



**OPEN SESSION  
AGENDA ITEM IV.E.  
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 Probation Progress Report – Peoples College of Law

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**EXECUTIVE SUMMARY**

The Committee of Bar Examiners (committee) placed Peoples College of Law (PCL) on probation effective December 2, 2022 through May 30, 2024, and directed the law school to file monthly progress reports on the first day of each month during its probation. PCL filed timely progress reports on July 1, 2023 and August 1, 2023, but these reports appear to have material inconsistencies and omissions as described below. (Attachments A-B).

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**BACKGROUND**

Peoples College of Law is a registered, unaccredited fixed-facility law school founded in 1974 and located in Los Angeles, California. It is a stand-alone law school and solely offers a JD program. Volunteer faculty teach the students in a building owned by the law school.<sup>1</sup> (PCL 2022 Annual Report). During the fall 2022 term, PCL enrolled 21 students (9 1L; 9 2L; 2 3L; and 1 4L); during the spring 2022 term, PCL enrolled 14 students (4 1L; 7 2L; 2 3L; 1 4L). ([Jan. 2023 Cal. Bus. & Prof. Code section 6061.7\(a\) disclosure; email from Peoples College of Law Administrator, March 24, 2023, 5:45 p.m.](#)).

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

## SUMMARY OF PROBATION CONDITIONS

On December 2, 2022, because the law school did not show continued compliance in the areas identified as recommendations in its most recent inspection report, the committee placed PCL on probation through May 30, 2024. ([Item O-400](#), Committee of Bar Examiners Meeting, Dec. 2, 2022), adopting the following motion:

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

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that sufficient progress has been made toward compliance, or its registration as an unaccredited law school will be withdrawn, with the law school's progress to be reviewed at the committee meeting in October 2023 and April 2024, and agree to submit to annual inspections thereafter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

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

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

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

([Committee of Bar Examiners' Minutes, December 2, 2022 Meeting](#)).

Though the committee's original order contemplated a review in October 2024, PCL "request[ed] that the State Bar send to PCL a written statement stating precisely what PCL has done or failed to do that the Bar believes PCL is not in compliance with any rules, guidelines, statutes or other regulatory requirements, and precisely what the Bar requires or wants PCL to do with respect to each item of noncompliance" in a letter dated March 1, 2023.

At its March 2023 meeting, the committee responded to PCL's letter by confirming that, consistent with its prior directives issued since 2020, PCL's progress reports must include status as to "each element of probation," which is each recommendation noted in its 2020 inspection report<sup>2</sup>. The committee also confirmed that in areas where PCL had demonstrated compliance

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<sup>2</sup> Prior to the imposition of probation, PCL was already required to write annual progress reports addressing each recommendation identified in the law school's inspection report. ([Minutes of Meeting of August 20, 2020 Meeting](#), Adopted at Committee of Bar Examiners Meeting, October 16, 2020).

following the 2020 inspection report, PCL must sustain compliance and avoid falling out of compliance with other rules or guidelines. If the law school falls out of compliance, it must include a plan and timeline to come into compliance in that area in the monthly progress report. As a courtesy, the committee provided the law school with another copy of each of the recommendations from the 2020 inspection report and a summary of PCL's compliance or lack thereof for each recommendation (derived generally from their prior submissions). (See [O-402 Attachment E](#), Committee of Bar Examiners Meeting, March 24, 2023).

The committee also reviewed PCL's January, February, and March 2023 progress reports and requested more information to give the law school another opportunity to demonstrate whether its disclosure practices comply with Rule 4.241 and California Business and Professions Code section 6061.

The committee adopted the following motion at its March 2023 meeting, extending the deadline for the April 2023 progress report to April 4 as a one-time courtesy:

**MOVE**, that the Committee of Bar Examiners receive and file the probationary reports filed by Peoples College of Law in January, February, and March 2023.

**FURTHER MOVE**, that in response to Peoples College of Law's March 2023 letter seeking information as to its compliance status and required actions, staff transmit to the law school the annotated summary and restatement of the probationary order set forth in Attachment E (amended to be due, EOD, April 4).

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

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

(Committee of Bar Examiners' Meeting, March 24, 2023, adopted motion posted onscreen, posted via meeting recording).

The law school's April progress report included timelines in some areas but not others, and continued to omit topics requested. After reviewing the report, the committee adopted the following motion at its April 2023 meeting, urging the law school to file complete, consistent reports with timelines. The committee also asked a series of specific questions related to

disclosures and providing notice to students about the law school's probationary condition and disclosure compliance, and repeated its admonishment to the law school to maintain full compliance with disclosure requirements:

**MOVE**, that the Committee of Bar Examiners receive, and file Peoples College of Law's probationary progress report filed in part on April 1, 2023 and in part on April 5, 2023.

**FURTHER MOVE**, that the committee advises that the submission of late, incomplete, or inconsistent progress reports will contribute to the committee's assessment of whether the law school is able to achieve and sustain compliance.

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

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

In June 2023, the committee reviewed the law school's May and June 2023 progress reports, noting that the reports were not responsive to the questions provided in April, timelines were extended without explanation, and insufficient data was provided for the committee to evaluate the law school's planned sale of its building. The committee passed the following motion:

**FURTHER MOVE**, that the committee again remind PCL that the submission of late, incomplete, or inconsistent progress reports will contribute to the committee's assessment of whether PCL is able to achieve and sustain compliance.

**FURTHER MOVE**, that the law school update the committee as to its compliance in general, but in particular with Rule 4.241 and California Business and

Professions Code 6061.7(a), requested since January, for which failure to comply can result in termination of registration.

**FURTHER MOVE**, that the law school be directed to file, as soon as possible and no later than its July 1, 2023 progress report, a motion for permanent change to the distance learning category if it intends teach classes online in fall 2023, or alternatively affirm in its July 1, 2023 progress report that it will be teaching classes in-person in a fixed-facility in fall 2023, with the understanding that the law school will not be permitted to change to the distance learning category until a proper motion has been reviewed and approved by this committee.

**FURTHER MOVE**, the law school is directed to supplement its major change request to change its administrative office as soon as possible and no later than its July 1, 2023 progress report with sufficient detail for the committee to evaluate the proposal including: 1) confirming its category and providing a separate major change request if that category is distance or correspondence instead of the current fixed-facility; 2) documenting its plans to fulfill the library required by its category choice; 3) describing the contingency plan if a space is not found; 4) documenting the criteria being used to seek a permanent location and the location in which classes will be taught in fall 2023; and 5) documenting how those criteria are appropriate for the category selected, whether fixed-facility or distance learning. The law school will not be permitted to change its administrative headquarters until a proper motion has been reviewed and approved by the committee.

**FURTHER MOVE**, that consistent with the committee's guidance in March 2023, PCL should be reminded of its responsibility to take prompt action to establish full compliance, as well as any other steps necessary to avoid noncompliance with any other rule or guideline, and to provide evidence of this in its July 2023 progress report. If the law school cannot document compliance in a particular area, the law school must provide an explanation and detailed, documented timeline and action plan as to when compliance is expected to be achieved.

**FURTHER MOVE**, that the law school be required to provide a copy of this order to all current and prospective students until further notice, and post this motion prominently on its website home page along with the original probationary order, and attach this motion to student disclosures.

**FURTHER MOVE**, that all outstanding requests and compliance actions, except as noted, must be completed and documented by the law school in the August 1, 2023 progress report.

## **DISCUSSION**

While the law school submitted timely progress reports by July 1, 2023 and August 1, 2023, It is challenging to follow the law school's progress, as it sets timelines, changes them without

explanation, and provides conflicting updates within a single document. In addition, when reports change from the prior month, the changes are generally neither highlighted nor explained. Finally, the reports contain material omissions, particularly in the area of refunds issued, as discussed below. The law school must understand that failure to properly inform the committee is not a basis for seeking more time to comply.

### **PCL WILL REMAIN IN ITS CURRENT LOCATION**

Regarding the location where PCL will teach its fall classes, the law school's position appears to have evolved; most recently indicating that it will teach classes in person at its current building . The law school still plans to sell the building, but represents that it will remain in the space under an option to do so during the 2023-2024 school year. The law school did not provide documentation of the sale or the option. At the last meeting, the law school represented that the sale was in escrow, but the current status is unclear.

PCL generally teaches on the second floor of this building. However, the second floor is currently undergoing significant maintenance.<sup>3</sup> PCL has discussed the repairs with contractors and expects that they will be complete by August 25, 2023, in which case it will return to using that space. If not, the law school represents that it plans to share space with its first-floor tenant, but does not provide documentation of any agreement nor an understanding of how much space would be available and whether it would be sufficient for the school's need, temporary as they may be.

PCL described one alternative location that it may purchase if its offer is accepted, but has not otherwise discussed the criteria for its search.

The law school has not filed a formal major change regarding its headquarters. PCL has been advised that a move must be pre-approved, and that a major change request is still needed.

### **PCL'S JULY AND AUGUST PROGRESS REPORTS SUMMARIZED**

In its July progress report the law school failed to follow at least two directives from the committee by: 1) omitting the amended major change of headquarters requested by the committee no later than July 1, 2023; and 2) submitting a plan to issue refunds at the end of August, when the committee asked that they be completed by the start of August, since they were months overdue. As in prior months, staff noted deficiencies and discussed them with the law school verbally and in writing.

The August report was more responsive. While the law school did not include the major change of headquarters, its omission was appropriate as the school advised that it would stay in its current location for another school year. It also issued some refunds, but did not explain why

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<sup>3</sup> PCL will contract with a professional cleaning service to do a deep steam cleaning of the carpet in the hallways. PCL will then replace the carpet in the large classroom and fix any remaining issues. Among the improvements an initial internal assessment has revealed is replacement of ceiling tiles, windows and flooring, and in the exterior security cameras and lighting. PCL also plans to upgrade and reinforce windows to prevent break-ins and add key card access for building security..

at least one refund owed was not issued. The report also still contained inconsistent information and required significant analysis on the part of staff to harmonize the various sections.

Key remaining compliance issues are summarized below.

### **Item 1 Testing Accommodations**

PCL has improved the instructions and timetable for applying for testing accommodations, and the State Bar has not received any new complaints in this area since the last meeting. The law school did not provide an update as to the current complaint it is researching.

### **Item 2/4 Disclosures**

The law school's current web disclosure contains errors, and it provided an incomplete list of students owed refunds related to defects in the law school's disclosure procedures.

Staff informed PCL of errors on the law school's California Business and Professions Code section 6061.7(a) disclosure posted on its website, specifically that (need to summarize what is wrong so there can be some understanding of what it means that the errors are still present). The law school advised in multiple reports that the errors have been corrected, but as of the writing of this memorandum, the disclosure is incorrect.

PCL provided refunds owed to certain students as a result of defects in its disclosure process required by rule 4.241, and provided them by the August 1, 2023 deadline imposed by the committee in June, after prior deadlines of April 1 and later were not met. The list provided, however, was incomplete, and staff had to inquire about at least one name that was omitted. PCL was well aware of the need for the additional refund and had corresponded with the State Bar about it previously. Initially, the school responded to staff's inquiry about the omission by stating that it would pay the refund "later," without further explanation. After further inquiry by State Bar staff, PCL issued the refund via priority mail on August 8, 2023.

### **Item 7 Secure Testing**

The law school now uses security software and proctoring for exams. The June 2023 progress report references a procedure under which an instructor may delay exams at their discretion for one or more students. The procedure does not appear to have limitations related to timing, fairness, or examination security. The law school must evaluate this policy for compliance, and make any necessary adjustments. The July and August progress reports did not include any further update on this matter.

### **Item 10 Staffing**

The law school admits continuing noncompliance in this area. PCL previously projected to hire new staff by mid-August, and now updates that it has begun interviewing and hopes that three new staff will start work on September 5, 2023.

### **Item 11 Faculty Evaluation**

The law school previously represented that its faculty evaluations would be fully administered by mid-July 2023. Instead, the law school advised that it collected feedback from students and self-evaluations from instructors, but does not advise whether the Faculty Curriculum Committee conducted any evaluations, or place record of the evaluations in the instructors' files.

### **Item 13 Clinical Courses**

The committee has previously asked the law school to identify who is overseeing students' clinical work currently, since PCL's policy describes a temporary procedure implemented by a prior dean, but does not describe what is being done now. In the June 2023 report, the law school advised that the policy related to clinical course oversight is not compliant, but a compliant policy will be created during summer 2023. The law school has not documented adoption or implementation of a compliant procedure in either the July or August progress reports.

In fact, the State Bar has learned that the law school did not record one student's participation in at least two clinical courses. PCL was not aware of the issue, so the student raised it. PCL had to contact prior professors to ascertain whether the student had been enrolled in two courses. This action delayed the student's ability to secure a transcript accurately reflecting the courses the student completed.

In response to an issue of which staff was made aware, on August 4, 2023 staff requested the law school to show how its credit hours are calculated for clinical courses, and for this student's clinical courses. The law school has not responded to that request except to say that PCL's governing board met in emergency session to confirm the credits that should be awarded.

It is recommended that the law school be required to generate transcripts for each current student to review to confirm their accuracy, and that the law school advise how it calculates credits for clinical courses, and records participation.

### **Item 14 Grade Review**

The law school has posted a policy for administrative grade appeal. The policy for reviewing grades prior to issuing them to students does not state who will be reviewing or what their qualifications are, noting that students may be part of the grading team. The law school has been asked to advise who is conducting the reviews currently. While the May 2023 report was nonresponsive, the June report advises in that "[t]he revision [to the school's current policy] adds the requirement that student examinations papers, as well as grades, must be reviewed and approved by the Dean or other legal educator before grades are posted. Adoption of a revision is scheduled to be considered at the next meeting of our board of directors," but does not list the date, the qualification of the reviewers, or the methods used.

The law school's progress reports do not advise whether the revision was adopted.



## **Item 16 Course Repetition**

The law school updated its course repetition policy in some respects. However, it mentions a policy pursuant to which a student who earned a failing grade could raise the grade by doing extra credit or repeating the final. This provision is not consistent with guideline 2.9(B) which provides that “[a] law school must adopt written policies on examinations and grading that are fair and . . . [g]rades should indicate . . . the student’s level of achievement.” Here, the law school has had an issue with grade inflation that has spanned several inspections, resulting in grades that did not realistically help students assess their progress, and this practice may contribute to that issue. The law school should review and delete the noncompliant portion of this policy.

## **Item 18 Library**

PCL appears to be making progress in this area, but the level of progress is difficult to quantify. PCL provided receipts generally dated August 1, 2023 suggesting that it is making progress toward meeting the library requirement by the time that the law school resumes in person classes for fall 2023, but it did not provide an accounting of what was ordered, what was still needed, and when it would arrive. PCL should clearly state which library requirements are met, and, if any are not met, explain why and when they will be met.

## **Item 19 Record Storage**

The law school admits that it is not in compliance in this area, and has not provided updates as to some issues in a number of months. Faculty files do not contain the full documentation. The law school is not retaining the required five-year repository of exams, and is not filing current exams because the current administrator is working remotely.

During July and August, several additional fundamental recordkeeping issues were observed.

First, the law school did not record at least one student’s participation in two summer clinics despite having a Populi recordkeeping system. The student highlighted the error, and the law school conducted an investigation, adding the two courses to the student’s transcript. This is of particular concern because the courses took place after the law school implemented its current Populi recordkeeping system, which was intended to reduce transcript errors. It is unclear whether the law school is fully documenting student courses in the system.

Next, the website, recently refreshed and migrated to new software for easier updates, continues to display outdated disclosures and policies, as identified by State Bar staff and PCL students. The website showed a five-dollar fee for transcripts, but the current cost is 15 dollars, so the posted procedure was not working. Three students contacted the State Bar after they were unable to work with PCL to figure out how to obtain their transcripts. Regarding the disclosures, on June 8, staff identified that the amount of fees charged to earn a JD was significantly overstated. The law school agreed to update it immediately, but it is still incorrect.

Finally, the law school required nearly nine months and significant oversight to determine whether it was properly providing disclosures to students each term prior to payment. The process was delayed, in part, because some files were missing.

### **PCL Describes Some Improvement**

PCL filed timely progress reports in July and August 2023.

PCL represented in its July progress report that it has offered courses to the student awaiting a fourth-year curriculum since fall 2022, but did not provide documentation in the July or August progress reports. Staff made a specific request in August for the communications sent, financial terms offered, and any other relevant information. PCL produced an email listing courses, with a minority of the courses noted as staffed, without registration details, offer timelines, or financial details. More recently, after the law school needed to research defects in the student's transcripts being used to transfer, the law school mentioned as an aside that the courses would have been offered at no charge at PCL.

PCL appears to have purchased at least some of the books required to update its library, though it did not clearly show which documents are needed, which were ordered, and which, if any were still to be purchased.

PCL appears to be securing a loan to assist it with upcoming expenses, though overall financial sustainability appears to be challenging for the law school.

### **COMPLIANCE CONCERNS REMAIN**

The law school has been on probation since December 2022, filing monthly progress reports. It continues to experience issues with basic recordkeeping, transparency in reporting. The paid and volunteer staff efforts to carry out its educational program and administrative duties are insufficient.

The law school continues to provide unclear, incomplete, or inconsistent progress reports, reacting to committee directives, rather than establishing it can maintain compliance on its own. The law school continues to make fundamental errors despite an unprecedented level of support.

It is recommended that staff schedule the inspection contemplated in the original probation order in order to provide additional insight as to the law school's compliance. Generally, prior to an inspection, a law school prepares a self-study to inform the inspection team. Here, however, it may be appropriate for the team to rely upon the monthly progress reports provided by the law school, as well as their newly updated website.

### **RECOMMENDATIONS**

It is recommended that the Committee of Bar Examiners receive and file Peoples College of Law's July 2023 and August 2023 progress reports, reminding PCL that submission of late,

incomplete, or inconsistent progress reports will contribute to the committee's assessment of whether PCL is able to achieve and sustain compliance.

It is further recommended that the committee direct PCL to update the committee as to its compliance in general, and as to each aspect noted above, including confirming whether any additional refunds are due pursuant to rule 4.241, and explaining why at least one student was not included on its original refund list when the law school was aware that a refund was due for that student.

It is further recommended that the committee direct the law school to conduct an immediate analysis to determine whether the transcripts are correct and complete for each student who has attended the law school for any period of time since summer 2020, offering each student or former student the chance to review their transcript for accuracy, and providing results of the analysis to the committee in the September 1, 2023 progress report, advising whether each student's transcript is now correct, or identifying the changes that are still under review and the timeline for completion of the review.

It is further recommended that the committee direct the law school update the committee no later than the September progress report progress report as to its space plans and provide documentation of its right to access the space, filing a timely major change as soon as practicable.

It is further recommended that the committee direct the law school to be prepared to undergo the inspection contemplated by its probation terms, to be conducted as soon as staff can assemble the inspection team, relying upon the law school's progress reports, newly redesigned website, and updated catalog in lieu of a traditional self-study, as these documents should fully describe the law school's best efforts to sustain compliance in full detail.

## **PROPOSED MOTION**

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

**MOVE**, that the Committee of Bar Examiners receive and file Peoples College of Law's July 2023 and August 2023 progress reports, reminding PCL that submission of late, incomplete, or inconsistent progress reports will contribute to the committee's assessment of whether PCL is able to achieve and sustain compliance.

**FURTHER MOVE**, that the committee direct PCL to update the committee as to its compliance in general, and as to each aspect noted above, including confirming whether any additional refunds are due pursuant to rule 4.241, and explaining why at least one student was not included on its original refund list when the law school was aware that a refund was due for that student.

**FURTHER MOVE**, that the committee direct the law school to conduct an immediate analysis to determine whether the transcripts are correct and complete for each student who has

attended the law school for any period of time since summer 2020, offering each student or former student the chance to review their transcript for accuracy, and providing results of the analysis to the committee in the September 1, 2023 progress report, advising whether each student's transcript is now correct, or identifying the changes that are still under review and the timeline for completion of the review.

**FURTHER MOVE**, the committee direct the law school update the committee no later than the September progress report progress report as to its space plans and provide documentation of its right to access the space, filing a timely major change as soon as practicable.

**FURTHER MOVE**, the committee the committee direct the law school to be prepared to undergo the inspection contemplated by its probation terms, to be conducted as soon as staff can assemble the inspection team, relying upon the law school's progress reports, newly redesigned website, and updated catalog in lieu of a traditional self-study, as these documents should fully describe the law school's best efforts to sustain compliance in full detail.

#### **ATTACHMENTS LIST**

- A. July 1, 2023 Peoples College of Law Progress Report
- B. August 1, 2023 Peoples College of Law Progress Report



# People's College of Law

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

Hector C. Peña, J.D. – President

Edith Pomposo, J.D., LL.M – Dean

July 1, 2023

Dear Natalie,

Enclosed Please find the monthly progress report. Attached are the report and additional files that highlight our achievements and milestones.

Thank you for your guidance while we work to sustain compliance.

Sincerely,

Edith Pomposo, J.D., LL.M

Dean

Peoples College of Law



# People's College of Law

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Hector C. Peña, J.D. – President

Edith Pomposo, J.D., LL.M – Dean

July 1, 2023

## **June 2023 CBE Action – Review of Probationary Progress Report – Peoples College of Law**

Dear Natalie,

Thank you for providing us with the motion adopted by the Committee of Bar Examiners during their meeting on June 23, 2023. We appreciate the committee's thorough review and guidance regarding our compliance status. We would like to address the specific points raised in the motion and provide an update on our progress.

First, we want to assure the committee that we are committed to teaching classes on-site and have no intentions of changing our approach. Furthermore, we have taken proactive measures to ensure a backup plan is in place. We have recently entered into a partnership with BSP (Building Skills Partnership), a well-funded non-profit organization with an outreach of 25,000 members. BSP's donors include prominent entities such as Google, USC, and various foundations. They have generously offered us office space and expressed interest in housing our legal clinics to serve their membership across their multiple centers throughout Southern California, from San Diego to Palo Alto.

In the areas where building capacity is required or where the committee has requested a backup plan, our partnership with BSP provides us with a viable alternative. This collaboration not only presents us with additional office space but also opens up opportunities for scholarship programs and the potential for non-profit staff members to pursue legal careers. It is important to note that the arrangement with BSP is subject to approval during our upcoming board of directors meeting on July 16. While leasing space from BSP is a possibility, its approval is contingent upon the outcome of the board of directors meeting.

Regarding the committee's request to provide a copy of the order to our current and prospective students, we will promptly post a copy of the order, along with the original probationary order, on Populi, our student information system and also on our website. This will ensure that our current and prospective students are well-informed about the situation.

We sincerely appreciate the committee's guidance and will diligently work towards full compliance. In our upcoming July 2023 progress report, we will provide detailed evidence of our actions, explaining any areas where compliance has not yet been achieved and providing a documented timeline and action plan for attaining compliance.

Thank you for your attention to these matters. We remain committed to upholding the highest standards and meeting the requirements set forth by the Committee of Bar Examiners.

Sincerely,

Edith Pomposo, J.D., LL.M  
Dean  
Peoples College of Law

PEOPLE'S COLLEGE OF LAW

(ORIGINAL) NOVEMBER 2021 PROGRESS REPORT

ON COMPLIANCE WITH RECOMMENDATIONS

IN STATE BAR INSPECTION REPORT OF 2020

Updated July 1, 2023

**RECOMMENDED MANDATORY ACTIONS IN 2020 INSPECTION REPORT 1.**

**Guidelines 1.9 and 2.10:**

**Bar's Inspection Report**

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

**PCL'S Progress Report**

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **PCL'S Updated progress report as of 7/1/23:**

There have been no changes to the initiatives and measures outlined in the previous report. The progress reported last month remains unchanged, emphasizing our ongoing

commitment to comply with regulations. Our focus continues to be on maintaining a secure and transparent environment through our new website, Squarespace platform, student services page, and secure electronic form for accommodation requests. These measures reinforce our dedication to addressing concerns regarding documentation, data security, and privacy while striving for continuous improvement.

## **2. Guideline 2.2(B)**

### **Bar's Inspection Report**

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

### **PCL'S Progress Report**

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

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

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

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

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

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

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

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

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

### **PCL'S Updated progress report as of 7/1/23:**

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

In accordance with the State Bar guidelines, PCL will process refunds for the indicated students in late August.

We have published a clear refund policy and provided a copy to the State Bar, demonstrating our commitment to clarity and consistency. Our refund policies have been updated, and refunds will be processed as per the State Bar guidelines. We have addressed the concerns raised in the Inspection Report by publishing a clear policy and sharing it with the State Bar.

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

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

*Subsequent to the inspection, the school updated the course list, deleting two courses that did not meet these criteria, and added the language regarding frequency.*

### **PCL'S Progress Report**

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

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

PCL has remained in compliance with item #3.

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

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

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

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

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

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

#### **PCL'S Updated progress report as of 7/1/23:**

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

#### **4. Guideline 2.3(D)**

##### **Bar's Inspection Report**

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

##### **PCL'S Progress Report**

As noted in the Inspection Report, some months ago PCL came into compliance by correcting, revising and implementing the disclosures. Since then, the required disclosures were made in the Tuition and Enrollment Agreements signed by each student at the start of the Fall and Winter quarter. The Rule 2.3(D) disclosure has been updated to reflect the change in the principal method of instruction, a change caused by COVID-19, from physical classroom instruction to online interactive instruction. On October 18, 2020, well before the deadline in Rule 4.241, our prior Dean Ira Spiro signed and sent to the State Bar the certification of compliance required by the rule. In connection with preparation of the Annual Compliance Report, the Business and Professions Code section 6061.7 disclosure is being updated.

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

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

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

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

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

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

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

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

### **PCL's updated progress report as of 7/1/23**

PCL has diligently addressed the need for accurate implementation of disclosure statements as mandated by Guideline 2.3(D)(1)-(3), Business and Professions Code section 6061.7, and Rule 4.241. We have taken necessary corrective measures to ensure the accurate and complete implementation of these disclosures.

Regarding the refund process, we have identified certain students who will be eligible for refunds. These students include those for whom their disclosures couldn't be located in our records, as well as those who made payments before receiving the disclosures.

We understand the importance of providing timely refunds to these eligible students and are committed to processing them in a prompt manner. As such, refunds will be issued to these students in mid to late August.

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

### **Bar's Inspection Report**

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

### **PCL'S Progress Report**

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

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

The policy changes remain in effect and are being followed.

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

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

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

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

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

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

**PCL'S Updated progress report as of 7/1/23:**

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

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

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

### **PCL'S Progress Report**

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

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

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

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

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

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

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

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

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

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

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

#### **PCL'S Updated progress report as of 7/1/23:**

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

### **7. Guideline 2.9(D)**

#### **Bar's Inspection Report**

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

#### **PCL'S Progress Report**

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

#### **POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK**



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

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

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

(The Faculty-Curriculum Committee notes that online classes are given via Zoom only. The students attend class via Zoom. The students' names are shown during the class. The students are on camera during the class. Students speak during the classes, and their voices also identify them.)

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

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

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

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

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

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

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

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

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

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

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

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

#### **PCI's Updated Progress Report as of 7/1/23:**

We want to reiterate that we continue to utilize Testinville, an advanced testing platform, to enhance exam integrity and monitor student performance. Testinville offers robust anti-cheating mechanisms, including randomized question orders, time restrictions, and question banks, ensuring a fair and secure testing environment. It actively detects and prevents cheating attempts through various means, such as monitoring browser activities and disabling external applications.

The platform also enables real-time proctoring, allowing authorized staff to remotely monitor students during exams, promoting academic honesty while maintaining the flexibility of online testing. Testinville provides comprehensive reporting and analysis tools, aiding in reviewing test results, identifying anomalies, and investigating potential irregularities.

We remain appreciative of the advanced features and safeguards provided by Testinville, which greatly contribute to maintaining exam integrity and ensuring fair evaluations. Our commitment to utilizing this powerful tool for a secure and reliable testing environment continues.

#### **8. Guidelines 2.10 and 5.17**

##### **Bar's Inspection Report**

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

##### **PCL'S Progress Report**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **PCL'S Updated progress report as of 7/1/23:**

We want to assure you that the website update, as mentioned in the previous report, remains in effect. PCL has created a dedicated webpage specifically for the grade review process. This page serves as a centralized resource for students, providing all necessary information and access to the required forms.

We recognize the significance of offering clear and comprehensive information to our students. Hence, we are committed to maintaining up-to-date documentation of the grade review process, ensuring that the policy and relevant forms are readily available for their convenience.

## **9. Guidelines 2.11, 7.1, and 9.1**

### **Bar's Inspection Report**

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

### **PCL’S Progress Report**

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

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

PCL continues to utilize the above-listed security measures.

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

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

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

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

#### **PCL’S Updated progress report as of 6/1/23:**

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

### **PCL'S Updated progress report as of 7/1/23:**

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

### **10. Guideline 3.1**

#### **Bar's Inspection Report**

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

#### **PCL'S Progress Report**

Our Registrar/Administrator continues working full-time. During this Fall and Winter quarters, others have greatly contributed to the school's administrative work. Following are some examples. Our current President, who was previously the Board Treasurer, pitched in when our Administrator had a medical emergency and had to take sick days until she was able to return to work. Our current Dean has also pitched in to assist when we were short-handed. Our current President, when he was the Treasurer also organized faculty, alumni and together with our Registrar, conducted our student orientation and our fall faculty meeting at the start of the 2021-2022 Academic Year in late August 2021. It should be noted that People's College of Law is a nonprofit corporation. This type of corporation has members rather than shareholders, and PCL's members are students, faculty, alumni and former board members and officers. Our Development and Fundraising Committee, whose members are alumni, has weekly meetings with our professional fundraiser, and has begun planning an online fundraising event, which will be termed "PCL Alumni Reunion" We hope to attract alumnae by showcasing pictures of their graduating class and furthering our school's mission to get licensed attorneys who are social justice advocates into the communities that need them the most.

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

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

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

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

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

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

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

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

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

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

By adhering to this timeline, we are confident in our ability to attract and hire qualified professionals who will contribute significantly to our school's development and admissions/registration processes. We will ensure a thorough and efficient hiring

process to expedite the expansion of our staff and optimize the support provided to our students and stakeholders.

#### **PCL's Updated progress report as of 7/1/23:**

Following this timeline, as discussed in the attached addendum entitled, "Outstandings July" PCL continues to build capacity. PCL listed the job openings on craigslist and is now accepting applications. The job descriptions are attached (**attachment A**).

PCL officially entered into escrow on 6/28/23 for the sale of its building on REDACTED. This will be a 45 day escrow in which it will enter into a 1031 exchange. As such, another property has been identified at REDACTED. PCL submitted an offer for this building and is awaiting acceptance of the offer. The sale will leave PCL with an excess of REDACTED to build out infrastructure and build capacity.

### **11. Guidelines 4.8 and 4.9 Bar's Inspection Report**

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

#### **PCL'S Progress Report**

We use a standard evaluation form.

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

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

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

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

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

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

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



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

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

#### **PCL's Updated progress report as of 7/1/23:**

The evaluation process for our instructors, as outlined in the previous report, remains unchanged. It consists of three components with distinct purposes.

First, we continue to gather feedback from students to ensure their perspectives are considered and valued.

Second, instructors provide self-evaluations, encouraging self-reflection and continuous improvement.

Lastly, we receive evaluations from the FCC, including my comments, emphasizing the importance of accountability and adherence to school standards.

These evaluations demonstrate our ongoing commitment to conducting meaningful and timely reviews, as well as establishing clear expectations for faculty performance.

To date PCL continues to collect the self-evaluation forms and has collected five so far. The final evaluation process will be completed by mid July.

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

### **Bar's Inspection Report**

"To bring itself into full compliance, the school should adopt, implement, and publish attendance policies and procedures that: require student attendance at no less than 80 percent of the regularly scheduled class hours for each course during a particular term,

not a series of courses over two or more terms; provide for accurate and timely maintenance of records; and eliminate the policy of permitting students to make up absences from regularly scheduled class hours with alternate activities. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*

#### **PCL'S Progress Report**

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

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

The same policy is in place this month.

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

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

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

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

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

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

#### **PCL's Updated Progress Report as of 7/1/23:**

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

### **13. Guideline 5.8**

#### **Bar's Inspection Report**

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

## PCL'S Progress Report

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

**From:** Ira Spiro

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

**[names of recipients omitted from this report]**

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

**Importance:** High

Dear PCL SUMMER Students

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

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

Download the attachment to your computer.

Type your name and the course name at the top.

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

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

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

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

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

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

State Bar requires someone on faculty to monitor the students, and it's going to be me. If you have any questions about this, give me a call REDACTED, or send me an email. Remember, my phone doesn't receive texts.

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

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

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

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

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

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

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

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

**PCL's Updated progress report as of 7/1/23:**

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

**14. Guidelines 5.17, 5.18, and 5.25**

**Bar's Inspection Report**

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

**PCL'S Progress Report**

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

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

## Policies to Eliminate Grade Inflation

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

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

### Grading Standards:

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

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

90 - 100 (A+, A and A-)	Grades in this range should be only for very superb, outstanding work, not merely the best work among the students. The best work is often not in the A range. On an essay exam, the student should not only have identified all issues, but should have done a very superb, outstanding job of analyzing the issues. Sometimes there will be no grades in this range on an exam or for a quarter. This range should be under 10% of the grades, occasionally as much as 10%.
80 – 89 (B+ , B and B-)	Grades in this range should be only for excellent work, not merely good work. On an essay exam, the student should have identified all issues, and should have done an excellent job of analyzing the issues. This range should be

	under 20% of the grades, occasionally as much as 20%.
73 – 79 (C+ and C)	Grades in this range should comprise by far the largest share of the grades, often higher than 50%. But these grades are for good work, not necessarily average work, because the average might be less than good. A PCL student must have a C average or better, not C-, for all quarters, in order to advance to the next academic year and in order to graduate.
60 – 72 (C- to D-)	Grades in this range are for work that is somewhat less than good (C-) to work that is poor (D+ and D) to work that is marginally passing (D-). Unfortunately, this range will often comprise 15% to 20% of the grades, sometimes higher than 20%.
59 and below (F)	Failing. Unfortunately, there will often be multiple failing grades, even in a small class. A failing grade is not just for work that is entirely lacking – it is also for work that shows some grasp of the subject of the exam or course, but very little. On an essay exam, the student might have identified and discussed some issues but still receive an F. In a multiple-choice exam, if a student has correctly answered up to 59% of the questions, the grade will still be an F.

\*\*\*

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

### **Administrative Review of Grades**

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

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

### **Improvements in Eliminating Faculty Turnover**

The 2014 Inspection Report observed (p. 9):

“PCL operates with an all-volunteer, adjunct faculty and has someone so since its founding [it remains true in 2020]; a clear testament to the faculty’s dedication to PCL’s

mission of public service. One negative aspect of a volunteer faculty, however, is that PCL experiences a higher rate of faculty turnover than most law schools where faculty members are paid even a modest stipend or salary. ... on average, 20% of PCL's faculty appears to be new each academic year."

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

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

The policy remains the same.

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

The policy remains the same.

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

The policy remains the same.

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

The policy remains the same.

**PCL's Updated Progress Report as of 7/1/23:**

The policy remains the same.

**15. Guidelines 5.18–5.20**

**Bar's Inspection Report**

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

**PCL'S Progress Report**

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

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

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

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

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

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

PCL's revised policies have remained in effect.

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

PCL's revised policies have remained in effect.

**PCL's Updated Progress report as of 7/1/23:**

PCL's revised policies have remained in effect.

## **16. Guideline 5.24**

### **Bar's Inspection Report**

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

### **PCL'S Progress Report**

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



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

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

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

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

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

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

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

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

**PCL's Updated Progress Report as of 7/1/23:**

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

## **17. Guideline 6.2–6.4**

### **Bar's Inspection Report**

“To bring itself into full compliance, the school must devise a plan and a timeline to return to compliance regarding the library by owning and maintaining its own hard copy library as required under Guideline 6.2 and provide this timeline and proof of library purchase to the CBE; however, it may be appropriate to provide a waiver for this academic year while the law school teaches courses online due to the pandemic. In addition, to bring itself into full compliance, PCL should also demonstrate that students are receiving instruction in both physical publication and electronic-based legal research, as required by Guideline 6.3. The Catalog states that legal research is taught in several courses, but a review of syllabi attached to the self-study did not validate that statement. *Subsequent to the inspection, the school did confirm that legal research is being taught using both hard copy and electronic resources, and the syllabi are being updated appropriately.*”

### **PCL'S Progress Report**

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

PLAN TO RETURN TO COMPLIANCE: The brother of PCL founder, attorney REDACTED, who died this year, had offered to donate funds for the library. Our plan is to

use the money to restore the library to usable condition and purchase the books needed to bring the required hardbound books up to date, all to be completed by August 31, 2022. Our Board of Directors approved this plan on October 18, 2020.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### 3. August 1-15: Integration into Curriculum Design

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

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

- Conduct a final review of the library setup, including hard copy materials and curriculum design, to ensure alignment with the Bar's requirements.
- Gather proof of library purchase, including receipts and documentation of the acquired materials.

- Prepare and submit the required timeline, along with the proof of library purchase and curriculum design, to the CBE to demonstrate our commitment to compliance.

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

#### **PCL's updated progress report as of 7/1/23:**

As mentioned before, our plan includes conducting a thorough needs assessment, acquiring and organizing the necessary hard copy materials, integrating them into the curriculum design, and finalizing compliance proof. These steps align with our commitment to establishing a well-rounded law library that incorporates both hard copy and electronic research resources.

With the sale of the building, we will have the necessary funds available to proceed with the library's purchase. This development will reinforce our financial capability to acquire the required resources, including the identified hard copy materials, without compromising our budgetary constraints.

By implementing this timeline and utilizing the newly available funds, we aim to create a comprehensive and accessible resource for our students and faculty while complying with Guideline 6.2. We believe that the integration of hard copy and electronic research resources will enhance the educational experience and provide our students with valuable training in legal research.

#### **18. Guidelines 7.1 and 7.2**

##### **Bar's Inspection Report**

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

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

##### **PCL'S Progress Report**

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

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

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

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

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

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

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

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

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

**PCL's updated progress report as of 7/1/23:**

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

## **19. Guideline 9.1**

### **Bar's Inspection Report**

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

### **PCL'S Progress Report**

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

#### **New Student Information System**

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

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

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

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

### **PCL Files and Records**

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

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

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

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

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

### **Record Retention and Disposal Policy:**

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

### **New Policy on Changes to Entries in Transcripts**

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

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

1. The present or former student must submit a written application to the Dean, specifying the change requested and the reasons for it. The application must include any documentation or evidence supporting the application.
2. The Dean must investigate the facts and circumstances pertinent to the application. In doing so, the Dean must read the entire application and materials submitted with it. The applicant shall have the right to speak with the Dean in support of the application, and to have an attorney or other representative do so as well. If the applicant requests the Dean to listen to any other person with information pertinent to the application, the Dean shall do so, but the Dean need not listen to an excessive number of such persons. The Dean may also communicate any person who may have information pertinent to the application, including but not limited to any present or former faculty member. The Dean may also speak with the Registrar, the Administrator and any other person with information pertinent to the application. The Dean may also consult any person outside PCL who has expertise on the subject of transcripts, but shall maintain the confidentiality of the student's information by not disclosing the identity of the applicant. Before the Dean transmits to the applicant the Dean's decision on the application, the

applicant may submit additional materials to the Dean, who must read them if time permits.

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

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

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

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

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

### **PCL'S Progress Report**

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

## **2. Bar's Inspection Report**



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

### **PCL’S Progress Report**

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

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

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

### **3. Bar’s Inspection Report**

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

### **PCL’S Progress Report**

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

### **4. Bar’s Inspection Report**

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

### **PCL’S Progress Report**

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

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

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

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

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

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

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

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

**PCL's updated progress report as of 7/1/23:**

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

**ADDITIONAL UPDATES**

**REDACTED Courses-**

**Updated Progress Report 6/1/23:**

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

**Updated Progress Report 7/1/23:**

Roger Aramayo, our administrator, is currently in ongoing communication with REDACTED regarding the upcoming courses for next year. They are in the process of finalizing the dates and times for these classes.

## **Disclosures**

### **Updated Progress Report 6/1/23:**

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

### **Updated Progress Report 7/1/23:**

PCL has diligently addressed the need for accurate implementation of disclosure statements as mandated by Guideline 2.3(D)(1)-(3), Business and Professions Code section 6061.7, and Rule 4.241. We have taken necessary corrective measures to ensure the accurate and complete implementation of these disclosures.

Regarding the refund process, we have identified certain students who will be eligible for refunds. These students include those for whom their disclosures couldn't be located in our records, as well as those who made payments before receiving the disclosures.

We understand the importance of providing timely refunds to these eligible students and are committed to processing them in a prompt manner. As such, refunds will be issued to these students in mid to late August.

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

1. **Guidelines 1.9 and 2.10:** To demonstrate full compliance, the school should demonstrate that it has adopted adequate procedures to properly document applications for accommodations and decisions in student files, to secure health records against unauthorized disclosure, and to effectively administer the school's privacy policy.

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

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

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

**PCL's Response 5/1/23:**

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

A student who has a disability, long term or short term, and wants accommodation for it at PCL in taking exams or doing other academic work, must submit a written request for accommodation to the PCL Administrator.

The request must state (a) what the disability is, (b) how it interferes with the student's ability to take exams or do other academic work, (c) what accommodations are requested and (d) how long the student requests the accommodations to be in effect. The request must be accompanied by a statement from a physician or other qualified professional

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

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

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

The decision, whether denying the accommodation, or granting it in whole or in part, and the time during which it is in effect, is reviewable by the Executive Committee. The Executive Committee must review it if the student requests review within thirty days after receiving the decision from the Dean. The Executive Committee may review the decision even without a request for review, if the Executive Committee decides to do so thirty days after receiving the decision from the Dean. The Executive Committee must notify the student and the Dean of its decision on review within sixty days after the student's request for review or the Committee's own decision to review. There is no further right to review in PCL. However, the student may submit to any member of the Community Board a written request that the Community Board

review the decision of the Executive Committee, and the Community Board may decide to review or not to review, in whole or in part.

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

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

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

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

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

PCL has recently received a complaint from a student with initials REDACTED. The complaint will be responded to within the allotted time for a response and a

copy will be made available to the State Bar, if this is the conflict that the State Bar is referring to. If not further clarification is needed by the State Bar.

**PCL's Response 6/1/23:**

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

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

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

**PCL's Response 7/1/23:**

The accommodations page on our website has been successfully updated as mentioned in the previous report. Students can access it under the "Current Students" tab, where they will find the school policy, a timeline for the accommodations process, and a downloadable form. Our administrator is ensuring all forms are complete before sending them to the dean for review. We remain dedicated to providing a smooth accommodations process for our students.

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

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

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

### **PCL's Response 5/1/23:**

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

### **PCL's Response 6/1/23:**

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

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

By following this timeline, we aim to provide the required refunds to the specific students in accordance with Rule 4.241. It is essential to obtain the approval of the PCL Board of Directors during their June 18th meeting to proceed with the refund process. Once approved, we will promptly calculate,



process, and issue the refunds to the affected students. Our goal is to finalize and complete the refund issuance by mid-August, ensuring compliance with the Bar's requirements and demonstrating our commitment to rectifying any discrepancies promptly.

**PCL's Response 7/1/23:**

The PCL Board of Directors recognizes the importance of student refunds and has scheduled a dedicated discussion on this matter during the upcoming board meeting on July 16, 2023. Due to the ongoing process of electing a new slate of directors, the agenda item pertaining to student refunds was appropriately deferred until the next regularly scheduled meeting to ensure all relevant parties are present to make informed decisions.

In addition to the upcoming board meeting, the PCL Board of Directors has recently passed critical votes in June, including decisions regarding the purchase of a new building and associated logistical considerations. These matters required careful attention and deliberation from the board members. However, the issue of student refunds remains a priority, and the board is committed to addressing it in a timely manner.

Following the board meeting, the PCL administrator and dean will promptly reach out to eligible students and initiate the refund process in accordance with the applicable guidelines and regulations, including Rule 4.241 and California Business and Professions Code section 6061. We understand the importance of providing refunds to students when the law school fails to comply with the specified requirements, and we are dedicated to rectifying any instances where our refund policy may have fallen short of compliance.

We appreciate the Board's oversight and guidance in ensuring that our refund policies are fully compliant and transparent. The PCL administration is committed to maintaining clear communication and consistency in our publications to provide students with the necessary information regarding our refund policies. We will continue to review and refine our policies to align with the expectations set forth by the Board and the relevant regulations.

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

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

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

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

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

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

**PCL's Response 5/1/23:**

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

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

1. Admissions data
2. Tuition, fees and financial aid

3. Conditional scholarships
4. Enrollment data
5. Average class size

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

**PCL's Response 6/1/23:**

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

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

**PCL's Response 7/1/23:**

We want to reiterate that the status remains unchanged from the previous report. The disclosures on our website and handbook are still up to date with the most current information. Additionally, we continue to utilize Squarespace for website management, with the administration handling updates.

**B. Compliance with Rule 4.241**

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

Additionally, noncompliance with this rule is cause for withdrawal of registration.

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

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

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

The law school did not respond by January 13.

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

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

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

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

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

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

Based on the data PCL provided it appears that:

- At least 6 students did not sign disclosures for the Fall 2022 term
- At least 6 students did not sign disclosures for the Winter 2023 term
- Of the students above, 4 students did not sign a disclosure for either the fall 2022 or winter 2023 terms

- At least one student did not sign a disclosure for the spring 2020 term

- For the fall 2022 term, 13 out of 14 students who signed their disclosures did so in

December 2022 or January 2023, which was well after the start of the term and likely

after the students had paid tuition for the term

- For the spring 2023 term, 12 of 13 students signed the disclosures between September

and December 2022. Significantly, in many cases, the documents reflect that students signed the spring 2023 disclosure before they signed the fall 2022 disclosure. Additionally, the spring 2023 term disclosures appear to have been signed during the period when the Committee was considering whether to terminate the school's registration and before a decision had been made, and it is unclear whether students were provided with full information as to the law school's status.

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

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

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

Staff provided courtesy reminders on February 21 and March 16.

**Outstanding Action:** The law school must demonstrate for the original student identified and for each student enrolled during the fall 2022 or spring 2023 term, for , that the student received a timely and complete disclosure prior to making a payment, signed it, and received a copy of the signed disclosure. For any instance where PCL cannot demonstrate compliance, it must provide a refund to the student for that term. PCL must document compliance it is April 2023 progress report.

#### **PCL's Response 5/1/23:**

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

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

#### **PCL's Response 6/1/23:**

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

1. June 18: Board Meeting - Refunds Approval

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

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

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

3. August 1 - 15: Refund Issuance

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

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

**PCL's Response 7/1/23:**

The PCL Board of Directors recognizes the importance of student refunds and has scheduled a dedicated discussion on this matter during the upcoming board meeting on July 16, 2023. Due to the ongoing process of electing a new slate of directors, the agenda item pertaining to student refunds was

appropriately deferred until the next regularly scheduled meeting to ensure all relevant parties are present to make informed decisions.

In addition to the upcoming board meeting, the PCL Board of Directors has recently passed critical votes in June, including decisions regarding the purchase of a new building and associated logistical considerations. These matters required careful attention and deliberation from the board members. However, the issue of student refunds remains a priority, and the board is committed to addressing it in a timely manner.

Following the board meeting, the PCL administrator and dean will promptly reach out to eligible students and initiate the refund process in accordance with the applicable guidelines and regulations, including Rule 4.241 and California Business and Professions Code section 6061. We understand the importance of providing refunds to students when the law school fails to comply with the specified requirements, and we are dedicated to rectifying any instances where our refund policy may have fallen short of compliance.

We appreciate the Board's oversight and guidance in ensuring that our refund policies are fully compliant and transparent. The PCL administration is committed to maintaining clear communication and consistency in our publications to provide students with the necessary information regarding our refund policies. We will continue to review and refine our policies to align with the expectations set forth by the Board and the relevant regulations.

**5. Guidelines 2.9(A)-(B) and 5.24:** To bring itself into full compliance, the school should demonstrate that the Catalog and other publications set forth the school's academic standards and student assessment policies accurately, clearly, consistently, and as mandated.

The law school's catalog was posted on its web site in draft form, including notes, and included noncompliant policies, from January through May 2022. After multiple staff reminders and a directive from the Committee in March 2022, the law school posted an updated document in May 2022. Many of the law school's website pages appear out of date, potentially confusing prospective or current students as to PCL's current academic



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

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

**PCL's Response 5/1/23:**

Thank you for your inquiry about the progress of our website development. We are pleased to inform you that the law school's new website was launched on April 28, 2023. The development team has estimated that it will take approximately 6 weeks from the launch date to complete all necessary updates to the website. Our priority is to ensure that the website is fully functional and user-friendly, with a focus on providing a seamless user experience for our students, faculty, and other stakeholders. We understand the importance of timely and effective communication, and are committed to keeping you informed throughout the development process.

**PCL's Response 6/1/23:**

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

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

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

### **PCL's Response 7/1/23:**

We want to assure you that the significant improvements made to our school's website, including addressing outdated pages and establishing dedicated sections for essential information, remain in place. Updates to open enrollment dates, bar passage data, and removal of outdated law library pictures have been implemented. Our ongoing commitment to maintaining an up-to-date and user-friendly website continues.

**6. Guideline 2.9(C):** To bring itself into full compliance, the school should adopt, publish, and implement a policy, including oversight provisions, to ensure that students are provided with written statements of the components of course grades. Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.

**7. Guideline 2.9(D):** To bring itself into full compliance, PCL should adopt, publish, and implement a policy on authentication of student work, and discontinue its current practice of allowing students to take in-class exams using devices that are not protected by exam- security software. After the inspection in 2020, the law school purchased commercial software that provided exam security. During the fall semester in 2022, the law school had a technical issue with its software and ordered students to come in to take their exams, though another technical solution was found. The law school is again considering changing its vendor to a vendor it previously rejected. It is unclear whether the switching represents a technical issue or an evolving process. In addition, the law school's policy includes significant exceptions that allow students to take exams unmonitored, limiting the law school's ability to authenticate student work.

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

### **PCL's Response 5/1/23:**

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

### **POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK**

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

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

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

(The Faculty-Curriculum Committee notes that online classes are given via Zoom only. The students attend class via Zoom. The students' names are shown during the class. The students are on camera during the class. Students speak during the classes, and their voices also identify them.)

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

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

As a result, we do not allow students to take exams unmonitored. This policy has been put in place to protect the integrity of our academic programs and to

ensure that all students are held to the same high standards of academic excellence.

**PCL's Response 6/1/23:**

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

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

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

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

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

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

**PCL's Response 7/1/23:**

We want to reiterate that we continue to utilize Testinvite, an advanced testing platform, to enhance exam integrity and monitor student performance. Testinvite offers robust anti-cheating mechanisms, including randomized question orders, time restrictions, and question banks, ensuring a fair and secure testing environment. It actively detects and prevents cheating attempts through various means, such as monitoring browser activities and disabling external applications.

The platform also enables real-time proctoring, allowing authorized staff to remotely monitor students during exams, promoting academic honesty while maintaining the flexibility of online testing. Testinvite provides comprehensive reporting and analysis tools, aiding in reviewing test results, identifying anomalies, and investigating potential irregularities.

We remain appreciative of the advanced features and safeguards provided by Testinvite, which greatly contribute to maintaining exam integrity and ensuring fair evaluations. Our commitment to utilizing this powerful tool for a secure and reliable testing environment continues.

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

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

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

#### **PCL's Response 5/1/23:**

The law school recognizes the importance of documenting the grade review process and ensuring that the policy and related forms are easily accessible to students.

We are pleased to inform you that PCL is dedicating significant resources to updating our website, with a specific focus on creating a webpage that is dedicated to the grade review process. This page will provide students with all

necessary information regarding the process, as well as access to the required forms.

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

#### **PCL's Response 6/1/23:**

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

We understand the importance of providing clear and comprehensive information to our students, and are committed to documenting the grade review process and ensuring that the policy and related forms are available to them.

#### **PCL's Response 7/1/23:**

We want to assure you that the website update, as mentioned in the previous report, remains in effect. PCL has created a dedicated webpage specifically for the grade review process. This page serves as a centralized resource for students, providing all necessary information and access to the required forms.

We recognize the significance of offering clear and comprehensive information to our students. Hence, we are committed to maintaining an up-to-date documentation of the grade review process, ensuring that the policy and relevant forms are readily available for their convenience.

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

**10. Guideline 3.1:** To bring itself into full compliance, PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the CBE's standards, including written job descriptions for the dean and registrar, and adequate oversight provisions. Subsequent to the inspection, the school increased the paid hours of the administrator, and secured significant volunteer assistance from the dean, the Board, and alumni, resulting in significant progress seen since the inspection. The school also created compliant job descriptions for both the dean and the registrar.

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

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

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

**PCL's Response 5/1/23:**

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

While there is no specific requirement for a certain number of staff, we understand the importance of having sufficient capacity to ensure compliance.

Currently, PCL is operating with a small staff due to limited resources, with only the Dean, administrator and student resource coordinator as paid positions.

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

As explained in our previous report, PCL accepted an offer to sell our building, which we own outright. The proceeds from this sale will be reinvested into our school's operations, including hiring two additional full- time staff members. One of these hires will be a development person, while the other will be a full-time admissions and registration staff member.

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

### **PCL's Response 6/1/23:**

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

#### **1. June 1-15: Job Posting and Recruitment**

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

#### **2. June 16-30: Interviews and Selection**

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

#### **3. July 1-31: Onboarding and Training**

- Extend formal job offers to the selected candidates.
- Coordinate the onboarding process, including completing necessary paperwork and background checks.
- Develop an orientation and training program for the new hires.



- Introduce the new staff members to relevant team members and familiarize them with their respective roles and responsibilities.

#### 4. August 1-15: Finalization and Start Date

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

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

#### **PCL's Response 7/1/23:**

An ad was posted on craigslist.org for the positions of admissions recruitment, development and faculty assistant. The job descriptions for those are attached (**Attachment A**) to the report and the link is enclosed to view the opening positions.

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

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

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

**PCL's Response 5/1/23:**

PCL students are not required to "perform volunteer work 15 hours per week or pay additional fee." Accountability hours are 40 hours per year, which roughly translates to 3.3 hours per month since students are open to volunteer during the summer months. PCL's has a school policy in which students are able to perform accountability (volunteer) hours to help reduce the amount of their school tuition. The policy is voluntary and was implemented in the mid 1970's as an alternative to assist students in making tuition more affordable, as is part of the school's mission.

If the student elects to participate in performing accountability hours the student will be offered a reduction of tuition of REDACTED. The student does not have to participate in voluntary hours and as such each student can monitor their own needs of whether their schedule allows them to participate in accountability hours.

While the social justice mission remains very few students participate in accountability hours, contrary to the spirit of the school in the mid 1970's. To further benefit the student, PCL will be raising its student accountability wage from REDACTED per hour to REDACTED. This wage is higher than the minimum wage standards in the City of Los Angeles. This will reduce the amount of hours that the students will be required to volunteer to meet the REDACTED accountability fee. PCL has revisited the policy in regards to students being a part of the board. PCL m understands the State Bar's concerns of the bar and has taken precautionary measures to protect student privacy in disciplinary issues, student concerns, faculty issues. These issues are confidential and are dealt in closed sessions.

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

**PCL's Response 6/1/23:**

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

### **PCL's Response 7/1/23:**

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

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

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

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

**f. Outstanding Action:** The law school must engage sufficient staff and administrative support to maintain compliance with all Rules and Guidelines including responding to State Bar staff requests and probation requirements in a timely manner, and documenting its process to track status, complete and close requests in its April 2023 progress report.

### **PCL's Response 5/1/23:**

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

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

Once the sale is complete, PCL intends to hire two full-time staff members, including one development person and a full-time admissions and registration staff member. This step will help the law school to engage sufficient staff and administrative support to maintain compliance with all Rules and Guidelines, including responding to State Bar staff requests and probation requirements in a timely manner.

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

### **PCL's Response 6/1/23:**

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

#### **1. June 1-15: Job Posting and Recruitment**

- Develop job descriptions for the development and admissions/registration positions.
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#### **2. June 16-30: Interviews and Selection**

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

#### **3. July 1-31: Onboarding and Training**

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

#### **4. August 1-15: Finalization and Start Date**

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

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

#### **PCL's Response 7/1/23: (Attachment A)**

An ad was posted on craigslist.org for the positions of admissions recruitment, development and faculty assistant. The job descriptions for those are attached to the report and the link is enclosed to view the opening positions.

**11. Guidelines 4.8 and 4.9:** To bring itself into full compliance, the school must adopt and implement a faculty evaluation policy that meets guideline requirements. Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.

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

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

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

### **PCL's Response 5/1/23:**

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

The backup plan procedure was in place, where the dean would grade the exams if the professors did not meet the grading deadlines. After much effort, the professors turned in their grades in time and the students were notified of their grades within a 2-3 week period after the final exam. Feedback was provided in class.

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

As we mentioned earlier, PCL is short-staffed but we have a plan to build capacity. PCL has just accepted the offer to sell the building, as of last week. More details will follow on the specifics of the sale of the building. Once the sale goes through, PCL will hire 2 more full-time staff members. One staff member will be a development person, and a full-time admissions and registration staff member and a paid faculty member.

This will help us to better support our faculty and students, and ensure timely grading and other administrative tasks are completed on schedule.

### **PCL's Response 6/1/23:**

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

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

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

Lastly, we receive an evaluation from the FCC, which includes my comments and is likewise attached **(Attachment C)**. This underscores the importance of

accountability in implementing school standards and submitting grades punctually.

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

#### **PCL's Response 7/1/23:**

The evaluation process for our instructors, as outlined in the previous report, remains unchanged. It consists of three components with distinct purposes.

First, we continue to gather feedback from students to ensure their perspectives are considered and valued.

Secondly, instructors provide self-evaluations, encouraging self-reflection and continuous improvement.

Lastly, we receive evaluations from the FCC, including the dean's comments, emphasizing the importance of accountability and adherence to school standards.

These evaluations demonstrate our ongoing commitment to conducting meaningful and timely reviews, as well as establishing clear expectations for faculty performance

We have received 5 self-evaluations, thus far.

**12. Guidelines 5.3(A)(1) and 5.9:** To bring itself into full compliance, the school should adopt, implement, and publish attendance policies and procedures that: require student attendance at no less than 80 percent of the regularly scheduled class hours for each course during a particular term, not a series of courses over two or more terms; provide for accurate and timely maintenance of records; and eliminate the policy of permitting students to make up absences from regularly scheduled class hours with alternate activities. The law school's current policy does not comply with the guideline because it does not require students to attend 80 percent of regularly scheduled classes. Rather, students can petition to replace regularly scheduled class hours with

alternative classes taught by other professors at any time, even after the conclusion of the course or academic term.

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

**PCL's Response 5/1/23:**

PCL has updated its policy to require students to attend 80 percent of regularly scheduled class hours for each individual class. This guideline has been communicated to all faculty members, and we are implementing it by taking attendance on Populi.

**PCL's Response 6/1/23:**

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

**PCL's Response 7/1/23:**

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

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

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

This policy appears to have changed as staff has changed. Recently, the law school reported that it documented a policy and held faculty training on how



to implement that policy, focusing on grading standards and providing useful feedback on exams.

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

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

### **PCL's Response 5/1/23:**

The law school continues to utilize the same policy.

### **Policies to Eliminate Grade Inflation**

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

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

### **Grading Standards:**

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

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

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

### **Administrative Review of Grades**

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

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

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

### **Improvements in Eliminating Faculty Turnover**

The 2014 Inspection Report observed (p. 9):

"PCL operates with an all-volunteer, adjunct faculty and has someone so since its founding [it remains true in 2020]; a clear testament to the faculty's

dedication to PCL's mission of public service. One negative aspect of a volunteer faculty, however, is that PCL experiences a higher rate of faculty turnover than most law schools where faculty members are paid even a modest stipend or salary. ... on average, 20% of PCL's faculty appears to be new each academic year."

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

### **PCL's Response 6/1/23:**

The policy remains the same.

### **PCL's Response 7/1/23:**

Fall 2022 Quarter:

During the fall 2022 quarter, the law school continued to adhere to the grading policies (**Attachment C**) outlined in our previous progress report. The grading standards and limitations on participation points, as specified in the Student Handbook & Catalog and the Faculty Handbook, were consistently applied across all courses. Additionally, the administrative review policy was in place, involving designated reviewers, including the Dean, to assess adherence to grading policies and discuss potential grade adjustments, if necessary.

Spring 2023 Term:

In the past spring term, we maintained the implementation of our grading policies and procedures. Faculty members followed the established standards, ensuring fair and consistent grading practices. The administrative review process was utilized, allowing for thorough evaluation and potential adjustments to grades before their release to students.

Determining Correlation with State Bar Exam Outcomes:

To determine the correlation between grading results and State Bar exam outcomes, the law school implemented a comprehensive data collection and analysis system during the past spring term. We closely monitored the performance of our students in the State Bar exams, comparing their grades with their outcomes to assess the effectiveness of our grading policies and identify areas for improvement. This data-driven approach allowed us to evaluate the impact of grading standards on student success in the bar exams and make any necessary adjustments to our practices.

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

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

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

**PCL's Response 5/1/23:**

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

PCL's counsel, REDACTED, is appointed to communicate with REDACTED since the school was sued. REDACTED will be in communication with REDACTED.

**PCL's Response 6/1/23:**

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

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

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

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

**PCL's Response 7/1/23:**

Roger Aramayo, our administrator, is currently in ongoing communication with REDACTED regarding the upcoming courses for next year. They are in the process of finalizing the dates and times for these classes.

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

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

**PCL's Response 5/1/23:**

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

It is important to note that our course repetition policy is available to all students who may need to repeat a course.

We are committed to providing students with the support and resources they need to achieve their academic goals.

**PCL's Response 6/1/23:**

There have not been any further changes.

**PCL's Response 7/1/23:**

There have not been any further changes.

**17. Guidelines 6.2-6.4:** To bring itself into full compliance, the school must devise a plan and a timeline to return to compliance regarding the library by owning and maintaining its own hard copy library as required under Guideline 6.2 and provide this timeline and proof of library purchase to the CBE; however, it may be appropriate to provide a waiver for this academic year while the law school teaches courses online due to the pandemic. In addition, to bring itself into full compliance, PCL should also demonstrate that students are receiving instruction in both physical publication and electronic-based legal research, as required by Guideline 6.3. The Catalog states that legal research is taught in several courses, but a review of syllabi attached to the self-study did not validate that statement. Subsequent to the inspection, the school did confirm that legal research is being taught using both hard copy and electronic resources, and the syllabi are being updated appropriately.

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

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

**PCL's Response 5/1/23:**

PCL has accepted an offer for the sale of the building and has agreed to a sixty-day escrow. During the sixty-day escrow PCL will continue to search for a building in which to relocate its fixed-facility instruction.

On or about July 1, 2023 PCL will have the proceeds to purchase the legal library so that students are able to conduct legal research. The new PCL building will house the law library. The State Bar will be kept apprised of the new location.

#### **PCL's Response 6/1/23:**

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

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

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

#### **PCL's Response 7/1/23:**

The law school does not intend to file a change of instruction and intends to operate classes in person.

As of 6/28/23 PCL has officially entered escrow for the sale of its building and it is awaiting the acceptance of the offer for a building for purchase at REDACTED.

**18. Guidelines 7.1 and 7.2:** To bring itself into full compliance, the school should maintain essential and permanent hard-copy records in fire-safe lockable cabinets, maintain all electrical equipment in working order, and provide digital projection equipment adequate to meet the needs of faculty and students. Subsequent to the inspection, the school adopted a compliant policy and provided a copy of that policy to the State Bar.

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

**PCL's Response 5/1/23:**

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

Regarding enrollment forms, we acknowledge that there has not been a standard process for sending them out in the past.

When the current dean arrived, the enrollment process was already in place by the then-administrator, but it was ineffective. Some enrollment forms were sent via DocuSign, some via email, and others via regular mail, resulting in a lack of consistency and clarity.

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

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

**PCL's Response 6/1/23:**

To address the concerns and demonstrate our commitment to evolving our processes for improved recordkeeping, we have implemented Zapier as a key component of our file management system. Zapier is an automation tool that



seamlessly integrates with various platforms, enabling us to streamline and automate our record keeping procedures.

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

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

#### **PCL's Response 7/1/23:**

There have not been any further changes.

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

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

#### **PCL's Response 5/1/23:**

We strive to ensure that all materials identified in the guideline are stored in an organized manner and are easily accessible to the law school. We understand the importance of readily producing these materials to State Bar staff upon request, and we are committed to meeting this requirement. As of fall 2022, all new files and documents are stored in an organized folder online. This system allows for easy access and retrieval of information by authorized personnel within the law school. It also allows for the materials to be produced quickly upon request by the State Bar staff.

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

#### **PCL's Response 6/1/23:**

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

##### **1. June 1-15: Policy Research and Development**

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

##### **2. June 16-30: Policy Review and Refinement**

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

##### **3. July 1-31: Policy Implementation and Oversight**

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

#### 4. August 1-31: Policy Distribution and Submission

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

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

#### **PCL's Response 7/1/23:**

We have taken the following steps and included such in the policy draft which reads, "PCL employees will take the following measures to for the safe-keeping of records and record retention..

1. Categorization and Labeling: All materials have been categorized and labeled for easy identification.
2. Physical and Digital Storage: We have designated storage areas and implemented a digital archiving system for efficient retrieval.
3. Access Control: Authorized individuals only have access to handle the materials, maintaining confidentiality.
4. Inventory Management: We have implemented an inventory system to track the location and status of each material.

These efforts enable us to promptly respond to State Bar staff requests and meet regulatory requirements.

PCL's written policy on transcript changes:

Changes to entries on a PCL transcript may be made only upon a showing of good cause.

However, a contention or possibility that a grade given by an instructor was not justified shall not be good cause or an acceptable reason for a transcript

change. If a present or former student wishes a change to an entry on the person's transcript, the following procedures apply:

1. The present or former student must submit a written application to the Dean, specifying the change requested and the reasons for it. The application must include any documentation or evidence supporting the application.
2. The Dean must investigate the facts and circumstances pertinent to the application. In doing so, the Dean must read the entire application and materials submitted with it. The applicant shall have the right to speak with the Dean in support of the application, and to have an attorney or other representative do so as well. If the applicant requests the Dean to listen to any other person with information pertinent to the application, the Dean shall do so, but the Dean need not listen to an excessive number of such persons. The Dean may also communicate any person who may have information pertinent to the application, including but not limited to any present or former faculty member. The Dean may also speak with the Registrar, the Administrator and any other person with information pertinent to the application. The Dean may also consult any person outside PCL who has expertise on the subject of transcripts, but shall maintain the confidentiality of the student's information by not disclosing the identity of the applicant. Before the Dean transmits to the applicant the Dean's decision on the application, the applicant may submit additional materials to the Dean, who must read them if time permits.
3. Within thirty days after receiving the application, the Dean must render a written decision on it and transmit the decision to the applicant. The Dean shall cause the application and decision and any materials the Dean read or considered in connection with the application to be placed in the applicant's student file. If the decision is that a change is to be made, the decision must specify the change, and if the applicant has not requested an appeal within the fourteen days to appeal, Dean shall transmit the decision to the Registrar, who shall make the specified change on the transcript, and place on the transcript a notation of the reason(s) for the change.
4. The applicant may appeal the decision of the Dean to the Community Board, but may do so only by transmitting to the Chair of the Board a request for appeal within fourteen days of receiving the Dean's decision. In the request, the applicant must state whether the applicant consents to participation in the appeal by student members of the Community

Board. The Community Board may delegate the appeal to the Executive Committee. Within thirty days after the Chair receives the request for appeal, the Community Board or the Executive Committee, as the case may be, shall render a written decision on the appeal, and transmit it to the applicant. The Chair shall cause the request for appeal and any materials read or considered in connection with the appeal to be placed in the applicant's student file. If the decision on appeal is that a change is to be made, the decision must specify the change, and the Chair shall transmit the decision to the Registrar, who shall make the specified change on the transcript and place on the transcript a notation of the reason(s) for the change..

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

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

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

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

### **PCL's Response 5/1/23:**

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

### **PCL's Response 6/1/23:**

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

### **PCL's Response 7/1/23:**

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

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

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

**PCL's Response 5/1/23:**

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

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

**PCL's Response 6/1/23:**

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

**PCL's Response 7/1/23:**

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

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

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

**PCL's Response 5/1/23:**

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

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

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

**PCL's Response 6/1/23:**

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

**PCL's Response 7/1/23:**

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

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

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

**PCL's Response 5/1/23:**

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

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

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

**PCL's Response 6/1/23:**

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

**PCL's Response 7/1/23:**

No changes have been made to the grade review policy and process since the last report. The policy is still available on the school's website under the "Grade review policy" page, accessible through the Current Student tab. The form can be downloaded easily, and instructions for submission are provided. Rest assured that the grade review policy and process remain the same.





## Employment Opportunities



### Position: Development Officer

#### Job Description:

The Development Officer at Peoples College of Law will play a vital role in the college's fundraising efforts. This full-time position involves developing and implementing fundraising strategies, cultivating relationships with donors and sponsors, and coordinating fundraising events. The Development Officer will collaborate with the college's leadership and academic staff to identify funding needs, write grant proposals, and manage donor communications. The ideal candidate should have excellent interpersonal and communication skills, a strong understanding of fundraising principles, and a passion for supporting legal education.

### Position: School Admissions Recruiter

#### Job Description:

The School Admissions Recruiter at Peoples College of Law will be responsible for attracting and enrolling prospective students. This full-time role involves promoting the college's programs and academic offerings to potential applicants, attending college fairs and recruitment events, conducting informational sessions, and providing guidance to prospective students throughout the admissions process. The School Admissions Recruiter will also assist in evaluating applications, conducting interviews, and participating in admissions decision-making. The ideal candidate should possess exceptional communication skills, a thorough knowledge of the college's programs, and a genuine enthusiasm for recruiting and shaping a diverse student body.

#### Academic Qualifications:

- Bachelor's degree in a related field such as education, communications, or marketing.
- Previous experience in student recruitment or admissions is preferred.
- Knowledge of higher education admissions processes and requirements.
- Strong presentation and public speaking skills.
- Excellent interpersonal and relationship-building abilities.
- Familiarity with recruitment strategies and techniques.

### Position: Faculty Assistant

#### Job Description:

The Faculty Assistant at Peoples College of Law will provide comprehensive support to the college's faculty members. This full-time position involves assisting with administrative tasks, managing correspondence, organizing class schedules, and coordinating faculty meetings and events. The Faculty Assistant will also assist in preparing course materials, maintaining online platforms for course content, and supporting faculty in research projects and academic initiatives. The ideal candidate should be highly organized, detail-oriented, and possess excellent communication and time-management skills. A strong commitment to academic excellence and the ability to work collaboratively with faculty members are essential.

#### Academic Qualifications:

- Associate's or bachelor's degree in a relevant field such as education, administration, or liberal arts.
- Previous experience in an administrative or support role in an academic setting is beneficial.
- Proficiency in office productivity software (e.g., Microsoft Office, Google Suite).
- Strong organizational and multitasking abilities.
- Excellent written and verbal communication skills.

# Faculty Evaluation - Spring

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Start of Block: Peoples College of Law

A. Subject:

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B Instructor's Name:

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End of Block: Peoples College of Law

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Start of Block: Peoples College of Law

Q1 Assess the instructor's attendance?

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

Q2 Assess the instructor's attitude towards teaching.

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

---

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Q16 What did you like about this class?

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Q19 What did you dislike about the class?

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

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End of Block: Peoples College of Law

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

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

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

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

#### **Section 2. Failing and Substandard Grades**

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

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

#### **Section 3. Grading**

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

#### **Grading Standards:**

It is of primary importance for PCL students and all of PCL that the students have a realistic picture of a realistic picture of their outlook for passing First Year Law Students Exam (FYLSX) and Bar Exam. The pass rates for both exams have been very low. For example, the pass rate for the July 2019 Bar Exam was 14.4% for California Unaccredited law schools and 18.8% for California-Accredited (non-ABA) law schools. On the FYLSX of June 2019, the pass rate was 23.5% for all takers and 28.1% for California Unaccredited Fixed-Facility law schools (PCL is in that category).

Students' ideas about their chances on these exams are very likely influenced by their law school grades. If a student receives high grades, that is likely to raise the student's expectations of passing the FYLSX and the Bar Exam, but because of the low pass rates on the exams, the heightened expectations could well be unrealistic.

In light of these and similar considerations, PCL has adopted these Grading Standards for all examinations and final grades (grades for the full quarter) in all courses that are not graded pass-fail. NOTE that in the grouping of grades in the table below, C- grades are grouped with the D grades. That is because at PCL, in order for a student to advance to the next academic year and graduate, the student must have a grade point average of C or better.

90 - 100 (A+, A and A-)	Grades in this range should be only for very superb, outstanding work, not merely the best work among the students. The best work is often not in the A range. On an essay exam, the student should not only have identified all issues, but should have done a very superb, outstanding job of analyzing the issues. Sometimes there will be no grades in this range on an exam or for a quarter. This range should be under 10% of the grades, occasionally as much as 10%.
80 – 89 (B+ , B and B-)	Grades in this range should be only for excellent work, not merely good work. On an essay exam, the student should have identified all issues, and should have done an excellent job of analyzing the issues. This range should be under 20% of the grades, occasionally as much as 20%.
73 – 79 (C+ and C)	Grades in this range should comprise by far the largest share of the grades, often higher than 50%. But these grades are for good work, not necessarily average work, because the average might be less than good. A PCL student must have a C average or better, not C-, for all quarters, in order to advance to the next academic year and in order to graduate.
60 - 72 (C- to D-)	Grades in this range are for work that is somewhat less than good (C-) to work that is poor (D+ and D) to work that is marginally passing (D-). Unfortunately, this range will often comprise 15% to 20% of the grades, sometimes higher than 20%.
59 and below (F)	Failing. Unfortunately, there will often be multiple failing grades, even in a small class. A failing grade is not just for work that is entirely lacking – it is also for work that shows some grasp of the subject of the exam or course, but very little. On an essay exam, the student might have identified and discussed some issues but still receive an F. In a multiple choice exam, if a student has correctly answered up to 59% of the questions, the grade will still be an F.

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

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

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

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

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

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

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

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

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

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

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

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

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

**Plagiarism:** All PCL students are expected to know about and avoid plagiarism and other forms of cheating. All exam answers and assignments must be done solely by the student. Plagiarism and other forms of cheating are subject to discipline under PCL’s Disciplinary Code. The Code can be found in the Student Handbook and normally on the PCL website.

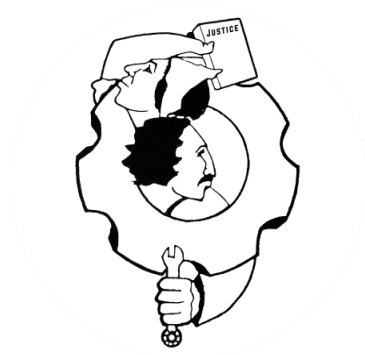
If an Instructor has a reasonable belief that the work was not done solely by the student, or that the student engaged in plagiarism or other cheating, the Instructor must report the belief to the Dean or the Administrator.

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

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

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

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



# People's College of Law

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

Hector C. Peña, J.D. – President

Edith Pomposo, J.D., LL.M – Dean

August 1, 2023

Dear Natalie,

I have attached the monthly progress report, as well as the outstanding items and necessary attachments for your review. Please let me know if you need any further information or assistance.

Thank you for your guidance while we work to sustain compliance.

Attachment A: refund excel sheet

Attachment B: proof of refunds

Attachment C: Reuters contracts

Attachment D: library Purchase receipts

Attachment E: faculty evaluations

Attachment F: job postings

Sincerely,

Edith Pomposo J.D., LL.M

Dean

Peoples College of Law

PEOPLE'S COLLEGE OF LAW

(ORIGINAL) NOVEMBER 2021 PROGRESS REPORT

ON COMPLIANCE WITH RECOMMENDATIONS

IN STATE BAR INSPECTION REPORT OF 2020

Updated August 1, 2023

**RECOMMENDED MANDATORY ACTIONS IN 2020 INSPECTION REPORT 1.**

**Guidelines 1.9 and 2.10:**

**Bar's Inspection Report**

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

**PCL'S Progress Report**

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

### **PCL'S Updated progress report as of 7/1/23:**

There have been no changes to the initiatives and measures outlined in the previous report. The progress reported last month remains unchanged, emphasizing our ongoing

commitment to comply with regulations. Our focus continues to be on maintaining a secure and transparent environment through our new website, Squarespace platform, student services page, and secure electronic form for accommodation requests. These measures reinforce our dedication to addressing concerns regarding documentation, data security, and privacy while striving for continuous improvement.

### **PCL'S Updated progress report as of 8/1/23:**

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

## **2. Guideline 2.2(B)**

### **Bar's Inspection Report**

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

### **PCL'S Progress Report**

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

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

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

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

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

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

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

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

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

### **PCL'S Updated progress report as of 7/1/23:**

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

In accordance with the State Bar guidelines, PCL will process refunds for the indicated students in late August.

We have published a clear refund policy and provided a copy to the State Bar, demonstrating our commitment to clarity and consistency. Our refund policies have been updated, and refunds will be processed as per the State Bar guidelines. We have addressed the concerns raised in the Inspection Report by publishing a clear policy and sharing it with the State Bar.

### **PCL'S Updated progress report as of 8/1/23:**

PCL has conducted an audit to verify Rule 4.241 compliance for all students enrolled in the 2022-2023 academic year. Based on our examination, the following non-compliant fees have been identified and are to be refunded to the respective students:

1. **REDACTED**
  - Fall 2022: REDACTED
  - Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

2. **Jennifer Cardona**
  - Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

3. **REDACTED**
- Winter 2022: REDACTED
  - Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

4. **REDACTED**
- Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

5. **REDACTED**
- Fall 2022: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

6. **REDACTED**
- Winter 2022: REDACTED
  - Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

For a detailed breakdown of this information, please consult **Attachment A**.  
Additionally, receipts and proof of refunds are enclosed in **Attachment B**.

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

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

*Subsequent to the inspection, the school updated the course list, deleting two courses that did not meet these criteria, and added the language regarding frequency.*

### PCL'S Progress Report

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

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

PCL has remained in compliance with item #3.

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

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

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

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

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

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

**PCL'S Updated progress report as of 7/1/23:**

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

**PCL'S Updated progress report as of 8/1/23:**

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

**4. Guideline 2.3(D)**

**Bar's Inspection Report**

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

**PCL'S Progress Report**

As noted in the Inspection Report, some months ago PCL came into compliance by correcting, revising and implementing the disclosures. Since then, the required disclosures were made in the Tuition and Enrollment Agreements signed by each student at the start of the Fall and Winter quarter. The Rule 2.3(D) disclosure has been updated to reflect the change in the principal method of instruction, a change caused by COVID-19, from physical classroom instruction to online interactive instruction. On October 18, 2020, well before the deadline in Rule 4.241, our prior Dean REDACTED signed and sent to the State Bar the certification of compliance required by the rule. In connection with preparation of the Annual Compliance Report, the Business and Professions Code section 6061.7 disclosure is being updated.

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

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

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

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

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

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

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

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

### **PCL's updated progress report as of 7/1/23**

PCL has diligently addressed the need for accurate implementation of disclosure statements as mandated by Guideline 2.3(D)(1)-(3), Business and Professions Code section 6061.7, and Rule 4.241. We have taken necessary corrective measures to ensure the accurate and complete implementation of these disclosures.

Regarding the refund process, we have identified certain students who will be eligible for refunds. These students include those for whom their disclosures couldn't be located in our records, as well as those who made payments before receiving the disclosures.

We understand the importance of providing timely refunds to these eligible students and are committed to processing them in a prompt manner. As such, refunds will be issued to these students in mid to late August.

### **PCL'S Updated progress report as of 8/1/23:**

PCL has proactively ensured the accurate and complete implementation of disclosure statements as required by Guideline 2.3(D)(1)-(3), Business and Professions Code section 6061.7, and Rule 4.241. We have taken necessary corrective actions to guarantee their precise implementation.

Regarding the refund process, we have identified eligible students and issued the refunds to them.

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

### **Bar's Inspection Report**

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

### **PCL'S Progress Report**

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

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

The policy changes remain in effect and are being followed.

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

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

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

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

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

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

#### **PCL'S Updated progress report as of 7/1/23:**

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

#### **PCL'S Updated progress report as of 8/1/23:**

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

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

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

### **PCL'S Progress Report**

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

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

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

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

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

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

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

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

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

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

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



### **PCL'S Updated progress report as of 7/1/23:**

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

### **PCL'S Updated progress report as of 8/1/23:**

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

## **7. Guideline 2.9(D)**

### **Bar's Inspection Report**

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

### **PCL'S Progress Report**

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

#### **POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK**

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

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

webcam. The students' exam answers are submitted to the proctor through the students' Microsoft Teams account.)

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

(The Faculty-Curriculum Committee notes that online classes are given via Zoom only. The students attend class via Zoom. The students' names are shown during the class. The students are on camera during the class. Students speak during the classes, and their voices also identify them.)

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

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

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

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

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

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

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

feedback is parallel with the research found on the Test Invite software before PCL contracted with the software company.

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

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

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

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

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

### **PCI's Updated Progress Report as of 7/1/23:**

We want to reiterate that we continue to utilize Testinvite, an advanced testing platform, to enhance exam integrity and monitor student performance. Testinvite offers robust anti-cheating mechanisms, including randomized question orders, time restrictions, and question banks, ensuring a fair and secure testing environment. It actively detects and prevents cheating attempts through various means, such as monitoring browser activities and disabling external applications.

The platform also enables real-time proctoring, allowing authorized staff to remotely monitor students during exams, promoting academic honesty while maintaining the flexibility of online testing. Testinvite provides comprehensive reporting and analysis

tools, aiding in reviewing test results, identifying anomalies, and investigating potential irregularities.

We remain appreciative of the advanced features and safeguards provided by Testinvite, which greatly contribute to maintaining exam integrity and ensuring fair evaluations. Our commitment to utilizing this powerful tool for a secure and reliable testing environment continues.

#### **PCL'S Updated progress report as of 8/1/23:**

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

#### **8. Guidelines 2.10 and 5.17**

##### **Bar's Inspection Report**

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

##### **PCL'S Progress Report**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **PCL'S Updated progress report as of 7/1/23:**

We want to assure you that the website update, as mentioned in the previous report, remains in effect. PCL has created a dedicated webpage specifically for the grade review process. This page serves as a centralized resource for students, providing all necessary information and access to the required forms.

We recognize the significance of offering clear and comprehensive information to our students. Hence, we are committed to maintaining up-to-date documentation of the grade review process, ensuring that the policy and relevant forms are readily available for their convenience.

### **PCL'S Updated progress report as of 8/1/23:**

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

## **9. Guidelines 2.11, 7.1, and 9.1**

### **Bar's Inspection Report**

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

### **PCL'S Progress Report**

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

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

PCL continues to utilize the above-listed security measures.

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

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

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

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

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

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

### **PCL'S Updated progress report as of 7/1/23:**

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

## **PCL'S Updated progress report as of 8/1/23:**

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

### **10. Guideline 3.1**

#### **Bar's Inspection Report**

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

#### **PCL'S Progress Report**

Our Registrar/Administrator continues working full-time. During this Fall and Winter quarters, others have greatly contributed to the school's administrative work. Following are some examples. Our current President, who was previously the Board Treasurer, pitched in when our Administrator had a medical emergency and had to take sick days until she was able to return to work. Our current Dean has also pitched in to assist when we were short-handed. Our current President, when he was the Treasurer also organized faculty, alumni and together with our Registrar, conducted our student orientation and our fall faculty meeting at the start of the 2021-2022 Academic Year in late August 2021. It should be noted that People's College of Law is a nonprofit corporation. This type of corporation has members rather than shareholders, and PCL's members are students, faculty, alumni and former board members and officers. Our Development and Fundraising Committee, whose members are alumni, has weekly meetings with our professional fundraiser, and has begun planning an online fundraising event, which will be termed "PCL Alumni Reunion" We hope to attract alumnae by showcasing pictures of their graduating class and furthering our school's mission to get licensed attorneys who are social justice advocates into the communities that need them the most.

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

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

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

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

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

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

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

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

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

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

By adhering to this timeline, we are confident in our ability to attract and hire qualified professionals who will contribute significantly to our school's development and admissions/registration processes. We will ensure a thorough and efficient hiring



process to expedite the expansion of our staff and optimize the support provided to our students and stakeholders.

#### **PCL's Updated progress report as of 7/1/23:**

Following this timeline, as discussed in the attached addendum entitled, "Outstandings July" PCL continues to build capacity. PCL listed the job openings on craigslist and is now accepting applications. The job descriptions are attached.

PCL officially entered into escrow on 6/28/23 for the sale of its building on REDACTED. This will be a 45 day escrow in which it will enter into a 1031 exchange. As such, another property has been identified at REDACTED. PCL submitted an offer for this building and is awaiting acceptance of the offer. The sale will leave PCL with an excess of REDACTED to build out infrastructure and build capacity.

#### **PCL'S Updated progress report as of 8/1/23:**

We have promptly responded to the bar's request and have already initiated the interviewing process for the additional staff positions. This proactive approach will ensure a smooth transition and enable the team to be fully operational by the specified date.

### **11. Guidelines 4.8 and 4.9 Bar's Inspection Report**

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

#### **PCL'S Progress Report**

We use a standard evaluation form.

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

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

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

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

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

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

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

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

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

### **PCL's Updated progress report as of 7/1/23:**

The evaluation process for our instructors, as outlined in the previous report, remains unchanged. It consists of three components with distinct purposes.

First, we continue to gather feedback from students to ensure their perspectives are considered and valued.

Second, instructors provide self-evaluations, encouraging self-reflection and continuous improvement.

Lastly, we receive evaluations from the FCC, including my comments, emphasizing the importance of accountability and adherence to school standards.

These evaluations demonstrate our ongoing commitment to conducting meaningful and timely reviews, as well as establishing clear expectations for faculty performance.

To date PCL continues to collect the self-evaluation forms and has collected five so far. The final evaluation process will be completed by mid July.

#### **PCL'S Updated progress report as of 8/1/23:**

The policy and procedure is complete. There has been no change. I have attached the Evaluation forms template in **Attachment E**

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

#### **Bar's Inspection Report**

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

#### **PCL'S Progress Report**

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

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

The same policy is in place this month.

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

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

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

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

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

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

### **PCL's Updated Progress Report as of 7/1/23:**

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

### **PCL's Updated Progress Report as of 8/1/23:**

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

## **13. Guideline 5.8**

### **Bar's Inspection Report**

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

### **PCL'S Progress Report**

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

**From:** Ira Spiro

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

**[names of recipients omitted from this report]**

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

**Importance:** High

Dear PCL SUMMER Students

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

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

Download the attachment to your computer.

Type your name and the course name at the top.

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

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

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

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

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

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

State Bar requires someone on faculty to monitor the students, and it's going to be me. If you have any questions about this, give me a call REDACTED, or send me an email. Remember, my phone doesn't receive texts.

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

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

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

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

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

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

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

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

**PCL's Updated progress report as of 7/1/23:**

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

**PCL's Updated progress report as of 8/1/23:**

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

**14. Guidelines 5.17, 5.18, and 5.25**

## **Bar's Inspection Report**

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

## **PCL'S Progress Report**

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

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

## **Policies to Eliminate Grade Inflation**

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

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

## **Grading Standards:**

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

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

90 - 100 (A+, A and A-)	Grades in this range should be only for very superb, outstanding work, not merely the best work among the students. The best work is often not in the A range. On an essay exam, the student should not only have identified all issues, but should have done a very superb, outstanding job of analyzing the issues. Sometimes there will be no grades in this range on an exam or for a quarter. This range should be under 10% of the grades, occasionally as much as 10%.
80 – 89 (B+ , B and B-)	Grades in this range should be only for excellent work, not merely good work. On an essay exam, the student should have identified all issues, and should have done an excellent job of analyzing the issues. This range should be under 20% of the grades, occasionally as much as 20%.
73 – 79 (C+ and C)	Grades in this range should comprise by far the largest share of the grades, often higher than 50%. But these grades are for good work, not necessarily average work, because the average might be less than good. A PCL student must have a C average or better, not C-, for all quarters, in order to advance to the next academic year and in order to graduate.
60 – 72 (C- to D- )	Grades in this range are for work that is somewhat less than good (C-) to work that is poor (D+ and D) to work that is marginally passing (D-). Unfortunately, this range will often comprise 15% to 20% of the grades, sometimes higher than 20%.
59 and below (F)	Failing. Unfortunately, there will often be multiple failing grades, even in a small class. A failing grade is not just for work that is entirely lacking – it is also for work that shows some grasp of the subject of the exam or course, but very little. On an essay exam, the student might have identified and discussed some issues but still receive an F. In a multiple-choice exam, if a student has correctly answered up to 59% of the questions, the grade will still be an F.

\*\*\*

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

### **Administrative Review of Grades**

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

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

### **Improvements in Eliminating Faculty Turnover**

The 2014 Inspection Report observed (p. 9):

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

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

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

The policy remains the same.

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

The policy remains the same.

### **PCL’s Updated Progress Report as of 5/1/23:**

The policy remains the same.

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



The policy remains the same.

**PCL's Updated Progress Report as of 7/1/23:**

The policy remains the same.

**PCL's Updated Progress Report as of 8/1/23:**

The policy remains the same.

**15. Guidelines 5.18–5.20**

**Bar's Inspection Report**

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

**PCL'S Progress Report**

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

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

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

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

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

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

PCL's revised policies have remained in effect.

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

PCL's revised policies have remained in effect.

**PCL's Updated Progress report as of 7/1/23:**

PCL's revised policies have remained in effect.

**PCL's Updated Progress Report as of 8/1/23:**

PCL's revised policies have remained in effect.

**16. Guideline 5.24**

**Bar's Inspection Report**

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

**PCL'S Progress Report**

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

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

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

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

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

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

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

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

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

**PCL's Updated Progress Report as of 7/1/23:**

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

**PCL's Updated Progress Report as of 8/1/23:**

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

**17. Guideline 6.2–6.4**

**Bar's Inspection Report**

“To bring itself into full compliance, the school must devise a plan and a timeline to return to compliance regarding the library by owning and maintaining its own hard copy library as required under Guideline 6.2 and provide this timeline and proof of library purchase to the CBE; however, it may be appropriate to provide a waiver for this academic year while the law school teaches courses online due to the pandemic. In addition, to bring itself into full compliance, PCL should also demonstrate that students are receiving instruction in both physical publication and electronic-based legal research, as required by Guideline 6.3. The Catalog states that legal research is taught in several courses, but a review of syllabi attached to the self-study did not validate that statement. *Subsequent to the inspection, the school did confirm that legal research is being taught using both hard copy and electronic resources, and the syllabi are being updated appropriately.*”

**PCL'S Progress Report**

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

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

The damage to the library was the destruction of part of its unique domed roof. The roof has now been repaired, which involved reconstruction of part of the domed roof. However, we recently discovered that there is further damage to the roof. At their last monthly meeting, in November 2021, the board approved another bid for another roof repair. Since our school still is conducting classes remotely, and has been since March of 2020, no students have been on campus to use the library. Thus, the library has not

been opened for use. Some clean-up of the library is still needed before it opens for use. The donation was only enough for the repair and reconstruction, not for the purchase of books. We do have the very large majority of the specified hardbound books, but not all of them or our book subscriptions. Currently our plan is to request an extension of time to comply with the hardbound library provisions, to August 2022, the same time to which the waiver of the requirement for in-person instruction was extended by the Committee of Bar Examiners.

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

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

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

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

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

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

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

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

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

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

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

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

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

## 3. August 1-15: Integration into Curriculum Design

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

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

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

By following this timeline, we aim to establish a well-rounded law library that includes both hard copy and electronic research resources. This approach will not only bring us into compliance with Guideline 6.2 but also enhance the educational experience for our students, providing them with comprehensive resources and training in legal research.

Our goal is to have all these initiatives finalized early, ensuring a smooth transition and adherence to compliance standards.

#### **PCL's updated progress report as of 7/1/23:**

As mentioned before, our plan includes conducting a thorough needs assessment, acquiring and organizing the necessary hard copy materials, integrating them into the curriculum design, and finalizing compliance proof. These steps align with our commitment to establishing a well-rounded law library that incorporates both hard copy and electronic research resources.

With the sale of the building, we will have the necessary funds available to proceed with the library's purchase. This development will reinforce our financial capability to acquire the required resources, including the identified hard copy materials, without compromising our budgetary constraints.

By implementing this timeline and utilizing the newly available funds, we aim to create a comprehensive and accessible resource for our students and faculty while complying with Guideline 6.2. We believe that the integration of hard copy and electronic research resources will enhance the educational experience and provide our students with valuable training in legal research.

#### **PCL's updated progress report as of 8/1/23:**

I am pleased to share that we have successfully secured a REDACTED loan from PCL to support our organization's growth and expansion. This funding comes at a crucial time as we embark on the journey to build our capacity and find a new suitable building for our operations. With this financial boost, we can now invest in essential resources, equipment, and training to enhance our capabilities.

With the allocated funds available, we are moving forward with purchasing the required books for the library. These include the published reports of California Courts with advance sheets and citator, a digest or encyclopedia of California law, an annotated set of California codes, and current, standard texts or treatises for each course in the law school's curriculum. By obtaining these materials, we aim to enhance the educational experience and provide valuable training in legal research, aligning with Guideline 6.2 for a well-rounded law library that incorporates both hard copy and electronic research resources. **Attachment D** contains receipts of library purchases.

We are on time with our deadline of updating the curriculum to meet legal research standards.

We have engaged in a 5-year contractual agreement with Thomson Reuters. For your reference, the contract is attached as **Attachment C**. As part of this agreement, we will be receiving several bundles of books, which include:

1. West's® Annotated California Codes (Annotated Statute & Code Series)
2. West's® California Reporter®, 3d
3. California Reporter Advance Sheets
4. West's® California Digest, 2d (1950 to Date) (Key Number Digest®)

## **18. Guidelines 7.1 and 7.2**

### **Bar's Inspection Report**

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

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

### **PCL'S Progress Report**

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

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

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

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

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

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

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

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

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

### **PCL's updated progress report as of 7/1/23:**

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

### **PCL's updated progress report as of 8/1/23:**

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

## **19. Guideline 9.1**

### **Bar's Inspection Report**

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

### **PCL'S Progress Report**

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

#### **New Student Information System**

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

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



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

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

### **PCL Files and Records**

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

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

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

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

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

administrator is developing protocols to collect the hard copies of the exams as part of the administrator's checklist re: maintenance of required records.

### **Record Retention and Disposal Policy:**

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

### **New Policy on Changes to Entries in Transcripts**

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

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

1. The present or former student must submit a written application to the Dean, specifying the change requested and the reasons for it. The application must include any documentation or evidence supporting the application.
2. The Dean must investigate the facts and circumstances pertinent to the application. In doing so, the Dean must read the entire application and materials submitted with it. The applicant shall have the right to speak with the Dean in support of the application, and to have an attorney or other representative do so as well. If the applicant requests the Dean to listen to any other person with information pertinent to the application, the Dean shall do so, but the Dean need not listen to an excessive number of such persons. The Dean may also communicate any person who may have information pertinent to the application, including but not limited to any present or former faculty member. The Dean may also speak with the Registrar, the Administrator and any other person with information pertinent to the application. The Dean may also consult any person outside PCL who has expertise on the subject of transcripts, but shall maintain the confidentiality of the student's information by not disclosing the identity of the applicant. Before the Dean transmits to the applicant the Dean's decision on the application, the applicant may submit additional materials to the Dean, who must read them if time permits.
3. Within thirty days after receiving the application, the Dean must render a written decision on it and transmit the decision to the applicant. The Dean shall cause the application and decision and any materials the Dean read or considered in connection with the application to be placed in the applicant's student file. If the decision is that a change is to be made, the decision must specify the change, and if the applicant has not requested an appeal within the fourteen days to appeal, Dean shall transmit the decision to the Registrar, who shall make the specified change on the transcript, and place on the transcript a notation of the reason(s) for the change.

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

5. No student member of the Community Board or the Executive Committee shall participate in the appeal unless the applicant consents in writing to participation by students.

## **RECOMMENDED SUGGESTIONS IN 2020 INSPECTION REPORT 1. Bar's Inspection Report**

"Pursuant to Guideline 2.9(C) and 5.13, it is suggested that the school require faculty to use a standard syllabus template to promote consistent communication of course requirements."

### **PCL'S Progress Report**

As we have said, PCL's new Student Information System has electronic features that enable the school to create global rubrics for use in any or all the courses. Those features can also be used to create a standard syllabus template.

## **2. Bar's Inspection Report**

"Pursuant to Guidelines 2.11, 7.1, and 9.1, it is suggested that the school base its data security policies and procedures upon the recommendations of generally accepted industry standards, consulting with an expert if the expertise is not available within the school."

### **PCL'S Progress Report**

As we report above, our data security is provided by the security protections of our new Student Information System, Populi. Populi's website states the following, among other things, concerning its security protections:

*"Populi's servers are stored in an SSAE 16 Type II compliant data center that is physically secured behind a battery of compartmentalized security zones with biometric*

*access controls. Numerous security, power supply, and infrastructure redundancies layer on additional safeguards. \*\*\**

“We built Populi on the open-source ‘LAMP’ stack (Linux, Apache, MySQL, PHP), availing you of the same powerful, secure technology undergirding web companies like Google, Vimeo, Facebook, and Amazon.”

### **3. Bar’s Inspection Report**

“Pursuant to Guidelines 5.14 through 5.16 and 5.25, it is suggested that the school adopt and implement a procedure requiring that examination questions, accompanied by issue outlines or model answers, must be reviewed and approved by the Dean or other legal educator before being administered.”

### **PCL’S Progress Report**

Our Faculty-Curriculum Committee and our former Dean formulated a procedure as stated above, requiring that examination questions, accompanied by issue outlines or model answers, must be reviewed and approved by the Dean or other legal educator before being administered. It was furnished to State Bar staff.

### **4. Bar’s Inspection Report**

“Pursuant to Guidelines 5.17, 5.18, and 5.25, it suggested that the school adopt and implement a procedure requiring that grades and student examinations papers must be reviewed and approved by the Dean or other legal educator before being posted.

### **PCL’S Progress Report**

In the summer of 2020, we adopted a procedure requiring that grades and must be reviewed and approved by the Dean or other legal educator before being posted. After implementing it in the fall quarter, we have been evaluating and revising it. Our Faculty-Curriculum Committee and Dean formulated a revision and furnished it to State Bar staff. The revision adds the requirement that student examinations papers, as well as grades, must be reviewed and approved by the Dean or other legal educator before grades are posted. Adoption of a revision is scheduled to be considered at the next meeting of our board of directors.

### **PCL’S Updated progress report as of 4/1/23:**

PCL retains the same policy and no change has been made.

### **PCL’s updated progress report as of 5/1/23:**

PCL retains the same policy and no change has been made.

**PCL's updated progress report as of 6/1/23:**

PCL retains the same policy and no change has been made.

**PCL's updated progress report as of 7/1/23:**

PCL retains the same policy and no change has been made.

**PCL's updated progress report as of 8/1/23:**

PCL retains the same policy and no change has been made.

**ADDITIONAL UPDATES**

**REDACTED-**

**Updated Progress Report 6/1/23:**

We are pleased to inform you that as of May, the final course, the Internship Course, is also ready for submission and is included with this report. With this, we are excited to announce that the program of instruction for REDACTED has been completed in its entirety.

**Updated Progress Report 7/1/23:**

Roger Aramayo, our administrator, is currently in ongoing communication with REDACTED regarding the upcoming courses for next year. They are in the process of finalizing the dates and times for these classes.

**Updated Progress Report 8/1/23:**

The classes REDACTED was enrolled in have been awarded the appropriate credit, and his grade has been duly fixed.

**Disclosures**

### **Updated Progress Report 6/1/23:**

PCL has enclosed the updated information in a letter dated June 1, 2023- Response to Natalie Leonard, State Bar Staff.

### **Updated Progress Report 7/1/23:**

PCL has diligently addressed the need for accurate implementation of disclosure statements as mandated by Guideline 2.3(D)(1)-(3), Business and Professions Code section 6061.7, and Rule 4.241. We have taken necessary corrective measures to ensure the accurate and complete implementation of these disclosures.

Regarding the refund process, we have identified certain students who will be eligible for refunds. These students include those for whom their disclosures couldn't be located in our records, as well as those who made payments before receiving the disclosures.

We understand the importance of providing timely refunds to these eligible students and are committed to processing them in a prompt manner. As such, refunds will be issued to these students in mid to late August.

### **Updated Progress Report 8/1/23:**

PCL has conducted an audit to verify Rule 4.241 compliance for all students enrolled in the 2022-2023 academic year. Based on our examination, the following non-compliant fees have been identified and are to be refunded to the respective students:

1. ***REDACTED***

- Fall 2022: REDACTED
- Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

2. ***REDACTED***

- Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

3. ***REDACTED***

- Winter 2022: REDACTED
- Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

4. ***REDACTED***

- Spring 2023: REDACTED

Total Refund: REDACTED  
Refund Issued on 8.01.23

5. **REDACTED**

- Fall 2022: REDACTED

Total Refund: REDACTED  
Refund Issued on 8.01.23

6. **REDACTED**

- Winter 2022: REDACTED
- Spring 2023: REDACTED

Total Refund: REDACTED  
Refund Issued on 8.01.23

For a detailed breakdown of this information, please consult **Attachment A**.  
Additionally, receipts and proof of refunds are enclosed in **Attachment B**.

**PROPOSED ANNOTATED SUMMARY AND RESTATEMENT OF PEOPLES  
COLLEGE OF LAW PROBATIONARY STATUS EFFECTIVE DECEMBER 2, 2022 –  
MAY 30, 2024**

1. **Guidelines 1.9 and 2.10:** To demonstrate full compliance, the school should demonstrate that it has adopted adequate procedures to properly document applications for accommodations and decisions in student files, to secure health records against unauthorized disclosure, and to effectively administer the school's privacy policy.

While the law school advised that as of November 2022 it had adopted and posted a compliant policy, later status reports indicate that the policy is in draft stage and is still being finalized as of March 1, 2023.

Since the December 2, 2022 committee meeting, staff has received two complaints from students regarding the policy's availability and application, and State Bar staff requested information related to these complaints. (Student A complaint, January 2023; Student B complaint, March 2023.)

**Outstanding Action:** The law school must demonstrate in its April 2023 progress report that it has created and implemented compliant procedures for reasonable accommodations and responded to the compliance issues raised by the student complaints, and resolved the conflict that appears to be present in the law school's prior responses.

**PCL's Response 5/1/23:**

Regarding the creation and implementation of compliant procedures the PCL student handbook outlines a process for applying for accommodations. It states in part:

A student who has a disability, long term or short term, and wants accommodation for it at PCL in taking exams or doing other academic work, must submit a written request for accommodation to the PCL Administrator.

The request must state (a) what the disability is, (b) how it interferes with the student's ability to take exams or do other academic work, (c) what accommodations are requested and (d) how long the student requests the accommodations to be in effect. The request must be accompanied by a statement from a physician or other qualified professional



stating, at a minimum, what the disability is and what accommodations should be given. The student may, in addition, submit other types of support for the request, such as verification of accommodations from undergraduate institutions or on the LSAT, and any other information and documentation the student believes is relevant to the request. Students must not send original documents, but should keep their original documents along with copies of everything they submit.

Entering students are urged to apply during the first week of August. Continuing students are urged to apply as soon as they are aware of the need for accommodation. Students should use all reasonable efforts to submit a request and documentation no later than six weeks before an exam. While PCL will make its best effort to process a student's request for accommodation promptly, a request can be denied if there is insufficient time to gather and evaluate the appropriate information. PCL may determine to request independent evaluations before granting or extending a requested accommodation.

The Administrator must send the request and all documents submitted in support of it to the Dean and the Executive Committee. The Dean will make the initial decision on the request, and must notify the student and the Executive Committee of the decision in writing. The decision must state whether the accommodation is granted, in whole or in part, and if granted, how long the student's accommodation will be in effect. After expiration of the time the accommodation is in effect, or within 60 days before the end of that time, the student may request renewal of the same or a similar accommodation, and must do so according to the same provisions as stated above.

The decision, whether denying the accommodation, or granting it in whole or in part, and the time during which it is in effect, is reviewable by the Executive Committee. The Executive Committee must review it if the student requests review within thirty days after receiving the decision from the Dean. The Executive Committee may review the decision even without a request for review, if the Executive Committee decides to do so thirty days after receiving the decision from the Dean. The Executive Committee must notify the student and the Dean of its decision on review within sixty days after the student's request for review or the Committee's own decision to review. There is no further right to review in PCL. However, the student may submit to any member of the Community Board a written request that the Community Board

review the decision of the Executive Committee, and the Community Board may decide to review or not to review, in whole or in part.

Accommodations may consist of additional time to take exams or do other academic work, and may consist of any other reasonable accommodation. However, the maximum additional time for the exam or work may not exceed twice the time allowed to students who do not have accommodations for the exam or work, unless, on review, the Community Board determines that more than twice the time is warranted and reasonable.

In general, PCL will try to follow the policies of the State Bar of California for the Bar Exam and the First Year Law Students Exam regarding types of disabilities and types of accommodations in exams. As of February 2020, the State Bar's website states the following about those policies (at <http://www.calbar.ca.gov/Admissions/Examinations/Requesting-Testing-Accommodations>):

To address the issues regarding the availability of the testing accommodation application PCL will create a new tab on the PCL website labeled Testing Accommodations. Here, students will be able to download the most recent accommodations request form. This form will be available for download to all current, and prospective students. Additionally, the accommodation language referenced above will be added to the body of the page.

Further, we are pleased to report that our new website has launched as of April 28, 2023. However, we acknowledge that the page providing information on how to apply for accommodations still needs to be added to the site, along with other necessary updates. Our development team estimates that it will take approximately 6 weeks to complete these updates, and we are committed to completing them as soon as possible. We recognize the significance of providing accurate and comprehensive information on this matter, and appreciate the opportunity to work with the Bar to ensure that all students have access to the necessary accommodations.

Additionally, student complaints that have been raised by one student have been resolved and accommodations have been provided.

PCL has recently received a complaint from a student with initials REDACTED. The complaint will be responded to within the allotted time for a response and a copy will be made available to the State Bar, if this is the conflict that the State Bar is referring to.

If not further clarification is needed by the State Bar.

**PCL's Response 6/1/23:**

PCL has finished the update to the website regarding the accommodations page. On the website, the button can be found under current students. The current students tab has a button entitled accommodations.

The accommodations page clearly states the school policy, provides a timeline for the accommodations process and provides a form in which students can easily download and submit to the school.

The administrator will then ensure all forms are complete, including documentation from the healthcare provider, if applicable before they are sent to the dean for review.

**PCL's Response 7/1/23:**

The accommodations page on our website has been successfully updated as mentioned in the previous report. Students can access it under the "Current Students" tab, where they will find the school policy, a timeline for the accommodations process, and a downloadable form. Our administrator is ensuring all forms are complete before sending them to the dean for review. We remain dedicated to providing a smooth accommodations process for our students.

**PCL's Response 8/1/23:**

PCL retains the same policy and no change has been made.

**2. Guideline 2.2(B):** To bring itself into full compliance, the school should demonstrate that its refund policies have been stated clearly and consistently in its publications.

The law school appears to have a compliant refund policy regarding those who withdraw. The law school does not appear to have a compliant policy of

providing refunds to students when the law school does not comply with Rule 4.241 and California Business and Professions Code section 6061. See item 4 for more detail.

**Outstanding Action:** The law school must document full compliance with Rule 4.241, including providing any refunds that are required under the rule, and provide evidence of compliance in its April 2023 progress report.

### **PCL's Response 5/1/23:**

PCL will provide refunds where required by Rule 4.241. Proof of refunds will be made available to the State Bar thereafter.

### **PCL's Response 6/1/23:**

We have developed a timeline for providing the required refunds to the specific students. Please find the timeline below, taking into account the approval process by the PCL Board of Directors:

1. June 18: Board Meeting - Refunds Approval
  - Include the item regarding refunds on the agenda for the PCL Board of Directors meeting.
  - Present the refund proposal to the board for their review and approval.
  - Seek necessary discussions and deliberations to obtain the board's consent on issuing the refunds.
2. June 19 - July 31: Refund Calculation and Processing
  - Once the refunds have been approved by the Board, initiate the process of calculating the exact refund amounts for each affected student, considering any applicable criteria as per Rule 4.241.
  - Prepare detailed documentation and evidence to support the refund calculations and compliance with the rule.
  - Notify the identified students about the approved refunds and provide them with the necessary information regarding the refund process and timelines.
3. August 1 - 15: Refund Issuance
  - Finalize the refund amounts for each student based on the approved calculations.
  - Prepare and issue the refund payments, ensuring they are disbursed to the respective students in a timely manner.

- Maintain accurate records of the refund transactions and ensure proper documentation for auditing and compliance purposes.

By following this timeline, we aim to provide the required refunds to the specific students in accordance with Rule 4.241. It is essential to obtain the approval of the PCL Board of Directors during their June 18th meeting to proceed with the refund process. Once approved, we will promptly calculate, process, and issue the refunds to the affected students. Our goal is to finalize and complete the refund issuance by mid-August, ensuring compliance with the Bar's requirements and demonstrating our commitment to rectifying any discrepancies promptly.

**PCL's Response 7/1/23:**

The PCL Board of Directors recognizes the importance of student refunds and has scheduled a dedicated discussion on this matter during the upcoming board meeting on July 16, 2023. Due to the ongoing process of electing a new slate of directors, the agenda item pertaining to student refunds was appropriately deferred until the next regularly scheduled meeting to ensure all relevant parties are present to make informed decisions.

In addition to the upcoming board meeting, the PCL Board of Directors has recently passed critical votes in June, including decisions regarding the purchase of a new building and associated logistical considerations. These matters required careful attention and deliberation from the board members. However, the issue of student refunds remains a priority, and the board is committed to addressing it in a timely manner.

Following the board meeting, the PCL administrator and dean will promptly reach out to eligible students and initiate the refund process in accordance with the applicable guidelines and regulations, including Rule 4.241 and California Business and Professions Code section 6061. We understand the importance of providing refunds to students when the law school fails to comply with the specified requirements, and we are dedicated to rectifying any instances where our refund policy may have fallen short of compliance.

We appreciate the Board's oversight and guidance in ensuring that our refund policies are fully compliant and transparent. The PCL administration is committed to maintaining clear communication and consistency in our publications to provide students with the necessary information regarding our

refund policies. We will continue to review and refine our policies to align with the expectations set forth by the Board and the relevant regulations.

**PCL's Response 8/1/23:**

PCL has conducted an audit to verify Rule 4.241 compliance for all students enrolled in the 2022-2023 academic year. Based on our examination, the following non-compliant fees have been identified and are to be refunded to the respective students:

1. **REDACTED**
  - Fall 2022: REDACTED
  - Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

2. **REDACTED**
  - Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

3. **REDACTED**
  - Winter 2022: REDACTED
  - Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

4. **REDACTED**
  - Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

5. **Sean Doyle**
  - Fall 2022: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

6. **REDACTED**
  - Winter 2022: REDACTED
  - Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

For a detailed breakdown of this information, please consult **Attachment A**. Additionally, receipts and proof of refunds are enclosed in **Attachment B**.

**3. Guideline 2.3(B):** To bring itself into full compliance, the school should remove from the Catalog any electives not offered in the past three years or not expected to be offered in the next two years, and inform students in the Catalog that electives are not taught each year, but are offered from time to time based on student interest and instructor availability. Subsequent to the inspection, the school adopted a compliant policy and updated the Catalog in this area.

**4. Guideline 2.3(D):** To bring itself into full compliance, the school should demonstrate that the disclosure statements required by Guideline 2.3(D)(1)-(3), Business and Professions Code section 6061.7, and Rule 4.241 have been implemented accurately, completely, consistently, and as mandated.

**A. Compliance with Business and Professions Code 6061.7(a)**

During 2022, the State Bar observed that PCL's Business and Professions Code section 6061.7(a) web disclosures and handbook were found to be out-of-date on the law school's website from January through June 2022. Staff reminded the law school to update the disclosures throughout the first half of 2022. PCL did so in May and June 2022. In November 2022, staff informed the law school via email that outdated disclosures appeared again in November 2022. PCL updated the disclosure and advised that this was due to reliance on volunteer work to update the website and that they would contract with information technology professionals to update the website. Since that time, the law school advises that as of March 1, it had selected a vendor and placed a deposit, but a timeline was not available.

**Outstanding Action:** In its April 2023 progress report, the law school must demonstrate that it is in compliance with the data and posting requirements of California Business and Professions Code section 6061.7(a), and document a specific timeline for its updated process, since it advises that the current process is insufficient to ensure sustained compliance.

**PCL's Response 5/1/23:**

PCL contracted with an internet technology professional on February 28, 2023 to rebuild, optimize and upgrade the PCL website and migrate onto a different web host. PCL has also addressed our email issues and upgraded to G SUITE. As of today the website is fully migrated and we are working with the vendor to update all relevant information, documents, etc. Our development team

estimates that it will take approximately 6 weeks to complete these updates, and we are committed to completing them as soon as possible.

As of Friday, April 28 the following materials have been updated:

1. Admissions data
2. Tuition, fees and financial aid
3. Conditional scholarships
4. Enrollment data
5. Average class size

We are currently working with and learning the new platform, and so further adjustments will be made to disclose total staff size. In addition, we are going to construct a new tab for information disclosure and a new tab specifically that explains accommodation policies and an accommodation request form. Again, compliance is ongoing, but we are moving in the right direction and out of date information is only due to very recent changes (made in the last two weeks) during which the website was still in the process of migration. The new website has the advantage of being on a much more stable platform.

#### **PCL's Response 6/1/23:**

Disclosures on the website and the handbook are up to date. They have been updated with the most current information.

We no longer rely on volunteers for website updates. Administration now manages and maintains our website using Squarespace.

#### **PCL's Response 7/1/23:**

We want to reiterate that the status remains unchanged from the previous report. The disclosures on our website and handbook are still up to date with the most current information. Additionally, we continue to utilize Squarespace for website management, with the administration handling updates.

#### **PCL's Response 8/1/23:**

PCL retains the same policy and no change has been made.



## B. Compliance with Rule 4.241

It appears from data provided by the law school that it is not in full compliance with Rule 4.241. This rule requires the law school to: (1) provide specified comprehensive disclosures to students prior to them making a payment for any term, which would be a quarter in the case of PCL; (2) have each student sign a copy of the disclosure statement; and (3) provide each student with a copy of their signed disclosure statement as a receipt. If the school fails to comply, it must refund all fees for that term, including tuition, to the student. Additionally, noncompliance with this rule is cause for withdrawal of registration.

The data PCL has provided to date indicates that several students are owed refunds for one or more quarters. The law school updated its disclosure statement policy in January 2023, but it does not appear that PCL has been acting in accordance with its policy.

State Bar staff has taken significant action to address this issue:

On December 8, 2022, State Bar staff requested the signed disclosures for one particular student who had completed three years of study. On December 30, the law school advised that it forwarded all disclosures that it had in its possession for the student, delivering one unsigned disclosure for one term, without evidence that it had been distributed to the student. On January 6, State Bar staff advised the law school that the disclosure was unsigned and asked the law school to provide evidence of compliance or provide a refund to the student by January 13 for that term as well as for any other term for which the law school did not comply with the Rule 4.241 process.

The law school did not respond by January 13.

On January 18, State Bar staff repeated its request regarding that student, and expanded the request by asking the law school to demonstrate compliance as to Rule 4.241 for all students enrolled during the 2022-2023 school year or provide refunds as required by the rule.

Later that day, on January 18, PCL's dean advised that the response had been completed but was still lodged in her draft folder. When she sent it, the response only addressed the disclosures for the original student, indicating that some more information had been found, and did not respond to the request as to the other students.

On January 26, PCL provided additional information regarding the first student including a recently located signature page, but still did not provide

information regarding the other students enrolled during the 2022-2023 school year.

On February 1, PCL provided additional disclosures for the original student with the subject line “Newly Found – Tuition Enrollment Agreements.”

On February 7, State Bar staff was scheduled to meet with PCL to determine why the law school had not demonstrated compliance. The law school postponed the meeting, rescheduling to February 13.

On February 13, 2023, State Bar staff met with the law school. PCL provided a spreadsheet with some, but not all, of the information requested.

Based on the data PCL provided it appears that:

- At least 6 students did not sign disclosures for the Fall 2022 term
- At least 6 students did not sign disclosures for the Winter 2023 term
- Of the students above, 4 students did not sign a disclosure for either the fall 2022 or winter 2023 terms

- At least one student did not sign a disclosure for the spring 2020 term

- For the fall 2022 term, 13 out of 14 students who signed their disclosures did so in

December 2022 or January 2023, which was well after the start of the term and likely

after the students had paid tuition for the term

- For the spring 2023 term, 12 of 13 students signed the disclosures between September

and December 2022. Significantly, in many cases, the documents reflect that students signed the spring 2023 disclosure before they signed the fall 2022 disclosure. Additionally, the spring 2023 term disclosures appear to have been signed during the period when the Committee was considering whether to terminate the school’s registration and before a decision had been made, and it is unclear whether students were provided with full information as to the law school’s status.

The spreadsheet provided at the meeting was not fully responsive to the State Bar’s requests. The law school needs to show for each student, for each term, that the student received a timely and complete disclosure prior to making a payment for that term, signed it, and received a copy of the signed disclosure. For any instance where PCL cannot demonstrate compliance, it must provide a refund to the student for that term.

The law school also indicated that it implemented a new procedure in January 2023 to ensure compliance, but PCL's data indicates that not all students signed the disclosure for the term beginning in January 2023, so that procedure appears to need further modification.

At the meeting, PCL agreed to provide an update demonstrating compliance complete its analysis, but no update has been received. after the exam period and include it in the March progress report. The law school did provide a copy of the disclosure that they indicate was distributed to all students at the start of the fall 2022 term, but no further update has been received since February 13.

Staff provided courtesy reminders on February 21 and March 16.

**Outstanding Action:** The law school must demonstrate for the original student identified and for each student enrolled during the fall 2022 or spring 2023 term, for , that the student received a timely and complete disclosure prior to making a payment, signed it, and received a copy of the signed disclosure. For any instance where PCL cannot demonstrate compliance, it must provide a refund to the student for that term. PCL must document compliance it is April 2023 progress report.

#### **PCL's Response 5/1/23:**

PCL will provide refunds where required by Rule 4.241. Proof of refunds will be made available to the State Bar thereafter.

PCL would like clarification in regards to this paragraph provided by the State Bar, " On December 8, 2022, State Bar staff requested the signed disclosures for one particular student who had completed three years of study. On December 30, the law school advised that it forwarded all disclosures that it had in its possession for the student, delivering one unsigned disclosure for one term, without evidence that it had been distributed to the student. On January 6, State Bar staff advised the law school that the disclosure was unsigned and asked the law school to provide evidence of compliance or provide a refund to the student by January 13 for that term as well as for any other term for which the law school did not comply with the Rule 4.241 process," PCL would like to seek clarification that the student in question is REDACTED so that we may process a refund.

#### **PCL's Response 6/1/23:**

We have developed a timeline for providing the required refunds to the specific students. Please find the timeline below, taking into account the approval process by the PCL Board of Directors:

1. June 18: Board Meeting - Refunds Approval

- Include the item regarding refunds on the agenda for the PCL Board of Directors meeting.
- Present the refund proposal to the board for their review and approval.
- Seek necessary discussions and deliberations to obtain the board's consent on issuing the refunds.

2. June 19 - July 31: Refund Calculation and Processing

- Once the refunds have been approved by the Board, initiate the process of calculating the exact refund amounts for each affected student, considering any applicable criteria as per Rule 4.241.
- Prepare detailed documentation and evidence to support the refund calculations and compliance with the rule.
- Notify the identified students about the approved refunds and provide them with the necessary information regarding the refund process and timelines.

3. August 1 - 15: Refund Issuance

- Finalize the refund amounts for each student based on the approved calculations.
- Prepare and issue the refund payments, ensuring they are disbursed to the respective students in a timely manner.
- Maintain accurate records of the refund transactions and ensure proper documentation for auditing and compliance purposes.

By following this timeline, we aim to provide the required refunds to the specific students in accordance with Rule 4.241. It is essential to obtain the approval of the PCL Board of Directors during their June 18th meeting to proceed with the refund process. Once approved, we will promptly calculate, process, and issue the refunds to the affected students. Our goal is to finalize and complete the refund issuance by mid-August, ensuring compliance with the Bar's requirements and demonstrating our commitment to rectifying any discrepancies promptly.

**PCL's Response 7/1/23:**

he PCL Board of Directors recognizes the importance of student refunds and has scheduled a dedicated discussion on this matter during the upcoming board meeting on July 16, 2023. Due to the ongoing process of electing a new slate of directors, the agenda item pertaining to student refunds was appropriately deferred until the next regularly scheduled meeting to ensure all relevant parties are present to make informed decisions.

In addition to the upcoming board meeting, the PCL Board of Directors has recently passed critical votes in June, including decisions regarding the purchase of a new building and associated logistical considerations. These matters required careful attention and deliberation from the board members. However, the issue of student refunds remains a priority, and the board is committed to addressing it in a timely manner.

Following the board meeting, the PCL administrator and dean will promptly reach out to eligible students and initiate the refund process in accordance with the applicable guidelines and regulations, including Rule 4.241 and California Business and Professions Code section 6061. We understand the importance of providing refunds to students when the law school fails to comply with the specified requirements, and we are dedicated to rectifying any instances where our refund policy may have fallen short of compliance.

We appreciate the Board's oversight and guidance in ensuring that our refund policies are fully compliant and transparent. The PCL administration is committed to maintaining clear communication and consistency in our publications to provide students with the necessary information regarding our refund policies. We will continue to review and refine our policies to align with the expectations set forth by the Board and the relevant regulations.

#### **PCL's Response 8/1/23:**

PCL has conducted an audit to verify Rule 4.241 compliance for all students enrolled in the 2022-2023 academic year. Based on our examination, the following non-compliant fees have been identified and are to be refunded to the respective students:

1. **REDACTED**
    - Fall 2022: REDACTED
    - Spring 2023: REDACTED
- Total Refund: REDACTED

Refund Issued on 8.01.23

2. **REDACTED**

- Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

3. **REDACTED**

- Winter 2022: REDACTED
- Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

4. **REDACTED**

- Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

5. **REDACTED**

- Fall 2022: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

6. **REDACTED**

- Winter 2022: REDACTED
- Spring 2023: REDACTED

Total Refund: REDACTED

Refund Issued on 8.01.23

For a detailed breakdown of this information, please consult **Attachment A**. Additionally, receipts and proof of refunds are enclosed in **Attachment B**.

**5. Guidelines 2.9(A)-(B) and 5.24:** To bring itself into full compliance, the school should demonstrate that the Catalog and other publications set forth the school's academic standards and student assessment policies accurately, clearly, consistently, and as mandated.

The law school's catalog was posted on its web site in draft form, including notes, and included noncompliant policies, from January through May 2022. After multiple staff reminders and a directive from the Committee in March 2022, the law school posted an updated document in May 2022. Many of the law school's website pages appear out of date, potentially confusing prospective or current students as to PCL's current academic policies. Examples include: the law school's homepage indicates that the

admission season for 2021-2022 is open, with the next class starting in fall 2021; recent bar passage data stops with 2019; and many pictures on the virtual tour show the library, which has been unavailable for a number of years after a fire, and the law school is operating under a waiver regarding its library. The law school's progress reports indicate that the law school intends to hire information technology experts to assist with website updates, and to adopt a web platform that can be more easily updated by staff and volunteers, but no timeline is provided for this action.

**Outstanding Action:** The law school must update its website and publications and provide a timeline as to when this process will be complete, in its April 2023 progress report.

**PCL's Response 5/1/23:**

Thank you for your inquiry about the progress of our website development. We are pleased to inform you that the law school's new website was launched on April 28, 2023. The development team has estimated that it will take approximately 6 weeks from the launch date to complete all necessary updates to the website. Our priority is to ensure that the website is fully functional and user-friendly, with a focus on providing a seamless user experience for our students, faculty, and other stakeholders. We understand the importance of timely and effective communication, and are committed to keeping you informed throughout the development process.

**PCL's Response 6/1/23:**

We have made significant improvements to our school's website by addressing outdated pages and establishing dedicated sections to post essential information about the institution and its policies.

We have updated the dates for open enrollment, updated the bar passage data and deleted pictures of the law library.

We recognize the importance of maintaining an up-to-date and informative online presence. As part of our ongoing commitment to enhancing user experience, we are actively working on frequent updates to ensure that our website remains current, informative, and user-friendly.

### **PCL's Response 7/1/23:**

We want to assure you that the significant improvements made to our school's website, including addressing outdated pages and establishing dedicated sections for essential information, remain in place. Updates to open enrollment dates, bar passage data, and removal of outdated law library pictures have been implemented. Our ongoing commitment to maintaining an up-to-date and user-friendly website continues.

### **PCL's Response 8/1/23:**

PCL retains the same policy and no change has been made.

**6. Guideline 2.9(C):** To bring itself into full compliance, the school should adopt, publish, and implement a policy, including oversight provisions, to ensure that students are provided with written statements of the components of course grades. Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.

**7. Guideline 2.9(D):** To bring itself into full compliance, PCL should adopt, publish, and implement a policy on authentication of student work, and discontinue its current practice of allowing students to take in-class exams using devices that are not protected by exam- security software. After the inspection in 2020, the law school purchased commercial software that provided exam security. During the fall semester in 2022, the law school had a technical issue with its software and ordered students to come in to take their exams, though another technical solution was found. The law school is again considering changing its vendor to a vendor it previously rejected. It is unclear whether the switching represents a technical issue or an evolving process. In addition, the law school's policy includes significant exceptions that allow students to take exams unmonitored, limiting the law school's ability to authenticate student work.

**Outstanding Action:** The law school must document how it ensures exam security and authentication of student work, and document its policies and their implementation, and explain how often the exceptions to the policy are invoked and how exam security and authentication of work is handled in those cases, and document this as part of its April 2023 progress report.



## **PCL's Response 5/1/23:**

During the Fall Quarter of 2020, PCL adopted the following policy and procedures on authentication of student work:

### **POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK**

A. Exams: All exams must be given using Microsoft Teams. If the exam is given remotely, the monitoring function of Teams must be used. If the exam is given in the classroom, the instructor or a non-student substituting for the instructor must be present during the entire exam to monitor the students. Students who handwrite exam answers must have all their electronic devices turned off. Students who answer the exams by Teams on a computer must have all their other electronic devices turned off. If the exam is given remotely, all students must have their video activated during the entire exam, but exceptions are allowed for students who encounter technical problems that result in the student not being able to have their video activated.

(The Faculty-Curriculum Committee notes that exams are given with Microsoft Teams. Teams requires students to register for each exam. The students' exam answers are sent to the Microsoft Teams account and only accessible through Teams. When taking the exams, the students' computer screens are locked upon being opened by the student, and thus the students cannot access other materials while the test is being taken. While taking the exam, the student is observed by the exam proctor through the webcam. The students' exam answers are submitted to the proctor through the students' Microsoft Teams account.)

B. Remote Class Participation: In all classes given remotely every student should have their video activated during the entire class, unless the student has hardware or software issues related to their computer or internet service provider or an extraordinary circumstance.

(The Faculty-Curriculum Committee notes that online classes are given via Zoom only. The students attend class via Zoom. The students' names are shown during the class. The students are on camera during the class. Students speak during the classes, and their voices also identify them.)

We are committed to maintaining the integrity of our academic programs and ensuring that all students' work is authentic.

Since the fall of 2022, there have been no exceptions to this policy. Our faculty and staff have worked diligently to ensure that all students are aware of this policy and that all exams are conducted in a monitored setting.

As a result, we do not allow students to take exams unmonitored. This policy has been put in place to protect the integrity of our academic programs and to ensure that all students are held to the same high standards of academic excellence.

### **PCL's Response 6/1/23:**

We would like to provide an updated clarification regarding the examination monitoring and safeguarding tools we employ.

We noticed that there was an editing error in our previous report for 5/1/23, incorrectly stating the use of Microsoft for this purpose. We apologize for any confusion caused.

The accurate information is that we utilize Testinvice, an advanced testing platform, to enhance exam integrity and monitor student performance.

Testinvice offers robust anti-cheating mechanisms that effectively safeguard the integrity of our exams. Through its comprehensive features, such as randomized question orders, time restrictions, and question banks, Testinvice helps ensure a fair and secure testing environment. It detects and prevents cheating attempts through various means, including monitoring browser activities, disabling external applications, and preventing copying and pasting during the test.

The platform aids exam monitoring by providing real-time proctoring capabilities, allowing authorized staff to monitor students remotely during their exams. This feature helps ensure adherence to academic honesty standards while maintaining the convenience and flexibility of online testing. Additionally, Testinvice provides comprehensive reporting and analysis tools, allowing us to review test results, detect anomalies, and identify potential irregularities for further investigation.

We appreciate the advanced features and safeguards offered by Testinvice, which have significantly bolstered our ability to maintain exam integrity and ensure fair evaluations. Moving forward, we will continue to leverage this

powerful tool to provide a secure and reliable testing environment for our students.

**PCL's Response 7/1/23:**

We want to reiterate that we continue to utilize Testinvite, an advanced testing platform, to enhance exam integrity and monitor student performance. Testinvite offers robust anti-cheating mechanisms, including randomized question orders, time restrictions, and question banks, ensuring a fair and secure testing environment. It actively detects and prevents cheating attempts through various means, such as monitoring browser activities and disabling external applications.

The platform also enables real-time proctoring, allowing authorized staff to remotely monitor students during exams, promoting academic honesty while maintaining the flexibility of online testing. Testinvite provides comprehensive reporting and analysis tools, aiding in reviewing test results, identifying anomalies, and investigating potential irregularities.

We remain appreciative of the advanced features and safeguards provided by Testinvite, which greatly contribute to maintaining exam integrity and ensuring fair evaluations. Our commitment to utilizing this powerful tool for a secure and reliable testing environment continues.

**PCL's Response 8/1/23:**

PCL retains the same policy and no change has been made.

**8. Guidelines 2.10 and 5.17:** To bring itself into full compliance, the school should review, revise, and republish its grade review policy to meet guideline requirements.

A student complaint alleged that forms related to grade review were inaccessible during the first part of 2022. (Student Complaint, March 2023.)

**Outstanding Action:** The law school must document the grade review process, and establish whether the policy and related forms are available to students, and document this in the law school's April 2023 progress report.

### **PCL's Response 5/1/23:**

The law school recognizes the importance of documenting the grade review process and ensuring that the policy and related forms are easily accessible to students.

We are pleased to inform you that PCL is dedicating significant resources to updating our website, with a specific focus on creating a webpage that is dedicated to the grade review process. This page will provide students with all necessary information regarding the process, as well as access to the required forms.

Our new website will be launched on April 28, 2023. While the timeframe for completing all necessary updates is estimated to be approximately 6 weeks from the launch date, we are confident that the grade review page will be available to students as soon as possible. We understand the importance of providing clear and comprehensive information to our students, and are committed to documenting the grade review process and ensuring that the policy and related forms are available to them.

### **PCL's Response 6/1/23:**

PCL has updated our website and created a webpage that is dedicated to the grade review process (Attached in **Attachment D**). This page provides students with all necessary information regarding the process, as well as access to the required forms.

We understand the importance of providing clear and comprehensive information to our students, and are committed to documenting the grade review process and ensuring that the policy and related forms are available to them.

### **PCL's Response 7/1/23:**

We want to assure you that the website update, as mentioned in the previous report, remains in effect. PCL has created a dedicated webpage specifically for the grade review process. This page serves as a centralized resource for students, providing all necessary information and access to the required forms.

We recognize the significance of offering clear and comprehensive information to our students. Hence, we are committed to maintaining an up-to-date

documentation of the grade review process, ensuring that the policy and relevant forms are readily available for their convenience.

**PCL's Response 8/1/23:**

PCL retains the same policy and no change has been made.

**9. Guidelines 2.11, 7.1, and 9.1:** To bring itself into full compliance, the school should adopt policies and procedures that are adequate to protect the school's digital records. Subsequent to the inspection, the school purchased Populi, a commercially available package designed for schools containing the safeguards identified in the law school's inspection report.

**10. Guideline 3.1:** To bring itself into full compliance, PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the CBE's standards, including written job descriptions for the dean and registrar, and adequate oversight provisions. Subsequent to the inspection, the school increased the paid hours of the administrator, and secured significant volunteer assistance from the dean, the Board, and alumni, resulting in significant progress seen since the inspection. The school also created compliant job descriptions for both the dean and the registrar.

**A. Impact of Reliance on Volunteer Work**

In 2022, the law school advised that it hired additional support staff, but eliminated those roles in 2023 without identifying other sources of volunteer or paid staff. Yet, the law school cited reliance on volunteer labor as the reasons for its noncompliance in a number of areas including: 1) the ability to create courses required for students; 2) the ability to keep the website updated; 3) the ability to issue grades timely. Reliance on volunteers does not excuse compliance.

**Outstanding Action:** While the law school is not required to have a particular number of staff, it must have sufficient capacity available to maintain compliance. The law school should demonstrate how it estimates its needs and fulfills those needs, explaining changes in support from 2022 to 2023, and document this in its April 2023 progress report.

**PCL's Response 5/1/23:**

In response to The Bar's request for information regarding our law school's capacity to maintain compliance, we would like to provide an overview of our current staffing situation and our plans for the future. We acknowledge that we are currently short-staffed, but we have a plan in place to build capacity.

While there is no specific requirement for a certain number of staff, we understand the importance of having sufficient capacity to ensure compliance.

Currently, PCL is operating with a small staff due to limited resources, with only the Dean, administrator and student resource coordinator as paid positions.

Although, PCL's legal clinic coordinator position was vacated it was only a 10 hour a week position and in no way impacted PCL's academic programs. Additionally, PCL has still maintained two part time development consultants who mainly work on fundraising. One of those new part time development contractors, Allision Domato, currently works to coordinate the remaining PCL legal clinics on a consultancy basis to meet the grant requirements.

As explained in our previous report, PCL accepted an offer to sell our building, which we own outright. The proceeds from this sale will be reinvested into our school's operations, including hiring two additional full- time staff members. One of these hires will be a development person, while the other will be a full-time admissions and registration staff member.

We will continue to keep The Bar informed of our progress as we work towards building our capacity to ensure compliance and provide the highest quality education for our students.

### **PCL's Response 6/1/23:**

We have devised a timeline to hire additional full-time staff members, with a targeted completion date of August 15th. The timeline is as follows:

#### **1. June 1-15: Job Posting and Recruitment**

- Develop job descriptions for the development and admissions/registration positions.
- Advertise the job openings on relevant platforms and networks.
- Conduct initial screening of applications and shortlist candidates.

2. June 16-30: Interviews and Selection

- Conduct interviews with shortlisted candidates for both positions.
- Evaluate candidates based on their qualifications, experience, and alignment with our school's mission and values.
- Select the most suitable candidates for each role.

3. July 1-31: Onboarding and Training

- Extend formal job offers to the selected candidates.
- Coordinate the onboarding process, including completing necessary paperwork and background checks.
- Develop an orientation and training program for the new hires.
- Introduce the new staff members to relevant team members and familiarize them with their respective roles and responsibilities.

4. August 1-15: Finalization and Start Date

- Finalize employment contracts and other administrative procedures.
- Ensure the new hires are fully integrated into their respective departments.
- Provide any additional training and resources required for their success.
- August 15th will serve as the start date for the two full-time staff members, officially marking the completion of the hiring process.

By adhering to this timeline, we are confident in our ability to attract and hire qualified professionals who will contribute significantly to our school's development and admissions/registration processes. We will ensure a thorough and efficient hiring process to expedite the expansion of our staff and optimize the support provided to our students.

**PCL's Response 7/1/23:**

An ad was posted on craigslist.org for the positions of admissions recruitment, development and faculty assistant. The job descriptions for those are attached to the report and the link is enclosed to view the opening positions.

**PCL's Response 8/1/23:**

We have promptly responded to the bar's request and have already initiated the interviewing process for the additional staff positions. As per our schedule, the new positions of Registrar/Development, Administrative Assistant, and School Admissions Recruiter are set to commence on September 5, 2023. This

proactive approach will ensure a smooth transition and enable the team to be fully operational by the specified date. **Attachment F** contains the job postings.

### **B. Impact of Reliance on Student Volunteer Work**

PCL's current model relies on significant student volunteer work. For example,

**Outstanding Action:** The law school must evaluate the role of student participation to ensure that students have sufficient time to devote to their studies, and the law school has sufficient resources available to sustain compliance. The State Bar remains concerned at the potential for conflict of interest or violation of student privacy, as was expressed at the January 2020 inspection, and seeks further comment from the law school.

### **PCL's Response 5/1/23:**

PCL students are not required to "perform volunteer work 15 hours per week or pay additional fee." Accountability hours are 40 hours per year, which roughly translates to 3.3 hours per month since students are open to volunteer during the summer months. PCL's has a school policy in which students are able to perform accountability (volunteer) hours to help reduce the amount of their school tuition. The policy is voluntary and was implemented in the mid 1970's as an alternative to assist students in making tuition more affordable, as is part of the school's mission.

If the student elects to participate in performing accountability hours the student will be offered a reduction of tuition of REDACTED. The student does not have to participate in voluntary hours and as such each student can monitor their own needs of whether their schedule allows them to participate in accountability hours.



While the social justice mission remains very few students participate in accountability hours, contrary to the spirit of the school in the mid 1970's. To further benefit the student, PCL will be raising its student accountability wage from REDACTED per hour to REDACTED. This wage is higher than the minimum wage standards in the City of Los Angeles. This will reduce the amount of hours that the students will be required to volunteer to meet the REDACTED accountability fee. PCL has revisited the policy in regards to students being a part of the board. PCL understands the State Bar's concerns of the bar and has taken precautionary measures to protect student privacy in disciplinary issues, student concerns, faculty issues. These issues are confidential and are dealt in closed sessions.

Furthermore, students are not privy to transcripts because the administrator fulfills the transcript requests. The school has experienced fewer volunteer efforts. If student volunteers are utilized they are involved in fundraising committees and helping to organize the legal clinic.

**PCL's Response 6/1/23:**

PCL continues its practice as listed above in PCL's response.

**PCL's Response 7/1/23:**

PCL continues its practice as listed above in PCL's response.

**PCL's Response 8/1/23:**

PCL continues its practice as listed above in PCL's response.

**C. Overall Ability to Maintain Compliance**

It is unclear whether the law school has sufficient resources to maintain compliance. Examples include:

- a. The law school has not been able to create a fourth-year program of study for a student who was due to begin that study in September 2022.
- b. The law school has not fully implemented its testing accommodation policy first considered in 2020, but not yet implemented. Two complaints regarding the law school's current process have been received since the Committee's December 2022 meeting.

- c. When asked to document compliance with Rule 4.241, the law school was challenged to locate the relevant records and has not been able to locate all records after three months of efforts.
- d. The law school admitted at least one student on the first day of her classes in fall 2022, and no orientation was provided for her after orientation was conducted one week prior for other students. (Student Compliant January 2023; Staff meeting with Peoples College of Law, February 13, 2023.)
- e. The law school did not respond to several requests from State Bar staff to complete its demographic reporting spreadsheet that is part of the law school's annual report. After first requesting updates on December 6, and reminding the law school in writing on several occasions, the material was ultimately provided on February 16, 2023.

**f. Outstanding Action:** The law school must engage sufficient staff and administrative support to maintain compliance with all Rules and Guidelines including responding to State Bar staff requests and probation requirements in a timely manner, and documenting its process to track status, complete and close requests in its April 2023 progress report.

#### **PCL's Response 5/1/23:**

To comply with all Rules and Guidelines, including responding to State Bar staff requests and probation requirements in a timely manner, our law school acknowledges the need to engage sufficient staff and administrative support. However, currently, we are short-staffed but have a plan to build capacity, as mentioned earlier.

In addition to the plan to document its process and track status, our law school has a timeline to build more capacity. Recently, PCL accepted an offer to sell the building, as of last week. The escrow period is for 60 days and PCL is currently viewing several buildings in the area.

Once the sale is complete, PCL intends to hire two full-time staff members, including one development person and a full-time admissions and registration staff member. This step will help the law school to engage sufficient staff and administrative support to maintain compliance with all Rules and Guidelines, including responding to State Bar staff requests and probation requirements in a timely manner.

We are committed to ensuring that PCL is well-equipped to meet all of its obligations and responsibilities towards its students and the State Bar.

### **PCL's Response 6/1/23:**

We have devised a timeline to hire additional full-time staff members, with a targeted completion date of August 15th. The timeline is as follows:

1. June 1-15: Job Posting and Recruitment

- Develop job descriptions for the development and admissions/registration positions.
- Advertise the job openings on relevant platforms and networks.
- Conduct initial screening of applications and shortlist candidates.

2. June 16-30: Interviews and Selection

- Conduct interviews with shortlisted candidates for both positions.
- Evaluate candidates based on their qualifications, experience, and alignment with our school's mission and values.
- Select the most suitable candidates for each role.

3. July 1-31: Onboarding and Training

- Extend formal job offers to the selected candidates.
- Coordinate the onboarding process, including completing necessary paperwork and background checks.
- Develop an orientation and training program for the new hires.
- Introduce the new staff members to relevant team members and familiarize them with their respective roles and responsibilities.

4. August 1-15: Finalization and Start Date

- Finalize employment contracts and other administrative procedures.
- Ensure the new hires are fully integrated into their respective departments.
- Provide any additional training and resources required for their success.
- August 15th will serve as the start date for the two full-time staff members, officially marking the completion of the hiring process.

By adhering to this timeline, we are confident in our ability to attract and hire qualified professionals who will contribute significantly to our school's development and admissions/registration processes. We will ensure a thorough and efficient hiring process to expedite the expansion of our staff and optimize the support provided to our students.

### **PCL's Response 7/1/23: (Attachment)**

An ad was posted on craigslist.org for the positions of admissions recruitment, development and faculty assistant. The job descriptions for those are attached to the report and the link is enclosed to view the opening positions.

**PCL's Response 8/1/23:**

We have promptly responded to the bar's request and have already initiated the interviewing process for the additional staff positions. As per our schedule, the new positions of Registrar/Development, Administrative Assistant, and School Admissions Recruiter are set to commence on September 5, 2023. This proactive approach will ensure a smooth transition and enable the team to be fully operational by the specified date.

**11. Guidelines 4.8 and 4.9:** To bring itself into full compliance, the school must adopt and implement a faculty evaluation policy that meets guideline requirements. Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.

Between January 2020 and May 2022 PCL failed to release grades on time for one or more classes. PCL has indicated that the delay is due to the fact that volunteer professors have other time commitments. The law school reports it is working with professors to implement quality control procedures for class and exam creation and grading.

The law school advised that it has created a backup procedure to be implemented if a professor cannot grade exams on time. It also advised that it continues to seek student feedback.

**Outstanding Action:** The law school must establish a meaningful faculty evaluation process that sets expectations for professors, and holds them accountable, advise whether faculty grades were released on time, and, if not, advise the results of implementing the backup procedures, and document status as to all of these elements in its April 2023 progress report.

**PCL's Response 5/1/23:**

PCL continues to utilize its faculty evaluation process that sets expectations for professors. Grades were released on time in the fall of 2022.

The backup plan procedure was in place, where the dean would grade the exams if the professors did not meet the grading deadlines. After much effort, the professors turned in their grades in time and the students were notified of their grades within a 2-3 week period after the final exam. Feedback was provided in class.

The winter grades for Criminal law are on a delay. The professor had an emergency. However, the students have been notified of the delay. We understand the importance of timely grading and are taking steps to ensure that grades are released on schedule going forward.

As we mentioned earlier, PCL is short-staffed but we have a plan to build capacity. PCL has just accepted the offer to sell the building, as of last week. More details will follow on the specifics of the sale of the building. Once the sale goes through, PCL will hire 2 more full-time staff members. One staff member will be a development person, and a full-time admissions and registration staff member and a paid faculty member.

This will help us to better support our faculty and students, and ensure timely grading and other administrative tasks are completed on schedule.

#### **PCL's Response 6/1/23:**

The evaluation process for our instructors encompasses three components, each serving a specific purpose.

Firstly, we gather feedback from the students, as attached to this report **(Attachment A)**, to ensure their voices are heard and their experiences are taken into account.

Secondly, instructors provide their own self-evaluations, which fosters self-reflection and encourages continuous improvement **(Attachment B)**.

Lastly, we receive an evaluation from the FCC, which includes my comments and is likewise attached **(Attachment C)**. This underscores the importance of accountability in implementing school standards and submitting grades punctually.

These evaluations are indicative of our law school's commitment to meaningful and timely reviews, as well as the establishment of clear faculty performance expectations.

**PCL's Response 7/1/23:**

The evaluation process for our instructors, as outlined in the previous report, remains unchanged. It consists of three components with distinct purposes.

First, we continue to gather feedback from students to ensure their perspectives are considered and valued.

Secondly, instructors provide self-evaluations, encouraging self-reflection and continuous improvement.

Lastly, we receive evaluations from the FCC, including the dean's comments, emphasizing the importance of accountability and adherence to school standards.

These evaluations demonstrate our ongoing commitment to conducting meaningful and timely reviews, as well as establishing clear expectations for faculty performance

We have received 5 self-evaluations, thus far.

**PCL's Response 8/1/23:**

The evaluation process for our instructors, as outlined in the previous report, remains unchanged. It consists of three components with distinct purposes (**Attachment E**).

First, we continue to gather feedback from students to ensure their perspectives are considered and valued.

Secondly, instructors provide self-evaluations, encouraging self-reflection and continuous improvement.

Lastly, we receive evaluations from the FCC, including the dean's comments, emphasizing the importance of accountability and adherence to school standards.

These evaluations demonstrate our ongoing commitment to conducting meaningful and timely reviews, as well as establishing clear expectations for faculty performance

We have received all the evaluations we sent out.

**12. Guidelines 5.3(A)(1) and 5.9:** To bring itself into full compliance, the school should adopt, implement, and publish attendance policies and procedures that: require student attendance at no less than 80 percent of the regularly scheduled class hours for each course during a particular term, not a series of courses over two or more terms; provide for accurate and timely maintenance of records; and eliminate the policy of permitting students to make up absences from regularly scheduled class hours with alternate activities. The law school's current policy does not comply with the guideline because it does not require students to attend 80 percent of regularly scheduled classes. Rather, students can petition to replace regularly scheduled class hours with alternative classes taught by other professors at any time, even after the conclusion of the course or academic term.

**Outstanding Action:** The law school must update its policy to require a student to attend 80 percent of regularly scheduled class hours for each individual class and address all elements of this guideline, and document the new policy and its implementation in its April 2023 progress report.

**PCL's Response 5/1/23:**

PCL has updated its policy to require students to attend 80 percent of regularly scheduled class hours for each individual class. This guideline has been communicated to all faculty members, and we are implementing it by taking attendance on Populi.

**PCL's Response 6/1/23:**

PCL continues its practice as listed above in PCL's response.

**PCL's Response 7/1/23:**

PCL continues its practice as listed above in PCL's response.

**PCL's Response 8/1/23:**

PCL continues its practice as listed above in PCL's response.

**13. Guideline 5.8:** To bring itself into full compliance, the school should demonstrate that its clinical courses meet all Guideline 5.8 requirements, including maintenance of records for each student in the course. Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.

**14. Guidelines 5.17, 5.18, and 5.25:** To bring itself into full compliance, the school should review, revise, and republish its exam and grading policies and procedures, taking action as necessary to improve the quality of exams, curb grade inflation, and ensure that students receive adequate feedback on their exam performance.

This policy appears to have changed as staff has changed. Recently, the law school reported that it documented a policy and held faculty training on how to implement that policy, focusing on grading standards and providing useful feedback on exams.

The law school also indicated that at times the dean or administrator have reviewed grades before they are released.

**Outstanding action:** The law school should describe the processes used to meet this recommendation so far in the fall 2022 quarter, what is planned for the spring 2023 quarter, and explain how the law school will continue to determine whether grading results correlate with outcomes on State Bar exams, and document this in the law school's April 2023 progress report.

**PCL's Response 5/1/23:**



The law school continues to utilize the same policy.

### **Policies to Eliminate Grade Inflation**

The Inspection Report, on page 15, referring to the 2014 inspection, states: “To address grade inflation, PCL adjusted its grading scale and urged instructors not to inflate grades. PCL did not, however, adopt other policies to control inflation, such as administrative review of grades prior to their release, or reasonable limits on the extent to which grades may be based on class participation, including attendance. As concluded in 2014, a sound grading program would limit participation points to no more than three [of 100], and the award of points based on attendance is “clearly inappropriate” in light of Guideline 5.3(A)(1) minimum attendance requirement. PCL’s policy allows up to thirty percent of a course grade to be based on participation.”

In the summer of 2020 we did adopt the policies recommended in that paragraph. They are now in the Student Handbook & Catalog and the Faculty Handbook, as follows:

### **Grading Standards:**

It is of primary importance for PCL students and all of PCL that the students have a realistic picture of a realistic picture of their outlook for passing First Year Law Students Exam (FYLSX) and Bar Exam. The pass rates for both exams have been very low. For example, the pass rate for the July 2019 Bar Exam was 14.4% for California Unaccredited law schools and 18.8% for California-Accredited (non-ABA) law schools.

On the FYLSX of June 2019, the pass rate was 23.5% for all takers and 28.1% for California Unaccredited Fixed-Facility law schools (PCL is in that category). Students’ ideas about their chances on these exams are very likely influenced by their law school grades. If a student receives high grades, that is likely to raise the student’s expectations of passing the FYLSX and the Bar Exam, but because of the low pass rates on the exams, the heightened expectations could well be unrealistic. In light of these and similar considerations, PCL has adopted these Grading Standards for all examinations and final grades (grades for the full quarter) in all courses that are not graded pass-fail. NOTE that in the grouping of grades in the table below, C- grades are grouped with the D grades. That is because at PCL, in order for a student to advance to the next academic year and graduate, the student must have a grade point average of C or better.

Class participation must not count for more than three percent (3%) of the final grade in a course, and attendance may not be counted at all towards the grade, inasmuch as minimum 80% attendance is required.

### **Administrative Review of Grades**

In August, 2020, our Board adopted the following Administrative Review policy:

When faculty members have determined what grades they intend to give, the next step would not be to release the grades to the students, but instead to send the grades to reviewers. The reviewers very likely would include the Dean. Others could be members of the Faculty- Curriculum Committee and current or former faculty members, but faculty would not, of course, review their own grades, and students would not participate without consent of the student between reviews.

The reviewers would study the grades for adherence to PCL grading policies. ... If the grade reviewers find deficiencies, they would communicate with the faculty member about curing the deficiencies and changing the grades. The Dean or the Faculty- Curriculum Committee or both would participate in those discussions and decisions on changing grades. When the decisions are made, the grades would then be sent to the Administrator for release to students.

### **Improvements in Eliminating Faculty Turnover**

The 2014 Inspection Report observed (p. 9):

“PCL operates with an all-volunteer, adjunct faculty and has someone so since its founding [it remains true in 2020]; a clear testament to the faculty’s dedication to PCL’s mission of public service. One negative aspect of a volunteer faculty, however, is that PCL experiences a higher rate of faculty turnover than most law schools where faculty members are paid even a modest stipend or salary. ... on average, 20% of PCL’s faculty appears to be new each academic year.”

That turnover situation has been reversed. In the last academic year, 2020-2021, all faculty members except three taught at PCL the previous year, 2019-2020. Faculty turnover in the current 2021-2022 Academic Year had been on the decline previously as well.

### **PCL’s Response 6/1/23:**

The policy remains the same.

### **PCL's Response 7/1/23:**

Fall 2022 Quarter:

During the fall 2022 quarter, the law school continued to adhere to the grading policies outlined in our previous progress report. The grading standards and limitations on participation points, as specified in the Student Handbook & Catalog and the Faculty Handbook, were consistently applied across all courses. Additionally, the administrative review policy was in place, involving designated reviewers, including the Dean, to assess adherence to grading policies and discuss potential grade adjustments, if necessary.

Spring 2023 Term:

In the past spring term, we maintained the implementation of our grading policies and procedures. Faculty members followed the established standards, ensuring fair and consistent grading practices. The administrative review process was utilized, allowing for thorough evaluation and potential adjustments to grades before their release to students.

Determining Correlation with State Bar Exam Outcomes:

To determine the correlation between grading results and State Bar exam outcomes, the law school implemented a comprehensive data collection and analysis system during the past spring term. We closely monitored the performance of our students in the State Bar exams, comparing their grades with their outcomes to assess the effectiveness of our grading policies and identify areas for improvement. This data-driven approach allowed us to evaluate the impact of grading standards on student success in the bar exams and make any necessary adjustments to our practices.

### **PCL's Response 8/1/23:**

PCL retains the same policy and no change has been made.

**15. Guidelines 5.18-5.20:** To bring itself into full compliance, the school should adopt, publish, and implement policies for academic advancement that adhere to the school's academic standards and comply with the guidelines, and eliminate policies that do not adhere to the guidelines.

The law school allowed a student to take a non-standard schedule but did not ensure that it had a program of study of 270 hours available to the student for their fourth year as required by California Business and Professions Code

section 6060. As a result, the student was not able to continue their education at the law school in fall 2022. Currently, the law school advised staff that it has identified four course titles that it plans to create and offer beginning in fall 2023, but it has not discussed the course topics with the student or updated the student since September 2022. The law school must administer a compliant plan of study for all students.

**Outstanding action:** The law school must demonstrate that it has available a program of 270 hours per year for four years to all students, and document this in its April 2023 progress report.

**PCL's Response 5/1/23:**

With the completion of classes for REDACTED the law school has a program of 270 hours per year for four years to all students.

PCL's counsel, REDACTED, is appointed to communicate with REDACTED since the school was sued. REDACTED will be in communication with REDACTED.

**PCL's Response 6/1/23:**

The law school has an available program of study. Those classes include:

1. Administrative law (**attachment E**)
2. Second Amendment and Gun Control
3. Educational Law
4. The Law of Journalism and Mass Communication
5. The Law of Journalism and Mass Communication II
6. Environmental Law
7. Animal Rights Law
8. International Environmental Law
9. Juvenile Law
10. Business Law
11. Legal Internship (**Attachment F**)

REDACTED, will not be communicating with REDACTED on behalf of the school because he was sued by REDACTED personally. Instead, Pcl's administrator Roger Aramayo has started communication with REDACTED regarding the availability of his coursework.

**PCL's Response 7/1/23:**

Roger Aramayo our administrator, is currently in ongoing communication with REDACTED regarding the upcoming courses for next year. They are in the process of finalizing the dates and times for these classes.

**PCL's Response 8/1/23:**

The classes REDACTED was enrolled in have been awarded the appropriate credit, and his grade has been duly fixed to show 3.0 quarter units for the legal clinic courses.

**16. Guideline 5.24:** To bring itself into full compliance, the school should revise and republish its course repetition policy to meet all requirements of the guideline. Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.

**Outstanding Action:** The law school should provide an update as to whether any students have utilized this policy, the notice provided by the law school as to the implications of taking the leave, and the proposed plan that the student will be undertaking after the leave, as part of the law school's April 2023 progress report.

**PCL's Response 5/1/23:**

As of now, we have not had any students who have utilized the course repetition policy.

It is important to note that our course repetition policy is available to all students who may need to repeat a course.

We are committed to providing students with the support and resources they need to achieve their academic goals.

**PCL's Response 6/1/23:**

There have not been any further changes.

**PCL's Response 7/1/23:**

There have not been any further changes.

**PCL's Response 8/1/23:**

There have not been any further changes.

**17. Guidelines 6.2-6.4:** To bring itself into full compliance, the school must devise a plan and a timeline to return to compliance regarding the library by owning and maintaining its own hard copy library as required under Guideline 6.2 and provide this timeline and proof of library purchase to the CBE; however, it may be appropriate to provide a waiver for this academic year while the law school teaches courses online due to the pandemic. In addition, to bring itself into full compliance, PCL should also demonstrate that students are receiving instruction in both physical publication and electronic-based legal research, as required by Guideline 6.3. The Catalog states that legal research is taught in several courses, but a review of syllabi attached to the self-study did not validate that statement. Subsequent to the inspection, the school did confirm that legal research is being taught using both hard copy and electronic resources, and the syllabi are being updated appropriately.

The law school advised in its March progress report that it may comply with the guideline or apply to change its educational category to the distance learning category and comply with that library requirement.

**Outstanding Action:** If the law school plans to change categories, it must file an application to do so as soon as possible to ensure timely consideration, or the law school may not have a determination prior to the start of the law school year. The law school has been advised in 2020, 2021, Summer 2022, and again via this summary that sufficient notice must be provided to allow the Committee to evaluate the law school's request. If the law school plans to implement this transition, it must include its application in full with its April 2023 progress report.

**PCL's Response 5/1/23:**

PCL has accepted an offer for the sale of the building and has agreed to a sixty-day escrow. During the sixty-day escrow PCL will continue to search for a building in which to relocate its fixed-facility instruction.

On or about July 1, 2023 PCL will have the proceeds to purchase the legal library so that students are able to conduct legal research. The new PCL building will house the law library. The State Bar will be kept apprised of the new location.

**PCL's Response 6/1/23:**

We would like to inform you that PCL has included a comprehensive major change report with this report, which is attached herewith.

This major change report encompasses the necessary details and documentation related to our proposed transition. We understand the importance of submitting the application in full to ensure a prompt determination prior to the start of the law school year. Therefore, we have taken diligent steps to provide all relevant information and supporting materials required for a thorough review.

We greatly value the transparency and compliance in the category change process and are committed to following the established procedures.

**PCL's Response 7/1/23:**

The law school does not intend to file a change of instruction and intends to operate classes in person.

As of 6/28/23 PCL has officially entered escrow for the sale of its building and it is awaiting the acceptance of the offer for a building for purchase at REDACTED.

**PCL's Response 8/1/23:**

PCL will remain in its current location, and there will be no change to its address. In response to the Bar's recommendation, PCL has opted to remain at its current location to ensure it has a facility to provide instruction. Although PCL is in the process of selling its current location, PCL has the option, and will exercise it, to remain in the current building for the 2023-2024 academic school year. This extension will provide PCL with more time to secure a suitable location that will allow it to better serve students and provide an environment more conducive to in-person instruction.

Additionally, PCL is in process of securing a REDACTED loan to allow PCL to fund improvements and staffing, which, in turn, will allow us to continue to address the deficiencies noted by the State bar.

Regarding the damage in PCL's current building, PCL is coordinating an inspection and walk-through with a contractor to assess the scope of work and obtain an estimate and timeline for the work. A recently scheduled inspection with the contractor was re-scheduled by the contractor and we are now scheduled to meet on Friday August 4, 2023 to conduct an inspection and obtain an estimate for the work. Among the improvements an initial internal assessment has revealed is replacement of ceiling tiles, windows and flooring, and in the exterior security cameras and lighting.

Should the work not be able to be completed before the beginning of the academic school year, PCL intends to provide instruction in the 1st floor of the building given that the issues with the building are, primarily, confined to the second floor. Our current tenant is amicable to such space sharing while repairs are being undertaken.

**1. How we plan to address the necessary repairs and on what timeline  
The above-mentioned loan PCL is in the process of securing will allow it to make the needed repairs.**

The PCL board is working with professionals to coordinate the necessary repairs in order to host classes for the 2023-2024 academic school year. Firstly, PCL will contract with a professional cleaning service to do a deep steam cleaning of the carpet in the hallways. PCL will then replace the carpet in the large classroom and fix any remaining issues. Among the improvements an initial internal assessment has revealed is replacement of ceiling tiles, windows and flooring, and in the exterior security cameras and lighting. PCL also plans to upgrade and reinforce windows to prevent break-ins and add key card access for building security of building. We estimate the repairs will take three weeks and should be completed by August 25, 2023.

**2. Whether we still intend to move to Slauson and what that address and nature of the property is (why it fulfills our needs).**

PCL has made a purchase offer for a property located at REDACTED. The offer, however, has not been accepted. The property was listed for sale, PCL made a competitive offer, but the sellers have yet to accept



the offer. Pursuant to our brokers at VCA Realty, the sellers are two individuals, and one is re-considering his decision to sell. As such, at this time, PCL does not have plans to relocate to the Slauson property. Even if the offer is accepted, the due diligence period may take several months.

The property is a commercial two-story mixed-use office and retail property. The property would be ideal and more suitable to PCL than the current location. First, the property is smaller. It is approximately 3,000 square feet. PCL's current location is about 10,000.00, but only uses a portion of one floor. As such, the Slauson property would have sufficient space, but will not carry the costs, maintenance and capital improvements that its current property entails. Additionally, it has parking, nine spaces, and street parking. PCL's current location does not have any parking and given that the area is one of the most densely populated neighborhoods of the city of Los Angeles, street parking is a rare commodity. The Slauson property is located in a predominantly working-class neighborhood of people of color. Finally, given the sales prices of about REDACTED, should the sale be consummated, PCL will have sufficient net proceeds from its sale and purchase to be able to invest in the facility, staffing and long-term capacity building.

### **3. Why the original request for HQ change was a 1031 Exchange.**

The original request for a HQ change was considered as a 1031 Exchange, which was my mistake. It has been clarified that a 1031 exchange is not appropriate for non-profit organizations like ours. I apologize for any confusion it may have caused. There was originally a misunderstanding as to whether PCL's sale and purchase constituted a 1031 Exchange. It does not. A 1031 Exchange is undertaken by property owners in order to defer income tax on any gain from a sale of property. As a nonprofit organization, PCL is not liable for income tax, and, therefore, need not partake in 1031 Exchange.

### **4. Who is the legal entity that owns the building**

The owner of the building is The Guild Law School, Inc, a California Corporation. People's College of Law is a fictitious name of The Guild Law School, Inc.

### **5. If that entity is connected to the Lawyer's Guild**

The Guild Law School, Inc., and PCL do not have a legal relationship with the National Lawyer's Guild. It is our understanding that among the founding members were individuals who were members of other organizations, such as National Lawyer's Guild, the La Raza Law Students, the National Law Conference of Black Lawyers, and the Asian Law Collective, among others, some of which no longer exist. Nevertheless, there is no formal legal relationship with the National Lawyers Guild, or any other organization.

## **6. What we intend to do with the proceeds**

Any net proceeds from any sale of PCL's current building will be used to build capacity, increase staffing and make any necessary investments in the facility, library and student programs. Additionally, PCL plans to either hire a part-time fundraiser or use the services of such a person in order to increase its revenue to allow it to ensure its long-term viability.

**18. Guidelines 7.1 and 7.2:** To bring itself into full compliance, the school should maintain essential and permanent hard-copy records in fire-safe lockable cabinets, maintain all electrical equipment in working order, and provide digital projection equipment adequate to meet the needs of faculty and students. Subsequent to the inspection, the school adopted a compliant policy and provided a copy of that policy to the State Bar.

**Outstanding Action:** Given the challenges that the law school experienced locating paper documents related to disclosures, the law school must document in its April 2023 progress report whether files are stored in such a manner that they can be located and produced quickly enough to meet the needs of students, faculty, and the State Bar, and document its implementation and organization in the law school's April 2023 progress report.

## **PCL's Response 5/1/23:**

To address your concern, we do have some files stored in fire-proof filing cabinets on our school premises. However, we are in the process of

transitioning to electronic files to improve efficiency and accessibility. Our aim is to ensure that all files can be located and produced quickly to meet the needs of our students, faculty, and the State Bar.

Regarding enrollment forms, we acknowledge that there has not been a standard process for sending them out in the past.

When the current dean arrived, the enrollment process was already in place by the then-administrator, but it was ineffective. Some enrollment forms were sent via Docusign, some via email, and others via regular mail, resulting in a lack of consistency and clarity.

The current dean is working to address this issue by implementing a standardized process for enrollment forms. We understand that this process needs improvement, and we are committed to making the necessary changes to ensure that it is more efficient, effective, and consistent.

It is important to note that the administrator who was in charge of this process when I was hired did not have higher education experience or experience working in an education setting. We recognize that this may have contributed to some of the inefficiencies in the enrollment process. However, we are confident that with the current dean's leadership and the ongoing efforts of our team, we can improve the process and provide better service to our students, faculty, and the State Bar

### **PCL's Response 6/1/23:**

To address the concerns and demonstrate our commitment to evolving our processes for improved recordkeeping, we have implemented Zapier as a key component of our file management system. Zapier is an automation tool that seamlessly integrates with various platforms, enabling us to streamline and automate our record keeping procedures.

With Zapier, we have set up automated workflows that ensure the systematic storage of signed documents. When a document is signed, Zapier automatically saves it directly into our designated Dropbox folder, providing a secure and organized repository for important files. Furthermore, this automation extends to attachments sent to us, which are automatically saved to both our Dropbox and Google Drive folders. By leveraging Zapier's capabilities, we are enhancing our recordkeeping practices, eliminating manual efforts, and mitigating the risk of data discrepancies.

This implementation signifies our proactive approach to address the previous challenges encountered in producing key disclosure files. By utilizing Zapier's automation, we have established a more efficient and reliable system that promotes consistency, accuracy, and timely access to pertinent documents. We will continue to refine and optimize our processes, leveraging technology to uphold the highest standards of recordkeeping and ensure compliance with the expectations set forth by the Bar Association.

**PCL's Response 7/1/23:**

There have not been any further changes.

**PCL's Response 8/1/23:**

There have not been any further changes.

**19. Guideline 9.1:** To bring itself into full compliance, the school should adopt and implement a policy to ensure that records are fully compliant with Guideline 9.1, that the law school has adopted written procedures, including oversight provisions, of record-keeping processes and record retention requirements, and that it has adopted a written policy on transcript changes, as required by Guideline 9.1(D) Subsequent to the inspection, the school adopted compliant policies and provided the State Bar with copies of those policies.

**Outstanding Action:** Ensure that all materials identified in the guideline are stored in an organized manner and easily accessible to the law school and readily produced to State Bar staff upon request.

**PCL's Response 5/1/23:**

We strive to ensure that all materials identified in the guideline are stored in an organized manner and are easily accessible to the law school. We understand the importance of readily producing these materials to State Bar staff upon request, and we are committed to meeting this requirement. As of fall 2022, all new files and documents are stored in an organized folder online. This system allows for easy access and retrieval of information by

authorized personnel within the law school. It also allows for the materials to be produced quickly upon request by the State Bar staff.

However, we acknowledge that there are still older files from before fall 2022 that are currently stored in the fire-proof filing cabinet. We are actively working to digitize these files to ensure that they are also accessible and easily produced when needed.

### **PCL's Response 6/1/23:**

To ensure full compliance with Guideline 9.1 and address the Bar's recommendations, we have devised a timeline for the creation and finalization of the required policies. Our goal is to have these policies implemented and ready for use by September 1. The timeline is as follows:

#### **1. June 1-15: Policy Research and Development**

- Conduct comprehensive research on record-keeping processes, record retention requirements, and transcript changes as outlined in Guideline 9.1.
- Draft initial versions of the policies, ensuring alignment with the Bar's requirements and best practices in the field.

#### **2. June 16-30: Policy Review and Refinement**

- Seek input and feedback from relevant stakeholders, including administration, faculty, and legal experts, to refine the drafted policies.
- Conduct internal reviews and revisions based on the feedback received.
- Ensure the policies are comprehensive, clear, and reflect the specific needs and context of our law school.

#### **3. July 1-31: Policy Implementation and Oversight**

- Finalize the policies and prepare them for official adoption.
- Establish oversight provisions to ensure compliance with the policies.
- Communicate the policies to all relevant staff members and provide training on their implementation and adherence.

#### **4. August 1-31: Policy Distribution and Submission**

- Distribute copies of the finalized policies to the State Bar, demonstrating our commitment to compliance.
- Ensure all necessary documentation and records are in place to support the implementation of the policies.
- Confirm that the policies align with the requirements of Guideline 9.1 and provide transparency in our record-keeping and transcript change procedures.

By adhering to this timeline, we aim to develop robust policies that meet the Bar's requirements and promote consistent, compliant record-keeping practices within our law school. We are committed to timely action and will dedicate the necessary resources to ensure the policies are finalized, implemented, and ready for use by September 1, providing us with a solid foundation for effective record management and transcript change

### **PCL's Response 7/1/23:**

We have taken the following steps and included such in the policy draft which reads, "PCL employees will take the following measures to for the safe-keeping of records and record retention..

1. Categorization and Labeling: All materials have been categorized and labeled for easy identification.
2. Physical and Digital Storage: We have designated storage areas and implemented a digital archiving system for efficient retrieval.
3. Access Control: Authorized individuals only have access to handle the materials, maintaining confidentiality.
4. Inventory Management: We have implemented an inventory system to track the location and status of each material.

These efforts enable us to promptly respond to State Bar staff requests and meet regulatory requirements.

PCL's written policy on transcript changes:

Changes to entries on a PCL transcript may be made only upon a showing of good cause.

However, a contention or possibility that a grade given by an instructor was not justified shall not be good cause or an acceptable reason for a transcript change. If a present or former student wishes a change to an entry on the person's transcript, the following procedures apply:

1. The present or former student must submit a written application to the Dean, specifying the change requested and the reasons for it. The application must include any documentation or evidence supporting the application.

2. The Dean must investigate the facts and circumstances pertinent to the application. In doing so, the Dean must read the entire application and materials submitted with it. The applicant shall have the right to speak with the Dean in support of the application, and to have an attorney or other representative do so as well. If the applicant requests the Dean to listen to any other person with information pertinent to the application, the Dean shall do so, but the Dean need not listen to an excessive number of such persons. The Dean may also communicate any person who may have information pertinent to the application, including but not limited to any present or former faculty member. The Dean may also speak with the Registrar, the Administrator and any other person with information pertinent to the application. The Dean may also consult any person outside PCL who has expertise on the subject of transcripts, but shall maintain the confidentiality of the student's information by not disclosing the identity of the applicant. Before the Dean transmits to the applicant the Dean's decision on the application, the applicant may submit additional materials to the Dean, who must read them if time permits.
3. Within thirty days after receiving the application, the Dean must render a written decision on it and transmit the decision to the applicant. The Dean shall cause the application and decision and any materials the Dean read or considered in connection with the application to be placed in the applicant's student file. If the decision is that a change is to be made, the decision must specify the change, and if the applicant has not requested an appeal within the fourteen days to appeal, Dean shall transmit the decision to the Registrar, who shall make the specified change on the transcript, and place on the transcript a notation of the reason(s) for the change.
4. The applicant may appeal the decision of the Dean to the Community Board, but may do so only by transmitting to the Chair of the Board a request for appeal within fourteen days of receiving the Dean's decision. In the request, the applicant must state whether the applicant consents to participation in the appeal by student members of the Community Board. The Community Board may delegate the appeal to the Executive Committee. Within thirty days after the Chair receives the request for appeal, the Community Board or the Executive Committee, as the case may be, shall render a written decision on the appeal, and transmit it to the applicant. The Chair shall cause the request for appeal and any materials read or considered in connection with the appeal to be placed in the applicant's student file. If the decision on appeal is that a change

is to be made, the decision must specify the change, and the Chair shall transmit the decision to the Registrar, who shall make the specified change on the transcript and place on the transcript a notation of the reason(s) for the change..

5. No student member of the Community Board or the Executive Committee shall participate in the appeal unless the applicant consents in writing to participation by students.

#### **PCL's Response 8/1/23:**

PCL retains the same policy and no change has been made.

#### **Adopted Suggestions to Enhance Compliance**

**1. Pursuant to Guidelines 2.9(C) and 5.13,** it is suggested that the school requires faculty to use a standard syllabus template to promote consistent communication of course requirements. Subsequent to the inspection, the school purchased a commercially available software package that includes a standard syllabus template which was adopted.

**Outstanding Action:** Please confirm whether this template is being used for all classes, and, if not, which classes use it and what system is in place for the other classes, and document the law school's response in the April 2023 progress report.

#### **PCL's Response 5/1/23:**

We confirm that the standard syllabus template is being used for all classes at our law school, promoting consistency and clarity in course expectations for our students.

#### **PCL's Response 6/1/23:**

There has been no change and the same policy is in place.

#### **PCL's Response 7/1/23:**



There has been no change and the same policy is in place.

**PCL's Response 8/1/23:**

There has been no change and the same policy is in place.

**2. Pursuant to Guidelines 2.11, 7.1, and 9.1,** it is suggested that the school bases its data security policies and procedures upon the recommendations of generally accepted industry standards, consulting with an expert if the expertise is not available within the school. Subsequent to the inspection, the school purchased commercially available software package with these features included, and purchased the appropriate storage cabinets to protect hard copy files.

**Outstanding action:** Please continue to document the law school's status of implementation of the software and secure storage, as part of the April 2023 progress report.

**PCL's Response 5/1/23:**

Our Registrar/Administrator has largely completed the very substantial job of entering the digital records into Populi.

PCL continues to utilize the above-listed student information system, Populi. As such, Populi has built-in features that are adequate to protect the school's digital records.

**PCL's Response 6/1/23:**

PCL continues to utilize Populi that includes security features, and purchased the appropriate storage cabinets to protect hard copy files. Our current registrar/administrator continues to digitize student records and update Populi.

**PCL's Response 7/1/23:**

There has been no change and the same policy is in place.

**PCL's Response 8/1/23:**

There has been no change and the same policy is in place.

**3. Pursuant to Guidelines 5.14 through 5.16 and 5.25,** it is suggested that the school adopts and implements a procedure requiring that exam questions, accompanied by issue outlines or model answers, must be reviewed, and approved by the dean or another legal educator before being administered. Subsequent to the inspection, the school began evaluating this suggestion.

**Outstanding Action:** Please advise the status of a policy and implementation of that policy, including which staff or volunteers will carry it out and their qualifications to do so, and document these efforts in the April 2023 progress report.

**PCL's Response 5/1/23:**

PCL continues to review its exam process which includes reviewing the exam questions and grading rubric before sending them to the testing software company. These documents are emailed to the dean who then forwards them to the committee members.

The Dean is actively working with the Faculty Curriculum Committee (FCC) and meetings are scheduled monthly to oversee and improve the curriculum continuously.

In addition to the monthly FCC meetings, PCL has integrated curriculum alignment faculty meetings with the 1L faculty this year. The purpose of these meetings was to support first-year exam preparation efforts taking place on Saturdays with the resource coordinator and academic preparation in the classroom.

**PCL's Response 6/1/23:**

PCL's revised policies have remained in effect to the present.

**PCL's Response 7/1/23:**

There has been no change and the same policy is in place.

#### **PCL's Response 8/1/23:**

There has been no change and the same policy is in place.

**4. Pursuant to Guidelines 5.17, 5.18, and 5.25,** it is suggested that the school adopt and implement a procedure requiring grades and student exams papers to be reviewed and approved by the dean or another legal educator before being posted. Subsequent to the inspection, the school began evaluating this suggestion.

**Outstanding Action:** The law school must continue to evaluate its process for grade and exam review and approval, and document its process as part of its April 2023 progress report.

#### **PCL's Response 5/1/23:**

PCL continues to evaluate the process for grade and exam review and approval.

As part of this process, we are utilizing the grade review policy outlined in the student handbook. With the recent transfer of our website to Squarespace, the grade view process for students will be easily accessible under the student section of the website.

As part of our technology plan, we will include a section where students can find readily available information, including the grade review policies, forms for such procedures, and timelines that include automated confirmation of submission. We hope that these improvements will make it easier for our students to access and understand our grade review process.

#### **PCL's Response 6/1/23:**

The grade review (attached in **Attachment D**) policy and process is now available on the school's website. The button is located under the Current Student tab in its own clearly labeled page: Grade review policy. A large black button to the form is available for download. Instructions to submit the form

are available on the website and an email hyperlink is available. The grade review policy and process are complete.

**PCL's Response 7/1/23:**

No changes have been made to the grade review policy and process since the last report. The policy is still available on the school's website under the "Grade review policy" page, accessible through the Current Student tab. The form can be downloaded easily, and instructions for submission are provided. Rest assured that the grade review policy and process remain the same.

**PCL's Response 8/1/23:**

There has been no change and the same policy is in place.

# Attachment A

## 2022-2023 ENROLLMENT DISCLOSURE AUDIT REFUNDS DUE - SUMMARY

LAST NAME	FIRST NAME	FALL REFUND	WINTER REFUND	SPRING REFUND	TOTAL REFUND	NOTES
REDACTED	REDACTED	\$ REDACTED	\$ -	\$ REDACTED	\$ REDACTED	REDACTED
REDACTED	REDACTED	\$ -	\$ -	\$ REDACTED	\$ REDACTED	REDACTED
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	-
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	-
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	-
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	-
REDACTED	REDACTED	\$ REDACTED	\$ -	\$ -	\$ REDACTED	REDACTED
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	- Withdrew. No fees paid.
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	-
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	- No fees paid. No course work taken Fall and Winter.
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	-
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	- Withdrew. No fees paid.
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	-
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	-
REDACTED	REDACTED	\$ -	\$ REDACTED	\$ REDACTED	\$ REDACTED	REDACTED
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	-
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	- Withdrew. No fees paid.
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	- Withdrew. No fees paid.
REDACTED	REDACTED	\$ -	\$ -	\$ REDACTED	\$ REDACTED	REDACTED
REDACTED	REDACTED	\$ -	\$ REDACTED	\$ REDACTED	\$ REDACTED	REDACTED
REDACTED	REDACTED	\$ -	\$ -	\$ -	\$ -	-
<b>TOTALS</b>		<b>\$ REDACTED</b>	<b>REDACTED</b>	<b>REDACTED</b>	<b>REDACTED</b>	

Fall 2022 Disclosure Compliance Audit

Last	Name	Disclosure Date	PMT Date	PMT AMT	Non-compliant AMT	Refund Due - AMT	Notes
REDACTED	REDACTED	02/09/2022	16/09/2022	REDACTED	0	0	0 Payment included fees for fall and winter. Winter out of compliance.
REDACTED	REDACTED	26/08/2022	21/12/2022	REDACTED	0	0	0 No payment made. Balance paid on 12/21.
REDACTED	REDACTED	18/08/2022	0	0	0	0	0 No tuition payments made. Employer sponsored. Full balance is currently due
REDACTED	REDACTED	18/08/2022	SEE NOTES	0	0	0	0 PAYMENT PLAN. ALL PAYMENTS FOR CORRESPONDING QUARTER IN COMPLIANCE.
REDACTED	REDACTED	06/09/2022	05/01/2023	REDACTED	0	0	0
REDACTED	REDACTED	18/08/2022	17/11/2022	REDACTED	0	0	0
REDACTED	REDACTED	Unsigned		0	0	0	0 Withdrew. No fees paid.
REDACTED	REDACTED	18/08/2022	n/a	0	0	0	0 No fees paid.
REDACTED		02/09/2022					0
REDACTED	REDACTED	06/09/2022	15/09/2022	REDACTED	0	0	0
REDACTED	REDACTED	05/09/2022	15/09/2022	REDACTED	0	0	0
REDACTED	REDACTED	01/11/2022	05/10/2022	REDACTED	REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	02/09/2022	20/09/2022	REDACTED	0	0	Unsigned on populi. Signed Docusign.
REDACTED	REDACTED	09/09/2022	20/09/2022	REDACTED	0	0	0
REDACTED	REDACTED	Unsigned	06/09/2022	REDACTED	REDACTED	0	OREDACTED0
REDACTED	REDACTED	02/09/2022	13/09/2022	REDACTED	0	0	0
REDACTED		03/09/2022	07/01/2022	REDACTED	0	0	0 Returning student. Fees not assessed for 2022-2023
REDACTED		12/09/2022	27/09/2022	REDACTED	0	0	0
REDACTED	REDACTED	08/09/2022	08/09/2022	REDACTED	0	0	0
REDACTED	REDACTED	03/09/2022	n/a	0	0	0	0 No payment made.
REDACTED	REDACTED	n/a	n/a	n/a	0	0	0
							REDACTED

Winter 2022 Disclosure Compliance Audit

Last	Name	Disclosure Date	PMT Date	PMT AMT	Non Compliant AMT	Refund Due - AMT	Notes
REDACTED	REDACTED	12/11/2022	16/09/2022	REDACTED	REDACTED	REDACTED	Tuition paid with Fall fees. Winter non-complaint
REDACTED	REDACTED	15/11/2022	21/12/2022	REDACTED	0	0	
REDACTED	REDACTED	15/11/2022	0	0	0	0	No tuition payments made. Employer sponsored. Full balance is currently due
REDACTED	REDACTED	01/11/2022					0 payment plan. All installments in compliance
REDACTED	REDACTED	15/11/2022	0	0	0	0	No tuition payment
REDACTED	REDACTED	15/11/2022	17/02/2022	REDACTED	0	0	
REDACTED	REDACTED	withdrew	0	0	0	0	Withdrew. No fees paid.
REDACTED	REDACTED	26/12/2022					0
REDACTED	REDACTED	03/12/2023	03/12/2022	REDACTED	0	0	
REDACTED	REDACTED	15/11/2023	28/11/2022	REDACTED	0	0	
REDACTED	REDACTED	14/12/2022	14/12/2022	REDACTED	0	0	
REDACTED	REDACTED	01/11/2022	see notes	see notes	REDACTED	REDACTED	Non compliant Payment totaling REDACTED made on 10/10 . Compliant payments totaling on REDACTED made on 11/01/22, 11/15 and 11/30
REDACTED	REDACTED	12/01/2023	16/01/2023	REDACTED	0	0	
REDACTED	REDACTED	unsigned	30/11/2022	REDACTED	0	0	
REDACTED	REDACTED	15/11/2022	29/12/2022	REDACTED	0	0	
REDACTED	REDACTED	n/a	n/a	n/a	0	0	not enrolled
							REDACTED

Spring 2023 Disclosure Compliance Audit

Last	Name	Disclosure Date	PMT Date	PMT AMT	Non compliant AMT	Refund Due - AMT	
REDACTED	REDACTED	05/03/2022	12/12/2022	REDACTED	REDACTED	REDACTED	
REDACTED	REDACTED	07/03/2023	07/03/2023	REDACTED	0	0.00	
REDACTED	REDACTED	03/03/2023	0	0	0	0.00	No tuition payments made. Employer sponsored. Full balance is currently due
REDACTED	REDACTED	05/03/2022				0.00	
REDACTED	REDACTED	26/01/2022	0	0	0	0.00	No tuition payment
REDACTED	REDACTED	03/03/2023	23/07/2023	REDACTED	0.00	0.00	
REDACTED	Unsigned			0	0	0.00	Has not paid spring balance
REDACTED	REDACTED	06/03/2023	17/03/2023	REDACTED	0	0.00	
REDACTED	REDACTED	27/03/2023	19/02/2023	REDACTED	REDACTED	REDACTED	
REDACTED	REDACTED	Unsigned	11/03/2023	REDACTED	REDACTED	REDACTED	
REDACTED	REDACTED	Unsigned	see notes	see notes	REDACTED	REDACTED	Payments totaling 1866.66 made on 11/30; 2/11; 2/24; 3/06
REDACTED	REDACTED	03/03/2023	03/03/2023	REDACTED	0	0.00	
REDACTED	REDACTED	Unsigned		0	0	0.00	No payment made. Outstanding tuition balance
REDACTED	REDACTED	29/03/2023	29/12/2022	REDACTED	REDACTED	REDACTED	
REDACTED	REDACTED	Unsigned	n/a	n/a	0	0.00	No payment made. Outstanding tuition balance
						REDACTED	





# Certificate Of Mailing

To pay fee, affix stamp  
meter postage here

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing.  
This form may be used for domestic and international mail.

11-2500

PAID

REDACTED

PS Form 3817, April 2007 PSN 7530-02-000-9065



# Certificate Of Mailing

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meter postage here

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing.  
This form may be used for domestic and international mail.

From: People's  
GG O S

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PS Form 3817, April 2007 PSN 7530-02-000-9065



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From: People's

REDACTED

PS Form 3817, April 2007 PSN 7530-02-000-9065

ATTACHMENT B

 <b>THOMSON REUTERS™</b>	<b>Order Form</b> <b>Order ID: REDACTED</b>  Contact your representative REDACTED with any questions. Thank you.
--	---

<b>Sold To Account Address</b>  Account #: REDACTED  PEOPLES COLLEGE OF LAW DTP  REDACTED    “Customer”	<b>Shipping Address</b>  Account #: REDACTED  PEOPLES COLLEGE OF LAW DTP  REDACTED	<b>Billing Address</b>  Account #: REDACTED  PEOPLES COLLEGE OF LAW  DTP    REDACTED
---	--	--

This Order Form is a legal document between Customer and

- A. West Publishing Corporation to the extent that products or services will be provided by West Publishing Corporation, and/or
- B. Thomson Reuters Enterprise Centre GmbH to the extent that products or services will be provided by Thomson Reuters Enterprise Centre GmbH.

A detailed list of products and services that are provided by Thomson Reuters Enterprise Centre GmbH and current applicable IRS Certification forms are available at: <https://www.tr.com/trorderinginfo>

West Publishing Corporation may also act as an agent on behalf of Thomson Reuters Enterprise Centre GmbH solely with respect to billing and collecting payment from Customer. Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation will be referred to as “Thomson Reuters”, “we” or “our,” in each case with respect to the products and services it is providing, and Customer will be referred to as “you”, or “your” or “Client”.

West Complete Products  
See Attachment for Details

Material #	Product Name	Charges	Minimum Term (Months)
40666420	West Complete Library Subscription	REDACTED	60

West Complete Term

During your West Complete subscription term, you will receive subscription services consisting of automatic shipments of updates and supplements to the print product, including but not limited to pocket parts, pamphlets, replacement volumes, or loose-leaf pages. If your West Complete subscription includes ProView eBook titles, you will receive subscription services. For eBook products you will receive updates to the most current version of each edition of the eBooks which are available during your subscription terms.

Your West sales representative will provide frequency of updates upon request. Transportation charges, return and refund information is in the "Miscellaneous" section below.

#### Minimum Terms

Monthly Charges begin on the date we process your order and will be prorated for the number of days remaining in that calendar month, if any. Monthly Charges will continue for the number of complete calendar months listed in the Minimum Term column above. If your Minimum Term is longer than 12 months, then your Monthly Charges for each year of the Minimum Term are displayed in the Attachment to the Order Form.

#### Post Minimum Terms

           **Initial for Automatic Renewal Term.** I understand that West will continue to provide subscription services for the products listed above after the Minimum Term. Each Automatic Renewal Term will be 12 months in length ("Automatic Renewal Term") and we will notify you of any changes to your Charges at least 60 days before each Automatic Renewal Term begins. Automatic Renewal Charges will be in effect the month before the Automatic Renewal Term starts. Either of us may cancel in writing at least 30 days before an Automatic Renewal Term starts.

#### Miscellaneous

**Applicable Law.** If you are a state or local governmental entity, your state's law will apply, and any claim may be brought in the state or federal courts located in your state. If you are a non-governmental entity, this Order Form shall be interpreted under Minnesota state law and any claim by one of us shall exclusively be brought in the state or federal courts in Minnesota. If you are a United States Federal Government subscriber, United States federal law will apply, and any claim may be brought in any federal court.

**Charges, Payments & Taxes.** You agree to pay all charges in full within 30 days of the date of invoice. You are responsible for any applicable sales, use, value added tax (VAT), etc. unless you are tax exempt. If you are a non-government customer and fail to pay your invoiced charges, you are responsible for collection costs including attorneys' fees.

**eBilling Contact.** All invoices for this account will be emailed to your e-Billing Contact(s) unless you have notified us that you would like to be exempt from e-Billing.

**Credit Verification.** If you are applying for credit as an individual, we may request a consumer credit report to determine your creditworthiness. If we obtain a consumer credit report, you may request the name, address and telephone number of the agency that supplied the credit report. If you are applying for credit on behalf of a business, we may request a current business financial statement from you to consider your request.

**Cancellation Notification Address.** Send your notice of cancellation to Customer Service, 610 Opperman Drive, P.O. Box 64833, Eagan MN 55123-1803

**Returns and Refunds.** You may return a print product to us within 45 days of the original shipment date if you are not completely satisfied. Please see <http://static.legalsolutions.thomsonreuters.com/static/returns-refunds.pdf> or contact Customer Service at 1-800-328-4880 for additional details regarding our policies on returns and refunds.

**Document Intelligence Product Specific Terms:** The following product specific terms shall apply to the Document Intelligence products on this order form, and are incorporated by reference: [www.ThomsonReuters.com/DocIntel-PST](http://www.ThomsonReuters.com/DocIntel-PST)

**Product Specific Terms and Information Security Controls:** The following product specific terms and information security controls shall apply to the HighQ products on this order form, and are incorporated by reference:

- HighQ Product Specific Terms <http://tr.com/HighQ-PST>
- HighQ Information Security Controls <http://tr.com/HighQ-InfoSec>

**Service Levels:** Thomson Reuters shall provide service availability, maintenance and support for the term of the Agreement. Details are available at: <http://tr.com/HighQ-SLA>

**Product Specific Terms.** The following products have specific terms which are incorporated by reference and made part of this Order Form if they apply to your order. They can be found at <https://static.legalsolutions.thomsonreuters.com/static/ThomsonReuters-General-Terms-Conditions-PST.pdf>. If the product is not part of your order, the product specific terms do not apply. If there is a conflict between product specific terms and the Order Form, the product specific terms control.

- Campus Research
- Contract Express
- Hosted Practice Solutions
- ProView eBooks
- Time and Billing
- West km Software
- West LegalEdcenter
- Westlaw
- Westlaw Doc & Form Builder
- Westlaw Paralegal
- Westlaw Patron Access
- Westlaw Public Records

#### Amended Terms and Conditions

#### Government Non-Availability of Funds for Print Program/West Complete/Assured Print Pricing Products

After the initial 12 months, you may cancel a product or service with at least 30 days written notice if you do not receive sufficient appropriation of funds. Your notice must include an official document, (e.g., executive order, an officially printed budget or other official government communication) certifying the non-availability of funds. You will be invoiced for all charges incurred up to the effective date of the cancellation.

#### Acknowledgement: Order ID: REDACTED

REDACTED

Signature of Authorized Representative for order

REDACTED

Printed Name

Treasurer, Board of Directors

Title

August 1, 2023

Date

This Order Form will expire and will not be accepted after 9/29/2023.



Attachment

Order ID: REDACTED

Contact your representative REDACTED with any questions. Thank you.

Payment, Shipping, and Contact Information

Payment Method:

Order Confirmation Contact (#28)

Payment Method: Bill to Account

Contact Name: REDACTED

Account Number: REDACTED

Email: REDACTED

This order is made pursuant to:

eBilling Contact

Shipping Information:

Contact Name REDACTED

Shipping Method: Ground Shipping - U.S. Only

Email REDACTED

West Complete Products

\*If subscription type is “new”, the Ship To Address will be the same shipping address as on the Order Form..

Material #	Group	Product Name	Quantity	Subscription Type	Shipment or Entitlement Type for Products Indicated as NEW
22040614	Bundle A	West's® Annotated California Codes (Annotated Statute & Code Series)	1	New	Ship & Enter Subscription
40217465	Bundle A	West's® California Reporter®, 3d	1	New	Ship & Enter Subscription
22080136	Bundle A	California Reporter Advance Sheets	1	New	Ship & Enter Subscription
22083887	Bundle A	West's® California Digest, 2d (1950 to Date) (Key Number Digest®)	1	New	Ship & Enter Subscription

Charges During Minimum Term											
Material #	Product Name	Year 1 Charges per Billing Freq	% incr Yr 1-2*	Year 2 Charges per Billing Freq	% incr Yr 2-3*	Year 3 Charges per Billing Freq	% incr Yr 3-4*	Year 4 Charges per Billing Freq	% incr Yr 4-5*	Year 5 Charges per Billing Freq	Billing Freq
40666420	West Complete Library Subscription	REDACTED	4.00%	REDACTED	4.00%	REDACTED	4.00%	REDACTED	4.00%	REDACTED	Monthly

Charges During Minimum Term

Pricing is displayed only for the years included in the Minimum Term. Years without pricing in above grid are not included in the Minimum Term. Refer to your Order Form for the Post Minimum Term pricing. Refer to Order Form for Billing Frequency Type.





REDACTED

---

**Fwd: Your Amazon.com order of "Wills, Trusts, and Estates..." and 8 more items.**

---

REDACTED &lt;REDACTED&gt;

Mon, 31 Jul, 02:10

To: REDACTED &lt;REDACTED&gt;

Cc: REDACTED <administrator@peoplescollegeoflaw.edu>, REDACTED <REDACTED>,  
REDACTED <REDACTED>

FYI: Book order confirmation.

----- Forwarded message -----

From: **Amazon.com** <[auto-confirm@amazon.com](mailto:auto-confirm@amazon.com)>

Date: Sun, Jul 30, 2023 at 6:08 PM

Subject: Your Amazon.com order of "Wills, Trusts, and Estates..." and 8 more items.

To: <[ismael.venegas@gmail.com](mailto:ismael.venegas@gmail.com)>**Order Confirmation**

Hello REDACTED,

Thank you for shopping with us. We'll send a confirmation when your items ship.

Your purchase has been divided into **5** orders.**Order 1 of 5**Order **REDACTED****Shipment 1 of 2**

Arriving:

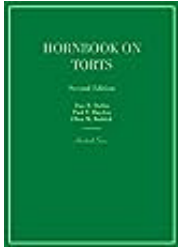
**Tuesday, August 1**

Ship to:

**Peoples****LOS ANGELES, CA**[View or manage order](#)



Community Property in Calif...  
Qty : 1



Hornbook on Torts (Hornbooks)  
Qty : 1



Criminal Law (Hornbooks)  
Qty : 1

Shipment 2 of 2

Arriving:  
tomorrow, July 31

Ship to:  
Peoples  
LOS ANGELES, CA

[View or manage order](#)



Civil Procedure: [Connected...]  
Qty : 1

Order Total: REDACTED

Order 2 of 5

Order REDACTED

Arriving:  
Thursday, August 3 -  
Tuesday, August 8

Ship to:  
Peoples  
LOS ANGELES, CA



[View or manage order](#)

Order Total: REDACTED



The Law of Business Organiz...  
Qty : 1

## Order 3 of 5

---

Order REDACTED

Arriving:  
**August 8**

Ship to:  
**Peoples  
LOS ANGELES, CA**

[View or manage order](#)

Order Total: REDACTED



Legal Ethics in the Practic...  
Qty : 1

## Order 4 of 5

---

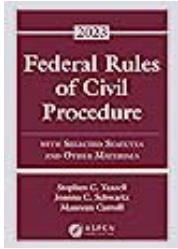
Order REDACTED

Arriving:  
**Monday, Jul 31, 7 a.m. – 11 a.m.**

Ship to:  
**Peoples  
LOS ANGELES, CA**

[View or manage order](#)

Order Total: REDACTED



Federal Rules of Civil Proc...  
Qty : 1



Wills, Trusts, and Estates,...  
Qty : 1

Order 5 of 5

Order #REDACTED

Arriving:  
**Tuesday, August 1 -**  
**Friday, August 4**

Ship to:  
**Peoples**  
**LOS ANGELES, CA**

[View or manage order](#)

Order Total: REDACTED



Cases and Problems on Contr...  
Qty : 1

We hope to see you again soon.  
Amazon.com

[Quoted text hidden]

Questions regarding this form or the administrative faculty annual evaluation process should be directed to the administrator or to the dean via email: REDACTED.

Evaluation Period End Date: \_\_\_\_\_

--

*Describe any special projects or notable accomplishments that contributed to the success at PCL.*

**Goals and Objectives**

*Describe your progress toward fulfilling the goals and objectives established during your last evaluation.*

*List your goals and objectives for the upcoming year.*

**Professional Development Plan**

*What professional development or training opportunities did you participate in during the current evaluation period? In what ways were they helpful to your job performance?*

*What professional development or training would you like undertake to improve your job performance and meet your goals for the next evaluation period?*

**COVID Impact Statement**

*As part of the 2021 annual evaluation process, we encourage you to provide a brief statement on COVID-19 impacts. For example, how has COVID-19 impacted your productivity and what challenges did you face? This question is optional.*

## Faculty Evaluation Form

*This form is for annual evaluations of all faculty, regardless of type of appointment.  
All faculty are required to be evaluated annually per State Bar rule, Guideline 4.7.*

Department: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Faculty member: \_\_\_\_\_ Effective hiring date: \_\_\_\_\_

Academic rank: \_\_\_\_\_ Since: \_\_\_\_\_ Highest degree: \_\_\_\_\_

Number of years of teaching experience: \_\_\_\_\_

Purpose of review:

\_\_\_\_ Probationary/tenure track  
\_\_\_\_ Tenure  
\_\_\_\_ Promotion  
\_\_\_\_ Annual

Period covered by the review (include the year)

\_\_\_\_ Academic Year \_\_\_\_  
\_\_\_\_ Fall only \_\_\_\_  
\_\_\_\_ Spring only \_\_\_\_  
\_\_\_\_ Other (specify) \_\_\_\_\_

### 1. Workload Expectations:

% Scheduled Teaching	% Scholarly/Research Activity	% Service	% Administration	% Other Activities
-------------------------	----------------------------------	-----------	------------------	-----------------------

**2. Evaluation:** Directions: Use the following five categories to describe the faculty member's performance relative to the expectations and goals (i.e., Position job Description). A thorough narrative commentary must be provided to justify each selection. Mere selection of a category does not constitute evaluation and will not be accepted.

Exceptional Performance: Designation used in extremely rare cases where the faculty member merits special recognition for unequivocally superior and exceptional performance (i.e., excellent student reviews, community service to the school). Supporting evidence must be presented in the narrative.

Exceeds Expectations: Designation used to indicate that certain aspects of the faculty member's performance substantially and frequently exceed that described in their position description. Supporting evidence must be presented in the narrative.

Meets Expectations: Designation used when the faculty member's performance is of high quality, fulfills expectations, and periodically may exceed them as described in his/her position description.

Requires Development: Designation used to indicate that certain aspects of the faculty member's performance does not consistently meet expectations and require improvement. The narrative must address specific areas that need improvement and include goals to get there.

Unsatisfactory: Designation used in cases where work is below the basic requirements of the job description and improvement is required, are not meeting professional obligations, or are simply incompetent. **Strong** supporting evidence must be presented in the narrative.

### SCHEDULED TEACHING

<input type="checkbox"/> Exceptional Performance	<input type="checkbox"/> Exceeds Expectations	<input type="checkbox"/> Meets Expectations	<input type="checkbox"/> Requires Development	<input type="checkbox"/> Unsatisfactory
--	---	---	---	---

Narrative:

**SCHOLARY/RESEARCH ACTIVITY**

<input type="checkbox"/> Exceptional Performance	<input type="checkbox"/> Exceeds Expectations	<input type="checkbox"/> Meets Expectations	<input type="checkbox"/> Requires Development	<input type="checkbox"/> Unsatisfactory
--	---	---	---	---

Narrative:

---

**SERVICE TO THE SCHOOL COMMUNITY**

<input type="checkbox"/> Exceptional Performance	<input type="checkbox"/> Exceeds Expectations	<input type="checkbox"/> Meets Expectations	<input type="checkbox"/> Requires Development	<input type="checkbox"/> Unsatisfactory
--	---	---	---	---

Narrative:

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**CLASSROOM ADMINISTRATION (GRADES, ATTENDANCE, SYLLABUS TURNED IN ON TIME)**

<input type="checkbox"/> Exceptional Performance	<input type="checkbox"/> Exceeds Expectations	<input type="checkbox"/> Meets Expectations	<input type="checkbox"/> Requires Development	<input type="checkbox"/> Unsatisfactory
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Narrative:

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**OTHER ACTIVITIES**

<input type="checkbox"/> Exceptional Performance	<input type="checkbox"/> Exceeds Expectations	<input type="checkbox"/> Meets Expectations	<input type="checkbox"/> Requires Development	<input type="checkbox"/> Unsatisfactory
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Narrative:

**3. FCC Evaluations Committee** (List all committee members and include committee chair signature)

Committee Chair \_\_\_\_\_  
Signature Date

**4. Department Chair's Evaluative Narrative** (Required for all faculty. Fill in or attach separate page):

Was this evaluation made in accordance with a set of written departmental evaluation procedures on file in the College office and communicated to faculty member? ☐ Yes ☐ No

Department Chair \_\_\_\_\_ Signature  
Date

**5. Faculty Member:**

I have been given the opportunity to review the contents of my file. ☐ Yes ☐ No

I have seen this evaluation and discussed it with the appropriate departmental representative.  
☐ Yes ☐ No

**Check one as appropriate.**

☐ I agree with the evaluation.

☐ I disagree with all or part of the evaluation.

☐ I disagree with all or part of the evaluation and intend to give my department chair a written statement within five working days.

Faculty Member

\_\_\_\_\_  
Signature Date

**6. Dean's Comments:**

Dean

\_\_\_\_\_  
Signature Date



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A green checkmark icon inside a circle, followed by the text "ZipApply".

**Registrar/Development**

Peoples College of Law

Los Angeles, CA, USA

Please include the position title in the subject line of the email. We look forward to receiving your application!

**About Peoples College of Law:**

People's College of Law is a pioneering educational institution committed to social justice and community empowerment. We strive to create a nurturing environment that fosters critical thinking, legal advocacy, and activism. Join us in making a lasting impact on society through education and progressive values.

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## Administrative Assistant

Peoples College of Law

Los Angeles, CA, USA



Full-Time



REDACTED to REDACTED per hour

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Estimated pay

### Why Work Here?

*Join People's College of Law, where education meets social justice, empowering minds and creating positive change in our communities!*

Job Title: Administrative Assistant

Are you detail-oriented, organized, and eager to support a mission-driven organization? People's College of Law is seeking a dedicated Administrative Assistant to be the backbone of our daily operations.

Responsibilities:

1. Office Management

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## School Admissions Recruiter

Peoples College of Law

Los Angeles, CA, USA

 Full-Time

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The School Admissions Recruiter at Peoples College of Law will be responsible for attracting and enrolling prospective students. This full-time role involves promoting the college's programs and academic offerings to potential applicants, attending college fairs and recruitment events, conducting informational sessions, and providing guidance to prospective students throughout the admissions process. The School Admissions Recruiter will also assist in evaluating applications, conducting interviews, and participating in admissions decision-making. The ideal candidate should possess exceptional communication skills, a thorough knowledge of the college's programs, and a genuine enthusiasm for recruiting and shaping a diverse student body.

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## Legal Faculty at People's College of Law

Peoples College of Law

Los Angeles, CA, USA

 Full-Time

### Why Work Here?

*Join People's College of Law, where education meets social justice, empowering minds and creating positive change in our communities!*

Are you a dedicated legal professional with a passion for social justice and community advocacy? People's College of Law invites you to join our esteemed faculty team as we empower aspiring lawyers to make a difference in the world.

### Responsibilities:

#### 1. Teaching and Curriculum Development:

- Deliver engaging and interactive lectures on various legal subjects.
- Develop innovative course content and instructional materials that align with our mission.

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