



**OPEN SESSION**

**AGENDA ITEM IV.B.**

**AUGUST 2023**

**COMMITTEE OF BAR EXAMINERS**

**DATE:** August 18, 2023

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

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

**SUBJECT:** Action on Conclusion of Probation and Application for Registration as an  
Unaccredited Distance Learning Law School – San Francisco Law School

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**EXECUTIVE SUMMARY**

San Francisco Law School's (SFLS) probationary period is concluding, and the law school has not met the conditions of its probation. On August 19, 2022 the Committee of Bar Examiners (committee) set forth as a condition of probation that SFLS earn and document a 2023 minimum, cumulative five-year bar exam pass rate (MPR) of 40 percent or more. The law school's 2023 MPR is 36.7 percent. The Committee of Bar Examiners (committee) will be deciding three issues today: 1) SFLS has requested a second extension of its probation (Attachment A); 2) if its probation is ending, the law school seeks a waiver allowing any law school accepting a transfer student from SFLS to exclude that student's bar results from the receiving law school's MPR calculation (Attachment A); 3) if the law school's extension is not granted and its accreditation is terminated, SFLS requests permission to operate as a registered, unaccredited distance law school (Attachments B-D).

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**BACKGROUND**

San Francisco Law School is an accredited law school teaching classes in fixed-facility format on approved branch campuses in Emeryville and San Diego. The law school operated independently for many decades before being purchased by Alliant University, owned by the [Arist Education System](#), a subsidiary of [Bertelsmann](#), about ten years ago. The majority of the university's classes are based at its campus in San Diego, but the law school considers the Emeryville campus to be its main campus, though it also enrolls students at the San Diego campus.

Since the start of the pandemic, the SFLS has been teaching classes online under a temporary waiver scheduled to end on August 31, 2023.

SFLS has not met the MPR requirement for four consecutive years. It was last in compliance with this requirement when it reported a 2019 MPR of 46.2 percent. In 2020, when the committee concluded that SFLS had not complied with the requirement, it issued a Notice of Noncompliance to SFLS. (Rule 4.172<sup>1</sup>). SFLS' 2020 MPR was 30.5 percent, below the 40 percent minimum required under Rule 4.160(D)(6).<sup>2</sup> ([See Item O-400, Committee of Bar Examiners' Meeting, Aug. 21, 2020](#)). SFLS responding to the Notice of Noncompliance with its plan to attempt to return the law school to compliance.

At its January 29, 2021 meeting, the committee reviewed the response and placed SFLS on two years' probation and required SFLS to return to compliance with the MPR requirement by the end of the probationary term, during the 2022 MPR reporting cycle. ([See Item O-402, Committee of Bar Examiners' Meeting, Jan. 29, 2021](#)).

In 2022, SFLS did not meet its probation condition because it reported an MPR of 35.4 percent. ([See Item O-404, Committee of Bar Examiners' Meeting, Aug. 19, 2022](#)). Upon request of SFLS, the committee extended the law school's probation under Rule 4.173 through the end of the 2023 MPR reporting cycle, which was July 1, 2023. ([See Item O-404, Committee of Bar Examiners' Meeting, Aug. 19, 2022](#)).

The committee approved the extension "because extraordinary circumstances exist due to the pandemic, and to the efforts the law school commits to provide to these students including extraordinary financial and educational support in the form of tuition scholarships for all enrolled JD students through the law school's return to compliance."

The committee advised that it would either "end the accredited law school's probation or will proceed to terminate the law school's accreditation" at its meeting in August 2023, depending on whether the law school demonstrated compliance with its 2023 MPR. (Rule 4.172(F)).

In accordance with Rule 4.173(A)(1), the committee may terminate a law school's accreditation if it has failed to meet the terms of its probation. The committee also sets a date for the termination.

### **Application for Registration as an Unaccredited Law School**

If the committee denies the extension, SFLS requests that the committee approve the law school's application for registration as an unaccredited, distance learning law school. (Attachment B). Because unaccredited law schools are not permitted to have branch campuses, the law school requests to designate the Emeryville campus as its sole location. It may utilize

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<sup>1</sup> Rule 4.172 was Rule 4.170 under the prior rules, though the extension was approved under the current Rules for Accredited Law Schools. All further references in the text of the agenda item are to current unaccredited school rules unless noted

<sup>2</sup> Previously Rule 4.160(N).

the support services operated out of Alliant University's San Diego campus, but accessible via distance learning or via the Emeryville headquarters.

## **DISCUSSION**

SFLS has reported MPRs as follows since 2020: 36.0 percent (2020); 39.0 percent (2021); 35.4 percent (2022); and 36.7 percent (2023). The law school indicates it worked hard to support its students, though unfortunately, the efforts did not return the law school to compliance with the MPR requirement.

SFLS stopped admitting students since the time it was placed on probation, advising that it preferred to focus on strengthening the curriculum to support its current students. As part of that effort, SFLS modified its curriculum, and also added a bar preparation program for alumni.

Currently, SFLS enrolls five students, all of whom are attending on full scholarships and preparing to begin their fourth and final year of law school.

These students have been aware since 2020 that the law school was on probation, that the law school's accreditation could have terminated in August 2022, and that its probation extended only through the 2023 MPR reporting cycle prior to their graduation. SFLS advised these students that if the law school's accreditation was terminated and they remained enrolled at SFLS, they would graduate with a degree from an unaccredited law school, since that was the character of their law school at the time of graduation, and their class schedule would need to comply with the requirements of the Rules for Unaccredited Law Schools.

### **SFLS Requests a Second One-Year Extension of its Probation Period**

"[T]he Committee may extend the probationary period if the Committee makes specific findings that extraordinary circumstances justify the extension." When "reviewing an extension request, the Committee shall consider the progress made toward bringing the law school into substantial compliance or compliance and any other relevant information." (Rule 4.172(E)).

Attachment A sets forth the law school's reasoning as to why it is seeking permission to extend its probationary term for a second time through the 2024 MPR reporting cycle ending July 1, 2024, resulting in a four-year long probation. The arguments are addressed below.

As conditions of the extension, SFLS proposed that it will transition to registered, unaccredited, distance learning status, if that is approved by the committee. During the proposed extension, SFLS proposes to: 1) continue to refrain from enrolling new students; 2) provide full tuition scholarships to the five remaining students; and 3) refrain from marketing its brand or soliciting prospective students.

SFLS argues that the extension is warranted because it is concerned for its students and wants them to have a chance to graduate with an accredited JD degree. The law school indicates that "staff and faculty have worked tirelessly to improve its curriculum, its programs, and to assist

graduating students and former alumni” to prepare for the bar exam, and it does not want its students to be harmed because its efforts did not result in sufficient improvement to achieve compliance.

The law school also argues that the students will be injured if probation is not extended. Another perspective, however, is that the students may be better served by attending a law school whose graduates have earned more favorable results on the bar exam. In addition, these students were well aware of the risk they took by remaining enrolled at this law school, weighing the benefit of the full scholarship against the law school’s compliance issues.

These law students have known since the imposition of probation in 2020 that the law school’s accreditation could be terminated, and likely expected it to happen during summer 2022, but for the most recent extension. These law students can still transfer to another law school for their final year, perhaps improving their opportunities to license.

SFLS is currently providing full scholarships to all five JD students, and may similarly advantage them by providing a refund of past tuition, or a stipend to use at another institution if the school so chooses.

While the law school believes that its students’ ability to take and pass the bar exam was impacted negatively by the pandemic, all law schools faced the same public health conditions as they delivered their educational programs during the pandemic. During that time, MPR values at many law schools increased. This may be, in part, due to a reduction in the passing score, as well as the option for certain students to license without taking another bar exam after completion of the Provisional Licensure Pathway Program under California Rule of Court 9.49.1. SFLS’s MPR has cycled up, down, and up again. While increasing 1.3 points versus last year, it still has not reached the 40 percent minimum.

The law school does not appear to project that its MPR will be compliant in 2024, and directly states that if a one-year extension is granted, the law school agrees to transition to unaccredited status at the end of the extension.

Therefore, based on both the law school’s own current representation, and four cycles of noncompliant MPR values, there are no extraordinary circumstances that would justify the extension of the law school’s probation.

### **Termination of Accreditation**

SFLS has not met the probation condition set by the committee in August 2022, that it achieves an MPR of 40 percent or more with the 2023 reporting cycle. The law school has not been able to return to compliance during the last four reporting cycles, and does not project to do so next year. The school was aware that it must come into compliance by the time of the 2023 MPR reporting cycle, or its accreditation would be terminated, and it has filed an application seeking registration if its extension is not approved. There is no evidence of extraordinary circumstances to justify an extension. The MPR increase from last year to this year is

insufficient to establish compliance or confidence that compliance is imminent, especially when placed in the context that the law school's MPR has been rising and falling for the last four cycles, never reaching compliance. Staff recommends denying the extension and terminating accreditation and the law school's degree-granting authority effective immediately.

The law school identified a termination date of September 1, 2023, but immediate termination is recommended to provide clear notice to students, who may be considering whether to transfer.

### **Request for Waiver of Application of MPR Requirement to Transferring Students**

SFLS seeks a waiver that would allow any of its remaining students who transfer from the law school to be excluded from their new law schools' MPR calculations.

Staff recommends denying this request. The MPR requirement is a fundamental and complex performance measure. Each accredited law school is expected to take responsibility for each student it accepts. If the law school does not believe that the student meets its admissions criteria, or that the student possesses the current intent and capacity to succeed, the law school should not be accepting that student. Moreover, if the student is not included in the law school's MPR calculation, the law school may prioritize supporting other students over these transfer students.

### **Application for Registration as an Unaccredited Law School**

If the Committee terminates the accreditation of SFLS, the law school requests that the Committee grant its application to register as an unaccredited, distance learning law school. The law school would teach out its current fourth-year students in the unaccredited program starting in fall 2023, and begin enrolling new students in January 2024. (Attachments B-D). Staff reviewed the attached application in detail and key points are summarized here.

SFLS agrees to take steps to meet all obligations of a registered, unaccredited, distance learning law school, including filing compliant annual reports and complying with conditions that the Committee may impose, including a confirming inspection to be scheduled shortly after the law school's registration takes effect. As registered schools are only allowed one campus, SFLS advised that it will designate its Emeryville campus as its sole campus.<sup>3</sup>

The school will use its current framework to ensure honesty, integrity, equity, and effective governance. The school described its infrastructure for ensuring lawful operation, integrity of operations, non-discrimination, and governance. (Rules 4.240 (A), (B), (C), (K), (L), (M)). The law school's status and contribution to Alliant International University, of which it is a part, will need to be monitored.

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<sup>3</sup> The law school could also choose to request permission to operate two separate law schools, one at each campus, but it has not selected that option.

In prior years, SFLS maintained a reserve large enough to support itself for approximately one school year. Its current reserve and ability to support itself should be monitored and verified, since the law school has not been taking in revenue for the last several years, though Alliant University indicates that it is committed to supporting the law school. (Rule 4.240 (K)).

The law school asserts it will continue to maintain accurate records. It will be important to verify this statement as well. SFLS previously experienced many issues with recordkeeping until a full-time registrar was hired. Unfortunately, the full-time registrar departed earlier this year and has not yet been replaced. (Rule 4.240(L)).

The school has a non-discrimination policy and maintains a diverse student body and faculty, as well as a policy designed to provide effective accommodations to qualified students. (Rule 4.240 (M)).

The credentials of the school's dean and faculty meet the requirements of the rules. The school's dean will continue to be Timothy Weimer, a graduate of the University of Akron School of Law who also holds a master's degree in business administration. He practiced law in a wide range of areas before joining the law school. (Rule 4.240 (D)). The law school also expects to retain its current faculty.

The school's proposed distance learning JD education program appears to comply with the hours requirements set forth in California Business and Professions Code section 6060. A registered, distance learning law school must offer a sound program of legal education that includes at least 864 hours of study and preparation per year for four years, with at least 135 hours per year being interactive. (Guideline 5.3). The law school's planned program appears to include more than the minimum hours of classroom instruction and interactive hours required per year. (Rule 4.240 (E)). The program should be promptly verified via inspection, however, as the school has submitted several formats for the committee's consideration, with the most recent format provided on August 3, 2023, and further modified on August 7, 2023, leaving staff a short time to study and verify the law school's assertions.

SFLS asserts it will maintain its competency training options and enhance its writing skills programs, exceeding the requirement that registered schools provide at least six units of competency training, as it has been doing remotely. (Rule 4.240 (F)).

SFLS advises that it will implement a compliant admissions program requiring students to establish that they have the time and capacity to devote to the demands of the distance learning JD program. The student outcomes achieved in recent years suggest the school must carefully scrutinize its admissions policy before admitting a new class. (Rule 4.240 (H)).

The school indicates it will update its outreach and disclosures to reflect its planned operation as an unaccredited, distance learning law school, and that students will continue to have access to all administrative and academic support services online (Rule 4.240 (G)). SFLS's headquarters will be located at its current Emeryville campus, shared with other programs of Alliant University. The library will be a fully remote library. (Rule 4.240(I)).

## RECOMMENDATIONS

Staff recommends that the committee deny San Francisco Law School's request for a second extension of its probation, because the committee finds that the law school has not demonstrated that extraordinary circumstances exist to justify the extension.

Staff recommends that the committee terminate San Francisco Law School's accreditation and its degree granting authority as an accredited law school effective August 18, 2023, based on a finding that the law school has not met its probationary condition of reporting a minimum, cumulative five-year bar exam passage rate of 40 percent or more for the 2023 MPR reporting cycle.

Staff recommends that the committee grant the law school's request for registration as an unaccredited, distance learning law school effective August 18, 2023 with degree granting authority as an unaccredited, distance learning law school to begin on this date, and that the law school be directed to undergo an inspection by the State Bar in 2024. The law school should be granted permission to teach out its current fourth-year students beginning with the fall 2023 term, and to enroll new students starting in January 2024

Staff also recommends that San Francisco Law School be directed to advise all students, prospective students, and the public of these decisions immediately, including posting prominent notice on its law school website home page in a font size consistent with the rest of the page and under its own heading and title, updating and redistributing its disclosures to all prospective and current law students.

Finally, staff recommends that the law school provide a detailed progress report documenting all aspects of its transition and implementation of the new program as part of its timely 2023 Annual Report by November 15, 2023, including verification of updated disclosures, and an evaluation and verification of each currently enrolled student's plan of study, with this detailed update to serve as the self-study for the law school's inspection planned for 2024.

## PROPOSED MOTION

If the committee agrees with this recommendation, the following motion is suggested:

**FURTHER MOVE**, that the Committee of Bar Examiners deny San Francisco Law School's request for a second extension of its probation, because the committee finds that the law school has not demonstrated that extraordinary circumstances exist to justify the extension.

**FURTHER MOVE**, the committee terminate San Francisco Law School's accreditation and its degree granting authority as an accredited law school effective August 18, 2023, based on a finding that the law school has not met its probationary condition of reporting a minimum, cumulative five-year bar exam passage rate of 40 percent or more for the 2023 MPR reporting cycle.

**FURTHER MOVE**, that the committee grant the law school's request for registration as an unaccredited, distance learning law school effective August 18, 2023 with degree granting authority as an unaccredited, distance learning law school to begin on this date, and that the law school be directed to undergo an inspection by the State Bar in 2024. The law school should be granted permission to teach out its current fourth-year students beginning with the fall 2023 term, and to enroll new students starting in January 2024.

**FURTHER MOVE**, that San Francisco Law School be directed to advise all students, prospective students, and the public of these decisions immediately, including posting prominent notice on its law school website home page in a font size consistent with the rest of the page and under its own heading and title, updating and redistributing its disclosures to all prospective and current law students.

**FURTHER MOVE**, that the law school be directed to provide a detailed progress report documenting all aspects of its transition and implementation of the new program as part of its timely 2023 Annual Report by November 15, 2023, including verification of updated disclosures, and an evaluation and verification of each currently enrolled student's plan of study, with this detailed update to serve as the self-study for the law school's inspection planned for 2024.

## **ATTACHMENTS LIST**

- A. Application for Extension of Probation Due to Extraordinary Circumstances and Waiver of MPR Requirements for Transferring Students
- B. Contingent Application for Registration as an Unaccredited, Distance Learning Law School
- C. SFLS Curriculum Revision Plan
- D. Modality from Fixed Facility to Distance Learning





**SAN FRANCISCO LAW SCHOOL**  
**ALLIANT INTERNATIONAL UNIVERSITY**  
1475 66<sup>th</sup> Street, Suite 104, Emeryville, CA 94608  
415-955-2162

July 5, 2023

State Bar of California  
Committee of Bar Examiners  
180 Howard Street  
San Francisco, CA 94105

Re: SFLS Probationary Status

Dear Committee Members,

On January 29, 2021 the State Bar of California's Committee of Bar Examiners (CBE or Committee) placed San Francisco Law School (SFLS) on probationary status due to the Multi-Year Bar Exam Pass Rate (MPR) falling below the required 40%.

On August 19, 2022, the Committee granted an extension of probation "because extraordinary circumstances exist due to the pandemic, and to the efforts the law school commits to provide to these students including extraordinary financial and educational support in the form of tuition scholarships for all enrolled JD students through the law school's return to compliance."

Since the time SFLS was originally placed on probation, and over the last year in particular, administrators, staff and faculty have worked tirelessly to improve its curriculum, its programs, and to assist graduating students and former alumni to prepare for the California State Bar Exam. These efforts have been reported to the CBE by SFLS in each of our periodic update reports. After the February 2023 administration of the exam SFLS' updated 2022 MPR is 36%.

Request for Probationary Status Extension

SFLS and Alliant's singular focus is on ensuring that the remaining five students are not negatively impacted. SFLS is requesting that rather than remove SFLS's accreditation, due to the MPR being below the 40% threshold, the Committee extend the probationary period through August 31, 2024. Again, the University commits to not enroll any new students into the program, and to cover the full tuition costs for the remaining students.

For the reasons stated below, SFLS is requesting an extension of probation for SFLS until August 31, 2024, with the following conditions:

1. SFLS will not enroll any new students during the probationary period.
2. SFLS will continue to provide full tuition scholarships to these five remaining students.
3. SFLS will not market its brand, nor solicit any prospective students.

The following serves as support for our requests.

Since being placed on probation SFLS', and Alliant's sole concern has been the wellbeing and success of its current students. SFLS would like to continue these efforts by requesting an extension of probation so that these five remaining students may complete their legal education and be eligible to sit for the CBX upon graduating in May 2024.

As we agreed at the CBE meeting in August 2022, SFLS has continued its extraordinary financial and educational support in the form of full tuition scholarships for all enrolled JD students through the law school's return to compliance.

SFLS is in a unique position among California Accredited Law Schools (CALS) because it is not a standalone law school, but part of larger Alliant International University (Alliant). This has allowed SFLS to make unprecedented decisions to ensure that it is focused on its current student's success above all else.

Because of its unique relationship with Alliant, SFLS has not had to focus on filling seats, and/or collecting tuition to continue its operations. Since August 2021 SFLS has been able to focus on continued curriculum improvement and the success of its current students. It has not marketed its brand, solicited any prospective students, or enrolled new students since August 2021.

This has allowed SFLS to focus its time and resources in preparing its current students to take the California Bar Exam (CBX) when they graduate. This has also allowed SFLS to continue assisting alumni in preparing for the CBX by continually improving the SFLS Alumni Bar Preparation Assistance Program.

Alliant International University, in collaboration with the non-profit Alliant Educational Foundation, has awarded full tuition scholarships to all current students attending SFLS while they complete their Juris Doctorate.

These efforts have ensured that SFLS is focused on the success of our current students and that SFLS has been able to avoid any negative impact on these students. For instance, students who have completed coursework for the last year at SFLS may not be able to transfer those credits to other law schools. This has a major impact for these students.

In closing, SFLS and Alliant's singular focus is on ensuring that the remaining five students are not negatively impacted. For the reasons stated above, SFLS is requesting an extension of probation for SFLS until August 31, 2024, with the following conditions:

1. SFLS will not enroll any new students during the probationary period.
2. SFLS will continue to provide tuition scholarships to these five remaining students.
3. SFLS will not market its brand, nor solicit any prospective students.

SFLS will apply to become a registered unaccredited law school at the end of the extension requested.

Alternative Request for Approval of SFLS Becoming a California Registered, Unaccredited Law School

In the alternative, should the Committee decide not to extend the probationary period until August 31, 2024. SFLS is applying for a change in status to a Registered, Unaccredited Law School under the State Bar Rules. This application should only be considered if the Committee removes SFLS accreditation after reviewing the extension request above.

Finally, as part of its application to become a registered unaccredited law school. SFLS is also requesting that the CBE approve that any receiving law school that accepts any of these five remaining SFLS students as a transfer student, be allowed to waive the transferred SFLS student from their MPR calculations.

Please feel free to contact me if you have any additional questions or require any additional information.

Sincerely,

*Timothy P. Weimer*

Timothy P. Weimer, Dean  
San Francisco Law School  
(415) 955-2162  
[timothy.weimer@alliant.edu](mailto:timothy.weimer@alliant.edu)



# The State Bar of California

## OFFICE OF ADMISSIONS

### APPLICATION FOR REGISTRATION AS A CALIFORNIA UNACCREDITED LAW SCHOOL

#### SCHOOL

Indicate the type of law school you are seeking to register (check only one):

☐ Fixed-Facility (classroom)      ☒ Distance-Learning (online)      ☐ Correspondence (mail)

Name: San Francisco Law School  
 Street Address: 1475 66<sup>th</sup> Street, Suite 104  
 City, State, Zip: Emeryville, CA 94608  
 Phone Number: (415) 955-2162  
 Website Address: [www.sfls.edu](http://www.sfls.edu)

The law school is established as (check one):      ☒ For-Profit      ☐ Not-For-Profit  
 Type of Entity: Benefit Corporation

#### PRINCIPAL CONTACT FOR THIS APPLICATION

Name: Timothy P. Weimer, Dean  
 Street Address: 1475 66<sup>th</sup> Street  
 City, State, Zip: Emeryville, CA 94608  
 Phone Number: (415) 955-2162  
 Website Address: [www.sfls.edu](http://www.sfls.edu)

#### PRIMARY ADMINISTRATIVE OFFICE OF THE LAW SCHOOL

Name: Timothy P. Weimer, Dean  
 Street Address: 1475 66<sup>th</sup> Street, Suite 104  
 City, State, Zip: Emeryville, CA 95608  
 Phone Number: (415) 955-2162  
 Website Address: [www.sfls.edu](http://www.sfls.edu)

**ADMINISTRATIVE CONTACT, IF DIFFERENT FROM PRINCIPAL CONTACT ABOVE**

Name: Timothy P. Weimer, Dean  
Street Address: 1475 66<sup>th</sup> Street, Suite 104  
City, State, Zip: Emeryville, CA 95608  
Phone Number: (415) 955-2162  
Website Address: [www.sfls.edu](http://www.sfls.edu)

**OWNER(S), SHAREHOLDER(S) AND/OR PARTNER(S) CONTACT INFORMATION**

Add additional sheets if needed to include all owners or partners.

Name: Arist Education System, LLC  
Street Address: 1745 Broadway  
City, State, Zip: New York, NY 10019  
Phone Number: 212-782-1000  
Website Address: N/A

## FILING INSTRUCTIONS

Send one electronic copy of the application and all attachments to [admissions@calbar.ca.gov](mailto:admissions@calbar.ca.gov) and also mail a hard copy of the application, payment page, and fee to:

Department of Educational Standards  
Office of Admissions  
The State Bar of California  
180 Howard Street  
San Francisco, CA 94105-1639

## ACKNOWLEDGEMENT AND AGREEMENT

*I hereby declare that I am authorized to sign on behalf of the school applying for registration as an unaccredited law school. The school understands that there are additional costs associated with the registration of a school as set forth in the list of charges and deadlines and that failure to pay these fees timely may result in delay, denial, or termination of registration. The school further agrees that additional information may be requested by the State Bar in connection with this application in order for consideration of the application to proceed. The school understands that the State Bar operates subject to the California Public Record Act, and all documents submitted to the State Bar or created by the State Bar become public documents unless they are within an exception to that Act.*

*The school understands that this is an application for registration as an unaccredited law school and all students attending the law school will be required to take and pass the First Year Law Students' Examination in accordance with the Rules and Guidelines for Unaccredited Law Schools as part of the process of completing their JD degrees.*

*The school agrees not to solicit applications or otherwise present itself to the public or students until it has earned registration.*

*I hereby declare under penalty of perjury under the laws of the State of California that the information provided in this application for registration of an unaccredited law school is true and correct.*

## SIGNATURE OF AUTHORIZED REPRESENTATIVE

Signature:	<i>Timothy P. Weimer</i>
Print Name:	Timothy P. Weimer
Title:	Dean
Phone Number:	(415) 955-2162
Email Address:	<a href="mailto:timothy.weimer@alliant.edu">timothy.weimer@alliant.edu</a>

## **REQUIRED ATTACHMENTS**

### **APPLICATION FOR REGISTRATION AS A CALIFORNIA UNACCREDITED LAW SCHOOL**

Please provide separate responses to each request for information. You may provide your responses below or on a separate sheet clearly numbered. To the extent that the question is answered by an attached document, the school may refer to the document, noting the specific page references responsive to the question.

- 1. Provide a written narrative explaining the history, mission, and goals of the law school. What evidence-based measures will be utilized to help the school evaluate whether it is meeting its mission and goals? State Bar Rule 4.240; Guideline 2.1.**

SFLS was founded in 1909 and accredited in 1937. In 1941, the school became a nonprofit entity and moved to its Haight Street campus in San Francisco. In 2010, SFLS began a merger with Alliant International University (Alliant). As a school within AIU, an institution regionally accredited by the WASC Senior College and University Commission SFLS became eligible to participate in federal financial aid programs. In 2014, SFLS received CBE approval to open a branch campus at an AIU campus in the Scripps Ranch area of San Diego.

The school offers a Juris Doctor (JD) through a part-time, four-year, 87-unit evening program that includes a combination of classroom courses and up to 12 online courses. Total program tuition is \$85,260. In fall 2019, total SFLS enrollment was 54 JD students, including 26 students enrolled at SFLS Emeryville and 28 students enrolled at SFLS San Diego. The school has two full-time faculty members; Professor Scott Pearce and Professor Katherine Alfieri. All instructors are graduates of law schools accredited by the CBE or approved by the Council of the Section on Legal Education and Admissions to the Bar of the American Bar association, and all faculty are licensed to practice law.

#### **Mission, Goals and Core Values**

San Francisco Law School is dedicated to providing the opportunity for a quality legal education to a diverse student population, many of whom are working full time jobs and have family responsibilities while attending law school. For over 100 years, San Francisco Law School has been devoted to educating attorneys who embody the highest aspirations of the legal profession and are committed to the ethical practice of law.

Students at San Francisco Law School seek to better their own lives and that of their families. Historically, many students are the first in their families to be in a doctoral program and, for some, the first to have graduated from college. Since its earliest days, San Francisco Law School has been a model of non-discrimination, diversity and opportunity.

This mission is congruent with the Alliant International University mission to prepare students for professional careers of service and leadership, and to promote the

discovery and application of knowledge to improve the lives of people in diverse cultures and communities around the world.

Currently, SFLS is working on a new five-year curriculum revision plan entitled the 'Academic Excellence Plan.' This plan was deliberated and approved by the academic curriculum committee in spring 2020. However, the plan will not be implemented until the 2023-2024 academic year. A brief description of this plan is included with this application as Appendix B – SFLS Curriculum Revision Plan and incorporated by reference. The implementation of these changes will be reported in the 2023 SFLS Annual Report as required.

Monitoring student and program successes is a priority for SFLS. A new assessment rubric was been created and has been tested since academic year (2021 – 2022). SFLS is also working closely with the University's Office of Assessment and Institutional Research. The goal is to integrate the rubrics into the course Canvas platforms. This will allow professors to integrate the assessment rubric directly into the grading of exams and assignments. This data will then be collected and reviewed periodically to determine whether the goals and mission of SFLS are being met and identify areas of needed improvement.

A full discussion about the two components of this change are included in Appendix A – Modality from Fixed Income to Distance Learning and Appendix B – SFLS Curriculum Revision Plan.

**2. Who or what business entity owns the law school? List the type of entity and attach the formation document and any business license(s) required to operate in the State of California. Guideline 2.4.**

The San Francisco Law School is one of six (6) schools at Alliant International University, Inc., which is 100% owned by Arist Education System, LLC. There are no individual owners of SFLS. See attached Articles of Incorporation and most recent Statement of Information.

**3. Provide a copy of the law school's proposed balance sheet and budget for the first three years of operation, including source of funds, and capitalization of the ownership entity. Also include the percentage of the budget that is expected to be covered by tuition and fees for each of the first three years. Guidelines 8.1-8.3.**

The attached .pdf entitled "SFLS Budget Projections" provides the plan for the law school which shows a positive contribution after instructional, program and school costs by the law school in year 2024. The latest composite score of Alliant's parent company shows the maximum score of 3.0 with a net income and strong equity position. See latest Arist audited financial statements. SFLS is part of Alliant International University Inc. and does not produce its own financial statements for its operations.

For percentage of the budget see attached .pdf "SFLS Budget Projections".



- 4. Provide a written narrative explaining how the school will maintain adequate resources to fulfill its educational goals, including sustainable operation of the school, payment of all fees owed to the State Bar, and sufficient reserves to sustain the school through fluctuations in available resources, market changes, faculty changes, and other changes in circumstances that can be reasonably anticipated. State Bar Rule 4.240(K); Guideline 2.2.**

As reported to the US Department of Education, the most recent federal composite score of Alliant International University (consolidated with its parent company Arist Education System) is 3.0. Accordingly, the financial position of the university is strong and there are no present concerns about sustainability or the ability to meet its operational obligations including faculty/staff hiring or payment of fees owed to the State Bar. Further, Alliant engages in a process of risk identification and assessment and develops plans and responses to anticipated market changes and other circumstances it considers as potentially impacting the university operations or its student body.

- 5. Describe the governance structure of the law school. State Bar Rule 4.240(C).**

SFLS is governed by Alliant International University's Board of Trustees as well as the Arist Education System Board of Directors.

- 6. Does the law school ownership entity engage in any other business or mission, educational or otherwise? If so, please explain the nature of the other business. (Guideline 2.2(A).)**

Alliant International University offers certificate, credential, undergraduate, graduate and doctoral programs in the following schools – California School of Professional Psychology (CSPP); California School of Education (CSOE); California School of Management and Leadership (CSML); California School of Forensic Studies (CSFS); School of Nursing and Health Sciences (in Arizona).

- 7. Does the law school ownership entity have any formal or informal relationship with any other business entities, educational or otherwise? If so, please list the other business entities and explain the nature of the relationship. (Guideline 2.2(A).)**

Alliant International University, Inc., is 100% owned by Arist Education System, LLC. Alliant International University also owns a major shareholding of St. Luke's Medical School in Mexico City, Mexico.

- 8. Does the law school ownership entity currently hold or plan to seek accreditation or registration with any other accreditation or registration entities, such as the Bureau of Private Post-Secondary Education or a regional or national accreditor? If so, please list**

**the accreditation or registration entities and the dates of accreditation or registration. (State Bar Rules 4.240(B) and 4.240(E); Guideline 2.1.)**

Alliant International University is authorized to operate by the Bureau of Private Post-Secondary Education until June 2028. Alliant is also accredited by the WASC Senior College and University Commission (WSCUC). Alliant also enjoys specialty accreditation of its programs as follows:

- Commission on Accreditation of the American Psychological Association (APA)
- Commission on Accreditation of Marriage and Family Therapy Education (COAMFTE), of the American Association for Marriage and Family Therapy.
- California Teacher Credentialing programs, approved by the California Commission on Teacher Credentialing (CTC).
- Accreditation Council for Business Schools and Programs (ACBSP)

For many of these Accreditors, accreditation is granted until it is withdrawn, so we have to use the date of the next visit.

WSCUC: next reaffirmation visit **Fall 2028** (no exact date) - accreditation decision is linked to date of site visit.

COAMFTE: **November 1, 2027**

CTC: **Spring 2024**

ACBSP: **2028** (no exact date)

APA

Fresno PhD - **2027**

Fresno PsyD - **2025 (Fall)**

Los Angeles PhD - **2025 (Spring)**

Los Angeles PsyD - **2023 (Spring)**

Sacramento PsyD - **2028**

San Diego PhD - **2023 (Fall)**

San Diego PsyD - **2025 (Spring)**

San Francisco PhD - **2027**

San Francisco PsyD - **2022 (Fall)**

Several of the APA dates are pushed back due to the pandemic. The ones far out don't have a term (fall/spring) set yet for a site visit.

9. **Provide a statement of the methods of instruction to be used by the law school. Provide a specific statement regarding how faculty will instruct students and how the law school will provide students with academic counseling. Describe the composition and experience of the team designing, maintaining, executing, and evaluating the instruction. (State Bar Rules 4.240(D) and 4.240(E); Guidelines 4.1-4.11.)**

The method of teaching the class is under the control of the individual instructor. The San Francisco Law School Administration respects academic integrity of the teaching methodology, and examination grading process. SFLS works with its Faculty Council to ensure the quality of instruction and grading.

Each student is assigned a Student Advisor at the beginning of the school year. Students are encouraged to meet with their academic advisor at least once each semester to review his/her Pathway to Graduation plan and any assessment information that is available to help the student identify needed areas of improvement.

The Peer Review and Faculty Development Committee is charged with monitoring to ensure that faculty peer review are conducted timely within the perimeters set by the Guidelines. All faculty are to be evaluated by a Peer Review Team, which consisting of two or more faculty members per review. The Peer Review Team will conduct classroom observations which will be reflected in a written report. Students provide separate evaluations at the conclusion of each course.

The Faculty Council codified the following criteria for evaluation of faculty at San Francisco Law School: education, expertise and experience, instructional competence and skills, materials utilized, including a course syllabus, examination skills, grading calibration, assessment and evaluation modalities, and professional competencies. Each evaluation includes a written report which is given to the instructor and included in the instructor's file.

Finally, SFLS has a Curriculum Committee made up of volunteer Adjunct Faculty members that periodically reviews the overall curriculum plan. Any changes to the curriculum plan, or curriculum in general must be first presented to and approved by the committee before they are implemented. Once the SFLS Curriculum Committee approves any changes, the plan is then submitted to the University's Curriculum Review Committee, which must also approve the changes before SFLS can include them in the revised curriculum.

**10. Describe the contents of the proposed JD curriculum, including total credits, required classes, electives and schedules. Explain how the proposed curriculum meets all requirements dictated by statute, rule or guideline, including specified competency and skills training and requirements. Describe the composition and experience of the team designing, maintaining, executing and evaluating the instructional methods. (State Bar Rule 4.240(E); Guidelines 5.1-5.36.)**

As mentioned above, SFLS is currently working on a new five-year curriculum revision plan entitled the 'Academic Excellence Plan.' This plan was deliberated and approved by the academic curriculum committee in spring 2020. However, the plan will not be

implemented until the 2023-2024 academic year. A brief description of this plan including specified competency and skills training and requirements, is included with this application as Appendix B – SFLS Curriculum Revision Plan. The implementation of these changes will be reported in the 2023 SFLS Annual Report as required.

**11. If the law school intends to deliver any or all of its curriculum via technology-based instruction methods, provide a detailed statement explaining the methods, technology and software to be used and the extent to which they will involve verified interaction between instructors and students, as well as describing how the school will authenticate a student's work as their own. Describe the school's experience with this technology, as well as how it will be deployed and supported. (State Bar Rule 4.240(E); Guidelines 5.1-5.36.)**

The authentication of student identity in the program and courses takes place through 1) the variety of faculty and peer interactions with the student in the courses and 2) a unique student log-in with added security. These interactions begin during the admission process and continue throughout the program.

- Admission to the program requires an initial Zoom-mediated interview with the program director or program faculty.
- Each student receives a unique email/account log-in and password, plus Alliant log-in requires Multi Factor Authentication using two methods: 1) the Microsoft Authenticator app and a mobile phone number for verification calls or text messages.
- Assignments in courses require complex thinking and build on knowledge and skills in prior courses, including case studies, research projects, and other written or applied assignments making it difficult for the others to submit work.
- Some courses require group work, so students must work together over a term.
- Students develop and present projects using multimedia through the learning management system in some courses.
- Students are required to attend one hour for each class in person during the program in which they meet with other students and faculty, helping faculty to get to know students individually.
- Students must write a doctoral exam and meet with three faculty to show videos and defend their theoretical orientations. They also have to participate in an internship sequence, in which students are individually supervised by faculty. Further, students must write a dissertation as part of the program, which requires intensive student-faculty interaction.

**12. Provide a written description of the law school's physical or electronic resources and assets of the school that will be used in the educational process, distinguishing items owned from items leased. (State Bar Rules 4.240(I) and 4.240(J); Guidelines 6.1-7.2.)**

SFLS is part of the larger Alliant International University (Alliant). SFLS' main campus is in Emeryville, CA, with a branch campus in San Diego, CA. SFLS is requesting to become a Distance Learning Law School. SFLS will be moving the majority of its instruction

online. While the paragraphs below discuss the current physical locations, the implementation of the online J.D. program is covered at length in Appendix A – SFLS Modality from Fixed Facility to Distance Learning.

Once SFLS makes the change from fixed facility to distance learning, the main Online administrative campus will remain in Emeryville, CA, with support and record keeping services from Alliant at the San Diego, CA location.

#### Current Physical Resources

The Emeryville campus has a total of 10 classrooms, 5 off them with a capacity for 18 students each, 1 computer classroom with capacity for 28 users, four 4 classrooms with capacity for 24 each, these four classrooms can be combined in two large classrooms with capacity for 48 students each. SFLS also has 5 study rooms inside the library.

For facilities at the San Deigo campus, SFLS students meet exclusively in the library building on campus. This building also has a number of various sized classrooms and study rooms available to students.

#### Electronic Resources

Alliant International University/San Francisco Law School campuses are interconnected via a wide area network for direct wired connectivity to, voice, local data transmission and Internet services. Additionally, there is segmented dedicated wireless network for Internet access. Data is hosted via off-site redundant cloud storage through Microsoft SharePoint and One Drive that provide access to files, and e-mail from anywhere on or off campus with an Internet connection. Students, faculty, and staff have access to a variety of software, including Microsoft Office 365 suite: Access, Excel, Outlook, PowerPoint, Teams, and Word. These packages are installed on all Alliant computers as well as available for download and installation on up to five users' personal devices. Site licenses are in place for a variety of applications and services including AMOS, Brainfuse, Career Impact (Purple Briefcase), Qualtrics, SPSS, QSR NUDIST, Zoom Meetings.

A standard issue workstation for faculty, staff, classrooms, and labs is at minimum an Intel-based laptop or desktop configuration which includes an i5 processor, 8GB of main memory, a 120GB solid-state disk drive, web camera, keyboard/mouse, 24" display, wired and wireless adapters and access to network connected multi-function copier/printer/scanner devices. A standard software image includes Windows 10, Office 365, Cylance PROTECT, Acrobat Reader, SPSS and Zoom. Additionally access to multiple online databases and library resources are available at <https://library.alliant.edu/>.

Classroom technology includes a 75" LED display or projector system with soundbar/speakers, dedicated computer with web-camera, and a secondary connection to connect a user provided device to the room audio/visual system. In the case of convertible classrooms, ceiling mounted projectors with screens and podium with A/V switching controls are available in each divisible room. Each meeting space can support

independent or combined room presentations, with program audio playback and speech reinforcement. All audio, video, and control infrastructure are included to support combined room and divided room operations.

Wi-Fi access points are distributed throughout the campus with full coverage to all Alliant-accessible areas. Each campus has at least one computer classroom and a library reference area and/or open computer lab available to students. All computers have a dedicated wired connection to the Alliant network and Internet. All courses: on-ground, remote and hybrid have access to our Canvas Learning Management System (LMS). Canvas has integration with Zoom web conference and Turnitin academic integrity applications.

The university implemented its new Student Information System (SIS), Campus Nexus Student, in December of 2019. The SIS provides students with an easy, intuitive platform for all daily education needs; efficiently track degree program progress; access to student services, grades, advisors, and faculty; and all forms necessary to complete the program. The faculty and student portal are available at <https://portal.alliant.edu/>. Technology support is available through an online knowledgebase and Helpdesk ticketing support at <https://ithelp.alliant.edu/>.

**13. Provide the date classes are proposed to start. Please be aware that applications should not be solicited or accepted until a school earns registration from the State Bar of California and no specific start date is guaranteed. (State Bar Rule 4.221.)**

No new applications will be accepted until SFLS has successfully registered with the State Bar of California. The current plan is to admit the first class under a Registered Unaccredited status for a January 2024 start.

**14. Provide the proposed tuition and fees for the entire J.D. degree. (Guideline 2.2.)**

Tuition and Fees for SFLS can be found in the Alliant International University Catalog, online at: <https://catalog.alliant.edu/content.php?catoid=37&navoid=1422>

**15. What is the projected class size? Describe the law schools admissions or recruitment strategy or mission. (State Bar Rule 4.241(A)(7).)**

SFLS plans to initiate the online curriculum by enrolling a limited cohort of 20-30 students for year one, 30-40 students year two, and 40+ students years three and four in the initial five-year development phase. The five-year phase includes the four-year online JD curriculum and the post-graduate year of bar preparation.

**Admissions Mission Statement**

The Office of Admissions is dedicated to matriculating a diverse group of students who reflect the core values and mission of Alliant International University. It is our goal to provide exceptional service as prospective students and their families navigate the

inquiry, application, decision, and enrollment process. Our knowledgeable Admissions Counselors are passionate about higher education and deem it a privilege to be a part of each individual student's educational journey. We strive for excellence in all interactions to ensure students are fully supported as they embark on their journey at Alliant.

### **SFLS Admissions Strategic Goals**

Objective: Establish the San Francisco Law School as a leading choice for students looking for a flexible, part-time law degree program with a California Registered Unaccredited Law School.

- Leverage the school's history, alumni, and faculty as proof of credibility and social proof to position SFLS as a historically committed to social justice and innovation that is poised to offer a quality degree option that fits the lives of busy adults.
- Activate alumni to get the word out through local media, social media, and events.
- Launch a dedicated SFLS website for SEO, awareness and credibility for prospective students.
- Use paid search, display and paid social efficiently to capture existing demand in our target markets; test some traditional media channels to raise awareness.
- Leverage LSAT lists and drip campaigns to raise awareness, consideration and inquiries for the JD program.

**16. Explain how the law school will comply with its disclosure requirements to accurately and affirmatively describe the opportunities and limitations associated with attending an unaccredited law school to its students, the public and prospective students in all communications including required disclosures. (State Bar Rule 4.241; Guideline 2.3(D).)**

We will work with our Compliance team to ensure that all collateral (both digital and printed), emails, and web properties (including websites and marketing landing pages) include the appropriate disclosure language displayed plainly for the reader to see. We will also create a disclosures page on the sfls.edu website that plainly displays the required disclosures, to which we can link from advertisements and other marketing that may be too small to display the full disclosure language.

**17. Explain how the law school will communicate to its students and prospective students that they will be required to pass the First Year Law Students' Examination after their first year and within a specified time frame in order to earn credit for the first year of law study and proceed to future years of law study prior to becoming eligible to take the California Bar Examination and how it will prepare its students to pass both the First-Year Law Students' Examination and the Bar Examination. (State Bar Rule 4.241; Guideline 2.3(D).)**

Language regarding the First Year Law Students' Examination requirement will be published in several places including but not limited to our website and in our catalog under program requirements. Information regarding requirements will be part of the conversation / presentation that our admission counselors have with all prospective law school candidates. The language will also be included in the admit package that is provided to all law students who have been admitted to the program for the upcoming year.

**18. Provide a roster setting forth the names of the Dean, administrators, the registrar, members of the governing body, and each person who is expected to teach during the first year of classes including (State Bar Rule 4.24(D); Guideline 4.6.):**

The names of the governing Board for Alliant International University are listed above.

For SFLS

**Timothy P. Weimer, Dean**

B.S. Parks Recreation and Tourism, University of Utah, 1999

M.B.A. Capella University, 2006

J.D. University of Akron School of Law, 2015

Jurisdictions of Licensure: Ohio, Active

Courses Taught: Torts, Success Skills, Foundations of Legal Analysis, Legal Writing, Externship

Present Employment: San Francisco Law School, Alliant International University, San Francisco, CA

**Scott Ford Pearce, Administrator San Diego Branch Campus, and Professor of Law**

Pacific University, Forest Grove, OR: Bachelor of Arts with Honors in Speech and Sociology, 1980

Law school education: Oxford Institute of International and Comparative Law: Magdalen College, Oxford University, and the University of San Diego School of Law, 1982

University of Southern California Gould School of Law, Los Angeles, CA: Juris Doctor, 1984

Jurisdiction(s) in which licensed to practice law and current status of all licenses: Actively licensed in California from December 1984 through today.

Experience teaching in any discipline:

UCLA Extension (with Martin Cohen): Music Publishing Law

Purdue University Online (Kaplan University): Employment Law; Insurance Law; Social Security Disability Law; Bioethics; Managed Care; Health Care Policy; Medical Records Summary & Review; Health Law Survey; Wills, Trusts & Estate Planning; Introduction to Legal Research; Law Office Management; Alternative Dispute Resolution, Eight Skills of the Effective Paralegal Student, Introduction to Legal Reasoning and Writing, Introduction to Torts.

University of West Los Angeles School of Law: Disability Law, Remedies, Bar Exam Essay Writing



University of West Los Angeles Paralegal School: Remedies, Wills, Trusts & Estate Planning, Business Organizations, Securities Law, Litigation 1 and Litigation 2.

National University Paralegal: Litigation 1, Litigation 2, Computers in the Law Office, Wills Trusts & Estate Planning

University of San Diego Paralegal: Creditor's Remedies; Corporations

San Francisco Law School: Torts, Corporations, Remedies, Entertainment Law, Legal Writing MBE Skills (3 courses), Real Property

Present employment (including any employment outside of Alliant/SFLS): Professor of Law, San Francisco Law School, Alliant International University

**Karen McCray, Registrar**

Suny Empire State College BS June 2019

United States University, MBA June 2020

Law school education: N/A

Jurisdiction(s) in which licensed to practice law and current status of all licenses: N/A

Experience teaching in any discipline: N/A

Present employment: San Francisco Law School, Alliant International University, San Francisco, CA, and Pacific College of Health Science, San Diego, CA

**SFLS First Year Courses are Taught by a Variety of Professors**

Dean Weimer may teach 1-2 courses each semester depending on need, including first year courses. Professors Pearce teaches 2-3 courses each semester depending on need, including first year courses. All other courses are taught by adjunct professors. It will not be known who these adjunct professors will be for the first-year courses until a few months prior to the start of Fall 2023. A list of adjunct professors and the courses they teach is kept on file with Alliant Human Resources and has been provided to the State Bar in its annual reports each year.

**19. Provide a copy of the law school's proposed written disclosure statement to students, as required by California Business and Professions Code Section 6061, Unaccredited Law School Rule 4.241, and Guideline 2.3(E).**

The method of instruction at this law school for the Juris Doctor (J.D.) degree program is principally in physical classroom facilities, as well as by technological means including interactive classes.

Students enrolled in the J.D. degree program at this law school who successfully complete the first year of law study must pass the First-Year Law Students' Examination required by Business and Professions Code § 6060(h) and Title 4, Division 1, Chapter 1 Rule 4.3(l) of the Rules of the State Bar of California as part of the requirements to qualify to take the California Bar Examination. A student who passes the First-Year Law Students' Examination within three (3) administrations of the examination after first becoming eligible to take it will receive credit for all legal studies completed to the

time the examination is passed. A student who does not pass the examination within three (3) administrations of the examination after first becoming eligible to take it must be promptly disqualified from the law school's J.D. degree program. If the dismissed student subsequently passes the examination, the student is eligible for re-enrollment in this law school's J.D. degree program but will receive credit for only one year of legal study."

Study at, or graduation from, this law school may not qualify a student to take the bar examination or to satisfy the requirements for admission to practice in jurisdictions other than California. A student intending to seek admission to practice law in a jurisdiction other than California should contact the admitting authority in that jurisdiction for information regarding the legal education requirements in that jurisdiction for admission to the practice of law.

**20. Explain the proposed admissions standards at the school. Because the school may be targeting non-traditional students or students with competing attentions, what steps will the school take to create a framework for success for enrolled students? (Guideline 9.1.)**

**Admissions Standards**

Admission Requirements for SFLS can be found in the Alliant International University Catalog online at

<https://catalog.alliant.edu/content.php?catoid=40&navoid=1509#sfls-admissions-regs>

**Student Success**

To ensure a framework for success for students enrolled at SFLS. SFLS has revised its entire four-year curriculum. The new revised curriculum plan is called the Academic Excellence Program. This comprehensive, streamlined, prerequisite driven Academic Excellence Program (AEP or The Program) was developed to address and remedy our students' specific skills deficits. A full discussion about the revised curriculum plan can be found in Appendix B – SFLS Curriculum Revision Plan.

It is designed to:

- Greatly improve SFLS Student's oral and written legal analytical abilities;
- Extensively prepare SFLS students for the CBE and greatly increase the number of SFLS students that pass it on their first attempt, and
- Develop successful, professional, highly skilled attorneys and alumni.
  
- The Program teaches, develops and reinforces a top-notch legal analytical skill set by replacing, retooling and greatly expanding existing SFLS courses, creating new, specifically curated courses, and organizing this curriculum into a comprehensive, four-year program that progressively builds upon itself.
  
- The AEP is designed to specifically improve necessary skills by:

- focusing the AEP curriculum on legal analysis and writing;
- incorporating elements of process-based teaching such as allocating time and re-sources for practice, repetition, contemporaneous instructor critique and peri-odic instructor-student conferences;
- intersecting substantive courses with AEP courses;
- slowing the stream of substantive material by, for example, breaking all single semester courses greater than 3 credits into two semester courses, and;
- converting all pass/fail courses to graded courses.

The Program is also designed to slow down the pace of instruction during the first two years of law school. As students study first year (“1L”) core curriculum topics such as Torts, Contract and Criminal Law, and the AEP 1L courses Legal Research and Writing I and II, they will acquire proficiency in basic oral and written legal analytical skills. As students study second year (“2L”) core curriculum topics and AEP 2L courses, they will build on their 1L skill set base and attain intermediate oral and written legal analytical skills proficiency.

Similarly, in years three (“3L”) and four (“4L”), students shall study a combination of core curriculum topics and AEP courses to master advanced and professional level oral and written, legal, analytical skills.

The Program intentionally differs from the instructional pace most full-time, three-year law schools follow. Because SFLS’s part-time students are often full-time working adults with family and community obligations, they require more time to develop their basic analytical skill set than a typical full-time student would. SFLS’s four-year structure accommodates that additional time. The Program thus provides our students with two years to reach the level of legal skills proficiency that full-time, three-year law schools require after year one. The Program aims to ensure that SFLS students graduate with the requisite skill set to be successful on the CBE and as professional, highly skilled attorneys and alumni.

**21. Explain the safeguards the law school has established against financial fraud and other financial improprieties. Will the school employ a Chief Financial Officer? (Guidelines 2.1, 2.2)**

Alliant employs a system of internal controls which mitigates the risk of financial fraud including potential fraud related to the law school. Alliant’s shareholder provides strict requirements on this which are from time to time subject to internal audit procedures by Alliant’s shareholder. In addition, Alliant is subject to financial statements and compliance external audits. CFO responsibility for the law school relates to the CFO of Alliant International University Inc.

**22. Provide a copy of the law school’s policy on academic freedom. (Guideline 4.10)**

The SFLS policy on Academic Freedom is found in the SFLS Faculty Handbook section 1.2 (p.3).

- 23. Complete and submit the attached library requirements worksheet demonstrating compliance with the requirements of California Rule of Court 9.30(b)(6) and Guideline 6.2 of the Guidelines for Unaccredited Law School Rules. (State Bar Rules 4.240(I); Guideline 6.2.)**

Requested information is attached as a separate form.

**LIBRARY REQUIREMENTS WORKSHEET - PLEASE SEE ATTACHED WORKSHEET**  
**GUIDELINE 6.2 OF THE GUIDELINES FOR UNACCREDITED LAW SCHOOL RULES**

6.2 Library Requirements. Registered unaccredited law schools must comply with the following library requirements as set forth in California Rule of Court 9.30 and the *Rules Regulating Admission to Practice Law in California*. Please establish that the school has all required resources listed in CRC 9.30 including the following:

<b>Fixed-Facility Law School Requirement</b>	<b>Hard Bound</b>	<b>Electronic</b>	<b>Indicate Hard Bound, Electronic or Both</b>
The published reports of the decisions of California Courts, with advance sheets and citator (all of which must be current and complete)	X	Optional	
A digest or encyclopedia of California law (all of which must be current and complete)	X	Optional	
An annotated set of California codes (all of which must be current and complete)	X	Optional	
A current, standard text or treatise for each course or subject in the curriculum of the law school for which such a text or treatise is available.	X	-	

<b>Correspondence and Distance-Learning Law School Requirement</b>	<b>Hard Bound</b>	<b>Electronic</b>	<b>Indicate Hard Bound, Electronic or Both</b>
The published reports of the decisions of California Courts, with advance sheets and citator (all of which must be current and complete)	Optional	X	
A digest or encyclopedia of California law (all of which must be current and complete)	Optional	X	
An annotated set of California codes (all of which must be current and complete)	Optional	X	
A current, standard text or treatise for each course or subject in the curriculum of the law school for which such a text or treatise is available.	X	-	
NOTE: The hardbound edition must be available at the law school's primary administrative office			

## LIBRARY REQUIREMENTS WORKSHEET FOR CALIFORNIA UNACCREDITED LAW SCHOOLS

See Rule 9.30 of the California Rules of Court and Guideline 6.2 of the *Guidelines for Unaccredited Law School Rules*.

<b>Published Reports of the decisions of California (one of the three reporting systems):</b>	<b>Yes</b>	<b>No</b>	<b>Indicate Hard Copy, Electronic, or Both</b>
California Reports, Volumes 1 to 220	<input type="checkbox"/>	<input type="checkbox"/>	
California Reports, 2d, Volumes 1 to 71	<input type="checkbox"/>	<input type="checkbox"/>	
California Reports, 3d, Volumes 1 to 54	<input type="checkbox"/>	<input type="checkbox"/>	
California Reports, 4th, Volumes 1 to Date	<input type="checkbox"/>	<input type="checkbox"/>	
California Appellate Reports, Volumes 1 to 140	<input type="checkbox"/>	<input type="checkbox"/>	
California Appellate Reports, 2d, Volumes 1 to 276	<input type="checkbox"/>	<input type="checkbox"/>	
California Appellate Reports, 3d, Volumes 1 to 235	<input type="checkbox"/>	<input type="checkbox"/>	
California Appellate Reports, 4th, Volumes 1 to Date	<input type="checkbox"/>	<input type="checkbox"/>	
<b>OR</b>			
West Reporting System, Pacific Reporter, Volumes 1 to 300	<input type="checkbox"/>	<input type="checkbox"/>	
West Reporting System, Pacific Reporter, 2d, Volumes 1 to 999	<input type="checkbox"/>	<input type="checkbox"/>	
West Reporting System, Pacific Reporter, 3d, Volumes 1 to Date	<input type="checkbox"/>	<input type="checkbox"/>	
<b>OR</b>			
West's California Reporter, Volume 1 to Date (Reprints of California Cases from Pacific Reporter, 1 <sup>st</sup> , 2 <sup>nd</sup> and 3 <sup>rd</sup> )	<input type="checkbox"/>	<input type="checkbox"/>	
<b>PLUS (regardless of reporting system used)</b>			
A citator for California Cases and Statutes with Case Name Citator (required in addition to the provided reporting system)	<input type="checkbox"/>	<input type="checkbox"/>	

<b>Digest or Encyclopedia (one of the three: McKinney, West, or California Jurisprudence):</b>	<b>Yes</b>	<b>No</b>	<b>Pocket Supplement Date</b>	<b>Indicate Hard Copy, Electronic, or Both</b>
McKinney's California Digest	<input type="checkbox"/>	<input type="checkbox"/>		
McKinney's California Digest of Cases in California Reports, 3d Series	<input type="checkbox"/>	<input type="checkbox"/>		
West's California Digest Volume 1-50, 1850-1950	<input type="checkbox"/>	<input type="checkbox"/>		
West's California Digest, 2d Volumes 1-50, 1950 to Date	<input type="checkbox"/>	<input type="checkbox"/>		
California Jurisprudence, Third, Volumes 1-66 plus indexes	<input type="checkbox"/>	<input type="checkbox"/>		

<b>Codes (one of the two)</b>	<b>Yes</b>	<b>No</b>	<b>Pocket Supplement Date</b>	<b>Indicate Hard Copy, Electronic, or Both</b>
Deering's California Codes	<input type="checkbox"/>	<input type="checkbox"/>		
West's Annotated California Codes	<input type="checkbox"/>	<input type="checkbox"/>		

**Texts or Treatises: (Insert name of author and date and number of edition).**

Add other texts or treatises, as applicable, for each course or subject in the curriculum of the law school for which such a text or treatise is available.

<b>Subject</b>	<b>Author</b>	<b>Date</b>	<b>Edition</b>
Business Associations			
Civil Procedure			
Community Property			
Constitutional Law			
Contracts			
Criminal Law			
Evidence			
Professional Responsibility			
Real Property			
Remedies			
Torts			
Trusts			
Wills and Succession			

**LIST OF REQUIRED POLICIES, DOCUMENTS AND RECORDS FOR REGISTERED UNACCREDITED LAW SCHOOLS (GUIDELINES FOR UNACCREDITED LAW SCHOOL RULES)**

1. **Law School Bulletin or Catalog of Classes.** To the extent that documents requested below are in the Bulletin/Catalog, it is permissible to refer to the appropriate pages in the catalog. Guideline 9.1(L).

2. **Application for Admission.** Guideline 5.26.

See attached Application Form.

3. **Written refund policy.** Guideline 2.2(B).

The refund policy can be found in the Alliant International University Catalog online at: <https://catalog.alliant.edu/content.php?catoid=40&navoid=1499#refund-policies>

4. **Required disclosure statement, in catalog and on website, and as incorporated into advertising or outreach including social media.** Guideline 2.3(D).

The following disclosure will be included in the University's catalog and website and incorporated into advertising or outreach, including social media, once SFLS is approved as a Registered Unaccredited law school.

The method of instruction at this law school for the Juris Doctor (J.D.) degree program is principally in physical classroom facilities, as well as by technological means including interactive classes.

Students enrolled in the J.D. degree program at this law school who successfully complete the first year of law study must pass the First-Year Law Students' Examination required by Business and Professions Code § 6060(h) and Title 4, Division 1, Chapter 1 Rule 4.3(I) of the Rules of the State Bar of California as part of the requirements to qualify to take the California Bar Examination. A student who passes the First-Year Law Students' Examination within three (3) administrations of the examination after first becoming eligible to take it will receive credit for all legal studies completed to the time the examination is passed. A student who does not pass the examination within three (3) administrations of the examination after first becoming eligible to take it must be promptly disqualified from the law school's J.D. degree program. If the dismissed student subsequently passes the examination, the student is eligible for re-enrollment in this law school's J.D. degree program but will receive credit for only one year of legal study."



Study at, or graduation from, this law school may not qualify a student to take the bar examination or to satisfy the requirements for admission to practice in jurisdictions other than California. A student intending to seek admission to practice law in a jurisdiction other than California should contact the admitting authority in that jurisdiction for information regarding the legal education requirements in that jurisdiction for admission to the practice of law.

**5. Student disclosure statement required by rule 4.241(A) including reference to disclosure statements in Guideline 2.3(D). Guideline 2.3(E).**

See attached form: Acknowledgement of Notification of SFLS Registered Unaccredited Status

**6. Written policy for the imposition of student discipline. Guideline 2.8.**

Section 11 of the SFLS Student Handbook outlines the policies for student discipline (pp. 30 - 34).

**7. Written academic standards. Guideline 2.9(A).**

Section 8 of the SFLS Student Handbook outlines the policies for academic standing (pp. 26-28).

Section 9 of the SFLS Student Handbook outlines the policies for graduation requirements (p. 28).

**8. Written policies on examinations and grading. Guideline 2.9(B).**

Section 6 of the SFLS Student Handbook outlines the policies for grading (pp. 17 – 20).

Section 7 of the SFLS Student Handbook outlines the policies for examinations (pp. 20 – 25).

**9. Policy for providing each student with written statement of the grading system. Guideline 2.9(B).**

Each student is provided with an updated copy of the SFLS Student Handbook at the beginning of each school year. Section 6 of the SFLS Student Handbook outlines the policies for grading (pp. 17 – 20).

**10. Policy for providing each student with written statement on basis for final grade. Guideline 2.9(C).**

Each student is provided with an updated copy of the SFLS Student Handbook at the beginning of each school year. Section 6 of the SFLS Student Handbook outlines the policies for grading (pp. 17 – 20).

- 11. Written policy setting forth the procedure used to authenticate the identity of the student submitting work and participating in educational and other law school activities and to ensure that work submitted is the student's own. Guideline 2.9(D).**

The procedures for grade appeals are found in sections 6.9 and 6.9.1 of the 2021 Student Handbook (p. 19).

- 12. Written procedures for processing requests for the review of grades by the Grade Review Committee. Guideline 2.9(H).**

The procedures for grade appeals are found in sections 6.8 of the 2021 Student Handbook (p. 19).

- 13. Written statement on the student services and activities are available to students. Guideline 2.12.**

A list of services available to all Alliant/SFLS students and how to access them can be found on Alliant's website at: <https://studentservices.alliant.edu/>

The information can also be found in the online catalog at:  
<https://catalog.alliant.edu/content.php?catoid=40&navoid=1511>

- 14. Written procedures for the regular evaluation of instructor competence. Guideline 4.8.**

The procedures for evaluating SFLS Instructors is contained in sections 1.7, 1.8 and 1.9 of the SFLS Faculty Handbook (p. 4).

- 15. Fixed facility law school: Written attendance policy and records. Guideline 5.3(A).**

Section 4 of the SFLS Student Handbook outlines the policies for attendance (pp. 13 – 15).

- 16. Correspondence law school: Written policy establishing procedures for verifying the number of hours spent in study and preparation and accurate records of student time spent in study and preparation. Guideline 5.3(B).**

NA

17. **Distance-learning law school: Written policy that establishes procedures for verifying student participation and study, including authentication of student work, and accurate records of student time spent in study and preparation. Guideline 5.3(C).**

The authentication of student identity in the program and courses takes place through 1) the variety of faculty and peer interactions with the student in the courses and 2) a unique student log-in with added security. These interactions begin during the admission process and continue throughout the program.

- Admission to the program requires an initial Zoom-mediated interview with the program director or program faculty.
- Each student receives a unique email/account log-in and password, plus Alliant log-in requires Multi Factor Authentication using two methods: 1) the Microsoft Authenticator app and a mobile phone number for verification calls or text messages.
- Assignments in courses require complex thinking and build on knowledge and skills in prior courses, including case studies, research projects, and other written or applied assignments making it difficult for the others to submit work.
- Some courses require group work, so students must work together over a term.
- Students develop and present projects using multimedia through the learning management system in some courses.
- Students are required to attend one hour for each class in person during the program in which they meet with other students and faculty, helping faculty to get to know students individually.

18. **Written record of all Special Circumstance Exemptions. Guideline 5.6.**

San Francisco Law School has not made any special circumstances exemptions.

19. **Policy on student participation in externship, clinical, law review, and similar programs. Guideline 5.8.**

Section 2.6 of the SFLS Student Handbook describes the policy on student participation in any of these activities (p. 8).

20. **Written grading standards that ensure accuracy, validity, reliability, and consistency in the evaluation of student performance. Guideline 5.17.**

Section 6 of the 2021 SFLS Student Handbook (pp. 17-20) contain the information for grading standards, etc.

21. **Sound written scholastic standards. Guideline 5.18.**

Section 8 of the 2021 SFLS Student Handbook (pp. 26-28) contain the information for scholastic standards, etc.

- 22. Written policy clearly defining academic standing, academic disqualification, advancement in good standing, and the requirements for graduation. Guideline 5.19.**

This information can be found in the Alliant International University Catalog using the following links.

Academic Policies section:

Academic Standing

(<https://catalog.alliant.edu/content.php?catoid=40&navoid=1510#academic-standing>)

Student Evaluation and Review Committee

(<https://catalog.alliant.edu/content.php?catoid=40&navoid=1510#student-evaluation-and-review-committee>)

For graduation requirements:

Programs section:

Juris Doctorate

([https://catalog.alliant.edu/preview\\_program.php?catoid=40&poid=5477&returnto=1506](https://catalog.alliant.edu/preview_program.php?catoid=40&poid=5477&returnto=1506))

San Francisco Law School section:

Academic Information:

<https://catalog.alliant.edu/content.php?catoid=40&navoid=1498#academic-information>

- 23. Policy stating that exceptions to foregoing policy, while rare, must be recorded in the permanent minutes of the faculty or faculty committee meetings and documented in a memorandum placed in the student's file. Guideline 5.19.**

Section 8 of the 2021 SFLS Student Handbook (pp. 26-28) contain the information for academic standards, etc. SFLS has no policy regarding making an exception to the foregoing policies. However, section 8.6 states, "The Student Handbook, including the Academic Standing section, may be amended by the Dean of San Francisco Law School, as needed, to ensure the fairness and suitability of these requirements."

It is the practice of SFLS administration and staff that any exception made for any student at any time be recorded and placed in the student's file.

**24. Written policy on course repetition. Guideline 5.24.**

Section 4.7 of the 2022 SFLS Handbook discusses course repetition requirements. This version of the Handbook will be published and distributed to students August 2022. It states,

A student who voluntarily withdraws from a course prior to the final examination may repeat the full course if the student is otherwise in good standing. If the student is not in good standing, or if the student was dropped from a course for excessive absences, the student must petition the Academic Standards Committee (ASC) for permission to repeat the course. A student may not repeat one semester of a two-semester course.

Upon successful completion of the repeat course, the student's transcript will reflect both final grades. The grade for the repeat course will be the grade used to compute the student's grade point average. The repeat course units will be the units for which the student receives credit. A course may not be repeated a second time. Repetition of a course(s) may delay a student's advancement to the next year and delay the student's graduation.

Additionally, as a condition of probation or readmission to San Francisco Law School, the ASC may allow or may require a student to repeat a course or courses. The decision of the ASC will be based on the individual circumstances presented by the student. The decision of the ASC is a final decision.

Section 6.3 of the 2021 SFLS Student Handbook (p. 18) further states,

... if a student receives a grade below a C- (70) in a course, the student will not receive credit for that course. If the course is a required course, the student will be required to retake the course and achieve a grade of C- (70) or higher to receive credit for the course. A student receiving a grade below C- (70) for any course will not be allowed to take the second part of a two-semester course (i.e. Torts 1 & 2, etc.). No Credit is given for a credit/no credit course for a grade score below C- (70).

**25. Sound written admission policy. Guideline 5.26.**

The admissions policies and procedures for Alliant International University can be found online in the Alliant 2022 – 2023 catalog at:

<https://catalog.alliant.edu/content.php?catoid=40&navoid=1509>

Admissions policies and procedures specific for SFLS can be found at:  
<https://catalog.alliant.edu/content.php?catoid=40&navoid=1509#sfls-admissions-regs>

- 26. Statement on basis for readmitting student previously disqualified for academic reasons placed in the student's file. Guideline 5.34.**

All students that are readmitted after being academically disqualified receive a letter of the review committee's decision. A copy of this letter is kept in the student's file.

- 27. Written policy on Admission as Visitors, Auditors or Non-JD Candidates. Guideline 5.36.**

The admissions policies and procedures for Auditing course can be found online in the Alliant 2022 – 2023 catalog at:  
<https://catalog.alliant.edu/content.php?catoid=40&navoid=1509#auditing-courses>

- 28. A complete hard copy or electronic list of all expenditures for hard copy and electronic library material and all other electronic legal resources available to students. Guideline 6.6(A).**

See attached form entitled SFLS Library Purchases, June 2022

- 29. A complete list of all hard copy and electronic library material and all other electronic legal research resources available to students, indicating the means of access and any restrictions and limitations on access. Guideline 6.6(B).**

See attached forms 2021 Library Content and Items in Hard Copy Law Collection

- 30. Written record-keeping and record recovery procedures, and all records required to be maintained pursuant to Division 9 of the Guidelines for Unaccredited Law School Rules. Guideline 9.1.**

See attached Registrar Document Retention Schedule

- 31. Written policy that provides that transcript entries may only be changed upon a showing of good cause. The policy must set forth the procedure to be followed to apply for and approve a transcript change under that standard. Guideline 9.1(D).**

*The language in the Student Rights and Responsibilities section of the catalog references our FERPA policy for students to request an amendment or correction to their academic records. The language from the catalog is below and can be*

accessed online at [Student Rights and Responsibilities - Alliant International University - Acalog ACMS™](#).

### **Correction of Education Records**

*Students have the right to ask to have records corrected that they believe are inaccurate, misleading, or in violation of their privacy rights. Following are the procedures for the correction of records:*

*A student must ask the custodian to amend a record. In so doing, the student should identify the part of the record to be amended and specify why the student believes it is inaccurate, misleading, or in violation of the student's privacy rights.*

*If the University decides not to amend the record as requested, the University will notify the student of the decision and inform the student of his or her right to a hearing to challenge the information believed to be inaccurate, misleading or in violation of the student's privacy right. Upon request, the University will arrange for a hearing, and notify the student, reasonably in advance, of the date, place, and time of the hearing.*

*The hearing will be conducted by a hearing officer who is a disinterested party; however, the hearing officer may be a school official. The student will be afforded a full and fair opportunity to present evidence relevant to the issues raised in the original request to amend the student's education records. The student, at his or her own expense, may be assisted by one or more individuals, including an attorney.*

*The University will prepare a written decision based solely on the evidence presented at the hearing. The decision will include a summary of the evidence presented and a reason for the decision. If the University decides that the information is inaccurate, misleading, or in violation of the student's right of privacy, it will amend the record and notify the student, in writing, that the record has been amended.*

*If the University decides that the challenged information is not inaccurate, misleading, or in violation of the student's right of privacy, it will notify the student that he or she has a right to place in the record a statement commenting on the challenged information or a statement setting forth reasons for disagreeing with the decision.*

*The statement will be maintained as part of the student's education records as long as the contested portion is maintained. If the University discloses the contested portion of the record, it must also disclose the statement.*

**Section 6.8 of the 2021 SFLS Student Handbook (p. 19) describes the Grade Appeal Process. It states,**

*No grade will be changed after it is received and approved except in the case of an objectively verifiable, clerical or mathematical mistake.*

*If a student believes that the examination or course grade was the product of unfairness or a departure from an established grading policy, the student may petition the Academic Standards Committee for a grade appeal by presenting the petition to the Registrar or Dean.*

*It is the student's burden to present credible, factual support for such a claim.*

*In all other situations, a student who requests a change of his/her grade may do so only by a written petition delivered to the Dean, who will refer the petition to the ASC for a grade review in accordance with Section 15.*

*As a general guideline, SFLS requires students to submit grade appeals and all supporting evidence by Wednesday of the first week of the subsequent semester to which the grade being appealed was received.*



Submitted: August 7, 2023

The State Bar of California  
Attn: Committee of Bar Examiners  
180 Howard Street  
San Francisco, CA 94105

To the Committee of Bar Examiners:

This appendix should replace Appendix B which was previously submitted with the SFLS application to become a registered unaccredited law school. The new academic/curriculum calendar ensures that SFLS meets the requirements that all students will be eligible to sit for the CA Bar Exam under the 4-year rules upon graduating with their J.D.

**I. Appendix C: SFLS Curriculum Revision Plan, Updated w/ Term Calendar – Introduction**

As part of its application to become a Registered Unaccredited Law School, San Francisco Law School (SFLS) respectfully requests the Committee of Bar Examiners' approval to revise its overall curriculum to meet the changing needs of the current legal profession and incoming student bodies.

The proposed curriculum revision will include the addition of one (1) unit to its overall program, changing the total required number of units to earn a Juris Doctorate (JD) degree from 87 units to 88 total units. The new plan also includes a slight change to the number of required core and elective courses. Under the new curriculum students will be required to take 82 units of core courses and six (6) units of elective courses. This is a slight change from the current 80 required units of core courses and 7 elective courses.

The new curriculum will address all substantive topics for required courses, curriculum sequence, research and writing requirements, clinical and practical skills training requirements, grading standards, and documented student engagement requirements. The admission requirements for students for the new curriculum will also remain the same as for the current program. The academic standards and performance measures required for eligibility to progress through the program will be the same as the current program.

The proposed revised curriculum will employ a combination of online, synchronous and asynchronous courses and class sessions depending on the modality of the program the student is enrolled in (see Application Appendix A SFLS Distance Learning Plan for more information about modality in teaching).

This proposal meets the standards and criteria of the Unaccredited Law School Rules (ULSR) approved by the Committee for legal education including Guidelines for Unregistered Law School Rules (ULSR) 5.3(C)(1-3).

SFLS plans to start the revised curriculum plan by enrolling a limited cohort of 20-30 students in its distance learning program each year in the initial five-year development phase. The five-year phase includes the four-year JD curriculum and the post-graduate year of bar preparation.

The revised JD curriculum will be offered in the proposed distance learning programs. The Dean of SFLS will oversee these programs with the assistance of the Campus Administrators and staff necessary to facilitate consistent oversight, monitoring, and feedback from faculty and students. Before enrollment in any of the JD programs using the revised curriculum, students will be provided with written notification of the following: course sequence, schedules, and locations of course offerings, including required courses, class sessions, and technology and equipment requirements.

Delivery of the required courses for all JD programs will be conducted remotely through the university's online learning technologies. The Dean of SFLS will oversee and conduct the online/distance learning program. This will facilitate consistent oversight, monitoring, and feedback from faculty and students.

Prior to enrollment into any of its JD programs, SFLS will confirm that each student is ready to engage in distance learning by possessing the necessary equipment as well as the technical skills required to use the technology properly.

## **II. Program Description**

The Academic Excellence Program, SFLS's Revised Curriculum Plan

The revised curriculum plan is a comprehensive, streamlined, prerequisite driven Academic Excellence Program (AEP, or the Program) developed to address the changing world of legal education. It is designed to:

1. Greatly improve SFLS Student's oral and written legal analytical abilities;
2. Extensively prepare SFLS students for the California Bar Exam (CBX) greatly increase the number of SFLS students that pass the exam on their first attempt, and;
3. Development successful, professional, highly skilled attorneys and alumni

The program teaches, develops and reinforces a top-notch legal analytical skill set by replacing, retooling and greatly expanding the existing SFLS courses, creating new, specifically curated courses, and organizing this curriculum into a comprehensive, four-year program that progressively builds upon itself.

The AEP is specifically designed to improve necessary skills by

- Focusing on the AEP curriculum on legal analysis and writing;
- Incorporating elements of process based teaching such as allocating time and resources for practice, repetition, contemporaneous instructor critique and periodic instructor-student conferences;
- Intersecting substantive courses with AEP courses;
- Slowing the stream of substantive material by, for example, breaking all single semester courses greater than three (3) credits into two semester courses, and;

- Converting all pass/fail courses to graded courses.<sup>1</sup>

Further, the AEP is designed to slow down the pace of instruction during the first two years of law school. As students study their first year (1L) core curriculum topics such as Torts, Contracts and Criminal Law, and the new AEP courses Legal Research and Writing 1 & 2, they will acquire proficiency in basic oral and written legal analytical skills. As students study second year (2L) core curriculum topics and AEP 2L courses, they will build on their 1L skill set base and attain intermediate oral and written legal analytical skills proficiency. Similarly, in years three (3L) and four (4L), students shall study a combination of core curriculum topics and AEP courses to master advanced and professional level oral and written, legal, analytical skills.

The program intentionally differs from the instructional pace most full-time, three-year law schools follow. Because SFLS's part-time students are often full-time working adults with family and community obligations, they require more time to develop their basic analytical skill set than a typical full-time student would. SFLS's four-year structure accommodates that additional time. The Program thus provides our students with two years to reach the level of legal skills proficiency that full-time, three-year law schools require after one year. The Program aims to ensure that SFLS students graduate with the requisite skill set to be successful on the CBX and as professional, highly skilled attorneys and alumni.

### **III. Curriculum Basics**

#### **Compliant and Rigorous Course Design**

The Academic Excellence Program curriculum is designed to meet all of the requirements related to student engagement, student monitoring, course design, course content, examinations, and grading as found in Guideline for ULSR 2.9, 5.3(C)(1-3), and 5.9 – 5.17, as well as CALS Rules 4.160(B)(1-5) & (10 – 12). To verify student academic engagement, the law school will rely on methods provided in CALS rule 4.160(B)(12)(d). SFLS will confirm student engagement in the program through online tracking and reporting utilizing the University's online/distance learning technologies.

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<sup>1</sup> See generally, Margolis & DeJarnatt, *Moving Beyond Product to Process: Building A Better LRW Program*, 46 SANTA CLARA L. REV. 93 (2005), (Describing Beasley School of Law of Temple University's Legal Research & Writing Program); Andrea A. Lunsford, *Cognitive Development and the Basic Writer*, 41.1 C. ENG. 449-59 (1979), re- printed in CROSS-TALK, *supra* note 17, at 303; Felsenberg & Graham, *A Better Beginning: Why and How to Help Novice Legal Writers Build a Solid Foundation by Shifting Their Focus From Product to Process*, 24 REGENT UNIV. L. REV. 83 (2011-2012) (Describing strategies of Wake Forest University School of Law's Legal Analysis, Writing and Research course). Elements of these programs, ideas and strategies have been substantially modified and adapted for use in the SFLS Academic Excellence Program.

In addition, the degree program and each course will follow the WASC Interregional Guidelines for the Evaluation. (See <https://www.wscuc.org/content/interregional-guidelines-evaluation-distance-education>).

### Curriculum Construction

The AEP curriculum has been, and will continue to be, built from the ground up. SFLS is not simply revising existing courses, utilizing new textbooks, and drafting syllabi. But rather, creating entirely new curriculum, developing original content, and constructing all AEP courses with a “plug and play” level of detail. A review of the new AEP Legal Research & Writing I (“LR&WI”) syllabus, attached hereto as Appendix E, illustrates the “plug and play” nature of the AEP courses.

The AEP LR&WI syllabus describes specific weekly class lesson plans, reading and viewing assignments, a multitude of specified assignments, exercises and quizzes, and separate weekly lab lesson plans and assignments. Specifically, for the LR&WI class curriculum we have created 15 separate weekly lessons plans, 12 - 1L Correlated Essay Problems, 8 Memo Assignments, 10 Glossary Assignments, 7 Research Exercises, 9 IRAC Exercises, 10 Find the Facts Exercises and 7 Citations Formatting Quizzes. These will be incorporated into the new Term Calendar described later in this proposal.

For the lab component we have created 15 separate lesson plans as well as separate lab assignments that include 12 Writing Assignments and 12 Proofreading Quizzes. All of the class and lab weekly lesson plans, assignments, exercises, quizzes, and model answers will be fully drafted and specified in detail so that any competent legal research and writing professor can simply pick up the course binder and begin teaching the course. Each AEP course has, and shall be designed, created and drafted with the same level of detail.

Alliant International University has committed the necessary upfront investment of resources for constructing curriculum at this heightened level of detail. Once the AEP curriculum is fully developed and implemented, we will have an enduring program that can be consistently implemented, methodically assessed and progressively improved without the necessity of perpetual reinvention and the expenditure of resources that entails.

### Curriculum Components – Orientation

The Program begins prior to the commencement of classes with a newly developed, mandatory, successive, four evening orientation that replicates incoming students’ Monday through Thursday 6:20 p.m. to 9:10 p.m. first-year law school schedule. The AEP Orientation provides general information, including:

- Alliant and SFLS policies and procedures;

- SFLS's four-year program, specific courses in the program, program structure and the road to graduation;
- the vast SFLS resources available to students, i.e., library, tutoring, Westlaw, Barbri, etc., and;
- SFLS's tone and culture, i.e., rigor, commitment, classroom behavior, study groups, professional responsibility, etc.

The AEP Orientation also introduces and teaches specific skills such as document and file formatting, case briefing, case diagramming, utilizing IRAC<sup>2</sup>, legal analysis, critical thinking, time management and notetaking. Daily homework assignments require incoming students to practice the skills taught and are debriefed in the following orientation session. Orientation concludes with participation in a mock first-year law school class, student skills assessments, the issuance of the first Legal Research and Writing I assignment.

In addition to Dean Weimer and fulltime faculty, we will invite as many first-year professors as possible to teach various components of the AEP orientation program. In this way, incoming students will become familiar with their soon-to-be professors and will experience a bit of each professor's teaching style.

This newly developed, AEP aligned, and expansive orientation is designed to inform, familiarize, instruct, and prepare incoming students for the academic rigor they will encounter at SFLS on day one of law school.

#### Curriculum Components – Research and Writing

The AEP program teaches basic and advanced research skills, including how to utilize primary and secondary authority, develop research strategies and a research plan, parse and understand statutes and cases, utilize WestLaw, LexisNexis, Fastcase, Casetext, Findlaw, Google, GoogleScholar, CornellLaw, government sites, and implement proper legal citation skills. It also teaches basic and advanced writing skills including IRAC outlining and writing, critical thinking and reasoning, case briefing, objective and persuasive writing, trial court and appellate litigation briefing, and judicial opinion writing.

#### Curriculum Components – Analytical Skills

The AEP program focuses on teaching a series of progressive basic, advanced and professional level oral and written analytical skills culminating in teaching California Bar Exam-specific skills, i.e., essay writing, responding to multiple choice questions, and performance writing.

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<sup>2</sup>. The IRAC method of legal analysis requires the identification of the legal issues to be resolved (the I of IRAC), the articulation of the applicable rule (the R of IRAC), the analysis or application of the facts to the rule (the A of IRAC), and the conclusion (the C of IRAC).

## Curriculum Components – Competency Training and Required 6-Unit Practice-Based Skills Training

The AEP program teaches hands-on, practical, and academically rigorous civil, criminal, and appellate litigation skills. The Program meets the requirements of Guideline 5.12 of the Unaccredited Law School Rules that *“instruction should be available in the practical skills of legal research, drafting legal documents, trial and appellate advocacy, and in professional skills such as law office management, counseling and negotiation.”*

Students in the online JD program will complete at least six (6) units of required practical skills training in the same format as the residential program during years 2, 3, and 4. These courses will include courses such as Legal Research and Writing, Criminal/Civil Litigation, a required appellate court writing program, and elective courses such as Contracts Drafting, and Mediation. Students will receive credit for additional skills training by participation in supervised law school sponsored community law clinics, and individual supervised internships and externships at law firms, public law departments, and public service law agencies.

The Program requires students to complete at least six (6) units of required practical skills training during years 2, 3, and 4. These courses will include courses such as advanced trial practice, a required appellate court writing program (three courses that build upon each other), participation in supervised law school sponsored community law clinics, and individual supervised internships and externships at law firms, public law departments, and public service law agencies.

## Curriculum Components – Assessments

Pursuant to Guideline 5.2 of ULSR and CALS rule 4.4.160(B)(5), SFLS has created, and will continue to create rubrics that assess the knowledge and skills of our students during the admissions process, orientation and throughout law school. SFLS administrators, staff and professors will utilize these assessment rubrics to help evaluate the effectiveness of our teaching methods as well as to judge our students' progress. The new term calendar of 8 week sessions described below will allow SFLS administrators, faculty and students to receive and review data on performance every 4-8 weeks as opposed to the much longer time frame of the traditional 16 week semester.

## Curriculum Components – Faculty Participation

SFLS's faculty will be a critical component of the Program's success. Faculty shall participate in the AEP program by teaching portions of the orientation program, implementing assessments rubrics, developing specific, interrelated subject matter-based materials, and aligning subject matter curriculum with the program.

## Rigorous Academic Standards

Students in the new revised curriculum plan will be required to meet identical academic standards as students in SFLS's current programs to be eligible to progress through the second, third, and fourth years of legal study.

It is the policy of San Francisco Law School that all students are required to maintain academic good standing during the course of their law study. Students failing to meet these requirements will be subject to academic probation or disqualification. The student's grade point average is used to determine whether a student is in good academic standing, academically disqualified, or will be placed on academic probation. Academic standing is determined by grades at the conclusion of the Spring semester of each year.

As defined by section 8 of the SFLS Student Handbook. A student is in academic good standing when:

- (a) A student in the Second, Third, or Fourth year, has a minimum GPA for the academic year of 2.0/70% or greater, and a CGPA of 2.0/70% or greater, and has no additional CGPA requirements; or
- (b) A student is in the Second, Third, or Fourth year, has a requirement for a minimum GPA for the academic semester or year or a CGPA greater than 2.0/70% and has met that requirement; or
- (c) A student was admitted without a requirement that a GPA of greater than 2.0/70% be achieved at the end of the First year, and has attained a GPA of 2.0/70% at the end of the First Year, or
- (d) A student was admitted with a requirement that a GPA of greater than 2.0/70% be attained at the end of the First Year and has met the required GPA.

## Course Delivery Model Developed

While SFLS will be moving to a Distance Learning modality for its programs while it is a Registered Unaccredited Law School. The development of the AEP curriculum is designed to be implemented in all three teaching modalities; on ground, online and hybrid. The AEP JD curriculum will be supported by Alliant International University's various in-house departments, which are overseen by the Associate Provost for Strategic Initiatives and Partnerships and includes the many resources available through the university.

Online programs are further supported by Alliant's Information Technology Department, which has an IT Help Desk that can address technological support needs either via e-mail or phone.

In addition to the resources from Alliant's team, SFLS has the integrated legal research platform and content management Westlaw/TWEN. This allows for directed research and writing to be built into courses in a seamless fashion that helps prepare students for modern legal practice. SFLS has had a Fully Digital Law Library available to students since the fall of 2020.

Examinations will be conducted online using various software services such as the ExamSoft testing software, and Respondus' Lockdown Browser. Both of which are currently implemented both for on-the-ground and online examinations at SFLS.

#### **IV. The Academic Excellence Program Specifics**

The Program provides students with the training, time and opportunity to learn and improve specific skills and remedy skill deficiencies as they progress through the four-year program. The AEP curriculum includes 13 current courses that were revised and 12 new courses, all designed to meet the goals of the program. A visual of academic schedule that demonstrates when each course is to be taken during the four-years of law school can be found in the attached spreadsheet labeled Appendix D.

As mentioned above SFLS will be transitioning to a Term Calendar. In a term calendar, SFLS will be offering its courses in 6, 8-week terms each year. This will ensure the students meet the minimum hours and law study time required by ULSR 5.3(C) and 5.9 (C).

The term calendar requires that all courses be broken down into 8-week study periods. Courses that traditionally would be taught over a 16-week semester will be broken down into two 8-week sections label 'A' & 'B' respectively.

The following is a list of each course, with the number of units awarded and year it is taken during the four-year part-time J.D. program. As detailed below the following year-by-year list of courses, the AEP is a step-by-step, four-year, comprehensive program for all students that provides substantive material in measured increments, allots time for practice, repetition, and contemporaneous critique, intersects with substantive classes, and teaches the requisite analytical skills necessary to be successful in law school and as a lawyer. A table demonstrating the respective term for each course is listed below the year by year list.

##### **Year by Year Course List**

###### **First Year Curriculum:**

- Torts 1 (A & B), 2 units
- Torts 2 (A & B), 2 units
- Criminal Law 1 (A & B), 2 units
- Criminal Law 2 (A & B), 2 units
- Contracts 1 (A & B), 3 units
- Contracts 2 (A & B), 3 units
- Legal Research and Writing 1 w/ Lab (A & B), 4 units
- Legal Research and Writing 2 w/ Lab (A & B), 4 units
- Introduction to Analytical Skills 1, 1 unit

###### **Second Year Curriculum:**

- Criminal Procedure(A & B), 3 units



- Professional Responsibility (A & B), 2 units
- Criminal/Civil Litigation (A & B), 2 units
- Civil Procedure 1 (A & B), 2 units
- Civil Procedure 2 (A & B), 2 units
- Real Property 1 (A & B), 3 units
- Real Property 2 (A & B), 3 units
- Analytical Skills 1 (A & B), 2 units
- Introduction to Analytical Skills II, 1 unit

#### Third Year Curriculum:

- Constitutional Law 1 (A & B), 3 units
- Constitutional Law 2 (A & B), 3 units
- Evidence 1 (A & B), 3 units
- Evidence 2 (A & B), 2 units
- Corporations 1 (A & B), 2 units
- Corporations 2 (A & B), 2 units
- Analytical Skills II (A & B), 2 units
- Appellate Litigation (A & B), 2 units
- Introduction to Analytical Skills III, 1 unit

#### Fourth Year Curriculum:

- Judicial Decision Making (A & B), 2 units
- Commercial Law (A & B), 2 units
- Analytical Skills III (A & B), 2 units
- Wills and Trusts (A & B), 3 units
- Analytical Skills IV (A & B), 2 units
- Remedies (A & B), 3 units
- Bar Study Preparation (A & B), 3 units
- Community Property (A & B), 2 units

Students are also required to complete Six (6) total units of elective credits during years 2 – 4.

**Table Visualization of Academic/Curriculum Schedule for Term Calendar**

<b>Year One - Term 1</b>	<b>Year One – Term 2</b>	<b>Year One - Term 3</b>	<b>Year One – Term 4</b>	<b>Year One – Term 5</b>	<b>Year One Term 6</b>
Torts 1 A 1 unit 45 hrs	Torts 1 B 1 unit 45 hrs	Torts 2 A 1 unit, 45 hrs	Torts 2 B 1 unit, 45 hrs	Legal Research & Writing 2 A 2 units, 90 hrs	Legal Research & Writing 2 B 2 units, 90 hrs
Criminal Law 1 A 1 unit, 45 hrs	Criminal Law 1 B 1 unit, 45 hrs	Criminal Law 2 A 1 unit, 45 hrs	Criminal Law 2 B 1 unit, 45 hrs	Elective TBD 1 unit, 45 hrs	Introduction to Analytical Skills 1 1 unit, 45 hrs
Contracts 1 A 1.5 units, 67.5 hrs	Contracts 1 B 1.5 units, 67.5 hrs	Contracts 2 A 1.5 units, 67.5 hrs	Contracts 2 B 1.5 units, 67.5 hrs		Elective TBD 1 unit, 45 hrs
		Legal Research & Writing 1 A 2 units, 90 hours	Legal Research & Writing 1 B 2 units, 90 hours		
<b>Year Two - Term 1</b>	<b>Year Two – Term 2</b>	<b>Year Two - Term 3</b>	<b>Year Two – Term 4</b>	<b>Year Two – Term 5</b>	<b>Year Two Term 6</b>
Civil Procedure 1 A 1 unit, 45 hrs	Civil Procedure 1 B 1 unit, 45 hrs	Civil Procedure 2 A 1 unit, 45 hrs	Civil Procedure 2 B 1 unit, 45 hrs	Introduction to Analytical Skills II 1 unit, 45 hrs	Elective TBD 1 unit, 45 hrs
Real Property 1 A 1.5 units, 67.5 hrs	Real Property 1 B 1.5 units, 67.5 hrs	Real Property 2 A 1.5 units, 67.5 hrs	Real Property 2 B 1.5 units, 67.5 hrs	Criminal Procedure A 1 unit, 45 hrs	Criminal Procedure B 1 unit, 45 hrs
Analytical Skills 1 A 1 unit, 45 hrs	Analytical Skills 1 B 1 unit, 45 hrs	Civil/Crim. Litigation A 1 unit, 45 hrs	Civil/Crim. Litigation B 1 unit, 45 hrs	Professional Resp. B 1 unit, 45 hrs	Elective TBD 1 unit, 45 hrs
			Professional Responsibility A 1 unit, 45 hrs		
<b>Year Three - Term 1</b>	<b>Year Three – Term 2</b>	<b>Year Three - Term 3</b>	<b>Year Three – Term 4</b>	<b>Year Three – Term 5</b>	<b>Year Three Term 6</b>
Evidence 1 A 1.5 units, 67.5 hrs	Evidence 1 B 1.5 units, 67.5 hrs	Evidence 2 A 1 unit, 45 hrs	Evidence 2 B 1 units, 45 hrs	Introduction to Analytical Skills III 1 unit 45 hrs	Elective TBD 1 unit, 45 hrs
Corporations 1 A 1 unit, 45 hrs	Corporations 1 B 1 unit, 45 hrs	Corporations 2 A 1 unit, 45 hrs	Corporations 2 B 1 unit, 45 hrs		Elective TBD 1 unit, 45 hrs
Analytical Skills II A 1 unit, 45 hrs	Analytical Skills II B 1 unit, 45 hrs	Constitutional Law 1 A 1.5 units, 67.5 hrs	Constitutional Law 1 B 1.5 units, 67.5 hrs	Constitutional Law 2 A 1.5 units, 67.5 hrs	Constitutional Law 2 B 1.5 units, 67.5 hrs
			Appellate Litigation A 1 unit, 45 hrs	Appellate Litigation B 1 unit, 45 hrs	

<b>Year Four - Term 1</b>	<b>Year Four – Term 2</b>	<b>Year Four - Term 3</b>	<b>Year Four – Term 4</b>	<b>Year Four – Term 5</b>	<b>Year Four Term 6</b>
Judicial Decision-Making A 1 unit, 45 hrs	Judicial Decision-Making B 1 unit, 45 hrs	Analytical Skills IV A 1 unit, 45 hrs	Analytical Skills IV B 1 unit, 45 hrs	Community Property A 1 unit, 45 hrs	Community Property B 1 unit, 45 hrs
Analytical Skills III A 1 unit, 45 hrs	Analytical Skills III B 1 unit, 45 hrs	Remedies A 1.5 units, 67.5 hrs	Remedies B 1.5 units, 67.5 hrs	Bar Study Preparation A 1.5 units, 67.5 hrs	Bar Study Preparation B 1.5 units, 67.5 hrs
Wills & Trusts A 1.5 units, 67.5 hrs	Wills & Trusts B 1.5 units, 67.5 hrs	UCC/Sales A 1 unit, 45 hrs	UCC/Sales B 1 unit, 45 hrs	Elective TBD 1 unit, 45 hrs	Elective TBD 1 unit, 45 hrs

### Meeting Guideline 5.3 Minimum Requirements

Students completing this curriculum plan will meet the requirements of Guideline for ULSR 5.3(C)(1-3) by completing a minimum of 864 hours of preparation and study a year for four (4) years.

**Compliant Course Design:** The online curriculum will be designed to meet all of the requirements related to student engagement, student monitoring, course design, course content, examinations, and grading as found in CALS rules 4.160(B)(1-5) & (10 – 12), as well Guidelines for ULS rules 5.3(C), 5.9(C) and 5.10 – 5.20. To verify student academic engagement, the law school will rely on methods provided in CALS rule 4.160(B)(12)(d). SFLS will confirm student engagement in the program through online tracking and reporting. The University is already using these technologies for tracking student engagement in its California School of Education Programs.

The same rigorous studies will be required for the online program as is currently required of our residential programs. Alliant/SFLS uses the WASC Interregional Guidelines of 1 unit = 45 hours of study. Students will be required to be academically engaged with the course materials by interactions with the professor, other students and course materials via synchronous and asynchronous modalities for the number of units for each course. Students are expected to be further engaged with the course materials by completing at least two (2) hours of preparation work for each one unit in the course.

For instance, a student taking Torts 1 A & B their first two terms will engage with the academic materials for 45 hours for section A and another 45 hours for section B, for a total of 2 units or 90 hours of law study.

Using this formula, we can calculate the total hours of study a student will do for his/her first year at SFLS.

#### First Year Curriculum:

- Torts 1 (A & B), 2 units (90 Total hours)
- Torts 2 (A & B), 2 units (90 Total hours)
- Criminal Law 1 (A & B), 2 units (90 Total hours)
- Criminal Law 2 (A & B), 2 units (90 Total hours)
- Contracts 1 (A & B), 3 units (135 Total hours)
- Contracts 2 (A & B), 3 units (135 Total hours)
- Legal Research and Writing 1 w/ Lab (A & B), 4 units (180 Total hours)
- Legal Research and Writing 2 w/ Lab (A & B), 4 units (180 Total hours)
- Introduction to Analytical Skills 1, 1 unit (45 Total hours)

Total hours of study for first year courses = 1,035hours.

- This does not include the elective unit study hours.

Using the same formula for years 2 – 4 yields the following.

#### Second Year Curriculum:

- Criminal Procedure (A & B), 3 units (135 Total hours)

- Professional Responsibility (A & B), 2 units (90 Total hours)
- Criminal/Civil Litigation (A & B), 2 units (90 Total hours)
- Civil Procedure 1 (A & B), 2 units (90 Total hours)
- Civil Procedure 2 (A & B), 2 units (90 Total hours)
- Real Property 1 (A & B), 3 units (135 Total hours)
- Real Property 2 (A & B), 3 units (135 Total hours)
- Analytical Skills 1 (A & B), 2 units (90 Total hours)
- Introduction to Analytical Skills II, 1 unit (45 Total hours)

Total hours of study for second year courses = 900

#### Third Year Curriculum:

- Constitutional Law 1 (A & B), 3 units (135 Total hours)
- Constitutional Law 2 (A & B), 3 units (135 Total hours)
- Evidence 1 (A & B), 3 units (135 Total hours)
- Evidence 2 (A & B), 2 units (90 Total hours)
- Corporations 1 (A & B), 2 units (90 Total hours)
- Corporations 2 (A & B), 2 units (90 Total hours)
- Analytical Skills II (A & B), 2 units (90 Total hours)
- Appellate Litigation (A & B), 2 units (90 Total hours)
- Introduction to Analytical Skills III, 1 unit (45 Total hours)
- Elective Courses, 2 units (90 Total hours)

Total hours of study for third year courses = 900

#### Fourth Year Curriculum:

- Judicial Decision Making (A & B), 2 units (90 Total hours)
- Commercial Law (A & B), 2 units (90 Total hours)
- Analytical Skills III (A & B), 2 units (90 Total hours)
- Wills and Trusts (A & B), 3 units (135 Total hours)
- Analytical Skills IV (A & B), 2 units (90 Total hours)
- Remedies (A & B), 3 units (135 Total hours)
- Bar Study Preparation (A & B), 3 units (135 Total hours)
- Community Property (A & B), 2 units (90 Total hours)
- Elective Courses, 2 units (90 Total hours)

Total hours of study for fourth year courses = 900

#### Program Requirements

The AEP introduces twelve new courses, (a total of 25 units) into the mandatory, 88-unit, four-year program for all students. Each course in the program is designed to progressively build upon previous AEP courses so that each is a link in a chain of prerequisites.

## Year One

### The New AEP Courses

1. Legal Research and Writing I and Lab I (3 CR)
2. Legal Research and Writing II and Lab II (3 CR)

Previously, beginning legal research and writing was taught at SFLS in four separate courses, i.e., Legal Writing I, Legal Writing II, Legal Research I, and Legal Research II, and all courses were graded pass/fail. All four curricula taught both research and writing, as it is almost impossible to teach one without the other, but in a duplicative and unaligned manner.

SFLS' Legal Research and Writing curriculum has been reimagined, simplified and comprehensively aligned to fully integrate legal research and writing. The interrelationship between research, analysis and writing is central to a student's functional understanding of legal discourse.<sup>3</sup> SFLS' AEP Legal Research and Writing curriculum now recognizes this essential integration.

The new, graded curriculum is delineated by semester into basic and advanced skills. It allocates the time and resources necessary for students to grasp the basics, repetitively practice and ultimately master those skills, and makes room to do so by relocating more advanced subject matter to years two and three. Prompt instructor feedback and ongoing instructor-student conferences ensure that students are learning the skills taught.

The new Legal Research and Writing I and II curriculum emphasizes the critical importance of writing skills. It intersects with each substantive 1L class as weekly writing assignments will align with topics students are learning in their 1L substantive classes. Specifically, professors teaching Contracts, Torts and Criminal Law shall each provide three, substantive, single-issue essays with model answers per semester for use in the Legal Research and Writing I and II program. The Legal Research and Writing professors assign and grade these essays as part of the legal research and writing curriculum and provide feedback to 1L professors on each student's progress.

The new curriculum also adds a weekly, zero credit, hour-long lab component to Legal Research and Writing I and II. In the lab, students will receive instruction on the mechanics of basic and advanced English grammar, practice the organizational skills necessary for effective legal writing and analysis, and complete quizzes and writing exercises that reinforce those skills.

#### Introduction to Legal Analysis I (1 CR Summer)

This first in a series of three introductory, one-credit courses builds upon, improves and expands the writing and analytical skills students developed in the Legal Research and Writing 1L courses and teaches students the skills required to begin Analytical Skills I.

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<sup>3</sup> See, Margolis & DeJarnatt, *supra* at 109-110.

### Changes to Existing Substantive Courses

Previously, Torts and Criminal Law were taught as four-credit, single-semester courses. In an effort to slow down the rate of substantive material students must process and allot time for writing practice, legal analysis and repetition, these courses have been redrafted, redeveloped, and will now be taught as two-credit, two-semester 1L courses. All three 1L substantive courses (Torts, Criminal Law and Contracts) shall intersect with and be reinforced by the new AEP courses (Legal Research and Writing I and II) as articulated above.

### Year Two

#### The New AEP Courses

##### 1. Legal Analysis I (2 CR)

This first in a series of four Legal Analysis courses progressively builds upon, improves and expands the research, writing and analytical skills students developed in the prerequisite Legal Research and Writing 1L curriculum and is firmly rooted in teaching and reinforcing the basics of written legal analysis. Instruction will be offered at an introductory level in how to brief cases with the aim of deriving meaning and synthesizing legal rules, how to effectively identify legal and factual issues, pinpoint key facts, identify the correct rule of law, apply the rule of law to the relevant facts and produce a coherent legal analysis, and how to apply these skills to legal reasoning, outlining, and exam-taking. Students will also be introduced to and begin to work with California Bar Exam-level Essay and MBE questions.

This course will primarily utilize the CBE substantive material of 1L subjects, i.e., Criminal Law, Contracts, and Torts, to reinforce students' substantive knowledge. Time and resources will be allocated for practice, repetition, contemporaneous critique and periodic instructor-student conferences. Legal Analysis I replaces, retools and expands the current SFLS courses Success Skills, Foundations of Legal Analysis, and MBE I.

##### 2. Criminal/Civil Litigation (2 CR)

This first in a series of three litigation, skills based courses, progressively builds upon, improves, and expands the research, writing and analytical skills students developed in the prerequisite Legal Research and Writing and Legal Analysis curricula. This course focuses upon the practical application of legal principles to litigation at the trial court level. Students will conduct a civil or criminal case from case filing through jury verdict. Students will learn trial court practices and procedures, research, draft, submit and orally argue pretrial, trial and post-trial motions, hold evidentiary hearings, conduct voir dire, conduct a full jury trial with witnesses, obtain a verdict, and research, draft, submit and orally argue post-trial motions. Students will also finely hone litigation documents drafted in this course for use as future writing samples.

This course will primarily utilize the CBE substantive material of 1L courses, i.e., Criminal Law, Contracts, and Torts, to reinforce students' substantive knowledge. Time and resources will be allocated for

motion drafting practice, repetition, prompt critique and ongoing instructor-student conferences. Civil/Criminal Litigation replaces, retools and expands the current SFLS course Trial Practice.

### 3. Introduction to Legal Analysis II (1 CR)

This second in a series of three introductory one-credit courses builds upon, improves and expands the legal research, writing and analytical skills developed by students in the prerequisite AEP curricula and teaches students the skills required to begin Legal Analysis II.

#### Changes to Existing Substantive Courses

Each substantive 2L course, i.e., Criminal Procedure, Civil Procedure, Real Property, Professional Responsibility, etc., shall include a minimum of two graded, CBE-level essay writing assignments per semester.

### Year Three

#### The New AEP Courses

### 1. Legal Analysis II (2 CR)

This second in a series of four Legal Analysis courses progressively builds upon, improves and expands the research, writing and analytical skills students developed in the prerequisite AEP curricula and is firmly dedicated to developing solid written and analytical skills. Instruction will be offered at an intermediate level in how to effectively identify legal and factual issues, pinpoint key facts, identify the correct rule of law, apply the rule of law to the relevant facts and produce a coherent legal analysis, and how to apply these skills to legal reasoning, outlining, and exam-taking. Students will learn how to approach and analyze California Bar Exam-level Essay Writing and MBE questions.

This course will primarily utilize the CBE substantive material of 2L courses, i.e., Criminal Procedure, Civil Procedure, Real Property, Professional Responsibility, etc. Time and resources will be allocated for practice, repetition, contemporaneous critique and periodic instructor-student conferences. Legal Analysis II replaces and expands the current SFLS courses Advanced Legal Writing, Advanced Legal Reasoning I, and MBE II.

### 2. Appellate Litigation (2 CR)

This second in a series of three litigation, skills based courses, progressively builds upon, improves, and expands the research, writing and analytical skills students developed in the prerequisite AEP curricula. This course focuses upon the practical application of legal principles to litigation at the appellate court level. Students will represent either the Appellant or the Appellee from the filing of the notice of appeal through the issuance of an appellate decision. Students will learn advanced, professional-level oral and written legal analytical skills, learn California and Federal appellate court procedure and practice, research, draft and submit appellate briefs and conduct oral argument before a panel of judges. Students will also finely hone appellate briefs drafted in this course for use as future writing samples.



This course will primarily utilize the CBE substantive material of 2L courses, i.e., Criminal Procedure, Civil Procedure, Real Property, Professional Responsibility, etc. Time and resources will be allocated for appellate brief writing practice, repetition, prompt critique and periodic instructor-student conferences. Appellate Litigation replaces, retools and expands the current SFLS course Moot Court.

### 3. Introduction to Legal Analysis III (1 CR)

This third and final in a series of three introductory one-credit courses builds upon, improves and expands the legal research, writing and analytical skills developed by students in the prerequisite AEP curricula and teaches students the skills required to begin Legal Analysis III.

#### Changes to Existing Substantive Courses

Previously, Evidence (5 CR) and Corporations (4 CR) were taught as single-semester courses. In an effort to slow down the rate at which students must process substantive material provided and allot time for writing practice and repetition, these courses have been redrafted and redeveloped and will be taught as two-semester 3L courses.

Each substantive 3L course, i.e., Constitutional Law, Evidence, Corporations, etc., shall include a minimum of two graded CBE-level essay writing assignments per semester.

#### Year Four

#### The New AEP Courses

### 1. Legal Analysis III (2 CR)

This third in a series of four Legal Analysis courses progressively builds upon, improves and expands the research, writing and analytical skills students developed in the prerequisite AEP curricula and is firmly focused upon developing superior analytical skills specific to the CBE, i.e., essay writing, MBE, and Performance Exam. Advanced instruction will be offered in how to approach, dissect and answer CBE Essay Writing, MBE and Performance Test questions.

This course will utilize all substantive materials within the scope of the CBE. Time and resources will be allocated for practice, repetition, contemporaneous critique and periodic instructor-student conferences. Legal Analysis III replaces, retools and expands the current SFLS courses Advanced Legal Reasoning II and MBE III.

### 2. Legal Analysis IV (3 CR)

This fourth and final in the series of Legal Analysis courses progressively builds upon, improves and expands the research, writing and analytical skills developed by students in the prerequisite AEP curricula and is dedicated to developing highly advanced, professional-level, attorney-grade analytical

skills and finely honing analytical skills specific to the CBE, i.e., essay writing, MBE, and Performance Exam writing. Advanced, CBE-centric, professional-level instruction will be offered to students. Time and resources will be allocated for practice, repetition, contemporaneous critique and periodic instructor-student conferences.

### 3. Judicial Decision Making (2 CR)

This third and final in the series of litigation, skills-based courses, progressively builds upon, improves, and expands the research, writing and analytical skills students developed in the prerequisite AEP curricula. This course offers advanced level instruction on models of judicial decision-making, competing practical and theoretical approaches, and methods of understanding, analyzing and drafting the various forms of judicial decisions. Students will serve as judges for the 2L Criminal/Civil Litigation courses, where they will preside over a jury trial in every respect, including holding hearings, conducting voir dire, and issuing written opinions. Students shall also serve as appellate judges for the 3L Appellate Litigation course, where they will preside over an appellate case in every respect, including holding oral argument and issuing written opinions. Time and resources will be allocated for opinion drafting practice, repetition, contemporaneous critique and periodic instructor-student conferences. Students will also finely hone written opinions drafted in this course for use as future writing samples.

#### Changes to Existing Substantive Courses

Wills and Trusts, previously a four-credit, single semester course, will be reduced to a three-credit course. Each substantive 4L course, i.e., Wills & Trusts, UCC/Sales, Remedies, etc., shall include a minimum of two graded CBE-level essay writing assignments per semester.

## **V. Compliance with Other Applicable Rules**

As mentioned above, The AEP curriculum is designed to meet all of the requirements related to student engagement, student monitoring, course design, course content, examinations, and grading as found in Guideline for ULSR 2.9, 5.3(C)(1-3), and 5.9 – 5.17, as well as CALS Rules 4.160(B)(1-5) & (10 – 12). To verify student academic engagement, the law school will rely on methods provided in CALS rule 4.160(B)(12)(d). SFLS will confirm student engagement in the program through online tracking and reporting.

As previously indicated, the degree program will follow the WASC Interregional Guidelines for the Evaluation. (See <https://www.wscuc.org/content/interregional-guidelines-evaluation-distance-education>.)

WASC Accreditation

The traditional residential JD program offered by Alliant is part of Alliant's institutional WASC Senior College and University Commission (WSCUC) accreditation. SFLS has worked directly with the Provost's Office to seek approval for the revised program from the WASC Senior College and University Commission. This entails at a minimum a program screening process to ensure sufficient resources and expertise and may require a substantive change proposal. SFLS and the Provost's office will ensure that all WSCUC approvals are obtained prior to implementing the proposed programs.

**Law Library:** Each student in JD programs will continue to be provided with an online Westlaw account that meets the library requirements of rule 4.160(B)(18). In addition, students will have access to the law libraries located at either the law school's residential locations and/or local county law libraries if needed.

Guideline for ULSR 2.12 - Statement of Provided Student Services, Experiences, and Activities; Adequate Support and Resources for Provided Services, Experiences and Activities.

#### Academic Support

The same academic support services currently provided in the classroom-based program, including special skills courses, tutoring, and academic advising will be provided for all SFLS students enrolled in the distance learning program under the new curriculum. The academic support program will be coordinated by SFLS Administrators; currently Dean Tim Weimer in Emeryville, and Professor Scott Pearce in San Diego. Dean Weimer has served as an academic advisor at the Emeryville campus since 2018. Professor Pearce has served as the Administrator and Student Advisor of the San Diego campus since 2019. He also supported the development of the Law School's bar skills program that is part of the law school's primary curriculum.

#### Clinical Programs and Practical Skills Training

First-year law students do not traditionally participate in clinical programs at the Law School. However, for the upper division law students, clinical opportunities will be developed in collaboration with the current law school clinics and local bar association clinics. The six (6) units of required practical skills training will be provided through various courses, internships, and externships that follow the same rules and requirements as those currently in place for the existing SFLS programs. The SFLS Dean will be responsible for managing this program and will work closely with the Curriculum Committee, the SFLS Alumni Association, and other local and regional organizations such as government agencies, non-profit organizations, and law firms.

#### Student Organizations

Students will continue to participate in Student Bar Association activities through the election of student representatives to the existing SFLS Student Bar Association, which is active on both campuses.

## Business Services, Financial Aid Services and Admissions

Students will continue to have access to all of Alliant International University's student support service representatives, including Student Support Services, Business Services, Financial Aid Services, and Admissions. These services are provided by Alliant out of its San Diego headquarters.

Admissions files for prospective students will be compiled and maintained at the university's primary administrative offices. All enrollment decisions for students applying for the J.D. curriculum will be made by the law school's Admissions Committee and will follow the same standards, policies, and procedures that are currently utilized for both SFLS locations.

In addition to the services provided by Alliant, Dean Weimer and Professor Pearce are also available to current and prospective students for all programs for meetings by telephone e-mail, or in person during regular business hours.

## Guidelines for ULSR - Alliant International University Provost; Law School Dean; Full- Time Administrators; Registrar Duties

### Provost

Tracy L. Heller, Ph.D. has served as the Provost and Senior Vice President for Academic Affairs at Alliant International University for the last five years. Over her 24-year career at Alliant University/California School of Professional Psychology (CSPP) she has served in a variety of academic and administrative roles, including Vice and Associate Provost for Administration, Associate and Assistant Dean of the California School of Professional Psychology, Associate and Assistant Professor in the Los Angeles Clinical Doctoral Program, and Chair of the Faculty Senate. Dr. Heller received her PhD in Clinical Psychology from the University of California, Los Angeles. Prior to joining CSPP, Dr. Heller served as the Project Coordinator for a multi-modal treatment study funded by the National Institute for Mental Health (NIMH) at the University of California, Berkeley and Project Coordinator for a longitudinal research study at the University of California, Los Angeles. Dr. Heller also has practiced as a licensed clinical psychologist.

### Dean

Timothy P. Weimer has served as the full-time Dean of San Francisco Law School since February 2020. He previously served as the Registrar and Professor of Law at SFLS, and has extensive experience in law, legal education, and business. Dean Weimer received his Juris Doctorate from University of Akron School of Law and practiced law in Ohio before serving at SFLS. He received his Master's in Business Administration from Capella University and worked in the Finance Industry prior to attending law school.

### Registrar

Karen McCray has served as the full-time SFLS Registrar since July 2020. Paul Welch, the University's head Registrar also serves as a Registrar for SFLS when needed. The full-time Registrar is responsible for recording grades, maintaining all permanent student records, and registering students through the law school's on-line course management system. The vast majority of all information related to registration and student records, including transcripts, grades, and formal student notifications are provided to students through the web-based Campus Nexus Student (CNS) student information system. The Registrar is available by telephone, e-mail, and through the CNS system during regular business hours to students at both SFLS locations.

## Faculty

Following the successful model that SFLS has employed for the past 109 years, the adjunct law faculty for all JD curricula will be practicing lawyers and judges. SFLS currently has one full-time law professor, Scott Pearce. Mr. Pearce received his Juris Doctor degree from the University of Southern California. He has extensive legal experience in litigation and transactional practice areas and established an early bar examination preparation website in 1997.

The current law school faculty will continue to serve as the adjunct professors of law for the new courses. Adjunct faculty for the new courses will be selected using the same rigorous selection criteria as used for the current courses and will be licensed attorney practitioners and judges with experience in the topics they teach. Several of the current SFLS faculty members have already indicated an interest in potentially teaching sections of their courses under the new curriculum standards.

## Academic Program

The curriculum for all programs will be offered online, with live classroom sessions using the same Monday through Thursday evening schedule (6:20 – 9:10 pm) that is currently used by SFLS. Some elective courses may be offered on Saturdays.

Each of the courses will be offered in the new online, distance learning programs (see separate request). Students will also take the same format of examinations and be graded following the same rubrics across the different modalities of teaching. The syllabi, course materials, examinations, and grading rubrics for these courses will be submitted for review and approval by the Committee as part of SFLS's next periodic site inspection. The revised curriculum plan, entitled Academic Excellence Plan (AEP), that will go into effect January 2024 has also been included in Appendix A for the committee's review and approval.

## Practical Skills Training

As discussed above, pursuant to Guideline 5.12 of the Unaccredited Law School Rules, SFLS will offer a minimum of six (6) units of required practical skills training courses including the newly revised litigation and appellate writing program in the AEP, internships, externships, and clinical programs that will be delivered during the second, third, and fourth years. Additional practical skills units will be embedded within the curriculum to meet the 15-unit requirement.

## Academic Policies

SFLS will follow the same academic policies for all courses that are currently in place related to grading, attendance, academic honesty, equal opportunity, anti-harassment, faculty evaluations, course syllabi, examinations, academic probation, course repetition, and disqualification.

## Bar Review Resources

SFLS has a special license agreement with Barbri to provide comprehensive bar review programs and skills courses once the students graduate, that are included in the law school's tuition and fees. Graduating students will continue to have access to the same programs, all of which are already offered online.

## Student Handbook

All policies and procedures will continue as currently outlined in the SFLS Student Handbook.

## Faculty Handbook

All policies and procedures for faculty will continue as currently outlined in the SFLS Faculty Handbook and the Alliant International University Faculty Handbook.

## **VI. FINANCIAL COMMITMENT**

As discussed above, Alliant International University has committed the necessary upfront investment of resources for constructing curriculum at the heightened level of detail required by the AEP. For example, Alliant has budgeted an initial development investment of \$18,000 to fund the initial development and design of the online curriculum. The development investment for this specific phase of the AEP has been funded from Alliant International University's Online Learning and Instructional Design budget.

These initial investments will be supplemented by student tuition from new students enrolling in the next and subsequent cohort. We anticipate that the combination of initial investment funds and student tuition from the JD courses will be adequate to initiate and sustain the program.

## **VII. SUMMARY**

San Francisco Law School has been committed to furthering diversity and inclusion since its founding in 1906. For over 100 years SFLS' residential program has attracted a highly diverse student body and produced very successful lawyers representing historically underserved communities. This has and will continue to be an important part of San Francisco Law School's mission.

The step-by-step, four-year, comprehensive Academic Excellence Program provides students with the training, time and opportunity to learn specific skills and remedy skills deficits. The Program aims to greatly improve students' legal analytical abilities, extensively prepare students for success on the CBX, and develop dynamic, professional, highly skilled attorneys and alumni.

Offering this new curriculum will allow SFLS's to continue providing an excellent legal education to students from underrepresented groups. Because our program is a part-time, evening program, students with work, family, or other responsibilities will be able to pursue a legal career via a flexible, rigorous, legal education program. This will continue SFLS' ongoing contribution to diversifying the legal profession and providing access to justice.

San Francisco Law School's proposed revised JD curriculum also furthers the State Bar of California's mission, including advancing access to the legal system and promoting diversity and inclusion in the legal system.

SFLS requests the Committee approve its comprehensive Academic Excellence Program J.D. curriculum as part of its application to be a Registered Unaccredited Law School. This will allow the law school to enroll the first student cohort in the AEP JD curriculum for a January 2024 start.

Submitted by:

Provost Tracy Heller

Assistant Provost Diana Concannon

Dean Timothy Weimer

## **Appendix B1**

### **San Francisco Law School Academic Schedule**

**San Francisco Law School Academic Schedule**  
**Academic Excellence Plan (AEP) Fall 2022**

Updated April 21, 2023



### First Year Courses

Fall	Units	Spring	Units	Summer	Units
Torts 1	2	Torts 2	2		
Criminal Law 1	2	Criminal Law 2	2	Introduction to Analytical Skills I	1
Contracts 1	3	Contracts 2	3		
Legal Research and Writing 1, w/ Lab	4	Legal Research and Writing 2, w/ Lab	4	Electives	2
Total Units	11	Total Units	11	Total Units	3

### Second Year Courses

Fall	Units	Spring	Units	Summer	Units
Criminal Procedure	3	Professional Responsibility	2	Introduction to Analytical Skills II	1
Civil Procedure 1	2	Civil Procedure 2	2		
Real Property 1	3	Real Property 2	3		
Analytical Skills 1	2	Criminal/Civil Litigation	2	Electives	2
Total Units	10	Total Units	9	Total Units	3

### Third Year Courses

Fall	Units	Spring	Units	Summer	Units
Constitutional Law 1	3	Constitutional Law 2	3	Introduction to Analytical Skills III	1
Evidence 1	3	Evidence 2	2		
Corporations 1	2	Corporations 2	2		
Analytical Skills II	2	Appellate Litigation	2	Electives	2
Total Units	10	Total Units	9	Total Units	3

### Fourth Year Courses

Fall	Units	Spring	Units	Summer	Units
Judicial Decision Making	2	Bar Study Preparation	2		
UCC/Sales	2				
Analytical Skills III	2	Analytical Skills IV	2		
Wills and Trusts	3	Remedies	3	Total Core Units	81
		Community Property	2	Elective Units	6
Elective	1	Elective	1		
Total Units	10	Total Units	10	Total Units for J.D.	87

### Program Requirements

Required Courses: 81 Credits
Elective Courses: 6 Credits
Total Credits Required for J.D. = 87

\*\*Courses in **Black ink** are current courses that have been revised. Courses in **Blue ink** are new AEP Courses.

Submitted: May 22, 2023

The State Bar of California  
Attn: Committee of Bar Examiners  
180 Howard Street  
San Francisco, CA 94105

Re: Appendix A – SFLS Change Modality to Distance Learning Plan

To the Committee of Bar Examiners:

**I. Change of Modality to Distance Learning – Introduction**

As part of its application to become a Registered Unaccredited Law School, San Francisco Law School (SFLS) respectfully requests the Committee of Bar Examiners' approval for a major change to our program. Specifically, SFLS requests approval to change its primary mode of learning to distance learning. This will include offering our JD program in a 100% online, distance learning format via a combination of online, synchronous, and asynchronous courses and class sessions.

SFLS is currently a California Accredited Law School, on probation through August 31, 2023. SFLS has applied to become a Registered Unaccredited Law School starting September 1, 2023. This proposal reviews the request to change mode of learning to distance learning under both the California Accredited Law School Rules (CALS) and the Unaccredited Law School Rules (ULSR).

The proposed curriculum revision (explained in Appendix C) will include the addition of one (1) unit to its overall program, changing the total required number of units to earn a Juris Doctorate (JD) degree from 87 units to 88 total units. The new plan also includes a slight change to the number of required core and elective courses. Under the new curriculum students will be required to take 82 units of core courses and six (6) units of elective courses. This is a slight change from the current 80 required units of core courses and 7 elective courses.

However, the proposed changes for a distance/online JD program will include the same, substantive topics for required courses, curriculum sequence, research and writing requirements, clinical and practical skills training requirements, grading standards, and documented student engagement requirements. The admission requirements for students for the online JD cohorts will also be the same as for the current traditional residential program. The academic standards and performance measures required for eligibility to progress through the program will be the same as the current traditional residential program.

The proposed online JD curriculum will employ a combination of online, synchronous and asynchronous courses and class sessions. The Committee's recent approvals of a major change request for distance learning J.D. programs for various other California Accredited Law Schools including Santa Barbara and

Ventura Colleges of Law and 2018 approval of a similar request from Monterey College of Law have provided a valuable framework for SFLS's current online JD program proposal.

This proposal meets the standards and criteria of the CALS and ULS rules approved by the Committee for distance education including CALS 4.160(B)(12)(d) and Guidelines for ULSR 5.3(C)(1-3).

SFLS plans to initiate the online curriculum by enrolling a limited cohort of 20-30 students for year one, 30-40 students year two, and 40+ students years three and four in the initial five-year development phase. The five-year phase includes the four-year online JD curriculum and the post-graduate year of bar preparation.

During the developmental phase, delivery of the required courses and class sessions for the JD will be offered online via Alliant International University's (Alliant) systems, including the use of Canvas course management tools, Westlaw's TWEN and LexisNexis' online library resources. The Dean of SFLS will oversee these programs with the assistance of the SFLS fulltime faculty and other administrators. This will facilitate consistent oversight, monitoring, and feedback from faculty and students. Before enrollment to the program, students will be provided with written notification of the following: course sequence, schedules, and locations of course offerings, including required courses and class sessions, and technology and equipment requirements.

Prior to enrollment into the online J.D. program, SFLS will confirm that each student is ready to engage in distance learning by possessing the necessary equipment as well as the technical skills required to use the technology properly.

Since SFLS will be changing modality to a Distance Learning format. In accordance with ULSR 4.204(J)(2), SFLS will conduct instruction and provide interactive classes principally by technological means. If approved, starting September 1, 2023 SFLS will focus on the distance learning modality being administered at one office/campus location in Emeryville, with additional services and support from Alliant at its San Diego headquarters.

Students in the initial distance learning program cohort will not be able to transfer to the residential JD program. SFLS hopes to be reinstated as a California Accredited Law School in the near future. At that time, it will once again offer its on-ground residential program. When that occurs, if at any point in time students enrolled in the online J.D. program believe that the residential program is a better educational format for them, they may change to the on-ground program. Similarly, students in the residential program will then be free to enroll in classes from the online program.

## **II. Revised Curriculum, Academic Excellence Plan Description**

### **Revised Curriculum Plan – Academic Excellence Plan**

The proposed curriculum revision (explained in Appendix C) will include the addition of one (1) unit to its overall program, changing the total required number of units to earn a Juris Doctorate (JD) degree from 87 units to 88 total units. The new plan also includes a slight change to the number of required core and elective courses. Under the new curriculum students will be required to take 82 units of core courses and six (6) units of elective courses. This is a slight change from the current 80 required units of core courses and 7 elective courses.

The revised curriculum will include the required bar tested courses, as well as courses in legal research and writing, professional responsibility, and practice-based skills training.

Full-time and Adjunct faculty for the new online courses will be selected using the same rigorous selection criteria as used for traditional on-ground courses.

### **Required 6-Unit Practice-Based Skills Training**

CALS Rule 4.160(D)(2) requires the following practice-based skills and competency training:

*4.160 (D)(2) Competency Training. The law school must require that each student enrolled in its juris Doctor Degree program satisfactorily complete a minimum of six semester units (or their equivalent) of course work designed to teach practice-based skills and competency training. Such competency training must teach and develop those skills needed by a licensed attorney to practice law in an ethical and competent manner.*

Guideline 5.12 of the Unaccredited Law School Rules requires that “*instruction should be available in the practical skills of legal research, drafting legal documents, trial and appellate advocacy, and in professional skills such as law office management, counseling and negotiation.*”

Students in the online JD program will complete at least six (6) units of required practical skills training in the same format as the residential program during years 2, 3, and 4. These courses will include courses such as Legal Research and Writing, Criminal/Civil Litigation, a required appellate court writing program, and elective courses such as Contracts Drafting, and Mediation. Students will receive credit for additional skills training by participation in supervised law school sponsored community law clinics, and individual supervised internships and externships at law firms, public law departments, and public service law agencies.

## Rigorous Academic Standards

Students in the online JD program will be required to meet rigorous academic standards to be eligible to progress through the second, third, and fourth years of legal study.

It is the policy of San Francisco Law School that all students are required to maintain academic good standing during the course of their law study. Students failing to meet these requirements will be subject to academic probation or disqualification. The student's grade point average is used to determine whether a student is in good academic standing, academically disqualified, or will be placed on academic probation. Academic standing is determined by grades at the conclusion of the Spring semester of each year.

As defined by section 8 of the SFLS Student Handbook. A student is in academic good standing when:

*(a) A student in the Second, Third, or Fourth year, has a minimum GPA for the academic year of 2.0/70% or greater, and a CGPA of 2.0/70% or greater, and has no additional CGPA requirements; or*

*(b) A student is in the Second, Third, or Fourth year, has a requirement for a minimum GPA for the academic semester or year or a CGPA greater than 2.0/70% and has met that requirement; or*

*(c) A student was admitted without a requirement that a GPA of greater than 2.0/70% be achieved at the end of the First year, and has attained a GPA of 2.0/70% at the end of the First Year, or*

*(d) A student was admitted with a requirement that a GPA of greater than 2.0/70% be attained at the end of the First Year and has met the required GPA.*

## Compliant and Rigorous Course Design

The online curriculum will be designed to meet the requirements of CALS rule 4.160(B)(12)(b) and (d), as well ULS rule 4.240(E), and Guidelines of ULSR 5.3(C), 5.9(C) and 5.10 – 5.20. The law school will confirm student engagement utilizing an online system for tracking and reporting. Alliant is already using these technologies for tracking student engagement in its California School of Education programs.

In addition, the degree program and each online course will follow the WASC Interregional Guidelines for the Evaluation of Distance Education. (See <https://www.wscuc.org/content/interregional-guidelines-evaluation-distance-education>)

## Course Delivery Model Developed with Technical and Instructional Design Team

The design and development of the online JD curriculum is supported by Alliant's in-house Department of Online Learning, which is overseen by the Associate Provost for Strategic Initiatives and Partnerships and includes three Instructional Designers and one Instructional Technologist.

This team provides pedagogical and technological support to faculty delivering content in the online environment and assists with the integration of a variety of supplemental tools, including Canvas, Zoom, Issu, YouTube, and others to support a rich and interactive educational experience. Embedded in each course are a variety of assignments that can include discussion posts, role plays, groups presentations, individual presentations, and synchronous sessions and which support both peer-to-peer and faculty-to-student interactions.

Online programs are further supported by Alliant's Information Technology Department, which has an IT Help Desk that can address technological support needs either via e-mail or phone.

In addition to the resources from Alliant's team, SFLS has the integrated legal research platform and content management Westlaw/TWEN. This allows for directed research and writing to be built into courses in a seamless fashion that helps prepare students for modern legal practice. SFLS has had a Fully Digital Law Library available to students since the fall of 2020.

Examinations will be conducted online using various software services such as the ExamSoft testing software, and Respondus' Lockdown Browser. Both of which are currently implemented both for on-the-ground and online examinations at SFLS.

### **III. Compliance with Applicable Rules**

Compliant Course Design: The online curriculum will be designed to meet all of the requirements related to student engagement, student monitoring, course design, course content, examinations, and grading as found in CALS rules 4.160(B)(1-5) & (10 – 12), as well Guidelines for ULS rules 5.3(C), 5.9(C) and 5.10 – 5.20. To verify student academic engagement, the law school will rely on methods provided in CALS rule 4.160(B)(12)(d). SFLS will confirm student engagement in the program through online tracking and reporting. As mentioned above, Alliant is already using these technologies for tracking student engagement in its California School of Education Programs.

As previously indicated, the degree program and each online course will follow the WASC Interregional Guidelines for the Evaluation of Distance Education. (See <https://www.wscuc.org/content/interregional-guidelines-evaluation-distance-education>.)

#### **WASC Accreditation**

The traditional residential JD program offered by SFLS/Alliant is part of Alliant's institutional WASC Senior College and University Commission (WSCUC) accreditation. SFLS has worked directly with the Provost's Office to seek approval for the new online distance learning law program from the WASC Senior College and University Commission. This entails at a minimum a program screening process to ensure sufficient resources and expertise and may require a substantive change proposal. SFLS and the Provost's office will ensure that all WSCUC approvals are obtained prior to implementing the proposed programs.

Law Library: Each student in the online JD program will be provided with an online Westlaw account that meets the library requirements of CALS rule 4.160(B)(18) and Guidelines for ULSR 6.4 – 6.6. In addition,

students enrolled in the online JD curriculum will have access to Alliant's LexisNexis account that offers additional research and writing resources. Students living near the Emeryville and/or San Diego campuses will also have access to the law libraries located at those campuses. Students may also access local county law libraries if needed.

Guideline for ULSR 2.12 - Statement of Provided Student Services, Experiences, and Activities; Adequate Support and Resources for Provided Services, Experiences and Activities.

#### Academic Support

The same academic support services currently provided in the classroom-based program, including special skills courses, tutoring, and academic advising will be provided online for students taking the online JD curriculum. The academic support program will be coordinated by various Administrators; currently Dean Tim Weimer in Emeryville, and Professor Scott Pearce in San Diego. Dean Weimer has served as an academic advisor at the Emeryville campus since 2018. Professor Pearce has served as the Administrator and Student Advisor of the San Diego campus since 2019. He also supported the development of the Law School's bar skills program that is part of the law school's primary curriculum.

#### Clinical Programs and Practical Skills Training

First-year law students do not traditionally participate in clinical programs at the Law School. However, for the upper division online law students, clinical opportunities will be developed in collaboration with the current law school clinics and local bar association clinics. The six (6) units of required practical skills training will be provided through various courses, internships, and externships that follow the same rules and requirements as those in place for the existing SFLS classroom-based programs. The SFLS Dean will be responsible for managing this program and will work closely with the Curriculum Committee, the SFLS Alumni Association, and other local and regional organizations such as government agencies, non-profit organizations, and law firms.

#### Student Organizations

Students in the distance learning program will participate in Student Bar Association activities through election of student representatives to the existing SFLS Student Bar Association.

#### Business Services, Financial Aid Services and Admissions

Students enrolled in the online curriculum will have access to all of Alliant International University's student support service representatives, including Student Support Services, Business Services, Financial Aid Services, and Admissions.

Admissions files for prospective online students will be compiled and maintained at the university's primary administrative offices. All enrollment decisions for students applying for the online curriculum



will be made by the law school's Admissions Committee and will follow the same standards, policies, and procedures that are utilized for the current SFLS campus locations.

In addition to the services provided by Alliant, Dean Weimer and Professor Pearce are also available to current and prospective students for all programs, for meetings by telephone e-mail, or in person during regular business hours.

Guidelines for ULS 4.1 & 4.2 - Alliant International University Provost; Law School Dean; Full- Time Administrator; Registrar Duties

#### Provost

Tracy L. Heller, Ph.D. has served as the Provost and Senior Vice President for Academic Affairs at Alliant International University for the last five years. Over her 24-year career at Alliant University/California School of Professional Psychology (CSPP) she has served in a variety of academic and administrative roles, including Vice and Associate Provost for Administration, Associate and Assistant Dean of the California School of Professional Psychology, Associate and Assistant Professor in the Los Angeles Clinical Doctoral Program, and Chair of the Faculty Senate. Dr. Heller received her PhD in Clinical Psychology from the University of California, Los Angeles. Prior to joining CSPP, Dr. Heller served as the Project Coordinator for a multi-modal treatment study funded by the National Institute for Mental Health (NIMH) at the University of California, Berkeley, and Project Coordinator for a longitudinal research study at the University of California, Los Angeles. Dr. Heller also has practiced as a licensed clinical psychologist.

#### Dean

Timothy P. Weimer has served as the full-time Dean of San Francisco Law School since February 2020. He previously served as the Registrar and Professor of Law at SFLS, and has extensive experience in law, legal education, and business. Dean Weimer received his Juris Doctorate from University of Akron School of Law and practiced law in Ohio before serving at SFLS. He received his Master's in Business Administration from Capella University and worked in the Finance Industry prior to attending law school.

#### Registrar

Karen McCray has served as the full-time SFLS Registrar since July 2020. Paul Welch, the University's head Registrar also serves as a Registrar for SFLS when needed. The full-time Registrar is responsible for recording grades, maintaining all permanent student records, and registering students through the law school's on-line course management system. The vast majority of all information related to registration and student records, including transcripts, grades, and formal student notifications are provided to students through the web-based Campus Nexus Student (CNS) student information system. The

Registrar is available by telephone, e-mail, and through the CNS system during regular business hours to students at both SFLS locations.

## Faculty

Following the successful model that SFLS has employed for the past 109 years, the adjunct law faculty for the online JD curriculum will be practicing lawyers and judges. SFLS currently has one full-time law professor, Scott Pearce. Mr. Pearce received his Juris Doctor degree from the University of Southern California. He has extensive legal experience in litigation and transactional practice areas and established an early bar examination preparation website in 1997.

The current law school faculty will continue to serve as the adjunct professors of law for the onsite courses. Adjunct faculty for the new online courses will be selected using the same rigorous selection criteria as used for traditional onsite courses and will be licensed attorney practitioners and judges with experience in the topics they teach. Several of the current SFLS faculty members have already indicated an interest in potentially teaching online sections of their courses.

## Academic Program

The curriculum for the online program will be offered using the same Monday through Thursday evening schedule (6:20 – 9:10 pm) that is used for the law school's current residential locations. Some elective courses may be offered on Saturdays.

Students in the online program will be enrolled in the revised four-year curriculum provided to the committee in a separate request (see Appendix C SFLS Curriculum Revision Plan). The revised curriculum for all SFLS J.D. programs will be offered using a Term Calendar beginning January 2024. A term calendar breaks the education periods into 6, 8-week terms. The curriculum plan/schedule will be as follows.

### Year by Year Course List

#### First Year Curriculum:

- Torts 1 (A & B), 2 units
- Torts 2 (A & B), 2 units
- Criminal Law 1 (A & B), 2 units
- Criminal Law 2 (A & B), 2 units
- Contracts 1 (A & B), 3 units
- Contracts 2 (A & B), 3 units
- Legal Research and Writing 1 w/ Lab (A & B), 4 units
- Legal Research and Writing 2 w/ Lab (A & B), 4 units
- Introduction to Analytical Skills 1, 1 unit

#### Second Year Curriculum:

- Criminal Procedure(A & B), 3 units
- Professional Responsibility (A & B), 2 units
- Criminal/Civil Litigation (A & B), 2 units
- Civil Procedure 1 (A & B), 2 units
- Civil Procedure 2 (A & B), 2 units
- Real Property 1 (A & B), 3 units
- Real Property 2 (A & B), 3 units
- Analytical Skills 1 (A & B), 2 units
- Introduction to Analytical Skills II, 1 unit

#### Third Year Curriculum:

- Constitutional Law 1 (A & B), 3 units
- Constitutional Law 2 (A & B), 3 units
- Evidence 1 (A & B), 3 units
- Evidence 2 (A & B), 2 units
- Corporations 1 (A & B), 2 units
- Corporations 2 (A & B), 2 units
- Analytical Skills II (A & B), 2 units
- Appellate Litigation (A & B), 2 units
- Introduction to Analytical Skills III, 1 unit

#### Fourth Year Curriculum:

- Judicial Decision Making (A & B), 2 units
- Commercial Law (A & B), 2 units
- Analytical Skills III (A & B), 2 units
- Wills and Trusts (A & B), 3 units
- Analytical Skills IV (A & B), 2 units
- Remedies (A & B), 3 units
- Bar Study Preparation (A & B), 3 units
- Community Property (A & B), 2 units

Students are also required to complete Six (6) total units of elective credits during years 2 – 4.

Each of these courses will utilize the syllabi and casebooks as outlined in the revised curriculum plan. Students will also take the same format of examinations and be graded following the same rubrics as students currently attending the SFLS classroom-based locations. The only difference for the online JD curriculum will be the delivery of the materials as best practices become established. The syllabi, course materials, examinations, and grading rubrics for SFLS courses have all previously been submitted for review and approval by the Committee as part of SFLS's 2020 five-year site inspections. SFLS' revised curriculum plan entitled the Academic Excellence Plan (AEP), that will be implemented January 2024, has been submitted to the committee as Appendix C for review and approval at its August 18, 2023 meeting.

## Practical Skills Training

Pursuant to CALS rule 4.160(D)(2)(a) and Guideline 5.12 of the ULS rules, SFLS will offer a minimum of six (6) units of required practical skills training courses including the newly revised litigation and appellate writing program in the AEP, internships, externships, and clinical programs that will be delivered as courses during the second, third, and fourth years. Additional practical skills units will be embedded within the online curriculum to meet the 15-unit requirements of 4.160(D)(2)(b).

### Meeting Guideline 5.3 Minimum Requirements

Students completing this curriculum plan will meet the requirements of Guideline for ULSR 5.3(C)(1-3) by completing a minimum of 864 hours of preparation and study a year for four (4) years.

**Compliant Course Design:** The online curriculum will be designed to meet all of the requirements related to student engagement, student monitoring, course design, course content, examinations, and grading as found in CALS rules 4.160(B)(1-5) & (10 – 12), as well Guidelines for ULS rules 5.3(C), 5.9(C) and 5.10 – 5.20. To verify student academic engagement, the law school will rely on methods provided in CALS rule 4.160(B)(12)(d). SFLS will confirm student engagement in the program through online tracking and reporting. The University is already using these technologies for tracking student engagement in its California School of Education Programs.

The same rigorous studies will be required for the online program as is currently required of our residential programs. Alliant/SFLS uses the WASC Interregional Guidelines of 1 unit = 45 hours of study. Students will be required to be academically engaged with the course materials by interactions with the professor, other students and course materials via synchronous and asynchronous modalities for the number of units for each course. Students are expected to be further engaged with the course materials by completing at least two (2) hours of preparation work for each one unit in the course.

For instance, a student taking Torts 1 A & B their first two terms will engage with the academic materials for 45 hours for section A and another 45 hours for section B, for a total of 2 units or 90 hours of law study.

Using this formula, we can calculate the total hours of study a student will do for his/her first year at SFLS.<sup>1</sup>

Total hours of study for first year courses = 1,035hours.

Total hours of study for second year courses = 900

Total hours of study for third year courses = 900

Total hours of study for fourth year courses = 900

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<sup>1</sup> For a complete breakdown of these calculations please see Appendix C – SFLS Curriculum Revision Plan, pp. 9-10.

## Academic Policies

SFLS will follow the same academic policies for online courses that are currently in place at all on ground locations related to grading, attendance, academic honesty, equal opportunity, anti-harassment, faculty evaluations, course syllabi, examinations, academic probation, course repetition, and disqualification.

## Bar Review Resources

SFLS has a special license agreement with Barbri to provide comprehensive bar review programs and skills courses that are included in the law school's tuition and fees that students may access after they graduate. Students taking online courses will have access to the same programs and resources, all of which are already offered online.

## Student Handbook

All policies and procedures are the same for any of SFLS' JD programs. However, SFLS recognizes that the definition of attendance and student engagement for the online courses is unique and will comply with these regulations as outlined in CALS rule 4.160(B)(12) and ULS rule 5.3(C)(1-3).

## Faculty Handbook

All faculty policies and procedures for online courses will remain the same as they are currently established for SFLS' campus locations.

## **IV. Development of the Online JD Curriculum**

The primary emphasis in developing the proposed online JD is to design and deliver a curriculum that will provide a high quality, engaging, and rigorous educational experience that is comparable to the existing residential JD program.<sup>2</sup>

Although law school distance education programs are relatively new to the CALS, they are not new to the Committee or to California legal education. Concord Law School has been offering a 100% online legal education program since 1998. In addition to Concord Law School, the Committee has had direct oversight of at least four other 100% online law schools for several years, including Abraham Lincoln University School of Law, St. Francis School of Law, American Heritage University School of Law, and California School of Law. The Committee has also had direct oversight of numerous correspondence law schools that utilize online law school curriculum as well, including Northwestern California University School of Law, California Southern University School of Law, and Taft Law School.

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<sup>2</sup> See Appendix C - SFLS Curriculum Revision Plan.

Recently, the American Bar Association granted the first hybrid JD curriculum variance in California to Southwestern Law School in Los Angeles. The ABA previously granted similar hybrid curriculum variances to both Mitchell Hamline College of Law and Loyola University in Chicago. A report from the recent AALS mid-year conference in San Diego indicated that there are 5-6 additional ABA hybrid proposals under consideration. In addition, John Marshall Law School, Vermont Law School, Florida Coastal College of Law, New York University Law School, Washington University School of Law and the University of Alabama School of Law are just a few of the ABA law schools with established online LL.M. law degree programs, many of which allow JD students to take LL.M. courses for credit in the JD program.

As discussed above, the proposed curriculum revision will include the addition of one (1) unit to its overall program, changing the total required number of units to earn a Juris Doctorate (JD) degree from 87 units to 88 total units. The new plan also includes a slight change to the number of required core and elective courses. Under the new curriculum students will be required to take 82 units of core courses and six (6) units of elective courses. This is a slight change from the current 80 required units of core courses and 7 elective courses.

The new curriculum will address all substantive topics for required courses, curriculum sequence, research and writing requirements, clinical and practical skills training requirements, grading standards, and documented student engagement requirements. The admission requirements for students for the new curriculum will also remain the same as for the current program. The academic standards and performance measures required for eligibility to progress through the program will be the same as the current program.

All online courses will be taught using a combined asynchronous/synchronous methodology. The curriculum for the online JD is designed to meet the rigorous curriculum standards set forth in the amended rules by the Committee of Bar Examiners.

In the online courses and classes, many of the assignments and techniques will be the same as found in residential courses. Faculty will assign readings, just as in a residential course. Depending on the course, faculty may choose a traditional casebook or develop course material specifically for their class. Faculty will follow the methods provided in Guideline 2.9(D) and CALS rule 4.160(B)(12)(d) to verify academic engagement. Student and course records will include digital logs of student participation. Faculty will guide the students' learning through podcasts, video lectures, PowerPoint and similar presentations, or other multi-media resources as needed. Similar to traditional residential courses, students will analyze statutes and case law, and provide either written or video "case briefs." Students will engage in both asynchronous and synchronous online classroom discussions, submit written assignments, take quizzes and exams, and collaborate with classmates using Zoom video, postings, blogs, discussion groups, and e-mail.

Midterm and final exams for online courses will be administered in a secure testing environment that is established by using an online secure testing proctoring system such as Examsoft, ProctorU, or Respondus Lockdown Browser.

ExamSoft – Locks a student's laptop during an exam so the computer will only let the student take the examination.

<https://examsoft.com/>

ProctorU – Has the same functions as ExamSoft, but monitors the student with the laptop's webcam.

<https://www.proctoru.com>

Respondus Lockdown Browser – is a custom browser that locks down the testing environment within the learning management system, for SFLS Canvas.

Westlaw/TWEN – A law school-oriented content management system that is integrated into the Westlaw legal research databases.

Faculty will be provided university support in all aspects of the digital classroom and curriculum development by the school's technical design team, educational consultants, and law school professional staff.

## **V. Financial Commitment**

As described in detail in the request for approval of the revised curriculum. Alliant International University and SFLS have been working for the last two years in developing an updated, rigorous curriculum that meets the needs of our incoming students and the changes in the legal industry. Alliant has budgeted an initial development investment of \$18,000 to fund the integration of the first year of the revised curriculum into the online modality. The development investment has been funded from Alliant International University's Online Learning and Instructional Design budget. This initial investment, and the ongoing development of the 2L – 4L curriculum will be supplemented by student tuition from 20-30 new students enrolling in the pilot cohort. We anticipate that the combination of initial investment funds and student tuition from the online JD courses will be adequate to initiate and sustain the program.

## **VI. Summary**

San Francisco Law School has been committed to furthering diversity and inclusion since its founding in 1906. For over 100 years SFLS' residential program has attracted a highly diverse student body and produced very successful lawyers representing historically underserved communities. This has and will continue to be an important part of San Francisco Law School's mission.

Offering an online JD program will further SFLS's ability in providing an excellent legal education to students from underrepresented groups. The Law School will be able to open the JD program to students unable to move to San Francisco or San Diego for financial or other reasons. Because our program is a part-time, evening program, students with work, family, or other responsibilities will be able to pursue a legal career via a flexible, rigorous, distance/online legal education program. This will continue SFLS' ongoing contribution to diversifying the legal profession and providing access to justice.

San Francisco Law School's proposed online JD program also furthers the State Bar of California's mission, including advancing access to the legal system and promoting diversity and inclusion in the legal system.

Under Rule 4.165 (E), SFLS requests approval from the Committee to change its primary mode of learning to distance learning, including the addition of the revised J.D curriculum. The new curriculum will utilize online, synchronous, and asynchronous courses and class sessions. SFLS' will discontinue its existing traditional classroom-based J.D. curriculum until it re-establishes its full accreditation under the California Accredited Law School Rules.

SFLS requests the Committee approve its change of modality to Distance Learning as part of its application to be a Registered Unaccredited Law School. This will allow the law school a smooth transition from CALS to Registered Unaccredited status on September 1, 2023. It will also allow SFLS to enroll the first student cohort in the revised JD curriculum and distance learning program for a January 2024 start.

Submitted by:

Provost Tracy Heller

Assistant Provost Diana Concannon

Dean Timothy Weimer



