



People's College of Law

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"Over 48 Years of Educating People's Lawyers"

Hector C. Peña, J.D. – President

Edith Pomposo, J.D., LL.M – Dean

June 1, 2023

Dear Natalie,

Attached is our monthly progress report, which includes important updates and attachments addressing the requests and outstanding matters raised by the Bar Association. We appreciate your guidance and feedback, and we have taken significant steps to ensure compliance and improve our processes based on your valuable input.

Please review the provided updates and attachments for a comprehensive overview of our progress. Should you require further information or have any questions, please don't hesitate to reach out to us. We value our partnership with the Bar Association and remain committed to meeting the highest standards of legal education.

Thank you for your attention, and we look forward to your review of our progress report.

Sincerely,

Edith Pomposo, J.D., LL.M

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 June 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.

PCL'S Updated progress report as of 6/1/23:

We have made significant progress in ensuring the school's adherence to regulations and privacy policies.

First, we are pleased to announce that our new website was successfully launched on April 28, 2023. This development enables PCL staff members, faculty, and board members to access and make necessary changes to the website.

To facilitate website management, we have utilized Squarespace, a software-as-a-service (SaaS) platform for website building and hosting. This intuitive platform offers pre-built templates and drag-and-drop elements, making website creation and modification accessible to users without prior development experience.

We are particularly excited to introduce the student services page on our website. This page serves as a valuable resource for students seeking information on how to apply for disability accommodations. It provides details on timelines, required forms, and data protection policies, ensuring transparency throughout the application process.

In order to streamline the accommodation application process, we have implemented a secure electronic form on the website. This form allows students to submit their accommodation requests conveniently. Upon submission, students will receive an automated email containing the expected timeline for receiving a determination on their application.

We believe these measures address your concerns regarding documentation, data security, and privacy. PCL remains committed to continually improving our procedures and ensuring compliance with applicable regulations.

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.

PCL'S Updated progress report as of 6/1/23:

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

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.

PCL'S Updated progress report as of 6/1/23:

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.

PCL's updated progress report as of 6/1/23

PCL submitted the report on April 5 and is now working on the follow-up questions requested by the State Bar, in May 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.

PCL'S Updated progress report as of 6/1/23:

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.

PCL'S Updated progress report as of 6/1/23:

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.

PCI's Updated Progress Report as of 6/1/23:

We would like to provide an updated clarification regarding the examination monitoring and safeguarding tools we employ. We utilize Testinvite, an advanced testing platform, to enhance exam integrity and monitor student performance.

Testinvite offers robust anti-cheating mechanisms that effectively safeguard the integrity of our exams. Through its comprehensive features, such as randomized question orders, time restrictions, and question banks, Testinvite helps ensure a fair and secure testing environment. It detects and prevents cheating attempts through various means, including monitoring browser activities, disabling external applications, and preventing copying and pasting during the test.

The platform aids exam monitoring by providing real-time proctoring capabilities, allowing authorized staff to monitor students remotely during their exams. This feature helps ensure adherence to academic honesty standards while maintaining the convenience and flexibility of online testing. Additionally, Testinvite provides comprehensive reporting and analysis tools, allowing us to review test results, detect anomalies, and identify potential irregularities for further investigation.

We appreciate the advanced features and safeguards offered by Testinvite, which have significantly bolstered our ability to maintain exam integrity and ensure fair evaluations. Moving forward, we will continue to leverage this powerful tool to provide a secure and reliable testing environment for our students.

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.

PCL'S Updated progress report as of 6/1/23:

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.

We have now successfully created a webpage that specifically delineates the grade review procedure, policy, and timelines. Forms are now available on the website on its respective page and the information made available to the students.

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.

PCL'S Updated progress report as of 6/1/23:

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.

PCL’s Updated progress report as of 6/1/23:

We have devised a timeline to hire additional full-time staff members, with a targeted completion date of August 15th. The timeline is as follows:

1. June 1-15: Job Posting and Recruitment
 - Develop job descriptions for the development and admissions/registration positions.
 - Advertise the job openings on relevant platforms and networks.
 - Conduct initial screening of applications and shortlist candidates.
2. June 16-30: Interviews and Selection
 - Conduct interviews with shortlisted candidates for both positions.
 - Evaluate candidates based on their qualifications, experience, and alignment with our school's mission and values.
 - Select the most suitable candidates for each role.
3. July 1-31: Onboarding and Training
 - Extend formal job offers to the selected candidates.
 - Coordinate the onboarding process, including completing necessary paperwork and background checks.
 - Develop an orientation and training program for the new hires.
 - Introduce the new staff members to relevant team members and familiarize them with their respective roles and responsibilities.
4. August 1-15: Finalization and Start Date
 - Finalize employment contracts and other administrative procedures.
 - Ensure the new hires are fully integrated into their respective departments.
 - Provide any additional training and resources required for their success.
 - August 15th will serve as the start date for the two full-time staff members, officially marking the completion of the hiring process.

By adhering to this timeline, we are confident in our ability to attract and hire qualified professionals who will contribute significantly to our school's development and admissions/registration processes. We will ensure a thorough and efficient hiring process to expedite the expansion of our staff and optimize the support provided to our students and stakeholders.

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.

PCL's Updated Progress Report as of 6/1/23:

The evaluation process for our instructors encompasses three components, each serving a specific purpose. Firstly, we gather feedback from the students, as attached to this report in **Attachment A,B, and C** to ensure their voices are heard and their experiences are taken into account. Secondly, instructors provide their own self-evaluations, which fosters self-reflection and encourages continuous improvement. Lastly, an evaluation from the FCC (Faculty Compliance Committee) is included, along with my comments, underscoring the importance of accountability in implementing school standards and submitting grades punctually.

These evaluations are indicative of our law school's commitment to meaningful and timely reviews, as well as the establishment of clear faculty performance expectations. Through this process, we hold our instructors accountable for meeting grading calibration standards, providing valuable feedback on exams, and submitting grades within designated timelines. By emphasizing faculty accountability and aligning with school standards, we aim to cultivate an environment that nurtures academic excellence and student success.

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.

PCL’s Updated Progress Report as of 6/1/23:

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.

PCL's Updated progress report as of 6/1/23:

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.

PCL's Updated Progress Report as of 6/1/23:

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.

PCL's Updated Progress report as of 6/1/23:

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.

PCL's Updated Progress Report as of 6/1/23:

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.

PCL's updated progress report as of 6/1/23:

In order to address the Bar's request and ensure compliance with Guideline 6.2, we have developed a comprehensive timeline for returning to compliance regarding our law school's library. We have also included the incorporation of both hard copy and electronic research in our curriculum design. The timeline is as follows:

1. July 1-15: Library Needs Assessment and Planning

- Conduct a thorough needs assessment to determine the required resources, including hard copy materials, for our law school's library.
- Develop a plan for acquiring and maintaining the necessary hard copy library materials, considering budgetary constraints and future growth.

2. July 16-31: Library Material Acquisition and Organization

- Initiate the process of purchasing the identified hard copy library materials based on the assessed needs.
- Ensure that the acquired materials align with the curriculum design and cover relevant legal research topics.
- Organize and catalog the acquired materials within the library, creating a comprehensive and accessible resource for students and faculty.

3. August 1-15: Integration into Curriculum Design

- Collaborate with the curriculum committee and faculty members to integrate the utilization of both hard copy and electronic research resources into the curriculum.
- Design specific modules and assignments that promote the use of hard copy library materials for legal research.
- Ensure that students receive appropriate training and guidance on utilizing both hard copy and electronic resources effectively.

4. August 16-31: Finalization and Proof of Compliance

- Conduct a final review of the library setup, including hard copy materials and curriculum design, to ensure alignment with the Bar's requirements.
- Gather proof of library purchase, including receipts and documentation of the acquired materials.
- Prepare and submit the required timeline, along with the proof of library purchase and curriculum design, to the CBE to demonstrate our commitment to compliance.

By following this timeline, we aim to establish a well-rounded law library that includes both hard copy and electronic research resources. This approach will not only bring us into compliance with Guideline 6.2 but also enhance the educational experience for our students, providing them with comprehensive resources and training in legal research. Our goal is to have all these initiatives finalized early, ensuring a smooth transition and adherence to compliance standards.

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.

PCL's updated progress report as of 6/1/23:

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.

PCL's updated progress report as of 6/1/23:

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

ADDITIONAL UPDATE Courses-

XXX Student Awaiting Courses Updated Progress Report 6/1/23:

We are pleased to inform you that as of May, the final course, the Internship Course, is also ready for submission and is included with this report. With this, we are excited to announce that the program of instruction for XXX has been completed in its entirety.

Disclosures

Updated Progress Report 6/1/23:

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

Faculty Evaluation - Spring

Start of Block: Peoples College of Law

A. Subject:

B Instructor's Name:

End of Block: Peoples College of Law

Start of Block: Peoples College of Law

Q1 Assess the instructor's attendance?

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q2 Assess the instructor's attitude towards teaching.

- ☐ Enthusiastic (1)
- ☐ Satisfactory (2)
- ☐ Indifferent (3)
- ☐ Negative (4)

Q3 Assess the instructor's education, knowledge and experience in the subject matter.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

3a Assess the instructor's competence in the classroom or in other instructional activities.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q4 Assess the instructor's teaching skills given the technology and methodology used in instruction, and the quality of participatory experiences employed.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q5 Assess the instructor's organization of the course as demonstrated by outlines or syllabi.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

5a Assess the quality, nature, and type of examinations, and other assignments and the quality of grading.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q6 Describe the instructor's ability to communicate ideas and concepts clearly.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q7 Describe the instructor's understanding of the general principles of their discipline.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

7a Assess the relation between the field of instruction and the area of specialization, if any, of the instructor in private practice.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

7b Assess the years of experience, both in teaching and in practice.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q8 Assess the instructor's ability to encourage critical thinking by asking interesting, pressing, and challenging questions.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q9 Assess the instructor's ability to implement active learning strategies in the classroom.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q10 Assess the instructor's ability to persistently monitor student progress toward learning goals in a variety of creative ways.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q11 Assess the instructor's ability to clearly communicate class and assignment expectations.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q12 Assess the instructor's ability to provide students with constructive criticism on written assignments and exams.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q13 Assess the ability of the instructor to utilize a range of tools to assess student learning.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q14 Assess the instructor's success in creating an environment conducive to learning.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q15 Assess the ability of the professor to stimulate class interest in the topic at hand.

- ☐ Excellent (1)
 - ☐ Good (2)
 - ☐ Average (3)
 - ☐ Poor (4)
-

Q16 What did you like about this class?

Q19 What did you dislike about the class?

Q20 Is there anything you would do to improve the course?

End of Block: Peoples College of Law



Faculty Self-Evaluation Form

Instructions for Administrative Faculty Self-Evaluation

Administrative faculty at PCL are evaluated once a year (in the month of June) on their job performance during the prior academic year (i.e., September 1 through May 31). The evaluation process starts with the administrative faculty member completing a self-evaluation using this form or alternate method determined by the supervisor. The self-evaluation typically addresses the employee's fulfillment of job responsibilities outlined in the faculty job description and of specific work goals set at the time of the prior annual evaluation. The deadline for the submission of the self-evaluation is set by the supervisor.

Questions regarding this form or the administrative faculty annual evaluation process should be directed to the administrator or to the dean via email: dean@peoplescollegeoflaw.edu.

Employee Information

First Name: _____

Last Name: _____

Current Title: _____

Department/Unit: _____

Supervisor Name: _____

Evaluation Period Start Date: _____

Evaluation Period End Date: _____

Essential Functions from Your faculty job description

Discuss your performance of the essential functions of your position.

Describe any special projects or notable accomplishments that contributed to the success at PCL.

Goals and Objectives

Describe your progress toward fulfilling the goals and objectives established during your last evaluation.

List your goals and objectives for the upcoming year.

Professional Development Plan

What professional development or training opportunities did you participate in during the current evaluation period? In what ways were they helpful to your job performance?

What professional development or training would you like undertake to improve your job performance and meet your goals for the next evaluation period?

COVID Impact Statement

As part of the 2021 annual evaluation process, we encourage you to provide a brief statement on COVID-19 impacts. For example, how has COVID-19 impacted your productivity and what challenges did you face? This question is optional.

Faculty Evaluation Form

Attachment C

*This form is for annual evaluations of all faculty, regardless of type of appointment.
All faculty are required to be evaluated annually per State Bar rule, Guideline 4.7.*

Department: _____ Date of Review: _____

Faculty member: _____ Effective hiring date: _____

Academic rank: _____ Since: _____ Highest degree: _____

Number of years of teaching experience: _____

Purpose of review:

____ Probationary/tenure track
____ Tenure
____ Promotion
____ Annual

Period covered by the review (include the year)

____ Academic Year ____
____ Fall only ____
____ Spring only ____
____ Other (specify) _____

1. Workload Expectations:

% Scheduled Teaching	% Scholarly/Research Activity	% Service	% Administration	% Other Activities
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2. Evaluation: Directions: Use the following five categories to describe the faculty member's performance relative to the expectations and goals (i.e., Position job Description). A thorough narrative commentary must be provided to justify each selection. Mere selection of a category does not constitute evaluation and will not be accepted.

Exceptional Performance: Designation used in extremely rare cases where the faculty member merits special recognition for unequivocally superior and exceptional performance (i.e., excellent student reviews, community service to the school). Supporting evidence must be presented in the narrative.

Exceeds Expectations: Designation used to indicate that certain aspects of the faculty member's performance substantially and frequently exceed that described in their position description. Supporting evidence must be presented in the narrative.

Meets Expectations: Designation used when the faculty member's performance is of high quality, fulfills expectations, and periodically may exceed them as described in his/her position description.

Requires Development: Designation used to indicate that certain aspects of the faculty member's performance does not consistently meet expectations and require improvement. The narrative must address specific areas that need improvement and include goals to get there.

Unsatisfactory: Designation used in cases where work is below the basic requirements of the job description and improvement is required, are not meeting professional obligations, or are simply incompetent. **Strong** supporting evidence must be presented in the narrative.

SCHEDULED TEACHING

<input type="checkbox"/> Exceptional Performance	<input type="checkbox"/> Exceeds Expectations	<input type="checkbox"/> Meets Expectations	<input type="checkbox"/> Requires Development	<input type="checkbox"/> Unsatisfactory
--	---	---	---	---

Narrative:

SCHOLARY/RESEARCH ACTIVITY

<input type="checkbox"/> Exceptional Performance	<input type="checkbox"/> Exceeds Expectations	<input type="checkbox"/> Meets Expectations	<input type="checkbox"/> Requires Development	<input type="checkbox"/> Unsatisfactory
--	---	---	---	---

Narrative:

SERVICE TO THE SCHOOL COMMUNITY

<input type="checkbox"/> Exceptional Performance	<input type="checkbox"/> Exceeds Expectations	<input type="checkbox"/> Meets Expectations	<input type="checkbox"/> Requires Development	<input type="checkbox"/> Unsatisfactory
--	---	---	---	---

Narrative:

CLASSROOM ADMINISTRATION (GRADES, ATTENDANCE, SYLLABUS TURNED IN ON TIME)

<input type="checkbox"/> Exceptional Performance	<input type="checkbox"/> Exceeds Expectations	<input type="checkbox"/> Meets Expectations	<input type="checkbox"/> Requires Development	<input type="checkbox"/> Unsatisfactory
--	---	---	---	---

Narrative:

OTHER ACTIVITIES

<input type="checkbox"/> Exceptional Performance	<input type="checkbox"/> Exceeds Expectations	<input type="checkbox"/> Meets Expectations	<input type="checkbox"/> Requires Development	<input type="checkbox"/> Unsatisfactory
--	---	---	---	---

Narrative:

3. FCC Evaluations Committee (List all committee members and include committee chair signature)

Committee Chair _____
Signature Date

4. Department Chair's Evaluative Narrative (Required for all faculty. Fill in or attach separate page):

Was this evaluation made in accordance with a set of written departmental evaluation procedures on file in the College office and communicated to faculty member? ☐ Yes ☐ No

Department Chair _____ Signature
Date

5. Faculty Member:

I have been given the opportunity to review the contents of my file. ☐ Yes ☐ No

I have seen this evaluation and discussed it with the appropriate departmental representative.
☐ Yes ☐ No

Check one as appropriate.

☐ I agree with the evaluation.

☐ I disagree with all or part of the evaluation.

☐ I disagree with all or part of the evaluation and intend to give my department chair a written statement within five working days.

Faculty Member

Signature Date

6. Dean's Comments:

Dean

Signature Date

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

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 resolved the conflict that appears to be present in the law school's prior responses.

PCL's Response 5/1/23:

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 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 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 requested 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's 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 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. 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 the 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.

PCL's Response 6/1/23:

PCL has finished the update to the website regarding the accommodations page. On the website, the button can be found under current students. The current students tab has a button entitled accommodations.

The accommodations page clearly states the school policy, provides a timeline for the accommodations process and provides a form in which students can easily download and submit to the school.

The administrator will then ensure all forms are complete, including documentation from the healthcare provider, if applicable before they are sent to the dean for review.

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 5/1/23:

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

PCL's Response 6/1/23:

We have developed a timeline for providing the required refunds to the specific students. Please find the timeline below, taking into account the approval process by the PCL Board of Directors:

1. June 18: Board Meeting - Refunds Approval
 - Include the item regarding refunds on the agenda for the PCL Board of Directors meeting.
 - Present the refund proposal to the board for their review and approval.
 - Seek necessary discussions and deliberations to obtain the board's consent on issuing the refunds.
2. June 19 - July 31: Refund Calculation and Processing
 - Once the refunds have been approved by the Board, initiate the process of calculating the exact refund amounts for each affected student, considering any applicable criteria as per Rule 4.241.
 - Prepare detailed documentation and evidence to support the refund calculations and compliance with the rule.
 - Notify the identified students about the approved refunds and provide them with the necessary information regarding the refund process and timelines.
3. August 1 - 15: Refund Issuance
 - Finalize the refund amounts for each student based on the approved calculations.
 - Prepare and issue the refund payments, ensuring they are disbursed to the respective students in a timely manner.
 - Maintain accurate records of the refund transactions and ensure proper documentation for auditing and compliance purposes.

By following this timeline, we aim to provide the required refunds to the specific students in accordance with Rule 4.241. It is essential to obtain the approval of the PCL Board of Directors during their June 18th meeting to proceed with the refund process. Once approved, we will promptly calculate, process, and issue the refunds to the affected students. Our goal is to finalize and complete the refund issuance by mid-August, ensuring compliance with the Bar's requirements and demonstrating our commitment to rectifying any discrepancies promptly.

3. Guideline 2.3(B): To bring itself into full compliance, the school should remove from the Catalog any electives not offered in the past three years or not expected to be offered in the next two years, and inform students in the Catalog that electives are not taught each year, but are offered from time to time based on student interest and instructor availability. Subsequent to the

inspection, the school adopted a compliant policy and updated the Catalog in this area.

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

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

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

Outstanding Action: In its April 2023 progress report, the law school must demonstrate that it is in compliance with the data and posting requirements of California Business and Professions Code section 6061.7(a), and document a specific timeline for its updated process, since it advises that the current process is insufficient to ensure sustained compliance.

PCL's Response 5/1/23:

PCL contracted with an internet technology professional on February 28, 2023 to rebuild, optimize and upgrade the PCL website and migrate onto a different web host. PCL has also addressed our email issues and upgraded to G SUITE. 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. 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.

PCL's Response 6/1/23:

Disclosures on the website and the handbook are up to date. They have been updated with the most current information.

We no longer rely on volunteers for website updates. Administration now manages and maintains our website using Squarespace.

B. Compliance with Rule 4.241

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

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

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

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

The law school did not respond by January 13.

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

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

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

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

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

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

Based on the data PCL provided it appears that:

- At least 6 students did not sign disclosures for the Fall 2022 term
- At least 6 students did not sign disclosures for the Winter 2023 term

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

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

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

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

Staff provided courtesy reminders on February 21 and March 16.

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

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

PCL's Response 5/1/23:

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 XXX so that we may process a refund.

PCL's Response 6/1/23:

We have developed a timeline for providing the required refunds to the specific students. Please find the timeline below, taking into account the approval process by the PCL Board of Directors:

1. June 18: Board Meeting - Refunds Approval

- Include the item regarding refunds on the agenda for the PCL Board of Directors meeting.
- Present the refund proposal to the board for their review and approval.
- Seek necessary discussions and deliberations to obtain the board's consent on issuing the refunds.

2. June 19 - July 31: Refund Calculation and Processing

- Once the refunds have been approved by the Board, initiate the process of calculating the exact refund amounts for each affected student, considering any applicable criteria as per Rule 4.241.
- Prepare detailed documentation and evidence to support the refund calculations and compliance with the rule.
- Notify the identified students about the approved refunds and provide them with the necessary information regarding the refund process and timelines.

3. August 1 - 15: Refund Issuance

- Finalize the refund amounts for each student based on the approved calculations.
- Prepare and issue the refund payments, ensuring they are disbursed to the respective students in a timely manner.
- Maintain accurate records of the refund transactions and ensure proper documentation for auditing and compliance purposes.

By following this timeline, we aim to provide the required refunds to the specific students in accordance with Rule 4.241. It is essential to obtain the approval of the PCL Board of Directors during their June 18th meeting to proceed with the refund process. Once approved, we will promptly calculate, process, and issue the refunds to the affected students. Our goal is to finalize and complete the refund issuance by mid-August, ensuring compliance with the Bar's requirements and demonstrating our commitment to rectifying any discrepancies promptly.

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 5/1/23:

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.

PCL's Response 6/1/23:

We have made significant improvements to our school's website by addressing outdated pages and establishing dedicated sections to post essential information about the institution and its policies.

We have updated the dates for open enrollment, updated the bar passage data and deleted pictures of the law library.

We recognize the importance of maintaining an up-to-date and informative online presence. As part of our ongoing commitment to enhancing user experience, we are actively working on frequent updates to ensure that our website remains current, informative, and user-friendly.

6. Guideline 2.9(C): To bring itself into full compliance, the school should adopt, publish, and implement a policy, including oversight provisions, to

ensure that students are provided with written statements of the components of course grades. Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.

7. Guideline 2.9(D): To bring itself into full compliance, PCL should adopt, publish, and implement a policy on authentication of student work, and discontinue its current practice of allowing students to take in-class exams using devices that are not protected by exam- security software.

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

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

PCL's Response 5/1/23:

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.

PCL's Response 6/1/23:

We would like to provide an updated clarification regarding the examination monitoring and safeguarding tools we employ.

We noticed that there was an editing error in our previous report for 5/1/23, incorrectly stating the use of Microsoft for this purpose. We apologize for any confusion caused.

The accurate information is that we utilize Testinvice, an advanced testing platform, to enhance exam integrity and monitor student performance.

Testinvice offers robust anti-cheating mechanisms that effectively safeguard the integrity of our exams. Through its comprehensive features, such as randomized question orders, time restrictions, and question banks, Testinvice helps ensure a fair and secure testing environment. It detects and prevents cheating attempts through various means, including monitoring browser activities, disabling external applications, and preventing copying and pasting during the test.

The platform aids exam monitoring by providing real-time proctoring capabilities, allowing authorized staff to monitor students remotely during their exams. This feature helps ensure adherence to academic honesty standards while maintaining the convenience and flexibility of online testing. Additionally, Testinvice provides comprehensive reporting and analysis tools, allowing us to review test results, detect anomalies, and identify potential irregularities for further investigation.

We appreciate the advanced features and safeguards offered by Testinvice, which have significantly bolstered our ability to maintain exam integrity and ensure fair evaluations. Moving forward, we will continue to leverage this powerful tool to provide a secure and reliable testing environment for our students.

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 5/1/23:

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.

PCL's Response 6/1/23:

PCL has updated our website and created a webpage that is dedicated to the grade review process (Attached in **Attachment D**). This page provides students with all necessary information regarding the process, as well as access to the required forms.

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.

9. Guidelines 2.11, 7.1, and 9.1: To bring itself into full compliance, the school should adopt policies and procedures that are adequate to protect the school's digital records. Subsequent to the inspection, the school purchased Populi, a commercially available package designed for schools containing the safeguards identified in the law school's inspection report.

10. Guideline 3.1: To bring itself into full compliance, PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the CBE's standards, including written job descriptions for the dean and registrar, and adequate oversight provisions. Subsequent to the inspection, the school increased the paid hours of the administrator, and secured significant

volunteer assistance from the dean, the Board, and alumni, resulting in significant progress seen since the inspection. The school also created compliant job descriptions for both the dean and the registrar.

A. Impact of Reliance on Volunteer Work

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

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

PCL's Response 5/1/23:

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.

As explained in our previous report, PCL 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.

PCL's Response 6/1/23:

We have devised a timeline to hire additional full-time staff members, with a targeted completion date of August 15th. The timeline is as follows:

1. June 1-15: Job Posting and Recruitment

- Develop job descriptions for the development and admissions/registration positions.
- Advertise the job openings on relevant platforms and networks.
- Conduct initial screening of applications and shortlist candidates.

2. June 16-30: Interviews and Selection

- Conduct interviews with shortlisted candidates for both positions.
- Evaluate candidates based on their qualifications, experience, and alignment with our school's mission and values.
- Select the most suitable candidates for each role.

3. July 1-31: Onboarding and Training

- Extend formal job offers to the selected candidates.
- Coordinate the onboarding process, including completing necessary paperwork and background checks.
- Develop an orientation and training program for the new hires.
- Introduce the new staff members to relevant team members and familiarize them with their respective roles and responsibilities.

4. August 1-15: Finalization and Start Date

- Finalize employment contracts and other administrative procedures.
- Ensure the new hires are fully integrated into their respective departments.
- Provide any additional training and resources required for their success.

- August 15th will serve as the start date for the two full-time staff members, officially marking the completion of the hiring process.

By adhering to this timeline, we are confident in our ability to attract and hire qualified professionals who will contribute significantly to our school's development and admissions/registration processes. We will ensure a thorough and efficient hiring process to expedite the expansion of our staff and optimize the support provided to 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 5/1/23:

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.

PCL's Response 6/1/23:

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

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 5/1/23:

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.

PCL's Response 6/1/23:

We have devised a timeline to hire additional full-time staff members, with a targeted completion date of August 15th. The timeline is as follows:

1. June 1-15: Job Posting and Recruitment

- Develop job descriptions for the development and admissions/registration positions.
- Advertise the job openings on relevant platforms and networks.
- Conduct initial screening of applications and shortlist candidates.

2. June 16-30: Interviews and Selection

- Conduct interviews with shortlisted candidates for both positions.
- Evaluate candidates based on their qualifications, experience, and alignment with our school's mission and values.
- Select the most suitable candidates for each role.

3. July 1-31: Onboarding and Training

- Extend formal job offers to the selected candidates.
- Coordinate the onboarding process, including completing necessary paperwork and background checks.
- Develop an orientation and training program for the new hires.
- Introduce the new staff members to relevant team members and familiarize them with their respective roles and responsibilities.

4. August 1-15: Finalization and Start Date

- Finalize employment contracts and other administrative procedures.
- Ensure the new hires are fully integrated into their respective departments.
- Provide any additional training and resources required for their success.
- August 15th will serve as the start date for the two full-time staff members, officially marking the completion of the hiring process.

By adhering to this timeline, we are confident in our ability to attract and hire qualified professionals who will contribute significantly to our school's development and admissions/registration processes. We will ensure a thorough and efficient hiring process to expedite the expansion of our staff and optimize the support provided to our students.

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 5/1/23:

PCL continues to utilize its faculty evaluation process that sets expectations for professors. Grades were released on time in the fall of 2022.

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.

PCL's Response 6/1/23:

The evaluation process for our instructors encompasses three components, each serving a specific purpose.

Firstly, we gather feedback from the students, as attached to this report **(Attachment A)**, to ensure their voices are heard and their experiences are taken into account.

Secondly, instructors provide their own self-evaluations, which fosters self-reflection and encourages continuous improvement **(Attachment B)**.

Lastly, we receive an evaluation from the FCC, which includes my comments and is likewise attached **(Attachment C)**. This underscores the importance of accountability in implementing school standards and submitting grades punctually.

These evaluations are indicative of our law school's commitment to meaningful and timely reviews, as well as the establishment of clear faculty performance expectations.

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 5/1/23:

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.

PCL's Response 6/1/23:

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

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

14. Guidelines 5.17, 5.18, and 5.25: To bring itself into full compliance, the school should review, revise, and republish its exam and grading policies and procedures, taking action as necessary to improve the quality of exams, curb grade inflation, and ensure that students receive adequate feedback on their exam performance.

This policy appears to have changed as staff has changed. Recently, the law school reported that it documented a policy and held faculty training 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 5/1/23:

The law school continues to utilize the same policy.

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 reviews.

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 Response 6/1/23:

The policy remains the same.

15. Guidelines 5.18-5.20: To bring itself into full compliance, the school should adopt, publish, and implement policies for academic advancement that adhere to the school's academic standards and comply with the guidelines, and eliminate policies that do not adhere to the guidelines.

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 5/1/23:

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

PCL's Response 6/1/23:

The law school has an available program of study. Those classes include:

1. Administrative law (**attachment E**)
2. Second Amendment and Gun Control
3. Educational Law
4. The Law of Journalism and Mass Communication
5. The Law of Journalism and Mass Communication II
6. Environmental Law

7. Animal Rights Law
8. International Environmental Law
9. Juvenile Law
10. Business Law
11. Legal Internship (**Attachment F**)

Mr. Spiro, will not be communicating with XXX on behalf of the school because he was sued by Mr. XXX personally. Instead, Pcl's administrator Roger Aramayo has started communication with Mr. XXX regarding the availability of his coursework.

16. Guideline 5.24: To bring itself into full compliance, the school should revise and republish its course repetition policy to meet all requirements of the guideline. Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.

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

PCL's Response 5/1/23:

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.

PCL's Response 6/1/23:

There have not been any further changes.

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 5/1/23:

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.

PCL's Response 6/1/23:

We would like to inform you that PCL has included a comprehensive major change report with this report, which is attached (**Attachment G**) herewith.

This major change report encompasses the necessary details and documentation related to our proposed transition. We understand the importance of submitting the application in full to ensure a prompt determination prior to the start of the law school year. Therefore, we have taken diligent steps to provide all relevant information and supporting materials required for a thorough review.

We greatly value the transparency and compliance in the category change process and are committed to following the established procedures.

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 5/1/23:

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

PCL's Response 6/1/23:

To address the concerns and demonstrate our commitment to evolving our processes for improved recordkeeping, we have implemented Zapier as a key component of our file management system. Zapier is an automation tool that seamlessly integrates with various platforms, enabling us to streamline and automate our record keeping procedures.

With Zapier, we have set up automated workflows that ensure the systematic storage of signed documents. When a document is signed, Zapier automatically saves it directly into our designated Dropbox folder, providing a secure and organized repository for important files. Furthermore, this automation extends to attachments sent to us, which are automatically saved to both our Dropbox and Google Drive folders. By leveraging Zapier's capabilities, we are enhancing our recordkeeping practices, eliminating manual efforts, and mitigating the risk of data discrepancies.

This implementation signifies our proactive approach to address the previous challenges encountered in producing key disclosure files. By utilizing Zapier's automation, we have established a more efficient and reliable system that promotes consistency, accuracy, and timely access to pertinent documents. We will continue to refine and optimize our processes, leveraging technology to uphold the highest standards of recordkeeping and ensure compliance with the expectations set forth by the Bar Association.

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 5/1/23:

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.

PCL's Response 6/1/23:

To ensure full compliance with Guideline 9.1 and address the Bar's recommendations, we have devised a timeline for the creation and finalization of the required policies. Our goal is to have these policies implemented and ready for use by September 1. The timeline is as follows:

1. June 1-15: Policy Research and Development

- Conduct comprehensive research on record-keeping processes, record retention requirements, and transcript changes as outlined in Guideline 9.1.
- Draft initial versions of the policies, ensuring alignment with the Bar's requirements and best practices in the field.

2. June 16-30: Policy Review and Refinement

- Seek input and feedback from relevant stakeholders, including administration, faculty, and legal experts, to refine the drafted policies.
- Conduct internal reviews and revisions based on the feedback received.
- Ensure the policies are comprehensive, clear, and reflect the specific needs and context of our law school.

3. July 1-31: Policy Implementation and Oversight

- Finalize the policies and prepare them for official adoption.
- Establish oversight provisions to ensure compliance with the policies.
- Communicate the policies to all relevant staff members and provide training on their implementation and adherence.

4. August 1-31: Policy Distribution and Submission

- Distribute copies of the finalized policies to the State Bar, demonstrating our commitment to compliance.
- Ensure all necessary documentation and records are in place to support the implementation of the policies.
- Confirm that the policies align with the requirements of Guideline 9.1 and provide transparency in our record-keeping and transcript change procedures.

By adhering to this timeline, we aim to develop robust policies that meet the Bar's requirements and promote consistent, compliant record-keeping practices within our law school. We are committed to timely action and will dedicate the necessary resources to ensure the policies are finalized, implemented, and ready for use by September 1, providing us with a solid foundation for effective record management and transcript change procedures.

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 5/1/23:

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.

PCL's Response 6/1/23:

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

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 5/1/23:

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.

PCL's Response 6/1/23:

PCL continues to utilize Populi that includes security features, and purchased the appropriate storage cabinets to protect hard copy files. Our current registrar/administrator continues to digitize student records and update Populi.

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 5/1/23:

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.

PCL's Response 6/1/23:

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

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 5/1/23:

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.

PCL's Response 6/1/23:

The grade review (attached in **Attachment D**) policy and process is now available on the school's website. The button is located under the Current Student tab in its own clearly labeled page: Grade review policy. A large black button to the form is available for download. Instructions to submit the form are available on the website and an email hyperlink is available. The grade review policy and process are complete.

Attachment D



PEOPLES COLLEGE OF LAW

APPLY FOR FALL ADMISSION
(213) 483-0083

[HOME](#) [ABOUT](#) [ADMISSIONS](#) [ACADEMICS](#) [CURRENT STUDENTS](#) [FACULTY](#) [VIRTUAL TOUR](#) [CONTACT](#) [NEWS](#) [SUPPORT](#) [TEACH](#) [OUR FOUNDER](#)

Grade Review Process

Any student who is dissatisfied with any decision by PCL administration or faculty affecting the student's enrollment, status as a student in good standing or grade, or who is dissatisfied with the conduct, performance, or teaching methods of any instructor, may submit a written grievance. The grievance can dispute a grade based on the student's belief that the examination or course grade resulted from unfairness, a departure from established grading policy, or a clearly shown mistake, or some other legitimate reason. The student should present credible evidence in support of a grade dispute if such evidence is reasonably available. The student shall state in the grievance whether or not the student consents to allow other students to participate in the functions of the FCC and other committees and bodies in connection with the grievance. Those functions are described below.

Step 1: If the grievance involves an instructor, the complaint should first be submitted to that instructor, who must have an individual discussion with the student or, if brought by a group of students, with the group, in a good faith effort to resolve the matter.

Step 2: If unresolved in Step 1, the student must submit the grievance to the FCC, or if the grievance does not involve an Instructor, to the Dean or the Chair of the Community Board. The FCC, the Dean, or the Chair, as the case may be, must engage in a good-faith effort to resolve the matter.

Step 3: If unresolved in Step 2, the FCC, the Dean, or the Chair, as the case may be, must submit the matter to the Community Board for final resolution. The Community Board may delegate this function to the Executive Committee. The Board and the Executive Committee may receive recommendations for this function from the Executive Committee, the FCC, the Dean, and others.



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*.

Casebook

Readings are from Abrams, Ramsey, Mangold, Children and the Law, Doctrine Policy and Practice (7th Ed.), except where noted.

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.

Attachment F



People's College of Law

"Over 48 Years of Educating People's Lawyers"

SYLLABUS FOR Legal Internship Fall/Spring/Summer

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*

60–62 D-
0–59 F - failing

Instructor: TBA

Office Hours: By Appointment

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

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

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

Grade Determination

60% Final Examination
40% Writing Assignments (in class & homework)

The final exam will be given marginal weight in grading. Of far more importance, is class participation, and the writings of students submitted for each class.

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

Intensive experience with a law/social justice related non-profit organization, or public agency. The purpose of a Law internship is to gain practical work experience to apply and further your understanding the law and social justice. During the semester, the student will remain in contact with the supervising professor.

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.

- **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.

Learning Objectives

Upon completion of this course, the student should be able to:

- Articulate an awareness of the company’s or agency’s role in society or the relevant industry/community.
- Describe a scope of work and how the student delivered work product(s) in fulfillment of that scope of work.
- Produce documentation as to the benefits of the internship experience.
- Make career connections and begin establishing your alumni network.

Students are responsible for finding their own internship and for all expenses related to the internship, including travel, accommodations (if any), meals, etc.
A mandatory advisement appointment with the instructor is required in the first week of class.

Required Readings and Supplementary Materials

Assigned as needed

Description and Assessment of Assignments

The student is expected to fulfill the terms of the internship at the location of the non-profit organization, or public agency.

A weekly log and summary of work activity.

DATE: June 01, 2023

TO: COMMITTEE OF BAR EXAMINERS

FROM: Edith Pomposo, Dean- People's College of Law

SUBJECT: Major Change Request

Members, Committee of Bar Examiners

Natalie Leonard, Principal Program Analyst

Action on Major Change Request for – People's College School of Law

EXECUTIVE SUMMARY

People's College of Law (PCL) seeks the Committee of Bar Examiners' (Committee) approval of this Major Change Request seeking: a change of location for offices, operations, and teaching.

BACKGROUND

Guild Law School is currently a privately owned Non-Profit Corporation that has, since 1974, owned and operated the People's College of Law, which offers a Juris Doctor program. The law school is accredited by the Committee of Bar Examiners and was last inspected in 2021.

PCL submits this motion because an unaccredited law school contemplating a major change must notify the Committee and obtain its approval at least five days before making the change. The notice must explain in detail any effect the change might have on the law school's compliance with the rules and be submitted with the fees specified in the Schedule of Charges and Deadlines, and the Committee may then require submission of additional information or an inspection. (Rule 4.164)

Here, the major changes at issue are “A law school must notify the Committee in writing of any change of mailing address, e-mail address, phone number, or fax number for the law school’s primary administrative office ” (Rule 4.11 B, I2). Furthermore, the Committee must be informed “no later than five (5) days before the specified effective dates.”

DISCUSSION

PCL seeks approval of a change of physical location resulting from sale of the current building, located at 660 South Bonnie Brae, Los Angeles CA 90057. Because the building has suffered water damage during the Covid and immediate post Covid period, the building is no longer safe for instruction: the water damage has resulted in the building having both structural and mold issues which make it impossible to hold classes safely there. The library has suffered extensive damage and although we were able to repair some of the structural issues, at great expense, we are unable to bring the building up to a sufficient level of safety necessary to host classes for in-person instruction. Given our staffing and operational expenses, we are unable to feasibly remedy the current condition of the building.

As part of the transition, PCL plans to use funds from the sale of the building to relocate thus adjusting its the address where it will be physically conducting classes in the future. The sale and relocation of the school’s physical address will facilitate operation of the school as described in its attached application so that it may continue its charitable purpose and may also directly operate a law school.

The main benefit of this change is that the law school will not only be able to continue to meet its instructional obligations, but also will be able to better finance its staffing needs which will in turn make it easier to meet the requirements of the Committee of Bar Examiners.

PCL’s Board plans to continue in their current roles. Collectively, the

Board members have experience in business, law, education, and charitable pursuits.

Other than the change in address and related administrative adjustments, the law school asserts that it plans to continue its JD program as it currently operates.

In order to confirm the plan as it is carried out, the law school should be required to update the Committee as to the completion of the sale and subsequent address change.

FISCAL/PERSONNEL IMPACT

An increase in funds, possibly leading to a hire of a Legal Writing instructor or other staff members to further professionalize and update the school in compliance with Committee needs.

AMENDMENTS TO RULES OF THE STATE BAR

None

AMENDMENTS TO BOARD OF TRUSTEES POLICY MANUAL

None

STRATEGIC PLAN GOALS & OBJECTIVES

Goal: Core business operations

RECOMMENDATIONS

It is recommended that the Committee of Bar Examiners accept and file this application for major change seeking a change of location, and grant the change and that the school confirm the date that the purchase closes, as well as the date that the facility move is completed.

PROPOSED MOTION

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

MOVE, that the Committee of Bar Examiners receive and files PCL's application for major change. It is further recommended that the Committee grants approval to proceed with the proposed change of location of People's College School of law.

ATTACHMENT LIST

A. People's College of Law Application for Major Changes

ATTACHMENT A

People's College of Law

660 S. Bonnie Brae, L.A., CA 90057 Tel.:
213 483-0083 Fax: 213 483-2981

E-mail: administrator@peoplescollegeoflaw.edu

“Over 49 Years of Educating People’s Lawyers”

Pursuant to Rule Four, Section 4.164 of the Unaccredited Law School Rules, The People’s College of Law hereby gives the Committee of Bar Examiners more than the required five days of notice of a major change and requests the approval of the Committee of the change of physical location. PCL's major changes are two of the categories specifically defined in Rule 4. ADMISSIONS AND EDUCATIONAL STANDARDS Adopted JANUARY 2008, GUIDELINES FOR UNACCREDITED LAW SCHOOL RULES, page 12, Rule 4.11: (B) changing a mailing address, offices, and corresponding phone numbers.

The Board will maintain PCL’s current mission and commitment to excellence that reflect the College’s direction and focus. In addition, the Board plans to maintain continued compliance with all CBE standards through the transition and into the change of address and new hires.

We, as of yet have not designated a new location as we have begun the process of researching and making offers to available properties. We have located properties where the sellers are very motivated to sell and as soon as one of the several offers are accepted with PCL’s terms, PCL will close on the property quickly with a short escrow period.

If necessary, we are willing to rent an office building and will do so in these coming months if we are unable to purchase a new office building in time for instruction and if the CBE does not extend our waiver of in-person instruction so that we may continue teaching online.

Of course, the Committee will be notified as soon as we as find and secure a new address, be it through lease or purchase.

The Potential change of physical address will have no effect on the law school's compliance with the Rules.

A.

- *Records. The law school must maintain adequate records of its programs and operations.*
The law school does not plan to make any changes to the maintenance of the records of its programs and operations.
- *Consistent with sound educational policy and these rules, a law school must operate in accordance with policies and procedures that comply with the Constitutions and all applicable laws of both the United States and the State of California so as to provide both equality of opportunity and to prohibit unlawful discrimination.*
As noted above in part V.A., the law school, under its Board will continue to comply with the Constitutions and all applicable laws of both the United States and the State of California so as to provide both equality of opportunity and to prohibit unlawful discrimination. This includes compliance with all state and federal laws on discrimination.
- PCL is firmly committed to equal opportunity and prohibits unlawful discrimination. The Foundation will continue to adhere to the policies noted in the School catalog. The Guild School of Law grants students of any race, color, ethnic origin, age, sex, or sexual orientation all rights, privileges, programs, and activities generally

made available to students of the School of Law. The School of Law does not discriminate in administration of its educational policies, admissions policies, scholarship and loan programs, or other school administered

Compliance with Committee requirements. *The law school must demonstrate its compliance with these rules by submitting required reports and otherwise complying with the rules.*

The law school will continue to demonstrate compliance with Committee rules by operating the law school in compliance with the rules and by filing with the Committee all required reports going forward.

VI. Conclusion

We appreciate the Committee's review of this Notice of Major Changes and Major Change Proposal. In seeking approval for this change, PCL is confident that the proposed transaction and changes will strengthen the core mission of the law school and provide access to additional funding to further enhance the quality of the program and the student experience.

Sincerely,

Edith Pomposo, J.D., LL.M

Dean- Peoples College of Law

May 31, 2023

Committee of Bar Examiners
The State Bar of California
180 Howard St.
San Francisco, CA 94105
Via Email

Re: Request for Further Extension of Permission for Online Classes

Dear Committee of Bar Examiners:

The People's College of Law requests that the Committee of Bar Examiners extend its permission for online classes for fixed-facility law schools into the next academic year, 2023-2024. We ask that the extension be at least until the end of the 2023-2024 academic year, through August 30, 2024.

Last month in March, the Dean for the College administered a survey to students, alumni, faculty, and board members to determine the community's support regarding moving instruction to an primarily online format.

- 53% of the respondents indicated that they were in support of moving instruction to a primary online format;
- 28.6% of respondents are undecided and;
- 17.9% of respondents indicated that they are not in support of moving instruction to a primary online format.

When respondents were asked to explain why they felt instruction should move to a primary online format, respondents expressed concerns regarding the ongoing Covid-19 Pandemic and preference for an online model to allow non-traditional working students the flexibility they need to thrive.

In a recent press conference on March 29, 2023 the World Health Organization stated that the threat of the virus is not over and the most common deaths are among individuals who are of older age. [\[1\]](#) As the virus continues to evolve, waves of infection are still occurring and the threat for the virus to become more severe is ever present. It is important to note that as a small non-traditional school of law, PCL's diverse student and faculty is inclusive of those who are of older age. During recent board meetings, students have also expressed concern regarding the return of in-class instruction and the spread of the virus in small classrooms.

PCL is dependent on student tuition as a significant part of our revenue which is at stake if students feel unsafe coming to class. Similarly, we expect some faculty members to not attend in person instruction as they are unpaid volunteers who would also be putting themselves at risk.

It is our hope that the Committee of Bar Examiners will prioritize the health and safety of our community and the success of the upcoming 2023-2024 academic year and extend our permission for classes to be online.

Sincerely,
Hector C. Pena Ramirez President,
Peoples College of Law

Payment Related to March 2023 Committee Review Overdue

The law school's invoice related to the Committee's response to the law school's questions and review of progress reports was due on May 5, 2023. It appears that payment has not been received as of May 11, 2023. A courtesy copy is attached for your immediate payment, or internal review if there is proof payment has been sent.

Requests from the law school contained within the progress report

As to the law school's request for additional time to review and provide disclosures, staff does not have the authority to grant this request, and this information was requested by the Committee by April 4, 2023. Given that the law school requested two weeks, this would be through May 14, 2023; therefore, the information should be available to include in the law school's modified May 2023 progress. Report. The Committee will be advised of the law school's request and also any data provided.

PCL's Response:

We would like to inform you that we no longer require the extra time previously requested as we have resolved the issues regarding the disclosures. We have diligently submitted all the available disclosures that were within our possession. However, as stated in our previous report there were some missing disclosures that we were unable to locate.

In order to rectify this situation and ensure fairness to the affected students, we have made the decision to issue refunds to them. By taking this action, we are demonstrating our commitment to addressing any shortcomings and upholding the highest standards of compliance.

Major Change Motions Appearing to Be Required Immediately

It appears that the law school is considering several options for which the law school must file complete advance major change requests and seek approval as follows:

Change of Administrative Headquarters: This requires a pre-approved major change. The law school noted at the Committee's last meeting that it will soon be in escrow to sell its building and choose a new location, but the State Bar has not received the required major change for pre-approval. This implicates the law school's compliance. The major change is required immediately. The State Bar has previously reminded the law school of this obligation under the rules and guidelines.

PCL's Response:

PCL has just entered escrow for the sale of its building and is actively searching for a new headquarters. There are several buildings that the Building Search Committee has toured and letters of interest have been submitted to a few properties. Once PCL enters escrow for the purchase of the new building PCL will have the exact address of its intended acquisition. For now, a major change request is attached (**Attachment G**) to this document without an address.

Possible Change to Distance Category: The law school is scheduled to return to in person classes this fall, and will be required to be in compliance with the library requirements by then. Any change from this plan would require a pre-approved major change approved by the Committee at a regularly noticed meeting. Here, the law school appears to be actively considering a change, but has not filed the required paperwork to do so.

PCL's Response:

PCL's board has approved the decision to apply for a waiver to continue to utilize long-distance learning as a mode of instructional delivery. The waiver application is attached (**Attachment H**).

Waiver Requests that May Be Required:

At times the law school has indicated that it can comply with the requirement, while at other times it indicated it cannot. The law school must demonstrate compliance with the library requirement in order to proceed with fall 2023 classes.

PCL's Response

The waiver that is required has been included as an attachment to this report **(Attachment H)**.

Omissions in Progress Report

The May 2023 progress report is incomplete in the following ways and updates are requested:

Overall Compliance Issue (Missing or Incomplete Timelines):

Each element of the progress report must contain a **specific timeline**, but many do not contain the required timelines. Please add the timelines consistent with the Committee's directive:

FURTHER MOVE, that the law school continue to be directed to take prompt action to establish full compliance and take the actions noted in Attachment E from the committee's March 2023 meeting, as well as any other steps necessary to avoid noncompliance with any other Rule or Guideline, and to provide evidence of this in its May 2023 progress report. If the law school cannot document compliance in a particular area, the law school must provide **an explanation and detailed, documented timeline and action plan as to when compliance is expected to be achieved.**

Recommendation 10 (Inadequate Staffing):

The law school admits that its staffing is inadequate.

The law school does not address the Committee's question as to why it did not continue with the exam coach position added in 2022 when the law school identified that position as critical to improving results on State Bar exams and the law school saw the first increases in scores after employing the coach. Please explain how these hours were replaced or why they are no longer needed.

PCL's Response:

The law school is apologetic for the ambiguity. PCI has continuously employed John Duane as bar prep coach since (October 2022).

The law school does not address why it previously advised that a fundraiser was hired on an hourly basis and a clinic coordinator was also hired, but the current report indicates that only a dean and registrar are still hired. Please explain how these hours were replaced or why they are no longer needed.

PCL's Response:

The law school apologizes for its ambiguity. The only full time members of the administrative staff then were the dean and the fill-in administrator, John Duane.

The fundraiser/development consultant, Sarah Wild of Wild Fundraising, has been working with PCL to apply for grants and to organize its fundraiser this academic year. Wild fundraising has the capacity to assist PCL with the coordination of legal clinics, coordinating fundraisers etc. Wild fundraising has a staff member who we can use on an hourly basis to fill capacity at PCL.

The law school does not address whether faculty turned in grades on time for the fall 2022 semester, or which turned in grades late and by when. Historically, one or more faculty members turned in grades late for one or more terms; in the fall, the law school created a policy to try to prevent this or provide alternatives for grading.

PCL's Response:

In the Fall 2022, all professors turned in grades on time.

Recommendation 11 (Faculty Evaluation Forms):

This response is incomplete. While the law school has created a form, the law school has not responded to the request to explain how or whether the law school is using the evaluation process as a means to hold faculty accountable to implement school standards and turn in grades on time.

The evaluation form has been useful to evaluate performance criteria in the classroom. Additionally important data points are also taken into consideration such as timeliness of turning in grades, attendance, providing feedback, and availability of office hours. The faculty will receive their results at the end of

the academic year in which case they will be invited to come back, having achieved a satisfactory evaluation.

The law school must advise whether it is completing meaningful reviews on time, and how it is ensuring adequate faculty performance through the evaluation process. Please advise how many performance reviews were due in 2022 and how many were delivered. Also advise how many are due in 2023 and how many have been delivered so far. Also explain how faculty are being held accountable to meet grading calibration standards, include meaningful feedback on exams, and turn in grades on time.

PCL's Response:

Our institution has a well-defined and diligently followed faculty evaluation policy, which is documented in our official handbook. As evidence of our commitment to transparency, accountability, and adherence to established procedures, we have attached (**Attachment I**) a page from our handbook containing the relevant details of the policy to this report.

This comprehensive evaluation policy serves as a guiding framework to ensure consistent and fair assessment of our faculty members, promoting their professional growth and maintaining the high standards of our academic institution.

The faculty members are being held responsible for adhering to calibration standards, as the administration of PCL maintains diligent oversight to ensure timely submission of grades. Regular reminders are issued to prompt the timely submission of grades and the provision of feedback.

The evaluation process for our instructors encompasses three components, each serving a specific purpose.

Firstly, we gather feedback from the students, as attached to this report (**Attachment A**), to ensure their voices are heard and their experiences are taken into account.

Secondly, instructors provide their own self-evaluations, which fosters self-reflection and encourages continuous improvement (**Attachment B**).

Lastly, we receive an evaluation from the FCC, which includes my comments and is likewise attached. This underscores the importance of accountability in implementing school standards and submitting grades punctually(**Attachment C**).

These evaluations are indicative of our law school's commitment to meaningful and timely reviews, as well as the establishment of clear faculty performance expectations. Through this process, we hold our instructors accountable for meeting grading calibration standards, providing valuable feedback on exams, and submitting grades within designated timelines. By emphasizing faculty accountability and aligning with school standards, we aim to cultivate an environment that nurtures academic excellence and student success.

There have been evaluations turned in for 2022 and evaluations are still in progress for 2023.

Timeline:

Fall 2022 (attachment J)

December 1- Fall student evaluations were sent out.

December 3 - receipt of evaluations

(we sent out 38 but received only 8 responses)

Winter 2022 (attachment K)

March 10- Winter student evaluations were sent out

March 15- receipt of evaluations

(we sent out 49 but received only 2 responses)

Spring 2023 (attachment L)

May 26- student evaluations are sent out

May 26- receipt of evaluations

(Still in progress. So far we've received just 2 responses from the 30 evaluations sent out).

Recommendation 13 (Clinical Courses – Administrative Requirements):

Here, the law school was asked to ensure compliant oversight of its clinical programs. The law school demonstrates how a prior dean (four deans ago) handled this nearly two years ago using a personal email from that dean, but

does not include a current policy, demonstrate that it is implemented, or identify the individual responsible for ensuring compliance at the law school now.

PCL's Response:

Thank you for your inquiry regarding our current policy for ensuring compliant oversight of our clinical programs.

While we currently do not have a specific policy in place, we understand the importance of establishing one to ensure comprehensive oversight.

We are fully dedicated to rectifying this gap, and we have outlined a timeline for the creation and finalization of the policy, which we aim to have ready by September 1, the first day of school. The timeline is as follows:

1. June 15 - Internal Committee Formation: We will assemble a committee of faculty members, administrators, and legal experts to oversee the development and implementation of the policy.
2. July 1 - Policy Drafting: The committee will commence drafting the policy, considering industry best practices, relevant regulations, and input from key stakeholders within the institution.
3. August 1 - Consultation and Feedback: The drafted policy will be shared with internal stakeholders, including faculty, staff, and students, to gather valuable input and suggestions for refinement.
4. August 15 - Review and Revisions: The committee will review the feedback received and make necessary revisions to ensure the policy aligns with our institution's goals, ethical standards, and regulatory requirements.
5. August 30 - Finalization and Approval: The finalized policy will be submitted for official approval by the relevant authorities within the law school administration.

Recommendation 14 (Exam and Grading Policies) / (Outstanding Request – Grading):

The law school does not explain the process used to meet this recommendation so far in 2022, what is planned for winter 2023, or how the law school will continue to study whether its grades awarded correlate with outcomes on State Bar exams. The recommendation requires the law school to 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.

Instead, the law school identifies a pending policy, does not indicate whether the governing board adopted the policy, or whether or how it was implemented.

PCL's Response:

The policy as attached (**Attachment M**) was approved by the board in 2022. When the current dean arrived this was a new policy that was in the process of implementation. Since the Fall of 2022. Administration has adhered to the policy.

Recommendation 17 (Library) / (Outstanding Request – Library):

The law school must provide a specific date by which it will have completed the purchase of all required library volumes identified in the rules and guidelines. Previously, the law school indicated that it had the funds to come into compliance and planned to do so. More recently, it does not indicate that it has the funds or any longer understands what must be purchased, though that information is specified in the rules and guidelines. The law school has been provided with 41 months' notice and a waiver to create its plans to purchase these books. Yet, most recently, the law school wrote:

PCL would like [sic] 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.

PCL's Response:

We understand your concerns and acknowledge the importance of adhering to the rules and guidelines. To clarify, PCL is currently in the sale of its building. The funds by which to purchase the library books are available but not accessible since they are not liquid. However, the law school owns the building outright at its current address. This building is valued at \$3M based on the comps of the area. The funds can easily be accessed to purchase the library by securing a line of credit on the property.

By August 15, 2023 PCL will have purchased the new library volumes and books. The school has been working on pricing the cost of the books to ensure the purchase meets the State Bar guidelines.

We apologize for any confusion or lack of clarity in our recent communications. Rest assured, we are committed to fulfilling our obligations and ensuring that the law school's library is adequately equipped to support the needs of our students and faculty.

Recommendation 19 (Records):

The law school must provide specific timelines as to when the records will be fully updated, and may do so by record category.

Also, while the law school also indicates that records have been in an organized format since fall 2022, the law school was unable to provide a full set of Rule 4.241 disclosures for its students, calling into question the law school's assertion that its records were in order.

The law school must provide an accurate assessment of its recordkeeping and a timeline for improvement and compliance.

PCL's Response:

To address the Bar's request for specific timelines regarding the organization and improvement of our records, we have developed a timeline that encompasses organizing records in a filing cabinet and implementing a digital documentation process using Populi. The timeline is as follows:

1. June 1 - August 31, 2023: Records Organization and Filing Cabinet Implementation

- Conduct a comprehensive assessment of our existing records, categorizing them by record category and year.
- Establish a systematic approach to organizing the records within a filing cabinet, ensuring that each category is properly labeled and arranged for easy access and retrieval.
- Allocate resources and staff members to facilitate the organization process, dedicating sufficient time and effort to ensure the records are accurately sorted and stored.

2. September 1, 2023 - Ongoing: Digital Documentation with Populi

- Simultaneously with the organization process, implement a digital documentation system using Populi.
- Scan and upload all relevant documents onto the Populi platform, ensuring that records are easily accessible and securely stored in electronic format.
- Develop protocols and guidelines for ongoing documentation and record-keeping practices, ensuring that new documents are consistently scanned and uploaded onto Populi moving forward.

By finalizing the organization of records in the filing cabinet by August 31, 2023, we aim to establish an orderly and accessible system for physical record-keeping. This will enable us to promptly locate and retrieve documents as needed.

Furthermore, our implementation of Populi as a digital documentation platform will ensure the long-term efficiency and accessibility of our records. This transition will facilitate easier record retrieval, reduce the risk of document loss or misplacement, and support compliance with Rule 4.241.

We are committed to improving our recordkeeping practices and providing an accurate assessment of our record management. With the proposed timeline and implementation strategy, we are confident in achieving compliance and maintaining organized and accessible records moving forward.

Suggested Recommendation #3 / Outstanding Request (Quality Content Review of Exam Materials Prior to Administration):

The law school created 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. Please advise whether this policy has been implemented, what percentage of exams have been reviewed in fall 2022 and winter 2023 semesters, the personnel responsible for the review.

PCL's Response:

We are pleased to inform you that this policy has indeed been implemented. For both the fall 2022 and winter 2023 semesters, all examinations were thoroughly reviewed by the Faculty Curriculum Committee (FCC) and were approved for administration during the final exams.

Accompanying issue outlines or model answers, met the required standards of quality and accuracy.

Suggested Recommendation #4 (Grade Calibration / Outstanding Request):

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.

As of summer 2020, a policy had been created and was scheduled to be shown to the law school's board for adoption. Please confirm whether the policy has been adopted and implemented, including advising which of the classes offered in 2022 and 2023 used this process, which did not, and the effectiveness of the procedure.

PCL's Response:

The grade calibration procedure was approved by the board and continues to be implemented. The FCC committee consists of licensed California attorneys, many of which are faculty at PCL. The exams are distributed to the FCC committee and approved by the committee for administration. After the exam

completion all of the classes use the grade calibration procedure. It is a mandatory aspect of the grading process. In summary, the faculty submit the grades to the dean. The dean reviews the distribution of grades ensuring that it meets the required distribution, per the school policy. If there is inconsistency with the grading procedure it will be discussed with the professor.

To avoid inconsistencies, the dean coaches the faculty on the grading policy beforehand. This is done with one-on-one meetings before the faculty embarks on grading the exams.

Outstanding Question 1 (Testing Accommodations Student Complaint):

This relates to a review of the testing accommodations process in response to a complaint received. The law school advises that an investigation is underway. The law school has not provided a timeline or confirmed whether or not it continues to use a process in which students must request accommodations individually from each professor.

PCL's Response:

We want to confirm that our law school does not utilize the process in which students must individually request accommodations from each professor.

This information is clearly stated in our handbook and on our official webpage, as well as communicated directly to our students.

At our law school, if a student has a disability, whether long term or short term, and requires accommodations for exams or other academic work, they are required to follow a specific procedure. The student must submit a written request for accommodation to the PCL Administrator, which should include details about the disability, how it interferes with their academic performance, the specific accommodations being requested, and the duration for which the accommodations are needed.

Additionally, the request must be accompanied by a statement from a qualified professional, such as a physician, outlining the disability and recommending appropriate accommodations.

We encourage students to provide any additional supporting documentation, such as verification of accommodations from their previous educational institutions or relevant information from the LSAT. It is important to note that students should retain their original documents and submit copies instead.

We are committed to ensuring that our students' needs are met and that they have equal opportunities to succeed academically. Rest assured that our testing accommodations process is clearly outlined and communicated to all students.

Disclosures

Winter/Spring 2020 Disclosures

The law school has agreed to issue a refund to the student for whom it has no record of distributing and receiving a signed disclosure for the Winter/Spring 2020, and asks the State Bar to confirm that when referring to this student that the State Bar was referring to XXX, the only student with whom the State Bar has been discussing disclosures for that semester. If any other students are similarly situated, the law school should provide refunds to those students as well. The law school should be prepared to provide evidence that it is self-monitoring effectively and otherwise compliant as to other students.

PCL's Response:

We have implemented robust self-monitoring processes to ensure compliance with disclosure requirements for all students. One of the key tools we utilize in this regard is Zapier, which enables us to automate the collection of completed forms from Docusign and securely store them in Dropbox.

Docusign is an electronic signature platform that streamlines the process of obtaining signatures from students. When a student receives a disclosure form, they can digitally sign it using Docusign, which then triggers the automation through Zapier. Zapier facilitates the seamless transfer of the completed and signed forms from Docusign to our designated Dropbox folder, where they are securely stored for recordkeeping purposes.

This automation process eliminates manual handling and the potential for errors or delays in record collection. It allows us to efficiently gather and store completed forms while maintaining data integrity and confidentiality. Additionally, by utilizing Dropbox as our cloud storage solution, we ensure the security and accessibility of the stored documents for authorized personnel.

We want to assure you that our self-monitoring processes are designed to ensure compliance with disclosure requirements for all students. We continuously review and improve these processes to enhance efficiency and accuracy in recordkeeping.

We appreciate the opportunity to clarify our recordkeeping procedures and demonstrate our commitment to maintaining accurate and comprehensive records. Should you require any further information or evidence regarding our self-monitoring practices, we are more than willing to provide the necessary documentation.

2022/2023 Disclosures

Please provide refunds to the one to three students (XXX; possibly XXX and XXX) who paid prior to receiving a disclosure for the Winter 2023 term and document completion to the State Bar. Whether this number is one or three depends upon when the disclosures were distributed, November 30, 2022 or December 2, 2022. The law school had attested as to both dates and must provide evidence to the State Bar as to which is date is correct and issue one or three refunds, depending upon the distribution date of the disclosures.

The law school also indicated in its May response that some of the signed disclosures cannot be found. Since the law school issues disclosures through its information system and signs them in DocuSign, if they cannot be found, this may suggest that they were not distributed or signed, and, if so, the law school should provide documentation of refunds to those students.

PCL's Response:

The disclosures were distributed 11/30/2022

The students whose disclosures we couldn't find are:

- XXX,
- XXX and
- XXX,

Refunds will be issued to
Winter 2022

-XXX

Fall(missing disclosures)

- XXX,
- XXX and
- XXX.

We have developed a timeline for providing the required refunds to the specific students. Please find the timeline below, taking into account the approval process by the PCL Board of Directors:

1. June 18: Board Meeting - Refunds Approval

- Include the item regarding refunds on the agenda for the PCL Board of Directors meeting.
- Present the refund proposal to the board for their review and approval.
- Seek necessary discussions and deliberations to obtain the board's consent on issuing the refunds.

2. June 19 - July 31: Refund Calculation and Processing

- Once the refunds have been approved by the Board, initiate the process of calculating the exact refund amounts for each affected student, considering any applicable criteria as per Rule 4.241.
- Prepare detailed documentation and evidence to support the refund calculations and compliance with the rule.
- Notify the identified students about the approved refunds and provide them with the necessary information regarding the refund process and timelines.

3. August 1 - 15: Refund Issuance

- Finalize the refund amounts for each student based on the approved calculations.

- Prepare and issue the refund payments, ensuring they are disbursed to the respective students in a timely manner.
- Maintain accurate records of the refund transactions and ensure proper documentation for auditing and compliance purposes.

By following this timeline, we aim to provide the required refunds to the specific students in accordance with Rule 4.241. It is essential to obtain the approval of the PCL Board of Directors during their June 18th meeting to proceed with the refund process. Once approved, we will promptly calculate, process, and issue the refunds to the affected students. Our goal is to finalize and complete the refund issuance by mid-August, ensuring compliance with the Bar's requirements and demonstrating our commitment to rectifying any discrepancies promptly.

Please provide the information requested by the Committee in its April motion that does not appear to be in the law school's May 2023 progress report:

FURTHER MOVE, that the law school be directed to document compliance status as to Rule 4.241 and California Business and Professions Code section 6061 in its May 2023 progress report, including documenting: 1) whether the law school provided the specified law student with a disclosure for the spring 2020 term; 2) whether it has received a signed disclosure from the student who did not sign a disclosures for the fall 2022 term as of the date of the April 2023 10 progress report; 3) whether that the law school has "clearly advis[ed] the public, prospective students, and current students of its status on probation affirmatively and clearly, including attaching a copy of the probationary terms to student disclosures;" 4) whether it refunded the tuition of the student(s) who paid prior to receiving a disclosure, or a full explanation for each of those students as to why the refund was not issued; 5) providing consistent and complete information, including any disclosures omitted from the April 2023 progress report; and 6) explaining discrepancies between the disclosure status charts provided in March 2023 and April 2023.

PCL's Response:

1) whether the law school provided the specified law student with a disclosure for the spring 2020 term;

PCL's Response

We want to confirm that we have indeed provided the student with the necessary disclosure. For your convenience, we have attached a copy of the disclosure (**Attachment N**).

2) whether it has received a signed disclosure from the student who did not sign a disclosures for the fall 2022 term as of the date of the April 2023 progress report;

PCL's response:

We have successfully located and collected all missing disclosures that were within our possession, and they have been securely stored in the designated folder.

For any student disclosures that we cannot locate, we will promptly issue refunds to ensure fairness and compliance.

Our commitment is to address this matter with diligence and to take the necessary steps to rectify any missing disclosures.

3) whether that the law school has “clearly advis[ed] the public, prospective students, and current students of its status on probation affirmatively and clearly, including attaching a copy of the probationary terms to student disclosures;”

PCL's response:

We would like to assure you that we have taken appropriate measures to communicate this information effectively and transparently.

In adherence to the specified terms, we have actively informed the public and our student community about our probationary status. As part of our efforts, we have prominently published this information on our official website, ensuring its accessibility and visibility to all visitors, including prospective and current students.

Furthermore, we have strived to enhance transparency by attaching a copy of the probationary terms to our student disclosures. By doing so, we aim to

provide comprehensive information to our students, enabling them to make informed decisions about their educational journey.

We remain committed to complying with all applicable regulations and ensuring that our students, both present and future, have access to accurate and pertinent information about our institutional status.

4) whether it refunded the tuition of the student(s) who paid prior to receiving a disclosure, or a full explanation for each of those students as to why the refund was not issued;

PCL's response:

We have developed a timeline for providing the required refunds to the specific students. Please find the timeline below, taking into account the approval process by the PCL Board of Directors:

1. June 18: Board Meeting - Refunds Approval
 - Include the item regarding refunds on the agenda for the PCL Board of Directors meeting.
 - Present the refund proposal to the board for their review and approval.
 - Seek necessary discussions and deliberations to obtain the board's consent on issuing the refunds.
2. June 19 - July 31: Refund Calculation and Processing
 - Once the refunds have been approved by the Board, initiate the process of calculating the exact refund amounts for each affected student, considering any applicable criteria as per Rule 4.241.
 - Prepare detailed documentation and evidence to support the refund calculations and compliance with the rule.
 - Notify the identified students about the approved refunds and provide them with the necessary information regarding the refund process and timelines.
3. August 1 - 15: Refund Issuance
 - Finalize the refund amounts for each student based on the approved calculations.
 - Prepare and issue the refund payments, ensuring they are disbursed to the respective students in a timely manner.
 - Maintain accurate records of the refund transactions and ensure proper documentation for auditing and compliance purposes.

By following this timeline, we aim to provide the required refunds to the specific students in accordance with Rule 4.241. It is essential to obtain the approval of the PCL Board of Directors during their June 18th meeting to proceed with the refund process. Once approved, we will promptly calculate, process, and issue the refunds to the affected students. Our goal is to finalize and complete the refund issuance by mid-August, ensuring compliance with the Bar's requirements and demonstrating our commitment to rectifying any discrepancies promptly.

5) providing consistent and complete information, including any disclosures omitted from the April 2023 progress report; and

PCL's response:

We have successfully located and collected all missing disclosures that were within our possession, and they have been securely stored in the designated folder.

For any student disclosures that we cannot locate, we will promptly issue refunds to ensure fairness and compliance.

Our commitment is to address this matter with diligence and to take the necessary steps to rectify any missing disclosures.

6) explaining discrepancies between the disclosure status charts provided in March 2023 and April 2023.

PCL's response:

The discrepancies for Fall 2022 explained:

1. We conducted a thorough investigation and unfortunately, we were unable to locate the missing disclosures and information for XXX, XXX, and XXX in the fall 2022 folder. As a result, we have initiated the process of refunding these students.

4. Previously, XXX, XXX, and XXX were not included in the spreadsheet, but we have now added them to the spreadsheet.

5. Anabella Bastida had duplicate documents in the folder. We have taken the necessary steps to remove the duplicate document.

The discrepancies for Winter 2022 explained:

1.Regarding XXX's signature date, there was an error in the spreadsheet. We have rectified this mistake by adjusting the date to 1/12/2023.

2.The folder was missing the 4.241 disclosures for XXX and XXX. However, we have now included the required disclosures in the folder, making them readily available for your review.

3.In the Winter 2023 folder, there was a duplicate appearance of XXX's disclosure. We have resolved this issue by deleting the duplicate disclosure. Consequently, there is now only one disclosure for XXX in the folder.

Recommended Request 5 (Handbook):

The law school was asked to review the accuracy of its handbook. The law school's response discussed web design and management. The law school is asked to confirm when its handbook was last fully reviewed for compliance and to attest whether the handbook is fully compliant or to identify areas that should be updated.

PCL's Response:

We would like to inform you that our handbook is scheduled to undergo a comprehensive review before the start of the next school year. The review process will be conducted with great attention to detail, aiming to assess and update any areas that may require modification to ensure full compliance.

By June 30, 2023, we anticipate completing the review and making any necessary updates to the handbook. We recognize the significance of maintaining a handbook that accurately reflects our policies and procedures, and we are committed to providing our students and faculty with the most current and relevant information.

Outstanding Question 15 (Outstanding Information Related to 4th year program for student)

The law school was asked to provide a plan and timeline as to how it will provide a fourth-year curriculum for a student who was due to begin that curriculum in fall 2022 (XXX). Previously, the law school advised that it had created six of the needed eight courses and two more were under development. The law school must provide evidence that it is working with the student to create a reasonable solution. At this time, the law school has not provided any evidence that it has communicated with the student since September 2022. The law school must provide a reasonable plan as soon as possible to address this overdue situation.

PCL's Response:

Classes prepared for XXX:

1. Administrative law (**attachment E**)
2. Second Amendment and Gun Control
3. Educational Law
4. The Law of Journalism and Mass Communication
5. The Law of Journalism and Mass Communication II
6. Environmental Law
7. Animal Rights Law
8. International Environmental Law
9. Juvenile Law
10. Business Law
11. Legal Internship (**attachment F**)

Roger Aramayo, our school administrator, will be in communication with XXX. Aramayo has started communication with Mr. XXX regarding the availability of his coursework.

Outstanding Question 16 (Further Outstanding Information Related to 4th year program for student):

The law school must be transparent in its responses and demonstrate progress and a reasonable timeline to completion. Here, the law school should have been prepared to offer courses in fall 2022. As of April, the law school indicated that some courses were created, but two were under development. In May, one syllabus was provided. The status of the law school's ability to provide the student with a sound program of instruction of 270 hours is unclear and must be explained.

The law school indicates that Ira Spiro has been designated to speak to the student, but does not indicate that the law school has spoken to the student.

In addition, the law school is a fixed-facility school that should plan to deliver its courses via fixed-facility means. At one point, the law school discussed delivering the courses via online delivery, but has not filed a waiver to see if it receives permission to do so. Currently, it is privileged to deliver courses principally in fixed-facility format, with principally designating that some courses may be in clinical or internship format. The law school does not appear to propose a clinical or internship experience for this student, though it may do so.

PCL's Response:

In the beginning of April, we submitted nine courses. The tenth course was submitted in early May, along with our progress report. Attached (**Attachment F**) to this correspondence is the final course, the Internship Course, which marks the completion of the program of instruction for XXX.

Outstanding Question 17 (Major Change Pre-Approval Needed for Change of Headquarters)

The law school discusses the sale of the building and a search for a new building. Because pre-approval of a move is required, the law school appears to be taking major steps in a non-compliant manner. It has been advised on multiple occasions to file a major change seeking pre-approval in order to establish compliance, but it has not taken steps to comply. The law school must comply if it wishes to continue to operate and effectuate a move. This was discussed at the start of this communication.

PCL's Response:

PCL was under the impression that it needed to finalize the new building before seeking pre-approval. We now understand the importance of establishing compliance beforehand. I apologize for any misunderstanding.

Attached (**Attachment G**) with this response is our application seeking pre-approval, along with the comprehensive report.

Outstanding Question 19:

The law school advises that on a forward basis it has taken steps to ensure that files from fall 2022 onward are organized. Yet, practice shows that when asked to produce key disclosure files, the law school took significant time to do so, did not submit a complete list of files to the State Bar, and submitted different data on different days without explaining the discrepancies. Therefore, the law school is asked to address this situation and to continue to evolve its processes to improve its recordkeeping, and describe these to the Committee. This was also discussed above.

PCL's Response:

To address the concerns raised and demonstrate our commitment to evolving our processes for improved recordkeeping, we have implemented Zapier as a key component of our file management system. Zapier is an automation tool that seamlessly integrates with various platforms, enabling us to streamline and automate our record keeping procedures.

With Zapier, we have set up automated workflows that ensure the systematic storage of signed documents. When a document is signed, Zapier automatically saves it directly into our designated Dropbox folder, providing a secure and organized repository for important files. Furthermore, this automation extends to attachments sent to us, which are automatically saved to both our Dropbox and Google Drive folders. By leveraging Zapier's capabilities, we are enhancing our recordkeeping practices, eliminating manual efforts, and mitigating the risk of data discrepancies.

This implementation signifies our proactive approach to address the previous challenges encountered in producing key disclosure files. By utilizing Zapier's automation, we have established a more efficient and reliable system that

promotes consistency, accuracy, and timely access to pertinent documents. We will continue to refine and optimize our processes, leveraging technology to uphold the highest standards of recordkeeping and ensure compliance with the expectations set forth by the Bar Association.

group legal services plans, unauthorized practice of law, and compensation for legal services.

PROPERTY

The basic concepts of real property. and instruction on personal property as well. Topics include the legal categories of interests in land tenant rights and other aspects of landlord-tenant law, rent control, restrictions on land use, recordation, title registration, and conveyance.

REMEDIES

A study of the remedies available through the orders and judgments of courts. Remedies affect personal rights, property rights, the environment and governmental and social policy. Topics include injunctions, rescission, cancellation, reformation, restitution, damages, specific performance, balancing equities, equitable servitudes, equitable and legal defenses and extraordinary relief.

WILLS and TRUSTS

Study of the creation, use and termination of the various types of trusts, and of the responsibilities and potential liabilities of the trustor, trustee and beneficiaries. Also study of the basic principles in planning, creating, modifying, and revoking wills. Discussion of the powers and limitations of a will, intestate succession, and testamentary disposition.

ELECTIVES

These vary from year to year, and are for upper division students, as opposed to first year students. Electives have included those described below.

LEGAL PRINCIPLES AND ELEMENTS FOR THE MBE - One Quarter

CRIMINAL DEFENSE CLINIC - One Quarter

Students enrolled in the Criminal Defense Clinic will assist with representing clients facing misdemeanors and/or felonies charges.

ADVANCED ESSAY WRITING - One Quarter

This course will focus on the 14 core legal subjects tested on the California Bar Exam (CBE).

ELECTIVES AT PCL: Electives are not are taught each year, but are offered from time to time based on student interest and instructor availability.

D. EVALUATION OF FACULTY

State Bar rules require evaluation of faculty members. PCL asks faculty members to submit a periodical Self-Evaluation Form to the Administrator, who will provide a copy to the FCC. A State Bar rule, Guideline 4.7, states: "Faculty members must continually strive to improve their teaching skills and expertise in the subject(s) they teach. Faculty members are expected to keep informed of changes in the law and include in their course(s) a discussion of recent significant statutory changes and case law developments."

Faculty members are also evaluated by their students at the end of each course on a form provided by the FCC. These forms are maintained by the Administrator, who submits copies to the FCC. Also, the FCC evaluates all faculty members during each course, and the FCC may enlist persons who are not on the FCC to perform evaluations, if they are faculty or former faculty of any law school, alumni of PCL, present or retired members of the judiciary, or practicing or retired attorneys.

Pursuant to State Bar rules: the criteria for evaluation are:

- (A) The faculty member's education, knowledge, and experience in the subject matter;
- (B) The faculty member's competence in the classroom or in other instructional activities;
- (C) The faculty member's teaching skills given the technology and methodology used in instruction, and the quality of participatory experiences employed;
- (D) The faculty member's organization of the course as demonstrated by outlines or syllabi;
- (E) The quality, nature, and type of examinations, and other assignments and the quality of grading;
- (F) The relation between the field of instruction and the area of specialization, if any, of the faculty member in private practice; and
- (G) The years of experience, both in teaching and in practice.

All evaluators must submit their completed evaluations to the Administrator, who must place them in the files of the respective Instructors. Evaluators are requested to submit their completed evaluations to the Administrator on the day they complete them, but no later than the last day of the academic quarter during which the evaluation was done.

The evaluators, other than the student evaluators, must review of the materials used in faculty member's the course, examinations given, and the extent to which examinations and grading standards provide a reasonably accurate appraisal of each student's ability, and must set out their findings on those subjects in their written evaluations.

PCL must use its Student Information System to generate comparisons of course grades with examination scores in like subjects, to be used by the evaluators as some indication of the quality of instruction, examinations, and grading standards.

E. CHANGES TO ENTRIES IN PCL 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:

Attachment J

[illegible]

Attachment K

[illegible]

StartDate	EndDate	Status	IPAddress	Progress	Duration (ii	Finished	RecordedD	Response
Start Date	End Date	Response T	IP Address	Progress	Duration (ii	Finished	Recorded C	Response I

			47.229.23				R_305yrC	
							RCmiHbOi	
#####	#####	IP Address	4.32	100	284	True	#####	4

			172.248.1				R_1GNUI3	
							iZugNGW	
#####	#####	IP Address	30.0	100	208	True	#####	pa

RecipientL RecipientF RecipientE ExternalRe LocationLa LocationLo Distribution UserLangu A.
Recipient L Recipient F Recipient E External D Location La Location Lc Distribution User Langu Subject:

LaCarra	Robert	rlacarra@montereylaw.edu	34.1563	-118.087	email	EN	Teacher Evaluation
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Dashiell	Keeairra	keeairradashiell@gmail.com	33.8434	-118.074	email	EN	Legal Research
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B	Q1	Q2	Q3	3a	Q4	Q5	5a	Q6
Instructor's	Assess the	Assess the	Assess the	Assess the	Assess the	Assess the	Assess the	Describe th

Juan		Enthusiast						
Moran	Excellent	ic	Excellent	Excellent	Excellent	Excellent	Excellent	Excellent

		Enthusiast						
BIII	Good	ic	Poor	Poor	Poor	Poor	Poor	Poor

Q7	7a	7b	Q8	Q9	Q10	Q11	Q12	Q13
Describe th	Assess the	Assess the	Assess the	Assess the	Assess the	Assess the	Assess the	Assess the

Excellent Excellent Excellent Excellent Excellent Excellent Excellent Excellent Excellent

Poor Poor Average Poor Poor Poor Poor Average Poor

Q14	Q15	Q16	Q19	Q20
Assess the	Assess the	What did y	What did y	Is there any
		Professor did an excellent job this year!	Nothing	thing you would do to improve the course?
Excellent	Excellent			No
				There needs to be a curriculu m for this class. Instructor s should not be able to freestyle. PCL needs set curriculu ms and syllabus for all
Poor	Poor	The Class was not organized. I did not learn anything about legal research	everything	classes.

XIII. POLICIES ON ACADEMIC STANDING – GOOD STANDING, PROBATION, GRADES, GRADUATION, ACADEMIC GRIEVANCES, ETC.

Section 1. Payments To PCL Must Be Current: A student must have paid all amounts owed to PCL in full in order to do any of the following:

- a. advance to the next quarter
- b. be certified by PCL to take the First Year Law Student's Exam
- c. be certified by PCL to take the California Bar Exam
- d. graduate from PCL and receive a J.D. degree or any other degree from PCL
- e. attend classes and receive instruction

HOWEVER, in compliance with the California Educational Debt Collection Practices Act, PCL will provide transcripts to students and former students regardless of whether they owe a debt to PCL. As permitted by the Act, PCL may charge a fee for the transcript.

Section 2. Failing and Substandard Grades

No credit is given for any quarter in which a failing grade (below 60) has been received, unless the student raises the grade pursuant to Section 6 below.

First Year students who receive grades below 70 for two quarters or semesters, or one failing grade (below 60) for a quarter, shall not be certified to take the First Year Law Student's Examination (FYLSX) unless the student raises a quarter grade pursuant to Section 6 with the result that the student has no grades below 60 and, for first year students, not more than one grade below 70.

Section 3. Grading

Pass-fail Grading on Non-Bar Exam Subjects Only: The fourteen subjects tested on the California Bar Exam **must not be graded pass-fail**. They are listed at the end of this Section. Courses not tested on the California Bar Exam may be graded as pass-fail at the discretion of the Instructor.

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.

Grades must be numerical. In order to facilitate calculation of a grade point average, Instructors must give numerical grades, although they may in addition designate the corresponding letter grade. If a letter grade is give in addition to the numerical grade, the following, the following grade scale must be used.

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

Grading to be Anonymous: Grading of examinations in all PCL subjects is to be **anonymous** to the grader.

Written Final Exams Required: Written final examinations are required at PCL in all those Bar Exam subjects. If an Instructor wishes to substitute a project or some other assignment in place of a required final exam, the Instructor must make a request to the Faculty-Curriculum Committee (FCC). If the request is denied, the Instructor may request a review of the decision by the Dean. In all courses, the Instructor has the choice whether to give midterms and quizzes, and on non-Bar Exam subjects the Instructor has the choice whether to give final examinations.

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

Student Unable to Take Examination When Scheduled: If a student is unable to take an examination at the time scheduled, the student must notify the Instructor promptly, and must do so before the exam. The student must explain to the Instructor the reason the student cannot take the exam at the scheduled time, and if the Instructor finds the reason acceptable, the student must discuss alternate times with the Instructor and the Instructor must assign the student a different time to take the exam.

Basis of Grades: For each course, the Instructor must provide each student with a written statement (which can be in the syllabus) explaining the extent to which each of the following will be used in determining a final grade for the quarter:

- (1) The final examination;
- (2) Intermediate, midterm, or other examinations and quizzes;
- (3) Class participation
- (4) Evaluation of examinations or other performance by other than the course Instructor; and
- (5) Any other consideration that might affect the grade in any course.

However, 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.

By the second week of each quarter, the Administrator shall have obtained the syllabi from each Instructor, shall transmit them to the Dean along with a report stating whether all syllabi meet the requirements in the preceding paragraph (including (1) through (5), and pointing out which syllabi do not, if any. If any do not comply, the Dean, through the Administrator or directly, shall communicate with the Instructor to obtain compliance.)

Due Date for Grades from Instructors: For each course, the Instructors, directly or through the PCL Administrator, will notify students of their grades in writing, normally within two weeks after the last week of the quarter, earlier for the spring quarter. For example, a quarter has 10 weeks plus an 11th for a final exam, thus grades are due two weeks after the Friday of the 11th week, but earlier for the spring quarter. If students do not receive their grades within those two weeks, they should notify the Administrator or the Dean.

Students Missing Final Exams: Students who, with prior approval of the Instructor, do not take the final examination will receive a grade of Incomplete. If the student does not take the final exam within one quarter (10 weeks) or semester (15 weeks) after the end of the quarter in which the exam was given to the class, the grade of Incomplete will automatically change to the failing grade of 59, or lower if the Instructor decides it should be lower. **HOWEVER, THIS DOES NOT APPLY TO THE SPRING QUARTER.** If a student misses the final exam in a spring quarter course, the student must take the exam within a few days after missing it, so that the instructor can grade the exam and report the grade to PCL in time for the student receive credit for the course, because by law the student must get credit for the full 270 hours of classroom time in order to get any credit for the academic year.

Withdrawal from Courses: Students may withdraw from a course for any quarter at any time up through the day of the final exam, if they have, before the final exam begins, submitted a written request for that withdrawal to the Administrator. If a course has no final exam, students may withdraw from it up through the last session of the quarter. A grade of “W” will be recorded for all quarters from which a student withdraws following that procedures. No statement from a doctor or other documentation shall be required for withdrawal. If a student withdraws but does not follow the above procedure, the student will receive an failing grade, 59 or below.

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.

Student Inspection of Exams: PCL allows every student to inspect and copy examination questions and the student’s answers to those questions (if the technology makes it feasible) for a reasonable period after grades are recorded, and to compare the student’s answers to the answers for multiple-choice, true-false, and similar tests for a reasonable period of time after grades are transmitted.

Students Showing Inadequate Academic Progress: Faculty members should meet with and counsel students whose grasp of course work reflects insufficient understanding of the course material, and, if appropriate, the Faculty member should refer the student to the Administrator, the Dean, or the Faculty-Curriculum Committee for assistance or counseling of the student.

If a faculty member comes to believe that a student is likely to fail a course or, in the words of State Bar Guideline 5.27, “clearly lacks the ability or the educational background to study law.” the faculty member must report that belief to the Dean.

If, despite efforts by the faculty member and PCL, a student’s performance in a course continues to be poor, it can be necessary to give the student a failing grade. In cases where a student’s prospects for success are very dim, it benefits a student not to pass their courses, so that they do not spend valuable time and money on their studies to no avail.