCL is operating under a waiver until August 2023. PCL is starting to have a conversation as to whether it will choose to apply for a Distance learning option.

PCL's updated Items of non-compliance 2/1/23:

PCL is operating under a waiver until August 2023. PCL is underway with conversation as to whether it will choose to apply for a distance learning option.

PCL's updated Items of non-compliance 3/1/23:

PCL is operating under a waiver until August 2023. PCL is in the process of gathering community data through a survey distribution and townhall meetings as to whether it should apply for a distance learning option.

**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.

PCL's Updated progress report as of 11/15/22:

PCL continues to keep the documents in a fire-safe lockable cabinet. As such is in compliance.

PCL's updated Items of non-compliance 1/1/23:

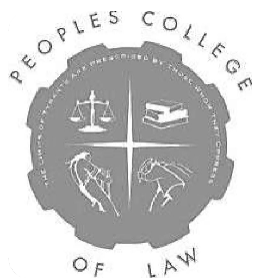
The school continues to maintain its security procedures as described above.

PCL's updated Items of non-compliance 2/1/23:

The school continues to maintain its security procedures as described above.

PCL's updated Items of non-compliance 3/1/23:

The school continues to maintain its security procedures as described above.



# People's College of Law

660 S. Bonnie Brae, L.A., CA 90057 - ( 213) 483-0083

E-mail: [dean@peoplescollegeoflaw.edu](mailto:dean@peoplescollegeoflaw.edu)

*"Over 48 Years of Educating People's Lawyers"*

March 1, 2023

Dear Natalie,

Enclosed please find the progress report for March 1, 2023. A thought occurred to me while I was drafting the status report, that most of the accrediting/oversight bodies I have worked with provide feedback as to each issue of non-compliance. This gives the school a reasonable opportunity to remedy the issues. Perhaps we should establish a process in which PCL can receive feedback on each point from the CBE on its progress.

With respect to all matters about which the State Bar considers PCL to be non-compliant, PCL formally requests that the State Bar send to PCL a written statement stating precisely what PCL has done or failed to do that the Bar believes PCL is not in compliance with any rules, guidelines, statutes or other regulatory requirements, and precisely what the Bar requires or wants PCL to do with respect to each item of noncompliance.

For instance, in the issue of test integrity, PCL has concerns about what the Bar believes PCL has done or failed to do that results in PCL being non-compliant. Thus, PCL asks for a written statement by the Bar stating what the Bar believes PCL has done or failed to do that results in PCL being noncompliant and what the Bar requires or wants PCL to do to become compliant. This would allow PCL due process and a fair opportunity to remedy. I am trying to avoid unexpected issues and with proper planning and feedback, we can avoid this.

The report is attached. Thank you.

Edith Pomposo, J.D., LL.M

Dean

**PROPOSED ANNOTATED SUMMARY AND RESTATEMENT OF  
PEOPLES COLLEGE OF LAW PROBATIONARY STATUS  
EFFECTIVE DECEMBER 2, 2022 – MAY 30, 2024**

RESOLVED, that the Committee of Bar Examiners finds that Peoples College of Law (PCL) is not in compliance with the unaccredited law school rules, but it has made perceptible progress toward compliance.

FURTHER RESOLVED, that the Committee places the law school on probation through and including May 30, 2024, with the understanding that the law school must demonstrate that sufficient progress has been made toward compliance, or its registration as an unaccredited law school will be withdrawn, with the law school's progress to be reviewed at the Committee meetings in October 2023 and April 2024, and the law school must agree to submit to annual inspections thereafter until the Committee is satisfied that compliance is likely to be sustained.

FURTHER RESOLVED, that the law school be directed to provide monthly progress reports to the State Bar on the first of the month as to each element of probation during the full term of probation, and to provide a self-study and submit to an inspection in 2023.

FURTHER RESOLVED, that the law school be directed to clearly advise the public, prospective students, and current students of its status on probation affirmatively and clearly, including attaching a copy of the probationary terms to student disclosures, web disclosures, the web home page, and communications shared with prospective students.

FURTHER RESOLVED, that the Committee reserves the right to terminate this probation prior to its scheduled conclusion if the law school fails to make or sustain adequate progress.

To ensure maximum clarity, the items are numbers to track the recommendation numbers in the original January 2020 inspection report:

**Mandatory Actions Adopted August 2020**

- 1. Guidelines 1.9 and 2.10:** To demonstrate 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.

While the law school advised that as of November 2022 it had adopted and posted a compliant policy, later status reports indicate that the policy is in draft stage and is still being finalized as of March 1, 2023.

Since the December 2, 2022 committee meeting, staff has received two complaints from students regarding the policy's availability and application, and State Bar staff requested information related to these complaints. (Student A complaint, January 2023; Student B

complaint, March 2023.)

Outstanding Action: The law school must demonstrate in its April 2023 progress report that it has created and implemented compliant procedures for reasonable accommodations and responded to the compliance issues raised by the student complaints, and resolve the conflict that appears to be present in the law school's prior responses.

- 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.

The law school appears to have a compliant refund policy regarding those who withdraw. The law school does not appear to have a compliant policy of providing refunds to students when the law school does not comply with Rule 4.241 and California Business and Professions Code section 6061. See item 4 for more detail.

Outstanding Action: The law school must document full compliance with Rule 4.241, including providing any refunds that are required under the rule, and provide evidence of compliance in its April 2023 progress report.

- 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. *Subsequent to the inspection, the school adopted a compliant policy and updated the Catalog in this area.*
- 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.

#### **A. Compliance with Business and Professions Code 6061.7(a)**

During 2022, the State Bar observed that PCL's Business and Professions Code section 6061.7(a) web disclosures and handbook were found to be out-of-date on the law school's website from January through June 2022. Staff reminded the law school to update the disclosures throughout the first half of 2022. PCL did so in May and June 2022. In November 2022, staff informed the law school via email that outdated disclosures appeared again in November 2022. PCL updated the disclosure and advised that this was due to reliance on volunteer work to update the website and that they would contract with information technology professionals to update the website. Since that time, the law school advises that as of March 1, it had selected a vendor and placed a deposit, but a timeline was not available.

Outstanding Action: In its April 2023 progress report, the law school must demonstrate that it is in compliance with the data and posting requirements of California Business and Professions

Code section 6061.7(a), and document a specific timeline for its updated process, since it advises that the current process is insufficient to ensure sustained compliance.

#### **B. Compliance with Rule 4.241**

It appears from data provided by the law school that it is not in full compliance with Rule 4.241. This rule requires the law school to: (1) provide specified comprehensive disclosures to students prior to them making a payment for any term, which would be a quarter in the case of PCL; (2) have each student sign a copy of the disclosure statement; and (3) provide each student with a copy of their signed disclosure statement as a receipt. If the school fails to comply, it must refund all fees for that term, including tuition, to the student. Additionally, noncompliance with this rule is cause for withdrawal of registration.

The data PCL has provided to date indicates that several students are owed refunds for one or more quarters. The law school updated its disclosure statement policy in January 2023, but it does not appear that PCL has been acting in accordance with its policy.

State Bar staff has taken significant action to address this issue:

On December 8, 2022, State Bar staff requested the signed disclosures for one particular student who had completed three years of study. On December 30, the law school advised that it forwarded all disclosures that it had in its possession for the student, delivering one unsigned disclosure for one term, without evidence that it had been distributed to the student. On January 6, State Bar staff advised the law school that the disclosure was unsigned and asked the law school to provide evidence of compliance or provide a refund to the student by January 13 for that term as well as for any other term for which the law school did not comply with the Rule 4.241 process.

The law school did not respond by January 13.

On January 18, State Bar staff repeated its request regarding that student, and expanded the request by asking the law school to demonstrate compliance as to Rule 4.241 for all students enrolled during the 2022-2023 school year or provide refunds as required by the rule.

Later that day, on January 18, PCL's dean advised that the response had been completed but was still lodged in her draft folder. When she sent it, the response only addressed the disclosures for the original student, indicating that some more information had been found, and did not respond to the request as to the other students.

On January 26, PCL provided additional information regarding the first student including a recently located signature page, but still did not provide information regarding the other students enrolled during the 2022-2023 school year.

On February 1, PCL provided additional disclosures for the original student with the subject line "Newly Found – Tuition Enrollment Agreements."



On February 7, State Bar staff was scheduled to meet with PCL to determine why the law school had not demonstrated compliance. The law school postponed the meeting, rescheduling to February 13.

On February 13, 2023, State Bar staff met with the law school. PCL provided a spreadsheet with some, but not all, of the information requested.

Based on the data PCL provided it appears that:

- At least 6 students did not sign disclosures for the Fall 2022 term
- At least 6 students did not sign disclosures for the Winter 2023 term
- Of the students above, 4 students did not sign a disclosure for either the fall 2022 or winter 2023 terms
- At least one student did not sign a disclosure for the spring 2020 term
- For the fall 2022 term, 13 out of 14 students who signed their disclosures did so in December 2022 or January 2023, which was well after the start of the term and likely after the students had paid tuition for the term
- For the spring 2023 term, 12 of 13 students signed the disclosures between September and December 2022. Significantly, in many cases, the documents reflect that students signed the spring 2023 disclosure before they signed the fall 2022 disclosure. Additionally, the spring 2023 term disclosures appear to have been signed during the period when the Committee was considering whether to terminate the school's registration and before a decision had been made, and it is unclear whether students were provided with full information as to the law school's status.

The spreadsheet provided at the meeting was not fully responsive to the State Bar's requests. The law school needs to show for each student, for each term, that the student received a timely and complete disclosure prior to making a payment for that term, signed it, and received a copy of the signed disclosure. For any instance where PCL cannot demonstrate compliance, it must provide a refund to the student for that term.

The law school also indicated that it implemented a new procedure in January 2023 to ensure compliance, but PCL's data indicates that not all students signed the disclosure for the term beginning in January 2023, so that procedure appears to need further modification.

At the meeting, PCL agreed to provide an update demonstrating compliance complete its analysis, but no update has been received. after the exam period and include it in the March progress report. The law school did provide a copy of the disclosure that they indicate was distributed to all students at the start of the fall 2022 term, but no further update has been received since February 13.

Staff provided courtesy reminders on February 21 and March 16.

Outstanding Action: The law school must demonstrate for the original student identified and for each student enrolled during the fall 2022 or spring 2023 term, for , that the student

received a timely and complete disclosure prior to making a payment, signed it, and received a copy of the signed disclosure. For any instance where PCL cannot demonstrate compliance, it must provide a refund to the student for that term. PCL must document compliance it is April 2023 progress report.

- 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.

The law school's catalog was posted on its web site in draft form, including notes, and included noncompliant policies, from January through May 2022. After multiple staff reminders and a directive from the Committee in March 2022, the law school posted an updated document in May 2022.

Many of the law school's website pages appear out of date, potentially confusing prospective or current students as to PCL's current academic policies. Examples include: the law school's homepage indicates that [the admission season for 2021-2022 is open, with the next class starting in fall 2021](#); [recent bar passage data stops with 2019](#); and many pictures on the [virtual tour](#) show the library, which has been unavailable for a number of years after a fire, and the law school is operating under a waiver regarding its library. The law school's progress reports indicate that the law school intends to hire information technology experts to assist with website updates, and to adopt a web platform that can be more easily updated by staff and volunteers, , but no timeline is provided for this action.

Outstanding Action: The law school must update its website and publications and provide a timeline as to when this process will be complete, in its April 2023 progress report.

- 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. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*
- 7. Guideline 2.9(D):** To bring itself into full compliance, PCL 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.

After the inspection in 2020, the law school purchased commercial software that provided exam security. During the fall semester in 2022, the law school had a technical issue with its software and ordered students to come in to take their exams, though another technical solution was found. The law school is again considering changing its vendor to a vendor it previously rejected. It is unclear whether the switching represents a technical issue or an evolving process. In addition, the law school's policy includes significant exceptions that allow

students to take exams unmonitored, limiting the law school's ability to authenticate student work.

Outstanding Action: The law school must document how it ensures exam security and authentication of student work, and document its policies and their implementation, and explain how often the exceptions to the policy are invoked and how exam security and authentication of work is handled in those cases, and document this as part of its April 2023 progress report.

- 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.

A student complaint alleged that forms related to grade review were inaccessible during the first part of 2022. (Student Complaint, March 2023.)

Outstanding Action: The law school must document the grade review process, and establish whether the policy and related forms are available to students, and document this in the law school's April 2023 progress report.

- 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. *Subsequent to the inspection, the school purchased Populi, a commercially available package designed for schools containing the safeguards identified in the law school's inspection report.*

- 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. *Subsequent to the inspection, the school increased the paid hours of the administrator, and secured significant volunteer assistance from the dean, the Board, and alumni, resulting in significant progress seen since the inspection. The school also created compliant job descriptions for both the dean and the registrar.*

#### **A. Impact of Reliance on Volunteer Work**

In 2022, the law school advised that it hired additional support staff, but eliminated those roles in 2023 without identifying other sources of volunteer or paid staff. Yet, the law school cited reliance on volunteer labor as the reasons for its noncompliance in a number of areas including: 1) the ability to create courses required for students; 2) the ability to keep the website updated; 3) the ability to issue grades timely. Reliance on volunteers does not excuse compliance.

Outstanding Action: While the law school is not required to have a particular number of staff, it must have sufficient capacity available to maintain compliance. The law school should demonstrate how it estimates its needs and fulfills those needs, explaining changes in support from 2022 to 2023, and document this in its April 2023 progress report.

## **B. Impact of Reliance on Student Volunteer Work**

PCL's current model relies on significant student volunteer work. For example, students must perform volunteer work 15 hours per week or pay an additional fee, and students also serve on the governing board. This impacts the time that students have available, and the law school acknowledges that it feels students are already busy, noting in its March 2023 report that students are too busy to fill out faculty evaluations. There is also the potential for conflict of interest or violation privacy.

Outstanding Action: The law school must evaluate the role of student participation to ensure that students have sufficient time to devote to their studies, and the law school has sufficient resources available to sustain compliance. The State Bar remains concerned at the potential for conflict of interest or violation of student privacy, as was expressed at the January 2020 inspection, and seeks further comment from the law school.

## **C. Overall Ability to Maintain Compliance**

It is unclear whether the law school has sufficient resources to maintain compliance. Examples include:

- a. The law school has not been able to create a fourth-year program of study for a student who was due to begin that study in September 2022.
- b. The law school has not fully implemented its testing accommodation policy first considered in 2020, but not yet implemented. Two complaints regarding the law school's current process have been received since the Committee's December 2022 meeting.
- c. When asked to document compliance with Rule 4.241, the law school was challenged to locate the relevant records and has not been able to locate all records after three months of efforts.
- d. The law school admitted at least one student on the first day of her classes in fall 2022, and no orientation was provided for her after orientation was conducted one week prior for other students. (Student Compliant January 2023; Staff meeting with Peoples College of Law, February 13, 2023.)
- e. The law school did not respond to several requests from State Bar staff to complete its demographic reporting spreadsheet that is part of the law school's annual report. After first requesting updates on December 6, and reminding the law school in writing on several occasions, the material was ultimately provided on February 16, 2023.
- f. Outstanding Action: The law school must engage sufficient staff and administrative support to maintain compliance with all Rules and Guidelines including responding to State Bar staff requests and probation requirements in a timely manner, and documenting its process to track status, complete and close requests in its April 2023 progress report.

- 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. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*

Between January 2020 and May 2022 PCL failed to release grades on time for one or more classes. PCL has indicated that the delay is due to the fact that volunteer professors have other time commitments. The law school reports it is working with professors to implement quality control procedures for class and exam creation and grading.

The law school advised that it has created a backup procedure to be implemented if a professor cannot grade exams on time. It also advised that it continues to seek student feedback.

Outstanding Action: The law school must establish a meaningful faculty evaluation process that sets expectations for professors, and holds them accountable, advise whether faculty grades were released on time, and, if not, advise the results of implementing the backup procedures, and document status as to all of these elements in its April 2023 progress report.

**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.

The law school's current policy does not comply with the guideline because it does not require students to attend 80 percent of regularly scheduled classes. Rather, students can petition to replace regularly scheduled class hours with alternative classes taught by other professors at any time, even after the conclusion of the course or academic term.

Outstanding Action: The law school must update its policy to require a student to attend 80 percent of regularly scheduled class hours for each individual class and address all elements of this guideline, and document the new policy and its implementation in its April 2023 progress report.

**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. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*

**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.

This policy appears to have changed as staff has changed. Recently, the law school reported that it documented a policy and held faculty trainings on how to implement that policy, focusing on grading standards and providing useful feedback on exams.

The law school also indicated that at times the dean or administrator have reviewed grades before they are released.

Outstanding action: The law school should describe the processes used to meet this recommendation so far in the fall 2022 quarter, what is planned for the spring 2023 quarter, and explain how the law school will continue to determine whether grading results correlate with outcomes on State Bar exams, and document this in the law school's April 2023 progress report.

**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.

The law school allowed a student to take a non-standard schedule but did not ensure that it had a program of study of 270 hours available to the student for their fourth year as required by California Business and Professions Code section 6060. As a result, the student was not able to continue their education at the law school in fall 2022. Currently, the law school advised staff that it has identified four course titles that it plans to create and offer beginning in fall 2023, but it has not discussed the course topics with the student or updated the student since September 2022. The law school must administer a compliant plan of study for all students.

Outstanding action: The law school must demonstrate that it has available a program of 270 hours per year for four years to all students, and document this in its April 2023 progress report.

**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. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*

Outstanding Action: The law school should provide an update as to whether any students have utilized this policy, the notice provided by the law school as to the implications of taking the leave, and the proposed plan that the student will be undertaking after the leave, as part of the law school's April 2023 progress report.

**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. *Subsequent to the inspection, the school did confirm that legal research is being taught*

*using both hard copy and electronic resources, and the syllabi are being updated appropriately.*

The law school advised in its March progress report that it may comply with the guideline or apply to change its educational category to the distance learning category and comply with that library requirement.

Outstanding Action: If the law school plans to change categories, it must file an application to do so as soon as possible to ensure timely consideration, or the law school may not have a determination prior to the start of the law school year. The law school has been advised in 2020, 2021, Summer 2022, and again via this summary that sufficient notice must be provided to allow the Committee to evaluate the law school's request. If the law school plans to implement this transition, it must include its application in full with its April 2023 progress report.

**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. *Subsequent to the inspection, the school adopted a compliant policy and provided a copy of that policy to the State Bar.*

Outstanding Action: Given the challenges that the law school experienced locating paper documents related to disclosures, the law school must document in its April 2023 progress report whether files are stored in such a manner that they can be located and produced quickly enough to meet the needs of students, faculty, and the State Bar, and document its implementation and organization in the law school's April 2023 progress report.

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

Outstanding Action: Ensure that all materials identified in the guideline are stored in an organized manner and easily accessible to the law school and readily produced to State Bar staff upon request.

### **Adopted Suggestions to Enhance Compliance**

1. Pursuant to Guidelines 2.9(C) and 5.13, it is suggested that the school requires faculty to use a standard syllabus template to promote consistent communication of course requirements. *Subsequent to the inspection, the school purchased a commercially available software package that includes a standard syllabus template which was adopted.*

Outstanding Action: Please confirm whether this template is being used for all classes, and, if not, which classes use it and what system is in place for the other classes, and document the law school's response in the April 2023 progress report.

2. Pursuant to Guidelines 2.11, 7.1, and 9.1, it is suggested that the school bases its data security policies and procedures upon the recommendations of generally accepted industry standards, consulting with an expert if the expertise is not available within the school. *Subsequent to the inspection, the school purchased commercially available software package with these features included, and purchased the appropriate storage cabinets to protect hard copy files.*

Outstanding action: Please continue to document the law school's status of implementation of the software and secure storage, as part of the April 2023 progress report.

3. Pursuant to Guidelines 5.14 through 5.16 and 5.25, it is suggested that the school adopts and implements a procedure requiring that exam questions, accompanied by issue outlines or model answers, must be reviewed, and approved by the dean or another legal educator before being administered. *Subsequent to the inspection, the school began evaluating this suggestion.*

Outstanding Action: Please advise the status of a policy and implementation of that policy, including which staff or volunteers will carry it out and their qualifications to do so, and document these efforts in the April 2023 progress report.

4. Pursuant to Guidelines 5.17, 5.18, and 5.25, it is suggested that the school adopt and implement a procedure requiring grades and student exams papers to be reviewed and approved by the dean or another legal educator before being posted. *Subsequent to the inspection, the school began evaluating this suggestion.*

Outstanding Action: The law school must continue to evaluate its process for grade and exam review and approval, and document its process as part of its April 2023 progress report.