



People's College of Law

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"Over 48 Years of Educating People's Lawyers"

May 1, 2023

Dear Nathalie Leonard,

Please find enclosed the following documents regarding our compliance efforts:

1. May's progress report
2. The Outstandings
3. Our Response regarding the 4.4241 Disclosures
4. Enrollment and disclosure records for Fall 2022 and Winter 2022/2023

Please let us know if you require any further information or have any questions.

Thank you for your continued support.

Sincerely,

Edith Pomposo

Dean

Peoples College of Law

PEOPLE'S COLLEGE OF LAW

(ORIGINAL) NOVEMBER 2021 PROGRESS REPORT

ON COMPLIANCE WITH RECOMMENDATIONS

IN STATE BAR INSPECTION REPORT OF 2020

Updated May 1, 2023

RECOMMENDED MANDATORY ACTIONS IN 2020 INSPECTION REPORT 1.

Guidelines 1.9 and 2.10:

Bar's Inspection Report

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

PCL'S Progress Report

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

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

PCL 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.

PCL'S Updated progress report as of 4/1/23:

PCL is in the process of implementing the technology plan. The technology plan implementation is about 50% completed. The outsourced contractor has successfully migrated the emails belonging to PCL administration from the Ipower host to Gsuite. The accessibility of Gsuite products will allow the school to run more effectively. Gsuite products will be quite useful in memorializing day-to-day office procedures in google drive. Google collaborative tools will allow PCL staff to run the office seamlessly. Google forms and Google docs will be quite useful in data collection.

The remaining 50% of the technology plan is currently in progress, which includes migrating the website to Squarespace as mentioned above. The student services page which will address the procedure to obtain accommodations will be created shortly after the migration. The estimated completion time frame of migrating the website from WordPress to Squarespace is seven to ten days.

PCL'S Updated progress report as of 5/1/23:

PCL's new website was launched on April 28, 2023. The website looks identical to the previous one with one major change. PCL staff members, faculty, and board members can now have access to making changes on the website. Squarespace provides software as a service (SaS) for website building and hosting. This allows users to use pre-built website templates and drag-and-drop elements to create and modify web pages. No prior experience is necessary for website development needed to create and update the website.

The goal is to create a webpage that specifically delineates the accommodations procedure, policy, and timelines. Forms will be made available on the website on its respective page and the information made available to the students.

The time expected for the update of the website is about six weeks. We are creating the webpage in house, as such, it will take some time to brainstorm, design, create, test, launch and implement.

2. Guideline 2.2(B)

Bar's Inspection Report

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

PCL'S Progress Report

As noted in the Inspection Report, PCL adopted a compliant policy some months ago. This new policy appears in our Tuition and Enrollment Agreement and our Student Handbook & Catalog. In late August and early September 2020, the students signed their Tuition and Enrollment Agreements, with the refund policy prominently displayed. At the beginning of every quarter and before they can enroll in classes, each student has to read and sign the Tuition and Enrollment Agreement, which they have again done for the Fall and Winter Quarters of 2021 (2021-2022 Academic Year). The Student Handbook & Catalog, with the new refund policy, is posted on our website.

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.

PCL'S Updated progress report as of 4/1/23:

PCL's revised warning remains in the refund policy, Section VIII, paragraph 9 (b) of the handbook. PCL is working with CBE staff on the analysis of the Fall and Winter disclosures. Data to be provided to the CBE on April 5.

PCL'S Updated progress report as of 5/1/23:

PCL's revised warning remains in the refund policy, Section VIII, paragraph 9 (b) of the handbook. PCL is working with CBE staff on the analysis of the Fall and Winter disclosures. Data to be provided to the CBE.

3. Guideline 2.3(B) Bar's Inspection Report

“To bring itself into full compliance, the school should remove from the Catalog any electives not offered in the past three years or not expected to be offered in the next two years, and inform students in the Catalog that electives are not are taught each year, but are offered from time to time based on student interest and instructor availability. ***Subsequent to the inspection, the school updated the course list, deleting two courses that did not meet these criteria, and added the language regarding frequency.***

PCL’S Progress Report

As noted in the Inspection Report, some months ago PCL came into compliance by deleting from the Student Handbook & Catalog the courses required to be deleted. Also, this past summer (2020) we had two elective courses, clinical courses on Criminal Defense and Eviction Defense. It was the second year in which the clinical course on Criminal Defense was given, the first year for Eviction Defense.

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

PCL has remained in compliance with item #3.

PCL’S Updated progress report as of 4/1/23:

The policy remains intact and there have not been any further changes.

PCL’S Updated progress report as of 5/1/23:

The policy remains intact and there have not been any further changes.

4. Guideline 2.3(D)

Bar’s Inspection Report

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

PCL’S Progress Report

As noted in the Inspection Report, some months ago PCL came into compliance by correcting, revising and implementing the disclosures. Since then, the required disclosures were made in the Tuition and Enrollment Agreements signed by each student at the start of the Fall and Winter quarter. The Rule 2.3(D) disclosure has been updated to reflect the change in the principal method of instruction, a change caused by COVID-19, from physical classroom instruction to online interactive instruction. On October 18, 2020, well before the deadline in Rule 4.241, our

prior Dean Ira Spiro signed and sent to the State Bar the certification of compliance required by the rule. In connection with preparation of the Annual Compliance Report, the Business and Professions Code section 6061.7 disclosure is being updated.

PCL's 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.

PCL's updated progress report as of 4/1/23

A report is being prepared with the requested information by the CBE and will be received no later than April 5.

PCL's updated progress report as of 5/1/23

PCL submitted the report on April 5 and is now working on the follow-up questions requested by the State Bar, which will be submitted via email.

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

Bar's Inspection Report

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

PCL'S Progress Report

As noted in the Inspection Report, some months ago PCL came into compliance by revising these policies as required. One of the changes in our policies has to do with student privacy. Specifically, our Student Handbook & Catalog now prohibits students from participating in proceedings involving possible academic disqualification of other students without consent of the student in jeopardy of disqualification. Likewise, it prohibits students from participating in academic grievance proceedings without the consent of the student who made the grievance.

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

The policy changes remain in effect and are being followed.

PCL'S Updated progress report as of 4/1/23:

The policy revisions remain in effect. There is no change to report.

PCL'S Updated progress report as of 5/1/23:

The policy revisions remain in effect. There is no change to the report.

6. Guideline 2.9(C) Bar's Inspection Report

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

PCL'S Progress Report

As noted in the Inspection Report, some months ago PCL came into compliance by revising the policies as required. The Dean has reviewed the syllabi that have been entered into Populi, our electronic information system, and finds that all but three professors have included, in their syllabi, written statements of the components of course grades, but two of those are pass-fail courses.

Attachment 1 to this report is examples of the statements of the components of course grades, contained in faculty members' syllabi.

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

The Dean continues to work with an active FCC (Faculty Curriculum Committee). The meetings are scheduled monthly 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.

PCL'S Updated progress report as of 4/1/23:

Students are provided with written statements of components of those grades. Those statements can be found in the student handbook. The student handbook is accessible online 24 hours a day. The written statements of the components of course grades are also found in the course syllabus.

PCL'S Updated progress report as of 5/1/23:

The policy and procedure remains the same. There has been no change.

7. Guideline 2.9(D)

Bar's Inspection Report

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

PCL'S Progress Report

During the Fall Quarter of 2020, PCL adopted the following policy and procedures on authentication of student work:

POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK

A. Exams: All exams must be given using Microsoft Teams. If the exam is given remotely, the monitoring function of Teams must be used. If the exam is given in the classroom, the instructor or a non-student substituting for the instructor must be present during the entire exam to monitor the students. Students who handwrite exam answers must have all their electronic devices turned off. Students who answer the exams by Teams on a computer must have all their other electronic devices turned off. If the exam is given remotely, all students must have their video activated during the entire exam, but exceptions are allowed for student who encounter technical problems that result in the student not being able to have their video activated.

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

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

(The Faculty-Curriculum Committee notes that online classes are given via Zoom only. The students attend class via Zoom. 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 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.

PCL'S Updated progress report as of 4/1/23:

PCL continues its contract with Test Invite to provide testing services. Test Invite provides a platform in which students can take their exams in which exam integrity will be in place. PCL continues to use Test Invite's consulting services. Test Invite takes an exam from PCL and individually programs each exam into their system. When the students take the exam utilizing the Test Invite system there are several features that provide for exam security for instance notification to the test proctor that another screen has been utilized, in which case the exam is immediately terminated. PCL also pays for live proctoring services in which a member of the PCL team can proctor live exams and catch any glitches or discrepancies. Students are only allowed to take exams utilizing the Test Invite software.

PCI's Updated Progress Report as of 5/1/23:

PCL continues to utilize the same policy and procedure. Test Invite is a software product that is reasonably priced compared to the Exam Soft software that larger law school utilize that have a larger student body. PCL received feedback from students that were content with the Test Invite software because it was easy to navigate. This feedback is parallel with the research found on the Test Invite software before PCL contracted with the software company.

8. Guidelines 2.10 and 5.17

Bar's Inspection Report

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

PCL'S Progress Report

We have begun implementing our new administrative grade review policy. Our committee in charge of it, the Faculty-Curriculum Committee, has met to formulate plans for the first implementation.

Registrar/Administrator has adjusted our Student Information System to hold the grades for administrative review before the grades are issued to students and entered in their transcripts.

PCL's 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 grade view 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.

PCL'S Updated progress report as of 4/1/23:

The technology plan is in the implementation stage with the outsourced contractor. Within the next seven to ten days the website will be migrated to Squarespace. Subsequently, a student services page that includes the procedure for grade review will be developed to help navigate the process more clearly.

PCL'S Updated progress report as of 5/1/23:

The answer to this question is similar as in question one. PCL's new website was launched on April 28, 2023. PCL staff members, faculty, and board members can now have access to making changes on the website. This allows users to use pre-built website templates and drag-and-drop elements to create and modify web pages. No prior experience is necessary for website development needed to create and update the website.

The goal is to create a webpage that specifically delineates the grade review procedure, policy, and timelines. Forms will be made available on the website on its respective page and the information made available to the students.

The time expected for the update of the website is about six weeks. We are creating the webpage in house, as such, it will take some time to brainstorm, design, create, test, launch and implement.

9. Guidelines 2.11, 7.1, and 9.1

Bar's Inspection Report

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

PCL’S Progress Report

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

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

PCL continues to utilize the above-listed security measures.

PCL’S Updated progress report as of 4/1/23:

PCL continues to utilize the above-listed student information system, Populi. As such, Populi has built-in features that are adequate to protect the school’s digital records.

PCL’S Updated progress report as of 5/1/23:

PCL continues to utilize the above-listed student information system, Populi. As such, Populi has built-in features that are adequate to protect the school’s digital records.

10. Guideline 3.1

Bar’s Inspection Report

“To bring itself into full compliance, PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the CBE’s standards, including written job descriptions for the dean and registrar, and adequate oversight provisions. ***Subsequent to the inspection, the school hired a paid full-time administrator, and secured significant volunteer assistance from the dean, the Board, and alumni. The school will monitor the adequacy of its administrative capacity. The school also created compliant job descriptions for both the dean and the registrar.***”

PCL’S Progress Report

Our Registrar/Administrator continues working full-time. During this Fall and Winter quarters, others have greatly contributed to the school’s administrative work. Following are some examples. Our current President, who was previously the Board Treasurer, pitched in when our Administrator had a medical emergency and had to take sick days until she was able to return to work. Our current Dean has also pitched in to assist when we were short-handed. Our current President, when he was the Treasurer also organized faculty, alumni and together with our

Registrar, conducted our student orientation and our fall faculty meeting at the start of the 2021-2022 Academic Year in late August 2021. It should be noted that People's College of Law is a nonprofit corporation. This type of corporation has members rather than shareholders, and PCL's members are students, faculty, alumni and former board members and officers. Our Development and Fundraising Committee, whose members are alumni, has weekly meetings with our professional fundraiser, and has begun planning an online fundraising event, which will be termed "PCL Alumni Reunion" We hope to attract alumnae by showcasing pictures of their graduating class and furthering our school's mission to get licensed attorneys who are social justice advocates into the communities that need them the most.

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.

PCL'S Updated progress report as of 4/1/23:

The administrator/registrar position continues to be filled by John Duane, the interim administrator. The open position has also been listed on Zip recruiter since the last report.

PCL's Updated progress report as of 5/1/23:

PCL has hired a new administrator, Roger Aramayo. Roger is a Southwestern Law School graduate with significant management experience. PCL has currently two paid staff members, the Dean and the administrator and one student resource coordinator, John Duane.

PCL has approved an offer for the sale of its building and will be entering into a 60 day escrow. Proceeds from the sale will be reinvested back into the school to hire a full-time faculty member, additional staff members to fill areas of development, admissions and recruitment.

11. Guidelines 4.8 and 4.9 Bar's Inspection Report

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

PCL'S Progress Report

We use a standard evaluation form.

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.

PCL'S Updated progress report as of 4/1/23:

The school continues to utilize a faculty evaluation policy that meets the guideline requirements.

PCL's Updated Progress Report as of 5/1/23:

The school continues to utilize a faculty evaluation policy that meets the guideline requirements.

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

Bar's Inspection Report

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

PCL'S Progress Report

As noted in the Inspection Report, some months ago we adopted the required policy. Our instructors have been the ones to take attendance, and then report it to the Registrar/Administrator, who enters it in Populi.

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

The same policy is in place this month.

PCL'S Updated progress report as of 4/1/23:

There has been no change and the same policy is in place.

PCL's Updated Progress Report as of 5/1/23:

There has been no change and the same policy is in place.

13. Guideline 5.8

Bar's Inspection Report

“To bring itself into full compliance, the school should demonstrate that its clinical courses meet all Guideline 5.8 requirements, including maintenance of records for each student in the course.

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

PCL'S Progress Report

As noted in the Inspection Report, some months ago we adopted the required policy. Below is an instructional message sent to the students which explains how to fill out timesheets.

From: Ira Spiro

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

[names of recipients omitted from this report]

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

Importance: High

Dear PCL SUMMER Students

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

when I was practicing law. Here's what to do:

Download the attachment to your computer.

Type your name and the course name at the top.

If you're taking both clinical courses, you'll have to have two separate timesheets, so save it twice, each with a different name for use by your computer.

Fill them out every day when you're done with work for the day. Way too hard to wait, say, a week, and try to remember your time at the end of the week. This is very good practice for when you become a lawyer, because most all lawyers have to fill out timesheets

“Date” column: When you start typing the date, e.g. 6/29, the year gets filled in automatically.

“Hours” column: You can round to the nearest quarter hour, for example .45, 1.75, 2.25. (But when you practice law, you should round to nearest tenth.)

“Task” column: What you fill in can be very short. For example, “attend Zoom” or “draft letter” or “draft memorandum” or “phone call to prof”. You can use abbreviations if you're sure you'll remember what they stand for. For example TC for telephone call, dft for draft, memo is fine for memorandum.

Email them to me every Friday when you're done with your work that day.

State Bar requires someone on faculty to monitor the students, and it's going to be me.

If you have any questions about this, give me a call (310-235-2350), or send me an email. Remember, my phone doesn't receive texts.

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

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

PCL'S Updated progress report as of 4/1/23:

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

PCL's Updated progress report as of 5/1/23:

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

14. Guidelines 5.17, 5.18, and 5.25

Bar's Inspection Report

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

PCL'S Progress Report

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

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

Policies to Eliminate Grade Inflation

The Inspection Report, on page 15, referring to the 2014 inspection, states:
 “To address grade inflation, PCL adjusted its grading scale and urged instructors not to inflate grades. PCL did not, however, adopt other policies to control inflation, such as administrative review of grades prior to their release, or reasonable limits on the extent to which grades may be based on class participation, including attendance. As concluded in 2014, a sound grading program would limit participation points to no more than three [of 100], and the award of points based on attendance is “clearly inappropriate” in light of Guideline 5.3(A)(1) minimum attendance requirement. PCL’s policy allows up to thirty percent of a course grade to be based on participation.”

In the summer of 2020 we did adopt the policies recommended in that paragraph. They are now in the Student Handbook & Catalog and the Faculty Handbook, as follows:

Grading Standards:

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

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

90 - 100 (A+, A and A-)	Grades in this range should be only for very superb, outstanding work, not merely the best work among the students. The best work is often not in the A range. On an essay exam, the student should not only have identified all issues, but should have done a very superb, outstanding job of analyzing the issues. Sometimes there will be no grades in this range on an exam or for a quarter. This range should be under 10% of the grades, occasionally as much as 10%.
80 – 89 (B+ , B and B-)	Grades in this range should be only for excellent work, not merely good work. On an essay exam, the student should have identified all issues, and should have done an excellent job of analyzing the issues. This range should be under 20% of the grades, occasionally as much as 20%.
73 – 79 (C+ and C)	Grades in this range should comprise by far the largest share of the grades, often higher than 50%. But these grades are for good work, not necessarily average work, because the average might be less than good. A PCL student must have a C average or

	better, not C-, for all quarters, in order to advance to the next academic year and in order to graduate.
60 – 72 (C- to D-)	Grades in this range are for work that is somewhat less than good (C-) to work that is poor (D+ and D) to work that is marginally passing (D-). Unfortunately, this range will often comprise 15% to 20% of the grades, sometimes higher than 20%.
59 and below (F)	Failing. Unfortunately, there will often be multiple failing grades, even in a small class. A failing grade is not just for work that is entirely lacking – it is also for work that shows some grasp of the subject of the exam or course, but very little. On an essay exam, the student might have identified and discussed some issues but still receive an F. In a multiple-choice exam, if a student has correctly answered up to 59% of the questions, the grade will still be an F.

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

Administrative Review of Grades

In August, 2020, our Board adopted the following Administrative Review policy:
When faculty members have determined what grades they intend to give, the next step would not be to release the grades to the students, but instead to send the grades to reviewers. The reviewers very likely would include the Dean. Others could be members of the Faculty-Curriculum Committee and current or former faculty members, but faculty would not, of course, review their own grades, and students would not participate without consent of the student between reviewed.

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

Improvements in Eliminating Faculty Turnover

The 2014 Inspection Report observed (p. 9):
“PCL operates with an all-volunteer, adjunct faculty and has someone so since its founding [it remains true in 2020]; a clear testament to the faculty’s dedication to PCL’s mission of public service. One negative aspect of a volunteer faculty, however, is that PCL experiences a higher rate of faculty turnover than most law schools where faculty members are paid even a modest stipend or salary. ... on average, 20% of PCL’s faculty appears to be new each academic year.”

That turnover situation has been reversed. In the last academic year, 2020-2021, all faculty members except three taught at PCL the previous year, 2019-2020. Faculty turnover in the current 2021-2022 Academic Year had been on the decline previously as well.

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

The policy remains the same.

PCL'S Updated progress report as of 4/1/23:

The policy remains the same.

PCL's Updated Progress Report as of 5/1/23:

The policy remains the same.

15. Guidelines 5.18–5.20

Bar's Inspection Report

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

PCL'S Progress Report

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

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

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

PCL'S Updated progress report as of 4/1/23:

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

PCL's Updated Progress report as of 5/1/23:

PCL's revised policies have remained in effect.

16. Guideline 5.24

Bar's Inspection Report

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

PCL'S Progress Report

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

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

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

PCL'S Updated progress report as of 4/1/23:

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

PCL's Updated Progress Report as of 5/1/23:

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

17. Guideline 6.2–6.4

Bar's Inspection Report

“To bring itself into full compliance, the school must devise a plan and a timeline to return to compliance regarding the library by owning and maintaining its own hard copy library as required under Guideline 6.2 and provide this timeline and proof of library purchase to the CBE; however, it may be appropriate to provide a waiver for this academic year while the law school teaches courses online due to the pandemic. In addition, to bring itself into full compliance, PCL

should also demonstrate that students are receiving instruction in both physical publication and electronic-based legal research, as required by Guideline 6.3. The Catalog states that legal research is taught in several courses, but a review of syllabi attached to the self-study did not validate that statement. ***Subsequent to the inspection, the school did confirm that legal research is being taught using both hard copy and electronic resources, and the syllabi are being updated appropriately.***

PCL'S Progress Report

PCL has devised the requested plan regarding the library. It was set out in our 2020 Annual Report. It reads as follows:

PLAN TO RETURN TO COMPLIANCE: The brother of PCL founder, attorney Hank di Suvero, who died this year, had offered to donate funds for the library. Our plan is to use the money to restore the library to usable condition and purchase the books needed to bring the required hardbound books up to date, all to be completed by August 31, 2022. Our Board of Directors approved this plan on October 18, 2020.

The damage to the library was the destruction of part of its unique domed roof. The roof has now been repaired, which involved reconstruction of part of the domed roof. However, we recently discovered that there is further damage to the roof. At their last monthly meeting, in November 2021, the board approved another bid for another roof repair. Since our school still is conducting classes remotely, and has been since March of 2020, no students have been on campus to use the library. Thus, the library has not been opened for use. Some clean-up of the library is still needed before it opens for use. The donation was only enough for the repair and reconstruction, not for the purchase of books. We do have the very large majority of the specified hardbound books, but not all of them or our book subscriptions. Currently our plan is to request an extension of time to comply with the hardbound library provisions, to August 2022, the same time to which the waiver of the requirement for in-person instruction was extended by the Committee of Bar Examiners.

We do still believe that the hardbound library requirement, which does not apply to other categories of California law schools, should not be applied to our category, as we have explained previously. Further, given the ongoing SARS-Cov-2 Pandemic, we believe we should further assess whether we should restore the library, given that students have been using the Los Angeles County Law Library, whenever they've needed access to hard copy law books.

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

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

PCL'S Updated progress report as of 4/1/23:

PCL is going to start working on an estimate to determine the cost of purchasing the library books needed to come into compliance.

PCL's updated progress report as of 5/1/23:

PCL would like the required materials and books that are necessary in the law library to meet compliance so it can begin pricing the cost of coming into compliance.

18. Guidelines 7.1 and 7.2

Bar's Inspection Report

“To bring itself into full compliance, the school should maintain essential and permanent hard-copy records in fire-safe lockable cabinets, maintain all electrical equipment in working order, and provide digital projection equipment adequate to meet the needs of faculty and students.

Subsequent to the inspection, the school transferred files to lockable, fire-safe cabinets; projectors were replaced with other options. Also, the only person who has keys to the records room is the Administrator. Not even the janitor has keys to that room, where the fire-safe cabinets are.

PCL'S Progress Report

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

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

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

PCL's updated Items of non-compliance 4/1/23:

The school continues to maintain its security procedures as in previous months.

PCL's updated progress report as of 5/1/23:

The school continues to maintain its security procedures as in previous months.

19. Guideline 9.1

Bar's Inspection Report

“To bring itself into full compliance, the school should adopt and implement a policy to ensure that records are fully compliant with Guideline 9.1, that the law school has adopted written procedures, including oversight provisions, of record-keeping processes and record retention

requirements, and that it has adopted a written policy on transcript changes, as required by Guideline 9.1(D). *Subsequent to the inspection, the school adopted compliant policies and provided the State Bar with copies of those policies.*”

PCL’S Progress Report

Last year, our Registrar/Administrator reported as follows to the Bar and the Committee:

New Student Information System

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

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

Our SIS system also has group sections that will accommodate our committees and store committee documents including minutes & agendas.

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

PCL Files and Records

In preparation for the 2020 State Bar of California inspection, the administrator completed a thorough assessment of the school’s files and records that fall under Rule 9.1 in the Guidelines for Unaccredited Law School Rules. Much of the reason that the school’s records and files were out of compliance at that time was because there has not been a systematic uniform process set for each administrator who has worked at the school over the past several years. Files and records that were not compliant post inspection, the prior administrator continued to reconcile the deficiencies to complete the records.

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

Faculty Files: To prevent noncompliance within the faculty records, our Faculty & Curriculum Committee are developing policy to request transcripts prior to hiring interviews or requiring them during new faculty onboarding.

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

File of Examinations: As required under 9.1(F), all examinations given in the last five years are to be kept in a file for inspection by the Committee. The prior administrator had been making best efforts to compile administered midterm and final exams for the past five years. For exams given in the 2019-2020 academic year, administrator has created a hard copy file and had actively been adding exams as they are administered. Our current Administrator only works remotely for the time being, so this project/task has been postponed until community infection conditions abate. Our student information system (which has already been implemented for faculty this 2021 Academic Year) facilitates the creation of tests by instructor which are saved electronically per course as well as permits uploading of exams created outside of the SIS. Further, our current administrator is developing protocols to collect the hard copies of the exams as part of the administrator's checklist re: maintenance of required records.

Record Retention and Disposal Policy:

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

New Policy on Changes to Entries in Transcripts

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

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

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

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

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

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

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

RECOMMENDED SUGGESTIONS IN 2020 INSPECTION REPORT 1. Bar's Inspection Report

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

PCL'S Progress Report

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

2. Bar's Inspection Report

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

PCL'S Progress Report

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

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

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

3. Bar's Inspection Report

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

PCL'S Progress Report

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

4. Bar's Inspection Report

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

PCL'S Progress Report

In the summer of 2020, we adopted a procedure requiring that grades and must be reviewed and approved by the Dean or other legal educator before being posted. After implementing it in the fall quarter, we have been evaluating and revising it. Our Faculty-Curriculum Committee and

Dean formulated a revision and furnished it to State Bar staff. The revision adds the requirement that student examinations papers, as well as grades, must be reviewed and approved by the Dean or other legal educator before grades are posted. Adoption of a revision is scheduled to be considered at the next meeting of our board of directors.

PCL'S Updated progress report as of 4/1/23:

PCL retains the same policy and no change has been made.

PCL's updated progress report as of 5/1/23:

PCL retains the same policy and no change has been made.

ADDITIONAL UPDATES

XXX Student Awaiting Courses-

Updated Progress Report 5/1/23:

PCL has enclosed the syllabus that was created by a faculty member who specializes in Administrative law. Administrative law is an elective that will be available in the fall 2023.

Update on Disclosures 5/1/23:

PCL has enclosed the updated information in a letter dated May 1, 2023- Response to Natalie Leonard, State Bar Staff.

Outstandings

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.

PCL's Response:

Regarding the conflict that has been identified in the law school's prior responses, this matter is currently under review by our school counsel and we are unable to provide a definitive resolution at this time. We understand the importance of timely and effective communication, and will keep the Bar informed as soon as a timeline for resolution becomes available.

Regarding the creation and implementation of compliant procedures the PCL student handbook outlines a process for applying for accommodations. It states in part:

A student who has a disability, long term or short term, and wants an accommodation for it at PCL in taking exams or doing other academic work, must submit a written request for accommodation to the PCL Administrator. The request must state (a) what the disability is, (b) how it interferes with the student's ability to take exams or do other academic work, (c) what accommodations are requested and (d) how long the student requests the accommodations to be in effect. The request must be accompanied by a statement from a physician or other

qualified professional stating, at a minimum, what the disability is and what accommodations should be given. The student may, in addition, submit other types of support for the request, such as verification of accommodations from undergraduate institutions or on the LSAT, and any other information and documentation the student believes is relevant to the request. Students must not send original documents, but should keep their original documents along with copies of everything they send submit.

Entering students are urged to apply during the first week of August. Continuing students are urged to apply as soon as they are aware of the need for accommodation. Students should use all reasonable efforts to submit a request and documentation no later than six weeks before an exam. While PCL will make its best effort to process a student's request for accommodation promptly, a request can be denied if there is insufficient time to gather and evaluate the appropriate information. PCL may determine to request independent evaluations before granting or extending a request accommodation.

The Administrator must send the request and all documents submitted in support of it to the Dean and the Executive Committee. The Dean will make the initial decision on the request, and must notify the student and the Executive Committee of the decision in writing. The decision must state whether the accommodation is granted, in whole or in part, and if granted, how long the student the accommodation will be in effect. After expiration of the time the accommodation is in effect, or within 60 days before the end of that time, the student may request renewal of the same or a similar accommodation, and must do so according to the same provisions as stated above.

The decision, whether denying the accommodation, or granting it in whole or in part, and the time during which it is in effect, is reviewable by the Executive Committee. The Executive Committee must review it if the student requests review within thirty days after receiving the decision from the Dean. The Executive Committee may review the decision even without a request for review, if the Executive Committee decides to do so thirty days after receiving the decision from the Dean. The Executive Committee must notify the student and the Dean of its

decision on review within sixty days after the student's request for review or the Committee's own decision to review. There is no further right to review in PCL. However, the student may submit to any member of the Community Board a written request that the Community Board review the decision of the Executive Committee, and the Community Board may decide to review or not to review, in whole or in part.

Accommodations may consist of additional time to take exams or do other academic work, and may consist of any other reasonable accommodation. However, the maximum additional time for the exam or work may not exceed twice the time allowed to students who do not have accommodations for the exam or work, unless, on review, the Community Board determines that more than twice the time is warranted and reasonable.

In general, PCL will try to follow the policies of the State Bar of California for the Bar Exam and the First Year Law Students Exam regarding types of disabilities and types of accommodations in exams. As of February 2020, the State Bar's website states the following about those policies (at <http://www.calbar.ca.gov/Admissions/Examinations/Requesting-Testing-Accommodations>):

To address the issues of regarding the availability of the testing accommodation application PCL will create a new tab on the PCL website labeled Testing Accommodations. Here, students will be able to download the most recent accommodations request form (see Attachment B). This form will be available for download to all current, and prospective students. Additionally, the accommodation language referenced above will be added to the body of page.

Further, we are pleased to report that our new website has launched as of April 28, 2023. However, we acknowledge that the page providing information on how to apply for accommodations still needs to be added to the site, along with other necessary updates. Our development team estimates that it will take approximately 6 weeks to complete these updates, and we are committed to completing them as soon as possible. We recognize the significance of providing accurate and comprehensive information on this matter, and appreciate the opportunity to work with the Bar to ensure that all students have access to the necessary accommodations.

Additionally, student complaints that have been raised by one student have been resolved and accommodations have been provided.

PCL has recently received a complaint from a student with initials K.M. The complaint will be responded to within the allotted time for a response and a copy will be made available to the State Bar, if this is the conflict that the State Bar is referring to. If not further clarification is needed by the State Bar. I have attached a copy of our accommodations form in **Attachment B**

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.

PCL's Response:

PCL will provide refunds where required by Rule 4.241. Proof of refunds will be made available to the State Bar thereafter.

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.

PCL's Response:

PCL contracted with an internet technology professional on February 28, 2023 to rebuilt, optimize and upgrade the PCL website and migrate onto a different web host. PCL has also addressed our email issues and upgraded to GSUITE. As of today the website is fully migrated and we are working with the vendor to update all relevant information, documents, etc. Our development team estimates that it will take approximately 6 weeks to complete these updates, and we are committed to completing them as soon as possible.

As of Friday, April 28 the following materials have been updated:

1. Admissions data
2. Tuition, fees and financial aid
3. Conditional scholarships
4. Enrollment data
5. 6. Average class size

We are currently working with and learning the new platform, and so further adjustments will be made to disclose total staff size. In addition, we are going to construct a new tab for information disclosure and a new tab specifically that explains accommodation policies and an accommodation request form. Again, compliance is ongoing, but we are moving in the right direction and out of date information is only due to very recent changes (made in the last two weeks) during which the website was still in the process of migration. The new website has the advantage of being on a much more stable platform.

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.

PCL's Response:

PCL's website was launched on April 28, 2023. PCL recognizes that there are modifications that need to be made to the website and as such will make those modifications within a six week period. Modifications will be scheduled weekly

in the administrator's calendar and will be made on a weekly basis. The school's consultant is also on call and readily available to make those modifications. Now that the website is transferred to Squarespace it will be much easier to make the modifications with ease without having to depend on volunteers with technical expertise.

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 in the April 2023 progress report.

PCL's Response:

PCL will provide refunds where required by Rule 4.241. Proof of refunds will be made available to the State Bar thereafter.

PCL would like clarification in regards to this paragraph provided by the State Bar, " 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,” PCL would like to seek clarification that the student in question is XXXX so that we may process a refund.

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.

PCL’s Response:

Thank you for your inquiry about the progress of our website development. We are pleased to inform you that the law school's new website was launched on April 28, 2023. The development team has estimated that it will take approximately 6 weeks from the launch date to complete all necessary updates to the website. Our priority is to ensure that the website is fully functional and

user-friendly, with a focus on providing a seamless user experience for our students, faculty, and other stakeholders. We understand the importance of timely and effective communication, and are committed to keeping you informed throughout the development process.

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.

PCL's Response:

During the Fall Quarter of 2020, PCL adopted the following policy and procedures on authentication of student work:

POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK

A. **Exams:** All exams must be given using Microsoft Teams. If the exam is given remotely, the monitoring function of Teams must be used. If the exam is given in the classroom, the instructor or a non-student substituting for the instructor must be present during the entire exam to monitor the students. Students who handwrite exam answers must have all their electronic devices turned off. Students who answer the exams by Teams on a computer must have all their

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

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

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

(The Faculty-Curriculum Committee notes that online classes are given via Zoom only. The students attend class via Zoom. 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.)

We are committed to maintaining the integrity of our academic programs and ensuring that all students' work is authentic.

Since the fall of 2022, there have been no exceptions to this policy. Our faculty and staff have worked diligently to ensure that all students are aware of this policy and that all exams are conducted in a monitored setting.

As a result, we do not allow students to take exams unmonitored. This policy has been put in place to protect the integrity of our academic programs and to ensure that all students are held to the same high standards of academic excellence.

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.

PCL's Response:

The law school recognizes the importance of documenting the grade review process and ensuring that the policy and related forms are easily accessible to students. We are pleased to inform you that PCL is dedicating significant resources to updating our website, with a specific focus on creating a webpage that is dedicated to the grade review process. This page will provide students with all necessary information regarding the process, as well as access to the required forms.

Our new website will be launched on April 28, 2023. While the timeframe for completing all necessary updates is estimated to be approximately 6 weeks from the launch date, we are confident that the grade review page will be available to students as soon as possible. We understand the importance of providing clear and comprehensive information to our students, and are committed to documenting the grade review process and ensuring that the policy and related forms are available to them.

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.

PCL's Response:

In response to The Bar's request for information regarding our law school's capacity to maintain compliance, we would like to provide an overview of our current staffing situation and our plans for the future. We acknowledge that we are currently short-staffed, but we have a plan in place to build capacity.

While there is no specific requirement for a certain number of staff, we understand the importance of having sufficient capacity to ensure compliance. Currently, PCL is operating with a small staff due to limited resources, with only the Dean, administrator and student resource coordinator as paid positions.

Although, PCL's legal clinic coordinator position was vacated it was only a 10 hour a week position and in no way impacted PCL's academic programs. Additionally, PCL has still maintained two part time development consultants who mainly work on fundraising. One of those new part time development contractors, Allision Domato, currently works to coordinate the remaining PCL legal clinics on a consultancy basis to meet the grant requirements.

We are pleased to inform The Bar that PCL has recently accepted an offer to sell our building, which we own outright. The proceeds from this sale will be reinvested into our school's operations, including hiring two additional full-time staff members. One of these hires will be a development person, while the other will be a full-time admissions and registration staff member.

We will continue to keep The Bar informed of our progress as we work towards building our capacity to ensure compliance and provide the highest quality education for our students.

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.

PCL's Response:

PCL students are not required to "perform volunteer work 15 hours per week or pay additional fee." Accountability hours are 40 hours per year, which roughly translates to 3.3 hours per month since students are open to volunteer during the summer months. PCL's has a school policy in which students are able to perform accountability (volunteer) hours to help reduce the amount of their school tuition. The policy is voluntary and was implemented in the mid 1970's as an alternative to assist students in making tuition more affordable, as is part of the school's mission. If the student elects to participate in performing accountability hours the student will be offered a reduction of tuition of \$600. The student does not have to participate in voluntary hours and as such each student can monitor their own needs of whether their schedule allows them to participate in accountability hours.

While the social justice mission remains very few students participate in accountability hours, contrary to the spirit of the school in the mid 1970's. To further benefit the student, PCL will be raising its student accountability wage from \$15 per hour to \$20. This wage is higher than the minimum wage standards in the City of Los Angeles. This will reduce the amount of hours that the students will be required to volunteer to meet the \$600 accountability fee.

PCL has revisited the policy in regards to students being a part of the board. PCL understands the State Bar's concerns of the bar and has taken

precautionary measures to protect student privacy in disciplinary issues, student concerns, faculty issues. These issues are confidential and are dealt in closed sessions.

Furthermore, students are not privy to transcripts because the administrator fulfills the transcript requests. The school has experienced fewer volunteer efforts. If student volunteers are utilized they are involved in fundraising committees and helping to organize the legal clinic.

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.

PCL's Response:

To comply with all Rules and Guidelines, including responding to State Bar staff requests and probation requirements in a timely manner, our law school acknowledges the need to engage sufficient staff and administrative support. However, currently, we are short-staffed but have a plan to build capacity, as mentioned earlier.

In addition to the plan to document its process and track status, our law school has a timeline to build more capacity. Recently, PCL accepted an offer to sell the building, as of last week. The escrow period is for 60 days and PCL is currently viewing several buildings in the area.

Once the sale is complete, PCL intends to hire two full-time staff members, including one development person and a full-time admissions and registration staff member. This step will help the law school to 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.

We are committed to ensuring that PCL is well-equipped to meet all of its obligations and responsibilities towards its students and the State Bar.

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.

PCL's Response:

PCL continues to utilize its faculty evaluation process that sets expectations for professors. Grades were released on time in the fall of 2023. The backup plan procedure was in place, where the dean would grade the exams if the professors did not meet the grading deadlines. After much effort, the professors turned in their grades in time and the students were notified of their grades within a 2-3 week period after the final exam. Feedback was provided in class.

The winter grades for Criminal law are on a delay. The professor had an emergency. However, the students have been notified of the delay. We understand the importance of timely grading and are taking steps to ensure that grades are released on schedule going forward.

As we mentioned earlier, PCL is short-staffed but we have a plan to build capacity. PCL has just accepted the offer to sell the building, as of last week. More details will follow on the specifics of the sale of the building. Once the sale goes through, PCL will hire 2 more full-time staff members. One staff member will be a development person, and a full-time admissions and registration staff member and a paid faculty member. This will help us to better support our faculty and students, and ensure timely grading and other administrative tasks are completed on schedule.

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.

PCL's Response:

PCL has updated its policy to require students to attend 80 percent of regularly scheduled class hours for each individual class. This guideline has been communicated to all faculty members, and we are implementing it by taking attendance on Populi. We have attached a screenshot of Professor Skeels' attendance records in Contracts class in **Attachment A** as an example of how we are tracking attendance.

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.

PCL's Response:

The law school continues to utilize the same policy

The Dean formulated a policy to require that students receive adequate and substantial feedback on their exam performance. It was furnished to State Bar

staff. Adoption of a policy on this subject is scheduled to be considered at the next meeting of our board of directors.

Policies to Eliminate Grade Inflation

The Inspection Report, on page 15, referring to the 2014 inspection, states: “To address grade inflation, PCL adjusted its grading scale and urged instructors not to inflate grades. PCL did not, however, adopt other policies to control inflation, such as administrative review of grades prior to their release, or reasonable limits on the extent to which grades may be based on class participation, including attendance. As concluded in 2014, a sound grading program would limit participation points to no more than three [of 100], and the award of points based on attendance is “clearly inappropriate” in light of Guideline 5.3(A)(1) minimum attendance requirement. PCL’s policy allows up to thirty percent of a course grade to be based on participation.”

In the summer of 2020 we did adopt the policies recommended in that paragraph. They are now in the Student Handbook & Catalog and the Faculty Handbook, as follows:

Grading Standards:

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

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

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

Administrative Review of Grades

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

When faculty members have determined what grades they intend to give, the next step would not be to release the grades to the students, but instead to send the grades to reviewers. The reviewers very likely would include the Dean. Others could be members of the Faculty- Curriculum Committee and current or former faculty members, but faculty would not, of course, review their own grades, and students would not participate without consent of the student between reviewed.

The reviewers would study the grades for adherence to PCL grading policies. ... If the grade reviewers find deficiencies, they would communicate with the faculty member about curing the deficiencies and changing the grades.

The Dean or the Faculty- Curriculum Committee or both would participate in those discussions and decisions on changing grades. When the decisions are made, the grades would then be sent to the Administrator for release to students.

Improvements in Eliminating Faculty Turnover

The 2014 Inspection Report observed (p. 9):

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

That turnover situation has been reversed. In the last academic year, 2020-2021, all faculty members except three taught at PCL the previous year, 2019-2020. Faculty turnover in the current 2021-2022 Academic Year had been on the decline previously as well.

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.

PCL's Response:

With the completion of classes for XXX the law school has a program of 270 hours per year for four years to all students.

In order to showcase the comprehensive planning that has been undertaken for the academic year, I have attached in **Attachment C** the administrative law course, which is an essential component of the curriculum for the students.

This document demonstrates our commitment to providing a well-rounded and organized academic program for our students.

PCL's counsel, Ira Sprio, is appointed to communicate with XXX since the school was sued. Mr. Spiro will be in communication with XXX.

16Guideline 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.

PCL's Response:

As of now, we have not had any students who have utilized the course repetition policy.

It is important to note that our course repetition policy is available to all students who may need to repeat a course. We are committed to providing students with the support and resources they need to achieve their academic goals.

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.

PCL's Response:

PCL has accepted an offer for the sale of the building and has agreed to a sixty-day escrow. During the sixty-day escrow PCL will continue to search for a building in which to relocate its fixed-facility instruction. On or about July 1, 2023 PCL will have the proceeds to purchase the legal library so that students are able to conduct legal research. The new PCL building will house the law library. The State Bar will be kept apprised of the new location.

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.

PCL's Response:

To address your concern, we do have some files stored in fire-proof filing cabinets on our school premises. However, we are in the process of transitioning to electronic files to improve efficiency and accessibility. Our aim is to ensure that all files can be located and produced quickly to meet the needs of our students, faculty, and the State Bar.

Regarding enrollment forms, we acknowledge that there has not been a standard process for sending them out in the past. When the current dean arrived, the enrollment process was already in place by the then-administrator, but it was ineffective. Some enrollment forms were sent via Docusign, some

via email, and others via regular mail, resulting in a lack of consistency and clarity.

The current dean is working to address this issue by implementing a standardized process for enrollment forms. We understand that this process needs improvement, and we are committed to making the necessary changes to ensure that it is more efficient, effective, and consistent.

It is important to note that the administrator who was in charge of this process when I was hired did not have higher education experience or experience working in an education setting. We recognize that this may have contributed to some of the inefficiencies in the enrollment process. However, we are confident that with the current dean's leadership and the ongoing efforts of our team, we can improve the process and provide better service to our students, faculty, and the State Bar.

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.

PCL's Response:

We strive to ensure that all materials identified in the guideline are stored in an organized manner and are easily accessible to the law school. We understand the importance of readily producing these materials to State Bar staff upon request, and we are committed to meeting this requirement.

As of fall 2022, all new files and documents are stored in an organized folder online. This system allows for easy access and retrieval of information by authorized personnel within the law school. It also allows for the materials to be produced quickly upon request by the State Bar staff.

However, we acknowledge that there are still older files from before fall 2022 that are currently stored in the fire-proof filing cabinet. We are actively working to digitize these files to ensure that they are also accessible and easily produced when needed.

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.

PCL's Response:

We confirm that the standard syllabus template is being used for all classes at our law school, promoting consistency and clarity in course expectations for our students.

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.

PCL's Response:

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

PCL continues to utilize the above-listed student information system, Populi. As such, Populi has built-in features that are adequate to protect the school's digital records.

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.

PCL's Response:

PCL continues to review its exam process which includes reviewing the exam questions and grading rubric before sending them to the testing software company. These documents are emailed to the dean who then forwards them to the committee members.

The Dean is actively working with the Faculty Curriculum Committee (FCC) and meetings are scheduled monthly to oversee and improve the curriculum continuously.

In addition to the monthly FCC meetings, PCL has integrated curriculum alignment faculty meetings with the 1L faculty this year. The purpose of these meetings was to support first-year exam preparation efforts taking place on Saturdays with the resource coordinator and academic preparation in the classroom.

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.

PCL's Response:

PCL continues to evaluate the process for grade and exam review and approval.

As part of this process, we are utilizing the grade review policy outlined in the student handbook. With the recent transfer of our website to Squarespace, the grade view process for students will be easily accessible under the student section of the website.

As part of our technology plan, we will include a section where students can find readily available information, including the grade review policies, forms for such procedures, and timelines that include automated confirmation of submission. We hope that these improvements will make it easier for our students to access and understand our grade review process.

Attachment A

HomeFilesCalendarBookstore

Peoples College of Law

HomeMy ProfileContactsAcademicsCampus LifeCommunicationsAdvisingAdmissions

CASES AND PROBLEMS ON
CONTRACTS

Seah Edition

John B. Calamelli, Joseph M. Per
John H. Hargrave, Michael B. Bredet
and Caroline N. Brown

Dashboard

Syllabus

Lessons

Files

Assignments

Discussions

Tests

Calendar

Roster

Gradebook

Attendance

Reporting

Chat

Settings

CONT III: Contracts III*

< Attendance

Edit Attendance

	All Present	All Absent	All Tardy	All Excused	
	Present	Absent	Tardy	Excused	Attendance note
	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
	Present	Absent	Tardy	Excused	Attendance note
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	Present	Absent	Tardy	Excused	Attendance note
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Delete Attendance

Save AttendanceCancel

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People's College of Law

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

213 483-0083 Fax: 213 483-2981

E-mail: president@peoplescollegeoflaw.edu

"Over 48 Years of Educating People's Lawyers"

SPECIAL ACCOMODATIONS REQUEST

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

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

Student's Name: _____

Address: _____

Home Telephone: _____ Alternate Telephone: _____

1. Disability Status

a. Are you (check all that apply):

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

b. When did your disability start? _____

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

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

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

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

5. Attach whatever 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: _____



People's College of Law

"Over 48 Years of Educating People's Lawyers"

Administrative Law Syllabus 2023–2024 Peoples College of Law

“...he laughed at him for imagining the dishonesty and covetousness of his countrymen could be restrained by written laws, which were like spiders’ webs, and would catch, it is true, the weak and poor, but easily be broken by the mighty and rich”—[Plutarch](#) *Solon*

“With the stripping off of conventional barriers and props for morality and law, bourgeois society itself falls victim to direct and limitless degeneration, for its innermost law of life is the profoundest of immoralities, namely, the exploitation of man by man.”—[Dr. Rosa Luxemburg](#) *The Russian Revolution*

Grading

Good Academic standing is determined by maintenance of an average grade of C or higher, with no Fs, and no more than one D for first year students. (This means the average of final grades in each class each quarter). The following grading system is used:

Grading Scale

97–100	A+
93–96	A
90–92	A-
87–89	B+
83–86	B
80–82	B-
77–79	C+
73–76	C
70–72	C-
67–69	D+
63–66	D
60–62	D-
0–59	F - failing

Students will receive a numerical grade at the completion of each quarter.

Grade Determination

50% Final Examination
50% Midterm Examination

Plagiarism

All PCL students are expected to know about and avoid plagiarism and other forms of cheating. All exam answers and assignments must be done solely by the student. Plagiarism and other forms of cheating are subject to discipline under PCL’s Disciplinary Code. The Code can be found in the Student Handbook and normally on the PCL website. If an Instructor has a reasonable belief that the work was not done solely by the student, or that the student engaged in plagiarism or other cheating, the Instructor must report the belief to the Dean or the Administrator.

Attendance

State Bar Guideline 5.3(A)(1) “requires regular and punctual attendance of not less than eighty (80) percent of the regularly scheduled class hours in each course.” For a course that extends over more than one quarter, for example, two quarters, this Guideline means that the student must attend 80% of the regularly scheduled class hours in each quarter of the course (The Guideline does not mean that the student must attend 80% of the total combined regularly scheduled class time of the two quarters).

Accommodations

Students needing information about accommodations for disabilities should read pages 38-40 of the *Student Handbook*.

Course Description

This course will study the origins and history, development, current structure and relation to constitutional and statutory principles of both federal and state administrative law. Emphasis will be placed on the presence of administrative agencies in many aspects of modern life and their current indispensability to the modern state

Professionalism: first and foremost, you are expected to follow the policies of the College of Law, including the Student Handbook, just as lawyers are subject to the rules of professional responsibility. But professionalism goes beyond ethical behavior. It includes characteristics such as preparedness, diligence, thoroughness, respectfulness, courtesy, and compassion.

Preparation and Participation: Each of you brings your own unique experiences and perspectives to class. If you come unprepared, fail to make a good faith effort on assignments, arrive late, leave during or before the end of class, or spend class or conference time doing other things (reading for another class, sleeping, surfing the web, eating lunch), you waste your tuition dollars and your colleagues' time. Lack of preparation and participation can result in a professionalism point deduction.

Course Objectives

To better understand the creation and operation of administrative law; how it fits into the legal system as a whole; the limitations, both constitutional and statutory, on its reach; and the various methods, judicial and otherwise, of challenging agency adjudicatory decisions and other actions, we will examine and analyze specific administrative agencies whose actions effect significant numbers of the population.

- **Ungraded Assignments:** Failure to submit an ungraded assignment when due will result in at least a 10-point penalty.
- **Electronics:** With laptops, I expect you to use them professionally. Cell phones must be turned off or silenced during class. Misuse of electronics can result in a professionalism point deduction. I reserve the right to ban in-class use of these devices entirely if they distract other students.
- **Civility:** Conduct that is uncivil, demeaning, threatening, or disrespectful to others stifles discussion and damages the learning environment. Unprofessional conduct toward others can result in a professionalism point deduction or final grade penalty. Conduct that violates College of Law policies may also be reported to school administration.
- **Recording notice:** Classrooms are equipped with cameras and microphones that can record video and audio from the entire room. From time to time, I may make use of this recording ability. I will aim to let you know before I begin recording on a given day, but as long as you conduct yourself professionally, you will always be ready for it.

CLASS SESSION 1

1. The origins and history of Administrative Law
 - A. The concept of administrative regulation in early class society
 - B. Government administrative programs under early industrial capitalism
 1. State regulation of railroads in the U.S.
 2. The Interstate Commerce Act of 1887
 3. Social benefits in Germany
 4. The U.K. example
 5. State workers' compensation programs in the U.S.
 6. Early 20th Century growth of federal commissions in the U.S.
 - C. The New Deal and the expansion of administrative agencies
 1. Lochner v. New York- early U.S. Supreme Court resistance to state administrative regulation
 2. "Liberty of contracts" under the 14th Amendment Due Process
 3. Clause v. regulation for the "public good".
 4. West Coast Hotel v. Parrish overrules Lochner
 5. The validity of federal administrative agencies and federal administrative regulation- NLRB v. Jones & Laughlin Steel
 - D. The growth and development of modern administrative agencies and administrative law

SESSION 2

2. Sources of administrative law
 - A. U.S. Constitution
 - B. State Constitutions
 - C. Statutory Provisions
 1. Federal Administrative Procedure Act
 2. California Administrative Procedure Act
 3. Other statutes of broad application
 4. Statutes that establish particular administrative agencies

- D. Regulatory provisions
- E. Case law
- F. Executive Orders and other executive branch documents
 - 1. Presidential
 - 2. Gubernatorial
 - 3. Administrative Agencies
- A. Statutory and other definitions
- B. How established and relation to U.S. and state governments
- C. Delegation of authority and separation of powers
 - 1. The concept of delegation
 - 2. Examples of delegation
 - 3. Limits on delegation
- D. The concepts of Due Process and Equal Protection as they apply to agencies
 - 1. Substantive Due Process
 - i. Life
 - ii. Liberty
 - iii. Property
 - iv. What is an “entitlement”?
 - 2. Procedural Due Process and fairness
 - i. The requirement of notice
 - ii. What is a “fair hearing”?
 - 3. Equal Protection

SESSION 3

- 4. Agency powers
 - A. Rulemaking
 - 1. Regulatory purpose
 - 2. Exemptions

3. Limitations
4. Emergency rulemaking
5. Judicial review

B. Adjudications

1. Notice
2. Internal agency process
3. The right to a hearing
 4. "Contested cases"
5. Pre-hearing procedures
6. The Administrative Law Judge
7. The hearing itself
 - i. Representation by counsel or qualified non-attorney
 - ii. Rules of procedure
 - iii. Motions
 - iv. Evidence
 - v. Cross-examination
 - vi. Burdens of proof
 - vii. Findings of Fact, Conclusions of Law
8. Decisions
9. Reopening and reconsideration

C. Judicial review of agency decisions

1. Statutory or other authorization
2. Time limitations
3. Scope of review- Chevron deference
 4. Standards of review
 - i. Substantial evidence standard
 - ii. Arbitrary, capricious, abuse of discretion standard
 - iii. Residuum rule

SESSION 4

5. Particular Administrative Agencies

- A. Social Security Administration- History and background
 1. RSDI- Retirement, Survivor's and Disability Insurance

2. Supplemental Security Income
3. Origins in “Impatient Armies of the Poor” and Great Depression
4. Medicare
5. Origins in Civil Rights Movement

B. Social Security Administration- Eligibility

1. Retirement

- i. Quarters of coverage
- ii. Age

2. Survivor's

- i. Quarters of coverage.
- ii. Relationship

3. Disability

- i. Quarters of coverage
- ii. Statutory Definition
- iii. Regulatory Definition
- iv. Sequential evaluation and Substantial Gainful Activity

4. Procedures and Appeals

- a. Application and Notice of decision
 - b. Reconsideration
 - c. Hearing before ALJ
 - d. Appeals Council
 - e. U.S. District Court and further appeals
6. Overpayments and underpayments

SESSION 5

C. California Unemployment Compensation and State Temporary Disability Insurance

1. Unemployment Insurance

- i. History

- ii. Federal/State partnership
- iii. Employer/employee contributions
- iv. Federal Statute
- v. State Statute
- vi. State administrative agency
- vii. State regulations

2. Unemployment Insurance- Earnings Eligibility

- i. “Employee” vs. Independent Contractor
- ii. Base period- Standard and Alternative Look-Back
- iii. Waiting Week
- iv. Minimum earnings

3. Unemployment Insurance- The three As

- i. Able
- ii. Available- EDD ruling on undocumented immigrants
- iii. Actively seeking work

4. Unemployment Insurance- Disqualifications

- i. Voluntary Quit
- ii. Termination for misconduct
- iii. Overpayments due to false statements or refusal to accept suitable employment
- iv. Criminal penalties for fraud

SESSION 6

5. Unemployment Insurance- Notices, Appeals & Hearings

- i. Notice of Determination
 - ii. Request for Hearing- Employee and employer
 - iii. Time for request
 - iv. Administrative Law Judge
 - v. Evidence
- vi. Decision
- vii. UI Appeals Board
- viii. Judicial review

6. Unemployment Insurance- Extended and Disaster benefits

7. Temporary Disability Insurance- Eligibility

- i. Concept and comparison to Unemployment Insurance
 - ii. State funds only
 - iii. Disability definition- under care of MD
 - iv. Minimum earnings in base period
- v. Minimum period out of work
 - vi. Lost wages
- vii. Time limitation on filing claim
 - viii. Undocumented immigrants eligible

8. Temporary Disability Insurance- Disqualifications

- i. Receiving UI or Paid Family Leave
- ii. Incarcerated after conviction
- iii. Refusal to take independent medical exam
- iv. Receiving workers' compensation equal to or greater

SESSION 7

D. California Workers' Compensation- In general

- 1. Brief reprise of history
- 2. State funds only
- 3. Employee v. Independent Contractor
- 4. "No fault", but give up right to sue except third-party claims
- 5. Requirement that employers have insurance
- 6. Scope of employment
- 7. Includes illness due to repetitive motion or on-the-job conditions
- 8. Undocumented immigrants eligible
- 9. Distinction from temporary disability
- 10. Temporary comp vs. Permanent comp
- 11. Medical benefits
- 12. Death benefits
- 13. Rehabilitation benefits
- 14. Employer's right to "independent" medical evaluation

E. California Workers' Compensation- Application process

- 1. Employer requirement to post notice of workers' comp info
- 2. Report injury or ailment within 30 days
- 3. Employer required to provide claim form- one working day
- 4. Employer required to complete their portion of claim form- one working day after employee completes their portion

5. Employer required to submit claim form to Claims Administrator
6. Notice of determination
7. Right to appeal adverse decision
 - i. Petition for Reconsideration
 - ii. Petition for Removal- ALJ Hearing
 - iii. Appeal to full Workers' Comp Appeal Board
 - iv. Judicial Review

SESSION 8

6. Practical application- Observation of administrative hearing and write paper summarizing what took place; the interplay between substantive and procedural issues; relevant factual issues and applying pertinent legal provisions to those facts, predicting potential outcomes of the hearing and possible grounds to pursue further action should that be necessary.

SESSIONS 9 &10

7. Hypothetical factual situation with mock application for benefits with classroom review of applications. Discussion of interplay between information provided in application with agency administrative process. Sections of application will be reviewed in conjunction with relevant regulations, statutory authority and case law.



People's College of Law

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"Over 49 Years of Educating People's Lawyers"

Hector C. Peña, J.D. – President

Edith Pomposo, J.D., LL.M – Dean

May 1, 2023

Response to State Bar Inquiry Regarding 4.241 Disclosures

I am writing in response to the recent inquiry from the State Bar regarding the 4.241 disclosures. I appreciate the opportunity to address any questions or concerns that have been raised, and I hope that the following answers will provide the clarity that is needed. Please find below a detailed response to the questions that were posed.

Spring 2020:

This student is not discussed. PC already advised that it does not have a signed disclosure for this student. Is there any evidence that the law student received the disclosure? If so, please provide evidence of the date it was received and the date that the student made their first payment for that term.

PCL's Response:

To assist you better, could you please provide me with the name of the law student in question? This will enable me to verify the status of their disclosure and payment information more accurately. Additionally, once I have this information, I can provide you with the necessary evidence, such as the date the disclosure was received and the date of the student's first payment for the term, to satisfy the board's request. Please let me know how I can further assist you.

Fall 2022:

The law school's B&P 6061.7(a) disclosure records 21 students as of September 15, 2022, but it appears that a lower number of disclosures was distributed. We are not quite sure of the number. The law school's fall chart below shows 15 students receiving a disclosure, while an additional three disclosures (XXXXX, XXXXXXXXX, XXXXXXXX) have disclosures in the Google Drive folder, suggesting a possible distribution of 18 students. We need your help to confirm the correct enrollment.

1. Please advise the correct number of students enrolled for fall 2022? The B&P Code section 6061.7(a) disclosure lists 21 students, and different numbers are provided on the law school's spreadsheet list and disclosure folder. Some students are on the list, but not in the disclosure folder, and some are in the disclosure folder, but not on the list.

2. Please correct the B&P Code section 6061.7(a) disclosure and Annual Report enrollment spreadsheet if needed. Advise whether correction was needed and, if so, please resubmit and repost the B&P Code section 6061.7(a) disclosure on PCL's website
3. Please adjust the fall 2022 disclosure summary provided on April 5 to include all students who received a disclosure for fall 2022
4. Please provide the fall 2022 disclosures for Robert La Carra, Gerardo Lopez and Jennette Rivera, which do not appear to be in the fall 2022 folder
5. Please add XXXX, XXXX and XXXXXX to the spreadsheet provided on 4/5 listing fall 2022 disclosure status if they were enrolled, as you provided disclosures for those students in the Google Drive
6. XXXXXXXXXXXX XXXXXXXXXXXX's disclosure is in the fall 2022 folder twice

PCL's Response:

1. Regarding the missing disclosures and information. After a thorough investigation, we regret to inform you that we were unable to locate these documents and information in our records. we will continue our efforts to locate these documents and will provide them to you as soon as possible. We understand the importance of having all necessary information for your records and will do our best to ensure that this is resolved quickly.
2. We kindly request a two-week timeframe to review the B&P Code section 6061.7(a) disclosure and Annual Report enrollment spreadsheet. During this period, we will conduct a thorough investigation to determine whether updates are necessary. We appreciate the board's understanding and cooperation as we work towards resolving this matter promptly.
3. (Regarding requests 3&4) The fall 2022 disclosures for Robert La Carra, Gerardo Lopez and Jennette Rivera, which do not appear to be in the fall 2022 folder, we haven't been able to find any more disclosures than what we provided in the folder.
4. XXXXX, XXXX and XXXX are already in the spreadsheet.
5. Lastly, we appreciate you bringing the duplicate document for XXXXX XXXXXX to our attention. We have taken steps to remove the duplicate document and will ensure that all necessary documents are accurate and complete moving forward.

Winter 2023:

It appears that XXXXX XXXX signed on 1/12/23 rather than 12/20/22 as listed on the spreadsheet.

Please provide the disclosures for XXXXX and XXXX, which we did not see in the Winter 2023 folder.

XXXXXX's disclosure is in the winter 2023 folder twice

PCL's Response:

1. Thank you for bringing to my attention the error in the 4.241 disclosures spreadsheet regarding the date of XXXX XXXX's signature. I have now corrected this mistake by adjusting the date in the spreadsheet to 1/12/2023. I apologize for any confusion this may have caused and appreciate your understanding in this matter.

2. Concerning your request to provide the 4.241 disclosures for XXXX and XXXX in the folder. I appreciate your prompt attention to this matter and wanted to let you know that I have now fulfilled this request. I have included the necessary disclosures in the folder and they should now be readily available for your review.
3. Regarding the duplicate appearance of XXX XXXXX's disclosure in the Winter 2023 folder, I would like to inform you that I have resolved this issue by deleting the duplicate disclosure. As a result, there is now only one disclosure for XXX XXXX in the folder.

Edith Pomposo, J.D., LL.M
Dean

Enrollment Record and Rule 4.241 Disclosures for Fall 2022 Term

The following table presents a comprehensive list of all students who have enrolled at any point, along with important details related to their enrollment. Specifically, it includes information on when each student received a Rule 4.241 disclosure, when they signed the disclosure, when they made their first payment, and when a copy of the signed disclosure was returned to them. This data has been compiled in the table below for easy reference and analysis.

Student Names	Date disclosure was received By the Students	Date disclosure was signed By the students	Date First Payment was made	Date the copy of signed disclosure was returned to them
XXX	9/5/2022	11/1/2022	10/5/2022	11/1/2022
XXX	9/5/2022	11/15/2022	11/20/2022	11/15/2022
XXX	9/5/2022	12/8/2022	No payment-Academically Dismissed	12/8/2022
XXX	9/5/2022	10/4/2022	9/15/2022	2/29/2022
XXX	9/5/2022	11/1/2022	9/30/2022	11/1/2022
XXX	9/5/2022	11/4/2022	11/17/2022	11/4/2022
XXX	9/5/2022	9/7/2022	9/6/2022	9/12/2022
XXX	9/5/2022	9/9/2022	No payment	9/16/2022
XXX	9/5/2022	9/9/2022	9/13/2022	9/16/2022
XXX	9/5/2022	12/1/2022	1/5/2023	11/30/2022
XXX	9/5/2022	Voluntarily Withdrew	No Payment made	n/a
XXX	9/5/2022	11/1/2022	Work Sponsorship-end of year	11/1/2022
XXX	9/5/2022	1/7/2023	12/26/2022	1/7/2023
XXX	9/5/2022	11/1/2022	9/20/2022	11/1/2022
XXX	9/5/2022		12/20/2022	

XXX	9/5/2022	Academically Disqualified	Not Paid	
XXX	9/5/2022	Voluntarily Withdrew	9/8/2022	
XXX	9/5/2022	12/31/2022	9/27/2022	11/30/2022
XXX	9/5/2022	Disqualified By the Bar	9/16/2022	
XXX	9/5/2022	11/12/2022	9/16/2022	11/12/2022
XXX	9/5/2022	9/5/2022	9/20/2022	9/5/2022

In addition to the information presented in the table above, it should be noted that all of the students received a Rule 4.241 disclosure prior to making their first payment for this term.

As a further point of clarification, copies of these signed disclosures will be included as attachments to this document.

This information is critical for ensuring that all students are aware of their rights and responsibilities related to their enrollment, and that they have agreed to abide by the terms outlined in the disclosure.

Enrollment Record and Rule 4.241 Disclosures for Winter 2022/2023 Term

The following table presents a comprehensive list of all students who have enrolled at any point, along with important details related to their enrollment.

Specifically, it includes information on when each student received a Rule 4.241 disclosure, when they signed the disclosure, when they made their first payment, and when a copy of the signed disclosure was returned to them. This data has been compiled in the table below for easy reference and analysis.

Student Names	Date disclosure was received	Date disclosure was signed	Date Payment was made	Date the copy of signed disclosure was returned to them
XXX	11/30/2022	12/1/2022	12/14/22	12/1/2022
XXX	11/30/2022	1/10/2023	11/28/22	1/10/2023
XXX	11/30/2022	12/3/2022	12/3/22	12/3/2022
XXX	11/30/2022	12/1/2022	1/4/23	12/1/2022
XXX	11/30/2022	3/2/2023	2/17/2023	3/2/2023
XXX	11/30/2022	3/4/2023	11/30/22	3/2/2023
XXX	11/30/2022	12/14/202	Acad. Disq	12/14/202
XXX*	11/30/2022	12/2/2022	Acad. Disq	12/2/2022
XXX	11/30/2022	12/1/2022	No payment	12/1/2022
XXX	11/30/2022	12/18/2022	No payment	12/18/2022
XXX	11/30/2022	1/12/2023	12/20/22	12/17/2022
XXX	11/30/2022	1/7/2023	2/5/23	1/7/2023
XXX	11/30/2022	1/9/2023	11/30/23	1/9/2023
XXX	11/30/2022	12/31/2022	12/29/22	12/31/2022
XXX	11/30/2022	12/17/2022	12/12/22	12/17/2022
XXX	11/30/2022	1/12/2023	1/6/23	1/12/2023

* No payment made by either XXX nor XXX for the Winter Quarter.

In addition to the information presented in the table above, it should be noted that all of the students listed received a Rule 4.241 disclosure prior to making their first payment for this term.

As a further point of clarification, copies of these signed disclosures will be included as attachments to this document.

This information is critical for ensuring that all students are aware of their rights and responsibilities related to their enrollment, and that they have agreed to abide by the terms outlined in the disclosure.

