



**OPEN SESSION
AGENDA ITEM
DECEMBER 2023
COMMITTEE OF BAR EXAMINERS**

DATE: December 14, 2023

TO: Members, Committee of Bar Examiners

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

Subject: Action on Inspection Report, Probationary Status, and Termination of Registration – Peoples College of Law

EXECUTIVE SUMMARY

The Committee of Bar Examiners (committee) ordered an inspection of Peoples College of Law (PCL) as a condition of the law school's probation to assess its current compliance with the Unaccredited Law School Rules and Guidelines. The committee can consider the October 2023 Inspection Report, along with all other information before the committee, to determine whether the law school has demonstrated adequate progress toward compliance, or the law school has not demonstrated sufficient progress in which case the committee may withdraw the law school's registration as an unaccredited law school.

The inspection took place on October 10 and 17, 2023. PCL received a copy of the October 2023 Inspection Report on November 17, 2023, and staff verbally advised the law school on November 28, 2023, that the staff memorandum would recommend withdrawing PCL's registration at the December 14, 2023, meeting because the law school is out of compliance with the Unaccredited Law School Rules and Guidelines and has not made adequate progress toward compliance, and that the withdrawal of its registration and termination of its degree-granting authority could be immediate. (Attachment A). PCL responded to the inspection report (Attachment B) on December 3, 2023, questioning some of the findings of the inspection report, and requesting either additional time to bring itself into compliance or to continue to teach its upper-level students while getting its first-year student through the First Year Law Students' Exam. Staff does not recommend either proposed alternative.

This action is before the committee following a warning issued to PCL in 2020, a Notice of Noncompliance issued in June 2022, and a period of probation which began on December 2, 2022. During the past twelve months, the law school provided monthly reports and received feedback from staff. The committee also received updates at each of its meetings in 2023, except for the December 1, 2023 meeting, since this meeting was taking place shortly thereafter.

In its response to the October 2023 Inspection Report, the law school acknowledges that it is not in compliance with many Unaccredited Law School Rules and Guidelines. (Attachment B, p.3).

Subsequent to the 2023 inspection, the law school timely submitted its November and December progress reports (submitted on November 1, 2023, and December 1, 2023, respectively). Because the law school failed to demonstrate sufficient progress toward compliance during the probationary period, including at the October 2023 inspection, which found continuing and newly observed compliance issues, and based on the most recent progress reports as well as PCL's admission that it is not likely to come into compliance soon, staff recommends immediate withdrawal of registration.

BACKGROUND

PCL is a registered, unaccredited fixed-facility law school that was founded in 1974. The school offers a JD program of study in Los Angeles, California. The law school specifically focuses on preparing students to practice public interest law. Volunteer faculty teach classes with support and leadership from both a full-time paid dean and a full-time paid administrator-registrar.

The following summarizes the procedural history of the law school's noncompliance with the Unaccredited Law School Rules and Guidelines as well as the authority informing the committee's review today.

SOURCE DOCUMENTS

The following documents are relevant to the committee's evaluation of the law school's noncompliance:

1. [2020 Periodic Inspection Report](#)
2. [2020 Annual Progress Report](#)
3. [2021 Annual Progress Report](#)
4. [2022 Noncompliance Inspection Report](#)
5. [Monthly Probation Progress Reports, January 1, 2023 – December 1, 2023](#)¹
6. [October 2023 Inspection Report \(Attachment A\)](#)

¹PCL will continue to file reports on the first of the month so long as probation continues.

7. 2023 committee meetings discussing the law school including public comment, and committee motions from meetings taking place in the following months: [December 2022](#), [March 2023](#), [April 2023](#), [June 2023](#), [August 2023](#), [October 2023](#)

CIRCUMSTANCES LEADING TO PROBATIONARY STATUS

This section summarizes the inspection and compliance actions that culminated in the law school's current probationary status.

Periodic Inspection, January 2020

In 2020, a State Bar team performed a periodic inspection of PCL pursuant to Rule 4.244. The resulting 2020 Periodic Inspection Report included 23 recommendations documenting significant noncompliance issues. (See [Item O-406, Committee of Bar Examiners Meeting, Aug. 21, 2020](#)).

After reviewing the report, the committee renewed PCL's registration as an unaccredited fixed-facility law school but placed conditions on the renewal because it had observed a pattern in PCL's three most recent inspection reports (2009, 2014, and 2020) that indicated problems with maintaining compliance. All three inspections, including the 2020 inspection, contained a number of recommendations or findings of noncompliance which PCL addressed shortly after the inspection, sometimes before the committee considered the inspection report. In many instances, the issue would reappear by the next periodic inspection. In other instances, new significant issues of noncompliance were found. To ensure PCL continued to maintain compliance following its renewal of registration, the committee required PCL to meet the following additional conditions of monthly progress reports and an inspection in 2022.

First, the committee directed that "the school provide in each Annual Report a detailed update as to its compliance status with respect to each of the recommendations set forth in the [2020 Periodic Inspection Report] with the understanding that failure to demonstrate continuing compliance will result in the issuance of a Notice of Noncompliance." (See [Item O-406, Committee of Bar Examiners Meeting, Aug. 21, 2020](#)).

Second, the committee directed that the law school undergo another full inspection in 2022, rather than waiting the typical five years, to establish that the school maintained compliance with the Unaccredited Law School Rules and Guidelines. In so doing, the committee emphasized the need for the law school to demonstrate sustained compliance.²

2020 Annual Progress Report Demonstrates Progress Towards Compliance

The committee accepted PCL's 2020 progress report at the committee's June 18, 2021, meeting. (See [Item O-402, Committee of Bar Examiners Meeting, Jun. 18, 2021](#); [Item O-100, Committee of Bar Examiners June 2021 Meeting Minutes, Aug. 20, 2021](#)).

² PCL received a Notice of Noncompliance before the 2022 inspection could take place. That notice evolved into a probationary order that included the requirement to undergo a final inspection during the probation period.

In the memorandum presented at that meeting, State Bar staff shared with the committee that, “while the school has made substantial progress in a short period, PCL must now demonstrate that the new policies, software, and staffing will be utilized to not only establish but also to proactively maintain continued compliance.” (Id.).

2021 Annual Progress Report and Compliance Issues

At the March 2022 committee meeting, the committee reviewed PCL’s 2021 Annual Progress Report and ordered the school to provide an updated 2021 Annual Progress Report within 30 days to fully address the compliance items identified in the 2020 Periodic Inspection Report with special emphasis on eight recommendations for which satisfactory responses had not been provided. (See [Item O-406, Committee of Bar Examiners Meeting, Mar. 18, 2022](#); [Item O-100, Committee of Bar Examiners March Meeting Minutes, Apr. 22, 2023](#)). Those compliance items were related to the law school’s refund policy; a complete and accurate Catalog; providing students with components of course grades; grade review policies; changes to the school’s administrative capacity; academic advancement policies included in the school’s Catalog; course repetition requirements; and recordkeeping.

PCL was also directed to include response to all pending staff requests related to the following: Incorrect web disclosures posted pursuant to California Business and Professions Code section 6061.7(a); replacement of incorrect student Catalog that included noncompliant policies and handwritten notes in the posted document about policy changes that should be made; incorrect credit calculations for quarter courses; and transcripts that did not indicate whether courses were offered in semesters or quarters.

Since the law school had been advised about these issues previously, 30 days appeared to be sufficient time to complete the tasks. While PCL paid the invoice that accompanied the order, suggesting that the law school was aware of the committee’s order, PCL did not file the updated Annual Progress Report or address the outstanding staff requests, and did not provide an explanation.

Notice of Noncompliance, June 2022

At its June 17, 2022, meeting, the committee issued a Notice of Noncompliance to PCL based on the compliance issues raised since the January 2020 inspection and the law school’s failure to respond to its March 2022 order. (See [Item O-406, Committee of Bar Examiners Meeting, Jun. 17, 2022](#); [Item O-100, Committee of Bar Examiners June Meeting Minutes, Aug. 19, 2022](#)). The Notice advised PCL that the committee would seek probation or withdrawal of registration if the law school did not establish that it was in compliance with the Unaccredited Law School Rules and Guidelines.

Noncompliance Inspection and Review of 2022 Noncompliance Inspection Report, September and October 2022

In August 2022, the committee reviewed PCL's written response to the Notice of Noncompliance as well as public comment from the law school and found PCL's response to be unsatisfactory. As a result, the committee directed that a follow-up noncompliance inspection be scheduled within 30 days, as required by Rule 4.262(B). (See [Item O-406, Committee of Bar Examiners August Meeting, Aug. 19, 2022](#); [Item O-100, Committee of Bar Examiners Meeting Minutes, Oct. 14, 2022](#)).

A State Bar team inspected the law school on September 12, 2022. The inspection team included committee member Dr. Don Wilcoxson and State Bar staff Audrey Ching, Shekhar Dubbani, and Natalie Leonard. The inspection team met with PCL's Board President, registrar, and general counsel.

At the October 2022 committee meeting, staff reported that the inspection team "did not find evidence to satisfy it that the law school has the framework in place to sustain compliance," and recommended that the committee withdraw the law school's registration as an unaccredited law school or impose probation if it did not withdraw registration. (See [Item O-401, Committee of Bar Examiners Meeting, Oct. 14, 2022](#)).

The team found that some recommendations addressed in the 2020 Inspection Report were addressed and sustained, but several material issues observed in 2020 resurfaced and the law school did not demonstrate a sufficient plan to prevent them in the future. Specifically, the law school did not appear to have a system to ensure that disclosures and documents remained updated, the accessibility and competence of the leadership was an issue, and grading issues were identified.

The committee reviewed the 2022 Noncompliance Inspection Report, as well as PCL's response to the inspection report, and determined that PCL was not or was not likely to be in compliance with the Unaccredited Law School Rules and Guidelines. The committee advised PCL that it planned to pursue either probation or withdrawal of PCL's registration as an unaccredited law school at its December 2022 meeting. (Rule 4.263). (See [Item O-401, Committee of Bar Examiners Meeting, Oct. 14, 2022](#); [Item O-100, Committee of Bar Examiners December Meeting Minutes, Dec. 2, 2022](#)).

PROBATIONARY PERIOD AND CONTINUED NONCOMPLIANCE

Probation Period Begins, December 2022

In December 2022, the committee considered withdrawal of PCL's registration, but ultimately ordered a term of probation.

In placing the school on probation, the committee made clear that the law school would be required to demonstrate adequate progress toward compliance during probation or its registration as an unaccredited law school would be withdrawn (See [Item O-400, Committee of Bar Examiners Meeting, Dec. 2, 2022](#); [Item O-100, Committee of Bar Examiners December Meeting Minutes, Jan. 27, 2023](#)). PCL's probationary conditions included both submitting

monthly progress reports addressing its compliance and undergoing an inspection to further assess its compliance, in order to clearly identify the law school's results in achieving and sustaining compliance. (See [Item O-100, Committee of Bar Examiners December Meeting Minutes, Jan. 27, 2023](#)).

Review of the monthly reports revealed that the school remained out of compliance, and new areas of noncompliance were observed almost immediately. Examples include: defective Rule 4.241 disclosures and the failure to provide timely refunds as required; the school's failure to provide a fourth year of classes for a student for approximately one year and minimal communication with the committee or student regarding that coursework once it was available; the school's failure to implement meaningful faculty evaluations; the school's failure to ensure timely delivery of grades; failure to record some classes on student transcripts; incomplete student and faculty files; incomplete student files; and other administrative issues.

Inspection, October 2023

In August 2023, the committee ordered that PCL's probationary inspection be scheduled. (See [Item IV.E, Committee of Bar Examiners Meeting, Aug. 18, 2023](#); [Item I.B, Committee of Bar Examiners August Meeting Minutes, Oct. 13, 2023](#)).

Because PCL had been providing monthly progress reports, the committee allowed the law school to forego completing a self-study, and, instead, required only the return of a State Bar document request.

Consistent with the terms of probation, a State Bar team inspected PCL on October 10 and 17, 2023, and produced the report outlined in Attachment A. The team included: consultant Heather Georgakis; Committee of Bar Examiners' Member and former Educational Standards Chair Jim Efting; and State Bar staff members Theresa Solenski and Cody Hounanian. The report documents that many previously observed noncompliance issues persist, PCL's efforts to achieve compliance have not produced sustained compliance, and newly-observed noncompliance issues have emerged.

Critical compliance issues and relevant observations noted in the October 2023 Inspection Report are included in the section below titled "October 2023 Inspection Report Confirms Significant Compliance Gaps During Probation."

The law school's response to the October 2023 Inspection Report is provided in Attachment B.

EVALUATION PROCESS

At least thirty days before probation expires, the committee must evaluate whether sufficient progress has been made toward compliance or whether it will proceed to withdraw the law school's registration. (Rule 4.267). PCL's probationary order expressly "reserves the right to terminate this probation prior to its scheduled conclusion if the law school fails to make or

sustain adequate progress.” While the committee ordered that PCL be placed on probation through May 30, 2024, the committee may take action at this time.

Withdrawing PCL’s registration as an unaccredited law school is appropriate if PCL is not in compliance and has not made or sustained perceptible and adequate progress toward compliance with the Unaccredited Law School Rules and Guidelines. (Rule 4.266(B)). (See [Item O-400, Committee of Bar Examiners Meeting, Dec. 2, 2022](#); [Item O-100, Committee of Bar Examiners December Meeting Minutes, Jan. 27, 2023](#)). If doing so, the committee should identify a date upon which the registration will be withdrawn, and degree-granting authority of the law school will terminate.

DISCUSSION

Because of the seriousness of this issue, and the volume of information the committee has evaluated to date and that is presented in this agenda item, the discussion section is organized in a manner intended to provide clarity on the staff recommendation and assist the committee in putting the myriad pieces together and understand the overall context.

The first part of the discussion section presents the staff recommendation. This is followed by the key compliance issues identified that led to this recommendation.

STAFF RECOMMENDATION OF WITHDRAWAL OF REGISTRATION AND TERMINATION OF DEGREE-GRANTING AUTHORITY

Staff recommends immediate withdrawal of registration due to the many noncompliance issues preceding the probation period and persisting throughout the probation period. These noncompliance issues were observed during the October 2023 inspection, as well as the review of the law school’s progress reports, and the law school acknowledged its current noncompliance in its response to the October 2023 Inspection Report, despite assertions that progress has been made in the last two months. Neither the inspection report, nor the school’s response, demonstrates that the school will be able to achieve and sustain compliance within any reasonable period of time. The most significant issues are summarized below and many are discussed further in the attached 2023 Inspection Report.

In response to the 2023 inspection report, PCL acknowledges that compliance issues persist stating, “PCL is well aware that its operational model is not in conformity with the strict letter of the Rules the CBE [committee] seeks to enforce.”³ (Attachment B, p. 3). PCL also admits that the inspection team’s assessment is fair and that as of September 2023, there were “many issues that PCL needed to overcome to remain in operation.” (Attachment B, p. 4). While PCL notes its recent efforts toward compliance, it also acknowledges that significant additional changes are needed and that its status as on probation with the State Bar has been 5, arguably even 15, years in the making. (Attachment B, p.5).

³ The next sentence advises that the law school, even now, “is endeavoring to modify its operations so that it is in substantial conformity with the Rules governing its functions,” rather than full compliance. (Attachment B, p. 3).

Elsewhere in the law school's response, it refutes the October 2023 Inspection Report's findings or describes actions taken after the inspection. However, the law school failed to provide evidence of adequate response to the significant compliance issues that the committee must assess when determining whether to withdraw the law school's registration.

For example, in response to the inspection report's finding that PCL failed to comply with disclosure requirements pursuant to Rule 4.241, the law school referenced actions taken after the October 2023 inspection and questioned whether the rule requires students to return signed disclosure statements. Later, in this report the section "PCL Has Not Fully Addressed Defects Related to its Rule 4.241 Disclosure, Justifying Withdrawal of Registration" describes the circumstances of the law school's noncompliance in more detail including the law school's practices and interactions with the State Bar over several years which are at odds with their recent response.

In another example, the law school disagrees with the inspection report's finding that the law school does not comply with Guideline 4.2 which requires a law school to have a competent dean and faculty devoting adequate time to administration, instruction, and academic counseling. The law school argues that the interim dean is experienced, that former leadership's failures are the cause of compliance issues, and that the current administrator is proficient. However, later in this report the section "Insufficient Staff and Volunteer Capacity" describes in more detail how the law school's current staffing is part of an ongoing pattern of capacity challenges and leadership changes that have resulted in persistent and continuing compliance issues.

During the probationary period, the law school has provided monthly updates, and also received feedback from staff nearly every month, and from the committee at each of its meetings in 2023, except the December 1, 2023, meeting. Despite this level of review, the law school admits that compliance issues remain, and important committee directives have not been fulfilled or were not fulfilled timely.

Given the number and severity of the compliance issues that persist, notwithstanding the school receiving repeated notice and opportunity to cure the deficiencies, staff recommends immediate withdrawal of registration.

While the law school requests additional time to come into compliance, it is not recommended due to the length of time it has already been afforded to correct these issues. Absent additional time, the law school requests the ability to continue to teach through spring 2024, with its current upper-level students attending through graduation (spring 2025) and its first-year student at least through the end of their first year (spring 2024), but the severity and number of compliance issues jeopardizes students' ability to receive a sound legal education. Students may be better served by attending a compliant institution.

October 2023 Inspection Report Confirms Significant Compliance Gaps During Probation

The October 2023 Inspection Report set forth in Attachment A identifies issues in at least sixteen of the areas of noncompliance observed at the 2020 inspection and for which the committee recommended certain actions to achieve compliance. The report also identifies at least nine compliance issues newly observed at the time of the 2023 inspection.

Ultimately, the inspection report states that the law school is not compliant with Rule 4.240 (N) which requires a law school to demonstrate compliance with committee requirements. The report summarizes the many compliance issues into the following categories:

1. **The law school has been unable to assemble a team of volunteers and paid staff with the experience and capacity to establish and sustain compliance:** Noncompliance with Guideline 3.1 was observed in 2020 and again at the October 2023 inspection. The October 2023 Inspection Report also identifies noncompliance with Guideline 4.2.
2. **PCL lacks appropriate administrative oversight to ensure a quality legal education for its students:** Noncompliance with Guidelines 5.17, 5.18, and 5.25 was observed in 2020 and again in 2023.
3. **The school lacks honest communication with its students and prospective students:** Noncompliance with Guidelines 2.2(B), 2.3, and 9.1 was observed in 2020 and again in October 2023. New compliance issues related to Rule 4.241 were documented in the recent inspection report.
4. **PCL lacks sound faculty oversight:** Noncompliance with Guidelines 4.8 and 4.9 was observed in 2020 and 2023. New issues related to Guideline 2.9(E) were documented in the October 2023 Inspection Report.
5. **PCL's curriculum does not provide a sound legal education.** In 2020 and 2023, noncompliance with Guidelines 2.3, 2.9(C), 3.1, 5.3(A), 5.8, 5.9, and 5.25 was observed. Noncompliance with Guidelines 5.1 and 5.2 was documented in the October 2023 Inspection Report.
6. **The school's record-keeping process is inadequate:** Noncompliance with Guidelines 2.11, 5.8, and 9.1 was observed at both the 2020 and 2023 inspections. New compliance issues related to Guideline 2.2(C) were documented in October 2023.

The committee is encouraged to adopt the October 2023 Inspection Report in full, finding that the law school is not in compliance and not likely to come into compliance with the Unaccredited Law School Rules and Guidelines, constituting a failure to meet the terms of the law school's probation.

While the law school has taken some steps since the inspection and considered further action, this mirrors its past pattern in which it responds only as State Bar action is imminent.⁴

PCL REMAINS NONCOMPLIANT IN MANY SIGNIFICANT RESPECTS

⁴ Subsequent to the inspection, the law school reported that it sought legal review of its testing accommodation policy, and that it had also changed certain policies regarding attendance, but those changes do not appear to be compliant because they still do not require students to attend at least 80 percent of regularly scheduled classes.

As a result of its history and falling out of compliance, the committee directed PCL to ensure that compliance was not transitory but was sustained. During the probationary period, PCL was found to be noncompliant in several significant ways, including:

PCL Has Not Fully Addressed Defects Related to its Rule 4.241 Disclosure, Justifying Withdrawal of Registration

Unaccredited law schools must provide accurate disclosures to applicants and students before each academic term and post certain other disclosures on their websites, pursuant to Rule 4.241 and California Business and Professions Code section 6061.7(a). PCL has not done so consistently, despite signing the following attestation as part of each of its annual reports (Attachment E):

I certify on behalf of the law school that during the 52 weeks ending September 15, each new student who paid an application fee to the law school, and each returning student, prior to the payment of any fee for an academic term, was provided with a current copy of a student disclosure statement that complied with the requirements of Section 6061 of the California Business and Professions Code and the applicable provisions of Rule 4.241 of the Unaccredited Law School Rules (effective on and after January 1, 2008). I certify that each such student signed such a student disclosure statement and that each student was provided with a copy of his or her signed statement. I further certify that a signed copy of each student's disclosure statement that was signed was placed in the student's file, as required by Guideline 9.1(C) of the Guidelines for Unaccredited Law School Rules.

Defects in PCL's process were first identified by the State Bar in December 2022. Since then, PCL has provided refunds owed to students who did not receive Rule 4.241 Disclosures during the 2022-2023 school year, but PCL has not completed the process for reviewing and providing refunds for the period of 2020-2022 and has not advised when it will do so. Initially, PCL set a completion deadline of September 25, 2023, later delayed to October 20, 2023.

While the school acknowledges, in its response to the October 2023 Inspection Report, that it has not always complied with the attestation above, the law school now adopts a different understanding of the requirements and questions their obligation to provide refunds to students. This understanding conflicts with the procedures the law school used to evaluate students' eligibility for a refund during the 2022-2023 school year. (Attachment C, p. 16). The law school took over six months to issue refunds related to the 2020-2023 school year and a review of the prior two school years is still in process.

It remains unclear how many students are owed refunds. (Attachment B, p. 16-17). Specifically, the December 2023 progress report shows, by the law school's own count, that the school does not have signed Rule 4.241 Disclosures for at least 37 individuals for at least one term for the period of 2020-2022. Thus, as many as 37 individuals may be owed refunds. Only one student appears to have been issued a refund for that period so far.

Currently, PCL's disclosure process requires students receive and sign a Rule 4.241 Disclosure before making a payment. However, the law school's disclosure also includes optional information asking the students to certify that they have received materials that have not been provided. For example, in late August 2023, students were asked to confirm that they had received their schedule for the fall quarter starting on September 5 as part of the disclosure. However, the schedule was incomplete with the times for each course not listed. Also, no course had a syllabus, one course title was listed with the nondescript title "Elective," and professors were not identified because the law school stated it was still recruiting instructors. (Attachment A).

If a school fails to comply with Rule 4.241, it must issue refunds to affected students. Additionally, the rule makes clear that a violation of the rule is grounds for withdrawal of registration.

2023 Annual Report Late

PCL's Annual Report, required by Rule 4.242, remains overdue since November 15, 2023 at the time of the posting of this memorandum. When PCL did not provide its report on November 15, staff contacted the law school on November 16 to determine its status. The interim dean advised that the report would be provided on November 24, but it was not provided. On November 28, the interim dean advised staff verbally that PCL hoped to provide the report by December 1 but could not commit. On December 10, PCL paid the annual fee and advised that the report would arrive at the State Bar on Tuesday, December 12, which is after the posting of this memorandum. Staff will provide an update at the meeting.

While the rules do specify a late fee, this does not excuse the school's failure to timely file the report.

While the Annual Report is needed for standardized reporting and regulation, it is data not needed to assess the law school's compliance at this meeting. This is because the Annual Report covers the 52-week period ending September 15, 2023, and PCL has provided more recent updates of its status through the October 2023 inspection and progress reports submitted in October, November, and December 2023.

Insufficient Staff and Volunteer Capacity

Since 2020, staff and the committee have urged the law school to adequately staff the school to ensure that it can provide a sound education for students and achieve and maintain compliance with the Unaccredited Law School Rules and Guidelines. The law school's 2023 inspection report response (Attachment B, p. 3, 23) continues to cite PCL's small staff and use of volunteer faculty as a defense to noncompliance.

The concern about staffing was repeated in the staff memorandum that was presented to the committee in December 2022. The staff memorandum advised the committee that the law school should include enough capacity to account for vacations, illness, and turnover. The law school admits that it struggles to meet its obligations due to having a small staff and faculty

that are unpaid and not under contract. Regardless, the school – whatever its size and staffing model – must comply with the registration requirements. The school cannot be excused from complying with the Unaccredited Law School Rules and Guidelines due to staffing changes or delays attributable to volunteers and a small number of paid staff.

Despite this guidance, the law school did not engage sufficient staff and volunteers, noting in its inspection response that, “PCL was faced with the difficulties of ironing out its untidy practices, while, at the same time, converting from an onsite educational facility to a vicarious teaching environment facilitated through classes conducted via Zoom. This double-edged sword proved far too difficult for PCL to maintain.” (Attachment B, p. 3).

The October 2023 Inspection Report cites the limitations of volunteer faculty and staff and other capacity issues as elements related to noncompliance with Guidelines 2.9(E), 4.2, 5.2(H), and 5.11. (Attachment A).

It is also unclear who is currently leading the law school. At the October 2023 inspection, the law school advised that Dean Edith Pomposo was on leave but remains the law school’s dean. PCL has not notified the State Bar otherwise, but the law school’s 2023 inspection report now states that she left abruptly in September. No formal notice has been provided to the State Bar as to whether this has occurred or why the law school changes its position. Interim Dean Ana Maria Lobos continues to lead the law school since late September 2023.

The law school also still does not recruit for the skills it needs. Community Board members are elected regardless of qualifications, including the treasurer. Neither the current dean nor the administrator has experience in higher education; the dean has limited experience as a licensed attorney. Faculty turnover is frequent, yet the last documented training for faculty was in March 2022.⁵

Staff does not have reason to believe that the performance of any particular dean or the replacement of any particular staff member would result in compliance. This is evidenced by the fact that each of the three most recent deans (two were short term interim deans) has suggested new leadership will yield compliance with the Unaccredited Law School Rules and Guidelines if they are given the time to do so. However, none have led the school into sustained compliance.

The law school’s structure and processes have not been sufficient to provide an orderly and sound education. While staffing changes may exacerbate these issues, noncompliance remains systemic. (Attachment A).

Frequent Curriculum Changes

⁵ That faculty training allotted one minute for the discussion of the importance of submitting timely grades when the law school has had a history of receiving grades late.

The law school is not following its own curriculum plan. Its inspection response includes an email exchange with a student advising that an Evidence course will be offered in the fourth year, while the curriculum plan suggests it should be offered in year two or three.⁶

The law school posted a partial curriculum plan in August which does not match the posted plan.⁷ Course curriculum and class days were changed in September without notice due to staff changes. The winter quarter classes were also changed just prior to the start of the term.

Privacy Concerns and Digital Safeguards

Student members of PCL's Community Board may review student petitions for disability accommodation if the student consents. At the inspection, the law school advised that students do not participate in the accommodations process, but the law school's December 1, 2023, monthly progress report indicates that they do participate if the petitioner consents. Given that there are six student spots on the Community Board and seven students total, this challenges the law school's ability to maintain student privacy.

The law school has been digitizing its files and storing them in Populi, but this process is not complete after nearly three years and no completion date has been provided. (Attachment C, p. 37-38).

PCL does not appear to have documented financial processes with stated safeguards as required by Guideline 2.2(C). For example, PCL does not appear to train staff on security and there appears to be no documentation on safeguards such as regularly scheduled audits and routine back-ups of financial records. In addition, the October 2023 inspection report noted that some financial files are readily available on a Google Drive to all Community Board members, even those without financial responsibilities, and without permission controls that would provide a reasonable safeguard as required by Guideline 2.2(C).

Also, PCL issued W-2 forms to at least one staff member at least eight months late. PCL sent the employee their own W-2 form along with several other employees' W-2 forms which contained confidential information. (Attachment G).

Finances Appear Insufficient

Expenses significantly exceed revenues at the law school, and by its own budget forecast, the law school may be unable to fund its operations beyond 2026. These projections do not take into account rent paid once the building is sold, loss of rental income, or the reality that the law school has not been able to secure a replacement building at its target price, while the deadline to close escrow in May 2024 is rapidly approaching. The law school's student body would need

⁶ PCL advises that the course dropped was trial advocacy. The course curriculum plan suggests that evidence should have been offered and at least one student in the student meeting expected evidence to be offered.

⁷ The original curriculum plan also contained other anomalies. For example, the 2023-2024 curriculum originally contained five quarters of Family and Criminal Law Internship. In addition, at least one of the two faculty members assigned to teach Multistate Bar Exam class was not a licensed attorney.

to grow significantly to break even if tuition is not raised based on the school's own calculations. (Attachment A).

In response to the October 2023 Inspection Report, PCL characterizes its budget forecast as being able to support the law school's "abilities to teach out [its] current upper division students and support our current 1L in taking the FYLSX before potentially transferring."

Also, On November 16, 2023, a loan broker copied the State Bar on an email advising that the law school had not paid his referral fee invoice on August 24, 2023, and had not responded to several additional attempts to collect the payment, characterizing it as "way overdue." (Attachment F).

Complaints are High

Last year's entire first-year class did not enroll for a second year, and enrollment continues to decline as the school's expenses rise.

Five students have contacted the State Bar with complaints over the last two years, and many of these complaints could have been resolved quickly or prevented with prompt responses from the law school. The October 2023 Inspection Report recounts several complaints, including one related to the law school's implementation of its disability accommodations policy. (Attachment A). Other complaints received by the State Bar relate to the law school's failure to provide students with diplomas, incomplete disclosures, and failure to provide a student with a fourth year of study. An employee contacted the State Bar because they did not receive their W-2 forms, while at least one former employee filed a lawsuit against the school regarding the conditions of their employment.

While the school aims to be a valuable asset to the community, its poor outcomes and disorganization undercut those goals.

Facility Plans are Unclear

PCL is currently operating in the building it has historically owned, but the law school has entered escrow to sell the building and close the transaction by May 2024. After that date, the law school indicated that it may purchase a different building or lease back space at its current location to teach classes if and when the building sale is complete, but it has not entered into a lease or purchase contract to do so, or filed a complete request for a major change of administrative headquarters as required by Rule 4.245.

PCL's building suffered a fire in 2017. While insurance proceeds and a bequest were received, repairs did not take place until August 2023, after the law school entered into a contract for the sale of the building in June 2023, with escrow to close by May 2024.

In March 2020, when the law school requested to teach classes online temporarily due to the pandemic, the state of the building was not listed as a factor. (See [Item O-400, Committee of Bar Examiners Meeting, March 20, 2020](#)).

Ability to Provide a Sound Educational Program

There are a number of issues that relate to the law school's ability to provide a sound education. Taking the fall and winter 2023 quarters as an example, there appear to be number of issues. Regarding fall quarter 2023, one course was listed nondescriptly as "Elective" less than two weeks before the quarter began. Another course lacked a syllabus as of the first night of class. A final course was cancelled and replaced by another during the first week of class, and the nights on which courses were held was changed after the semester began to accommodate the new professors.

In the two months prior to the start of the winter quarter on November 27, 2023, the courses scheduled to be offered to students changed twice. Despite the large number of changes, Evidence is not offered this year, leaving students unable to participate in the Practical Training of Law Students program during their internships.

The original schedule prepared for the school year included five sessions of Family and Criminal Law Internship which appears to conflict with the school's cluster schedule. Despite the school's cluster and rotation plan, the October 2023 inspection team observed that courses are offered on an ad hoc basis depending upon who is available to teach, rather than according to a coordinated plan, and that review of subject matter, syllabi, exams, and grading appears ad hoc as well. The law school acknowledges in its response to the inspection report that the law school has "previously failed to provide proper oversight" and that "faculty requires more direction and guidance." (Attachment B).

RECOMMENDATION

While on probation, PCL has remained out of compliance in fundamental and serious ways as documented in the law school's October 2023 Inspection Report. The law school has also not fully complied with the terms of probation set by the committee. Prior to all of the committee meetings held during the law school's probation to date, staff has been required to contact the law school for additional information because the committee-mandated monthly progress reports have been incomplete or failed to fully address the compliance issues identified. This has required significant staff time to get an accurate picture of the school's progress toward compliance.

Taking all facts and circumstances into account, staff recommends that the committee adopt the October 2023 Inspection Report in full and find that the law school is not in compliance with the Unaccredited Law School Rules and Guidelines and has not made adequate progress towards compliance during its probation as evidenced by the findings in the inspection report.

Staff further recommends that the committee withdraw PCL's registration and terminate its degree-granting authority effective immediately.

Immediate termination provides PCL's currently enrolled students the maximum number of options for transfer, including both in-person options and distance learning options, since January is a common time for law schools to begin academic terms.

On November 28, 2023, PCL informed its students that the State Bar staff planned to recommend closure of the law school and that the committee would be deciding whether to withdraw the school's registration at this meeting. The law school was required to share all committee orders with students as part of its Rule 4.241 Disclosure, and, as the winter quarter began on November 27, 2023, PCL had the ability to warn students of the recommended closure before they enrolled in the current term.

Although withdrawal of registration will certainly impact PCL's remaining seven students, the school cannot be permitted to continue to operate where the noncompliance issues are numerous and serious.

It is further recommended that the law school be directed to identify a custodian of records to assist students and graduates with transcript requests and advise its students and alumni as well as the State Bar of the procedure for requesting records.

RECOMMENDED MOTION

If the committee agrees with the staff recommendation, the following motion is recommended:

MOVE, that the committee adopts the October 2023 Inspection Report of Peoples College of Law and all of its recommendations as set forth in Attachment A and finds that the law school is not in compliance and has not made adequate progress toward compliance for the reasons set forth in that report as well as the law school's failure to fulfill its duties regarding Rule 4.241 Disclosures. The committee therefore withdraws the registration of Peoples College of Law and terminates its degree-granting authority effective immediately as of December 14, 2023.

FURTHER MOVE, that the law school is directed to identify a custodian of records to assist students and graduates with transcript requests and advise its students and alumni as well as the State Bar of the procedure for requesting records.

ATTACHMENTS LIST

- A. October 2023 Inspection Report – Peoples College of Law, October 2023
- B. December 3, 2023, Response to 2023 Inspection Report – Peoples College of Law
- C. December 1, 2023, Progress Report – Peoples College of Law (also contains November 1, Progress Report)
- D. August 30, 2023, Email from Student Regarding Disclosures
- E. 2020–2022 Annual Compliance Report Certifications – Peoples College of Law
- F. November 16, 2023, Email from Loan Broker Regarding Nonpayment

G. December 4, 2023, Email from Former Employee Regarding W-2 Form



The State Bar of *California*

Peoples College of Law Inspection Report

October 10 & 17, 2023

REPORT ON INSPECTION OF PEOPLES COLLEGE OF LAW

660 SOUTH BONNIE BRAE STREET, LOS ANGELES, CA 90057

INTRODUCTION

A State Bar inspection team conducted an interim inspection of Peoples College of Law (PCL) on October 10 and 17, 2023 pursuant to Rule 4.267(B) as well as the law school's probationary terms. The team consisted of Heather Georgakis, Educational Standards Consultant to the Committee of Bar Examiners (committee), and James H. Efting, Educational Standards Chair, Committee of Bar Examiners. The inspection team was supported by State Bar staff.

The State Bar last inspected PCL on January 14–16, 2020. During that inspection, the Educational Standards Consultant noted many compliance issues and memorialized them in an inspection report that the committee adopted in full during its August 21, 2020, meeting. While the committee renewed the law school's registration, it placed conditions on the renewal that required PCL to demonstrate continued compliance and document in its annual report each November; failure to do so would result in the immediate issuance of a Notice of Noncompliance and potentially further corrective action. After reviewing the law school's 2021 Annual Report, the committee issued a Notice of Noncompliance to PCL.

On December 2, 2022, the committee placed PCL on probation through May 30, 2024, due to PCL's failure to maintain compliance with the Unaccredited Rules and Guidelines. The conditions of probation required the law school to establish compliance and maintain it throughout the term of the probation. The committee reserved the right to end the probation early and withdraw the law school's registration if PCL did not demonstrate sufficient progress.

The inspection team concludes that the law school has not achieved and maintained compliance with the Unaccredited Law School Rules and Guidelines, based on a review of PCL's progress reports, written and verbal communication with the State Bar, and observations at the October 2023 inspection.

Background

PCL is a nonprofit 501(c)(3) organization registered as an unaccredited, fixed-facility law school offering a part-time JD program, and it currently enrolls seven students. The total tuition and fees required to earn a Juris Doctor degree (JD) are currently \$22,400.

PCL's governing Community Board is elected in full each year. Six students and nine nonstudents serve on the board. The Community Board not only makes policy decisions but also makes day-to-day decisions through full board action or one of its committees. There are six standing committees composed of Board and faculty members, and these committees handle certain day-to-day functions. The committees are: Executive, Finance/Fundraising and Development, Faculty and Curriculum, Admissions and Recruitment Building/Library, and Accountability.

Since June 2020, the law school has employed a full-time paid administrator, and since September 2022, the law school has employed a full-time paid dean. Previously, the dean position was unpaid, and a registrar position was a part-time paid position. The law school hired its current dean, Edith Pomposo, on September 27, 2022. On September 12, 2023, Dean Pomposo notified the State Bar that she was on a voluntary leave of absence. As of the time of the inspection, PCL indicated it had reached out to her, but she had not responded, and the law school did not know when she would return, but that the law school considered her to be its dean. On September 28, 2023, PCL hired Ana Maria Lobos as the interim dean. The school has experienced significant turnover in its administration. Since 2020, there have been five different deans and five different administrators.

PCL's faculty instructors are volunteers. All nine current faculty members earned JD degrees from law schools approved by the Council to the Section on Legal Education and Admissions to the Bar of the American Bar Association (ABA) or registered or accredited by the committee.

PCL enrolled seven students as of fall 2023: one first-year student, four third-year students, and two fourth-year students. None of the first-year students who enrolled in 2022 returned to the law school this year.

As of January 2023, PCL's five-year cumulative California Bar Exam (CBX) pass rate for graduates was 42.8 percent. It is based upon a pool of 21 graduates who took the exam during that period. Of those who passed, 40 percent passed more than five years after graduating.¹ About 25 percent of the law school's graduates since 2018 have not taken the bar exam. No PCL graduates took the July 2023 bar exam.

PCL's First-Year Law Students' Exam (FYLSX) pass rate dipped to REDACTED percent in June 2023, compared to REDACTED percent in October 2022 and REDACTED percent in June 2022, as reflected on the school's Rule 4.241 Disclosure Form.

Submission of Self-Study Materials

PCL's monthly progress reports issued since December 2022 were utilized in preparing for the law school's inspection. Due to the breadth of topics covered in those reports, the State Bar did not require the law school to create an additional self-study. On August 30, 2023, shortly after the inspection dates were determined, the State Bar requested that PCL submit additional documentation necessary for the inspection.² The material was required to be provided by

¹ Note that the cumulative pass rate for unaccredited law schools includes all those graduates who took the bar exam during a five-year period, no matter when they graduated; there is no minimum pass rate required for unaccredited law schools. This contrasts with the cumulative pass rate measure used for accredited law schools, which only includes the results of those students who graduated during the same five-year period. Therefore, if PCL were required to use the MPR formula, its cumulative pass rate would be significantly lower.

² The State Bar requested 32 documents including financial reports, student refund requests, minutes from various committee meetings, the current application form, the current transcript form, list of faculty, externship and clinical documentation, grade correlation studies, faculty evaluations, class records, admissions files, student files, the faculty manual, final examinations for courses, course syllabi, and all correspondence with the CBE.

September 11, 2023, but PCL provided the documentation more than two weeks late, on September 27, 2023.

Conduct of Site Visit

To prepare for the inspection, the team reviewed the law school's monthly progress reports, its 2020, 2021, and 2022 annual reports, website, Catalog, student results on State Bar exams, and records requested by the State Bar, including syllabi, course examinations, faculty evaluations, and Community Board meeting minutes.

The inspection took place from 9:30 a.m. to 4:30 p.m. on October 10 and October 17, 2023. During the inspection, the team toured PCL's facility virtually and conferred with members of PCL's board including Community Board Chair Clemente Franco, and members Carol Dupree, Ken Montenegro, and student Treasurer REDACTED. The team also spoke with PCL staff including Interim Dean Ana Maria Lobos, Administrator Roger Aramayo, and Admissions Chair Hector Peña Ramirez, as well as instructors Robert Skeels of the Faculty-Curriculum Committee, Laura Boudreau, John Duane, Pascual Torres, and Bill Maestas, and students representing all three current class years for which PCL has enrolled students.

Although the inspection was virtual, the team was nonetheless able to review the physical student files stored and maintained on site and inspect a representative sample of available records provided by PCL and shared through SharePoint. At the State Bar's request, PCL invited all current students to submit confidential comments via email, however, the inspection team did not receive any comments to review. The inspection team did meet with students during the inspection.

Under rules 4.201, 4.240(N), and 4.267(D) PCL must demonstrate its compliance with the terms of its probation and with the rules.

The findings listed below include: 1) compliance issues observed during the probationary period and the October 2023 inspection that were not enumerated in the 2020 inspection report, listed by letter; 2) status updates relating to the list of actions identified by the committee following PCL's 2020 inspection, required for the school to achieve and maintain compliance, listed by number.

INSPECTION OBSERVATIONS AND STATUS UPDATES

Compliance Issues Observed in October 2023

A. Rule 4.241: PCL is not compliant with Rule 4.241, which states that a registered law school must provide each student, in the format required by the committee, a disclosure statement that includes a specific set of information enumerated in the rule and the student must sign the disclosure and receive an executed copy before making a payment to the law school. Failure to comply with Rule 4.241 requires the law school to refund all tuition and fees to the student. The rule also states that noncompliance constitutes cause for withdrawal of registration.

In December 2022, the committee directed PCL to review whether this process was followed for a particular student and immediately provide the student a refund for any term in which PCL did not follow the proper Rule 4.241 procedure. While a refund was owed, the school did not issue payment to this student until August 2023, despite staff requests and committee orders to do so. Because of its demonstrated noncompliance with the rule for one student, the committee directed PCL to conduct a full audit of its Rule 4.241 Disclosures for all students in the 2022-2023 academic year in January 2023. This audit was completed in August 2023. During the audit, PCL determined that at least seven students were owed refunds for at least one term. These seven refunds were provided on August 1, 2023, and August 8, 2023. PCL stated it would complete an additional audit for the 2020-2021 and 2021-2022 academic years in September 2023. The audit for those years has not been completed. PCL first advised that the additional audits would be complete by September 25, 2023, but then pushed back this timeline by nearly a month to October 20, 2023. The law school indicated that it planned to hire a contractor to complete the 2020-2021 and 2021-2022 audits by mid-October 2023. No further update has been provided on the status of the audit or whether additional refunds are owed, despite the law school submitting its monthly progress report on November 1, 2023, after its internal deadline for completing the audit.

The inspection team also discovered that the law school included additional information along with the Rule 4.241 Disclosure that did not appear to be accurate. For example, in fall 2023, the document that students are required to sign before payment of any fee for an academic term asked students to confirm they had received their class schedules when neither the schedules nor the professors had been fully identified and not all syllabi were available until the end of the first night of class. The disclosure also linked to the State Bar's exam outcomes page as a means of showing performance on exams, but the page does not state PCL's pass rates³. The law school should have included the pass rates in the disclosure. A table in the disclosure incorrectly stated a CBX passage rate of 11 percent for July 2018, when there were no takers during that period. Further, although Rule 4.241(A)(9) only requires the school to disclose whether it has been issued a Notice of Noncompliance, in its April 2023 motion, the committee specifically required PCL to attach the Notice of Noncompliance and subsequent related committee actions to its Rule 4.241 disclosure. Despite this directive, the Rule 4.241 Disclosure did not include the Notice of Noncompliance.

The law school has not shown a settled procedure for the issuance of clear, complete, accurate, and timely disclosures or the administrative capacity to discover and correct errors promptly. PCL must immediately complete its audit and issue any refunds due since 2020, create compliant disclosures, and distribute and process them according to a compliant policy.

B. Guideline 2.2(C): The law school is not compliant with Guideline 2.2(C), which states a law school must establish reasonable safeguards against financial fraud and other financial improprieties. PCL does not appear to have documented financial processes with stated safeguards. For example, PCL

³ Data with sample sizes of under 11 are not published on the State Bar website.

does not appear to train staff on security practices or the importance of safeguarding financial information and there appears to be no documentation on safeguards such as regularly scheduled audits and routine back-ups of financial records.

The lack of documentation on financial safeguards is particularly noteworthy as the school's treasurer position is an elected position with high turnover, currently held by a student. While the position does not require financial experience, the treasurer has control of cash transactions, regular reconciliation of accounts, limited signatory authority on checking accounts, and tracking of debit card purchases.

While the law school uses an accounting software, Bench, for its bookkeeping, it also uses Google Drive to store financial documents. The Google Drive documents are accessible to all PCL committee members including students and those with non-finance-related positions. Bench is SOC 2 compliant, which means that it utilizes industry-standard data security practices such as access controls and methods for preventing unauthorized changes. A Google Drive accessible to many individuals does not meet this standard of data security and does not sufficiently safeguard financial documents.

C. Guideline 2.9 (E): The school is not compliant with Guideline 2.9(E) which requires a law school to advise each student of their final grades within a reasonable time after the student completes the course. The school's policy states grades must be turned in within two weeks after an exam or assignment. However, in practice, grades have been consistently late. According to PCL's administrators, at least one professor each quarter since 2020 has turned in grades after the deadline stated in the school's policy.

The law school has developed a process for backup grading in instances when instructors do not submit grades in time, however, it has not prevented the late release of grades so far. The law school has long acknowledged that it is challenging to meet the deadlines stated in its policy due to its use of volunteer faculty and lack of employment contracts, but it does not change its practice. The guideline does not provide an exception for the requirement to provide students with reasonably timely grades because volunteers are utilized.

D. Guideline 4.2: PCL is not compliant with Guideline 4.2, which states that a law school must have a competent dean and a competent faculty devoting adequate time to administration, instruction, and student academic counseling. The current dean, Edith Pomposo, was appointed by the Board in September 2022. Pomposo holds a JD from an accredited law school and an LLM from an ABA-approved law school but does not hold a license to practice law. Pomposo has experience in the primary and secondary school setting and some higher education experience.

In early September 2023, the dean announced that she was on voluntary leave, and she has not responded to PCL staff requests to expand upon the nature of the leave or advise whether or when she will return. PCL advises that she continues to be employed in the dean role. When she began

her leave on September 12, 2023, she advised the State Bar that her “professional standards and values no longer align with those of the organization, making it increasingly challenging for me to carry out my responsibilities effectively.” In August 2023, a student contacted the State Bar to advise that they could not reach her before her leave. The administrator also advised that it was challenging to reach her.

PCL has since hired Interim Dean Ana Maria Lobos, effective September 28, 2023. Lobos is a 2015 graduate of PCL who became a State Bar licensee in December 2022. She previously managed children’s gyms and completed an internship at a family law nonprofit organization. She has not been previously involved in law school or graduate school administration. At the time of the inspection, she had held the interim dean position for approximately two weeks.

With both holding JD degrees, Pomposo and Lobos possess the academic credentials required to serve as PCL’s dean. However, both are inexperienced as law school administrators. Although PCL’s dean must oversee curriculum and examination development as well as grading and providing model answers, and currently serves as chair of the Faculty Curriculum Committee, neither dean appears to have expertise in these areas. PCL does not have a procedures manual or updated Faculty Handbook to provide direction as to best practices.

The current administrator, Roger Aramayo, has held his position since June 2023. He is a full-time, salaried PCL employee. Aramayo earned a JD from an ABA-approved school in 2017. He is not licensed to practice law in any jurisdiction. As a law graduate, Mr. Aramayo has the academic credentials to serve as PCL’s administrator as required under Guideline 4.1. However, he does not have prior experience in higher education administration, particularly in performing duties typically handled by a registrar, such as course scheduling, determining eligibility for admission and graduation, reviewing students’ academic progress, preparing compliant reports and disclosures, and maintaining student records. He does not appear to have been provided with guidance or training in his role.

At the inspection, Mr. Aramayo was not aware of basic information that is critical to the registrar role, such as the number of credits needed to graduate, or the courses students need to take to become certified law students. Additionally, although he assisted both deans in responding to State Bar compliance inquiries, he has not read the 2020 Inspection Report.

Several observations raised concerns as to the law school’s ability to maintain a competent faculty that is able to fully meet its instruction needs. Though the interim dean advised that she has a list of 88 potential faculty, PCL has struggled to fill its faculty positions and retain teachers. The school does not enter into written contracts with faculty, which limits its ability to set standards, manage faculty, and hold them accountable. Faculty reviews appear cursory and fail to provide meaningful feedback.

The fall 2023 quarter was impacted by these issues. As described above, students received Rule 4.241 Disclosures on August 28, 2023, and were asked to confirm they had been advised of their

schedules and faculty, but they had not been provided with that information. By the first day of class, the Evidence instructor quit, and the first class was canceled. No replacement could be found. As a result, PCL canceled the Evidence course and replaced the course with an MBE Exam Preparation course for third- and fourth-year students.

This last-minute change had a negative impact on students. In a meeting with students during the inspection, one student stated they wished to apply to be a certified law student under the State Bar's Practical Training of Law Students program but were unable to do so due to the delay of the Evidence course, as they must enroll in Evidence to do so. As a result, their ability to participate in that program may be limited or impossible, depending upon their class year.

The course change also resulted in a last-minute schedule change for students. On September 6, 2023, approximately two hours before the scheduled Evidence class, PCL canceled the class. It also scheduled the replacement MBE course to be offered on a different day to accommodate the new volunteer faculty member's schedule. Since the law school only offers one set of courses, third- and fourth-year students had no choice but to accept the last-minute MBE course and weather the schedule change or risk delaying their graduation.

E. Guideline 4.7: The law school is not compliant with Guideline 4.7, which states that instructors must continually strive to improve their teaching skills and expertise in the subject(s) they teach. The school does not have a written policy as to faculty training. In the past, after the State Bar identified this as an area needing improvement to ensure compliance, PCL advised that it used a Faculty Handbook to orient faculty members and develop their teaching skills and that it also discusses teaching and grading topics at faculty meetings. Notably, the Faculty Handbook provided to the State Bar was last updated in 2021 and the inspection team did not find evidence of recent faculty training.

F. Guidelines 5.1 and 5.2: PCL is not compliant with Guidelines 5.1 and 5.2, which state that the law school must maintain a qualitatively and quantitatively sound program of legal education and enumerates the criteria for evaluating the law school's program. The JD program lacks coordinated planning or oversight. Course progression appears to be dictated by volunteer faculty availability, rather than one providing a balanced and comprehensive course of study with materials presented in an organized and logical manner and sequence. (Guideline 5.11). For example, the school planned to offer Evidence, but the professor quit, causing PCL to cancel the course hours before it was scheduled to take place and replace it with an MBE preparation course. This course was offered to the third-year students at least a year before they plan to take the CBX and may have deprived fourth-year students of taking the canceled class. The law school was also unaware of its responsibility to offer six hours of practical skills training and met the requirement only by happenstance rather than an attempt to comply. (Rule 4.240(F)). Further, PCL staff review syllabi, exam materials, and grades but the staff lack relevant knowledge and experience in these duties. PCL was also unable to sufficiently demonstrate the soundness of its grading system. (Guideline 5.2(H)). For example, it has not compared student grades to outcomes on State Bar exams.

Throughout the remainder of this report, numerous examples raise concerns about the soundness of the law school's program as it relates to the criteria listed in Guideline 5.2 including the quality of examinations (section 13 on Guidelines 5.17, 5.18, and 5.25) and the adequacy of the law school's finances (section I on Guideline 8.1).

G. Guideline 5.11: PCL is not compliant with Guideline 5.11, which states that a law school must offer a balanced and comprehensive course of study with materials presented in an organized and logical manner and sequence. As discussed above, the law school has changed courses and class schedules without notice or with little notice. As a result, as described in the scenario above, the law school had to defer offering coursework in Evidence, despite its prior placement in the sequence of coursework, and to the detriment of students seeking to participate in the Practical Training of Law Students program. This example also demonstrates that any balanced and comprehensive course of study collapses where PCL is unable to retain instructors. Evidence was swapped with an MBE prep course because an instructor with expertise in that subject was available; however, this was not the school's planned course progression.

Guideline 5.11 states that a law school's curriculum "should offer students the opportunity to take elective courses in a variety of legal topics," but PCL offers advanced students no more than the minimum required hours of coursework each year, so students are not afforded the opportunity to take electives. This is one instance in which the law school does not offer students the resources that the Guideline states that it should.

H. Guideline 5.12: The law school is not compliant with Guideline 5.12 which states that a law school should offer instruction in various practical skills. Course syllabi provided to the State Bar indicate that instruction does not include topics identified by the guideline, such as appellate advocacy, law office management, counseling, negotiation, or other practical skills courses beyond legal writing. This is another instance in which the law school does not offer the resources that the Guideline states it should.

I. Guideline 8.1: PCL is not compliant with Guideline 8.1, which states that a law school must have adequate present and anticipated financial resources to support its programs and operations, including providing all educational services the institution represented it would provide, ensuring that all students admitted have a reasonable opportunity to get a degree, and issuing timely refunds.

PCL's finances are handled primarily by the five-member Finance/Fundraising and Development Committee, chaired by the elected treasurer of the Community Board, REDACTED, REDACTED PCL student. There are no set qualifications for this role, and the current occupant of the role does not have a finance-related or accounting degree, although he does have a master's degree in public administration. The treasurer position has had significant turnover since the full board is elected each year, and REDACTED described the training for his position to be ad hoc,

including self-learning.

Because the full board is elected each year, and candidates are not required to have specific skills, it is likely the case that financial oversight is being conducted by individuals with no experience in financial matters. According to the treasurer, there is no formal budgeting process, and its financial policies and procedures are not currently well-defined or documented and appear to lack standard best practices. For example, the financial summary PCL prepared between the first and second day of the inspection contained outdated information that did not account for the impact of attrition in calculating tuition income, did not calculate or consider critical numbers such as breakeven enrollment, and projected large increases in revenue inconsistent with prior performance. This is particularly significant now that the law school is making major financial changes such as selling its building and adding employees.

Historically, the school's expenses have roughly equaled its revenue, but this operating position was balanced by the school's ownership of the Bonnie Brae building and the rental and borrowing power that ownership afforded. As reported in the 2020 Inspection Report, typically about one-third of the school's revenue came from rental of the building's first floor, while approximately two-thirds came from student tuition and fees. This was based on a model that did not account for paid full-time staff.

According to documents PCL provided to the State Bar, the law school's operating expenses now outpace operating revenues by a significant margin. The law school states that operating revenue for the 2023-2024 school year is projected to be REDACTED, which does not appear to take into account attrition that took place this term. The school projects an operating loss of REDACTED for this academic year, REDACTED for the 2024-2025 year, and REDACTED for the 2025-2026 year. Revenue has dropped due largely to a 66.6 percent decline in student enrollment between fall 2022 and fall 2023. The law school expects that future enrollment will climb from one first-year student this year to 25 first-year students by fall 2024. This assumption appears aggressive since the law school has enrolled at most 17 students in a 1L cohort since 2017 and most cohorts were smaller.⁴

PCL's expenses have increased since 2020. One-time expenses included installing a learning management system, significantly updating the library, and completing deferred maintenance on its building. Ongoing expenses include adding two paid administrative staff (administrator in 2020 and dean in 2022), and the law school plans to add additional paid staff.

The school has now entered escrow for the sale of its building, to close no later than May 2024. According to PCL's budget forecast, it expects to sell its property for a profit of REDACTED. It hopes to spend REDACTED or less on a replacement building, though its offers to date have not been accepted. PCL also plans to repay its current REDACTED loan as well as a REDACTED lien.

⁴ The 1L cohort sizes were 9, 14, 17, 17, 14, and 8 in the 2017, 2018, 2019, 2020, 2021, and 2022 academic years respectively, as reported in PCL's 6061.7(a) Disclosures.

PCL's budget also projects that, even upon the sale of its property, the school's cash and cash equivalents will decrease yearly from REDACTED in the 2023-2024 school year to REDACTED by the 2025-2026 school year. While the budget shared with inspectors does not forecast beyond the 2026 school year, its own optimistic projections show the school losing several hundred thousand dollars per year each year. Therefore, it is unclear whether the law school will be able to fund the entire four years of instruction for students enrolling as 1Ls during the 2024-2025 school year.

Efforts to find a replacement property at PCL's target price have not been successful and the law school has been unable to identify to the State Bar the criteria it is using to search for a new space. Most recently, the law school indicated that it hoped to rent back its premises from the new owners upon completion of the sale, though the cost of doing so, and the effect on its ability to repay its outstanding loan, is unknown.

Because the law school's leadership lacks financial expertise, there is uncertainty around the sale and purchase of property, and there are concerns raised by the school's budget forecast, the inspection team recommends that the committee request an audit report prepared by an independent certified public accountant, as allowed under Guideline 8.3, if the school is permitted to continue to operate.

Summary of 2020 Inspection Report Mandatory Actions and Current Status

Below is a list of actions, identified by the committee following PCL's 2020 inspection, that were required for the school to achieve and maintain compliance. The status of each action is updated based on observations from the October 2023 inspection.

1. Guidelines 1.9 and 2.10 (2020): 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.

October 2023 Status: PCL is not compliant with Guideline 1.9, which states that law schools must operate in compliance with all applicable federal, state, and local laws and regulations. The school created a policy in 2020 to address requests for accommodations pursuant to the Americans with Disabilities Act (ADA) and similar laws. However, the ADA policy created in 2020 was not implemented until the beginning of 2023, and only after the State Bar brought two student complaints to the school's attention, one of which remained unresolved as of October 2023.

Despite the adoption of the policy, implementation was not consistent with the policy. The State Bar received notice in the spring 2022 term that at least one student was required, contrary to the policy stated in its Catalog, to negotiate accommodations with each professor, and one professor refused to honor the student's school-approved accommodations on the eve of an exam. Another student filed a complaint because the school's policy did not clearly indicate what documentation the school required to request an accommodation.

Since that time, requests for accommodations have been submitted through Populi and initially decided by the dean, whose decisions are reviewable by the Executive Committee and, in some cases, the Board. Neither the dean nor the interim dean has prior experience with or knowledge about how accommodations requests are verified or decided. PCL was unable to demonstrate that, notwithstanding the adoption of a policy, it has effectively implemented the policy.

Additionally, PCL has not demonstrated compliance with Guideline 2.10 with respect to maintaining the privacy of student health records. According to PCL's Catalog, the Executive Committee, which includes a student member, reviews student accommodation requests. Thus, student members of the Community Board may be privy to student health information in cases where the Executive Committee evaluates ADA matters. While the dean indicated that student members of the board no longer participate in testing accommodation appeals, this is not stated in the recently updated Catalog.

Student committee members are barred from participating in academic disqualification and grade review proceedings without the subject student's consent, but students' privacy may be hard to maintain with a student body of seven and six student slots on the Community Board. The law school also lacks policies for recusal policy and/or conflict of interest.

2. Guideline 2.2(B) (2020): To bring itself into full compliance, the school should demonstrate that its refund policies have been stated clearly and consistently in its publications.

October 2023 Status: The school adopted a compliant policy for students who withdraw from the law school and provided the State Bar with a copy of that policy. The law school has not fully implemented its disclosure policy required pursuant to Rule 4.241, resulting in a significant number of refunds owed for the 2022-2023 school year, and potentially additional refunds owed, as discussed above in the section describing the law school's Rule 4.241 Disclosure defects.

3. Guideline 2.3(A)-(C): (2020): 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 via the Catalog that electives are not taught each year but are offered from time to time based on student interest and instructor availability.

October 2023 Status: The law school is not compliant with Guidelines 2.3(A)-(C), which state a law school must be honest and forthright in all communications, including applicants, prospective students, and current students. PCL removed from the Catalog electives not offered in the past three years or expected to be offered in the next two years and added to the Catalog a notice that electives are not taught each year but offered from time to time based on student interest and instructor availability. However, the school has not met its obligations for honest communication under this guideline in other ways.

The law school updated its website in April 2023, and on September 30, 2023, advised the State Bar that it had fully reviewed the website for accuracy. Yet, the inspection team noted many errors in a

brief review. For example, the academics webpage misstated the term length for first-year classes and understated how many units a student must complete during that year. The financials webpage misstated the FYLSX exam fee. The page included a hyperlink to a State Bar webpage with more information, but it required an applicant login, making it inaccessible for prospective students. The California Business and Professions Code section 6061.7(a) Disclosure contained errors in the cost section although the State Bar previously advised the school of the errors. The 2022 graduates' status is still listed as projected on its alumni page. Despite the law school's stated efforts to review the website, it remains inaccurate.

The Catalog also contains inaccurate information. Information in the Catalog is not consistent with information posted on the website or the Business and Professions Code section 6061.7(a) Disclosure as to required fees or total program units. Both the Catalog and website also contain outdated references to PCL's former schedule that was offered in 15-week semesters, when the law school has offered classes only on a quarter system since 2018. Most recently, the interim dean advised that at the start of the fall 2023 quarter, PCL simply changed the title of the 2022-2023 Catalog to 2023-24 Catalog and posted it without updating it. The interim dean revised the catalog on September 30, 2023, based on what she found while preparing for this inspection. Therefore, a correct catalog was not posted until about a month after students had enrolled for the fall quarter.

These examples reflect a pattern in which PCL reacts to requests from the State Bar rather than actively establishing and maintaining compliance.

The law school has indicated using several different methods to update and maintain its materials, but none have resulted in compliance. In August 2023, the school reported that responsibility for website updates would be centralized with the administrator, but at the inspection, the administrator was not aware that he was expected to update the website. It does not appear that PCL has established adequate administrative capacity and organization for managing its communications, despite the evident risk that mistakes may mislead prospective and current students and confuse personnel who must administer the school's policies.

Further, PCL is not forthright when communicating its compliance status to students. The law school's original Notice of Noncompliance issued on June 17, 2022, is obscured on the PCL website under a heading titled "CalBar Motion."

5. Guideline 2.3(D) (2020): 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(a), and Rule 4.241 have been implemented accurately, completely, consistently, and as mandated.

October 2023 Status: The school is not compliant with Guideline 2.3(D)(1)-(3), which states a law school must include specific statements, without alteration, in its bulletin, catalog, website, application for admission, and enrollment agreement for its JD degree program. State Bar staff has been required to repeatedly intervene to identify and address errors observed in the school's disclosures or disclosure process. At the time of the inspection, the Business and

Professions Code section 6061.7(a) Disclosure appeared to list incorrect law school fees, and the Rule 4.241 Disclosure inaccurately stated CBX passage results and other details described above in section B on Rule 4.241. After State Bar staff raised questions about PCL's disclosures, PCL audited the disclosures for the 2022-2023 academic year. As a result, seven students were owed a refund but did not receive a refund until approximately six months after the school identified that it failed to comply with the disclosure requirements. Further, the law school has been researching the issue of whether additional refunds are owed for the period of spring 2020 through spring 2022 since at least September 1, 2023, but it has not yet determined whether it has issued all refunds owed. Failure to provide necessary disclosure statements and failure to provide refunds to students who do not receive such disclosures constitutes noncompliance and cause for withdrawal of registration.

6. Guidelines 2.9(A)-(B) and 5.24 (2020): 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.

October 2023 Status: The school is not compliant with Guidelines 2.9(A)-(B), which states a law school must adopt written policies on academic and grading standards that are fair. The Catalog, website, and disclosure documents did not include written standards and requirements for clinical courses and externships. This omission comes even after the September 30, 2023, Catalog review, and a further Catalog update on November 1, 2023. PCL is also not compliant with Guideline 5.24 because the Catalog omits information about course repetition, such as the specific circumstances under which a course must be repeated and the impact of repetition on grade point average, as required; this is described further in section 17 on Guideline 5.24.

6. Guideline 2.9(C) (2020): 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.

October 2023 Status: PCL is not compliant with Guideline 2.9(C) which requires a law school to provide each student with a written statement explaining the extent to which certain factors will be used in determining a final grade. While the law school adopted a compliant policy that states syllabi, with the required components for determining a final grade, will be provided to students "by no later than the end of the first class in their course of instruction," at least one syllabus was not provided in advance of the course. Syllabi are also not reviewed sufficiently for adherence to PCL's own policies. For example, the Remedies I, Remedies II, Torts I, and Torts II syllabi contained course grading components for class participation that greatly exceeded the school's stated policy limiting class participation points to no more than three percent of the grade. The law school's administrator is responsible for reviewing the syllabi to ensure compliance with school policy, but the syllabi remain out of compliance with school policy.

7. Guideline 2.9(D) (2020): 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 exams using devices that are not protected by exam-security software.

October 2023 Status: The school is not compliant with Guideline 2.9(D), which states a law school must have a written policy setting forth the procedures used to authenticate the identity of the student submitting work and participating in educational and other law school activities and to ensure that work submitted is the student's own. Neither the 2023-2024 Catalog nor the Faculty Handbook contain policies about authentication of student work. Also, the administrator stated that the technology used for the authentication process is prone to technological issues that cannot be solved during exams because its vendor does not offer customer service during the hours when exams are administered. As such, the law school allows students to bypass authentication at the discretion of each faculty member.

8. Guidelines 2.11, 7.1, and 9.1 (2020): To bring itself into full compliance, the school should adopt policies and procedures that are adequate to protect the school's digital records.

October 2023 Status: The school is not compliant with Guideline 2.11, which requires a law school to establish and maintain adequate security and backup procedures to protect its electronic records. The school has transitioned from using paper files and a personal computer to a commercial software, Populi, which includes security and backup features as required by Guideline 2.11. However, PCL's digital financial records are not stored on Populi and are vulnerable to unauthorized changes because PCL has not established levels of access control, as described in section B, 2.2(C). The school is also not in compliance with Guideline 9.1, which requires a law school to maintain complete and accurate records of its programs and operations, as demonstrated by the continued inaccuracy of student records, such as missing coursework on transcripts, documents missing from student files, missing disclosure documents, and incomplete faculty files, described in further detail in section 18 on Guideline 9.1.

9. Guideline 3.1 (2020): To bring itself into full compliance, PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the committee's standards, including written job descriptions for the dean and registrar, and adequate oversight provisions.

October 2023 Status: The school is not compliant with Guideline 3.1, which states a law school must be governed, organized, and administered so as to maintain a sound program of legal education. Although job descriptions and administrative hours have been added, significant disorganization within the administration remains, resulting in unclear lines of authority that contribute to many compliance gaps. For example, key materials, such as the Catalog and website, remain out of date, at least one diploma was not distributed for the 2022 graduating class and the administrator was unaware of the status of the diplomas for the class of 2022, and the Business and Professions Code section 6061.7(a) Disclosure listed incorrect school fees as of the inspection date.

Neither the interim dean nor the administrator could identify for the inspection team the number of units required for graduation. Moreover, neither the interim dean nor the administrator was aware

of the requirement to offer practical skills training, and it was only a coincidence that the law school's curriculum met the requirement. These are all examples of the school's continuing failure to be governed, organized, and administered in a manner to maintain a sound program of legal education. To bring itself into full compliance with Guideline 3.1, PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the committee's standards, including clearly delineating the responsibilities of the dean and administrator.

10. Guidelines 4.8 and 4.9 (2020): To bring itself into full compliance, the school must adopt and implement a faculty evaluation policy that meets guideline requirements.

October 2023 Status: PCL is not compliant with Guideline 4.9, which states that the basis for instructor evaluations should include observation in the classroom and review of course materials, and grades. While the school has had an adequate written policy for some time, implementation appears sporadic and incomplete. No faculty evaluations were received by the State Bar for 2020, 2021, or 2022, though most recently, evaluations were conducted on July 6, 2023. The evaluations do not appear to provide meaningful feedback related to the factors identified in Guideline 4.8 or address serious issues, such as late turn-in of grades.

Of the faculty evaluations that were submitted to the State Bar as part of the inspection, most appeared incomplete, were not signed by the faculty member being evaluated, and did not include feedback for improvement. Effective evaluations are particularly important in a context where faculty receive little training, their course materials are subject to minimal oversight, and at least one professor turns in grades late every term.

11. Guidelines 5.3(A)(1) and 5.9 (2020): 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 regular 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.

October 2023 Status: PCL is not compliant with Guideline 5.3(A)(1) under which a law school must have a written attendance policy requiring regular and punctual attendance of not less than eighty (80) percent of the regularly scheduled class hours in each course and must keep accurate attendance records. The school's attendance practices appear to have been improved since the last inspection, with attendance taken manually and entered in Populi later. However, implementation of the improved policy does not fully satisfy Guideline 5.3(A)(1) because students who miss more than 20 percent of classes are given the opportunity to appeal the decision and take make-up classes; the Guideline requires attendance of not less than 80 percent of "regularly scheduled class hours" in each course.

PCL has not provided a clear, consistent, and unambiguous statement of the requirements for graduating from its program with a JD. At the time of inspection, the law school's webpage

contained an error showing a curriculum that does not satisfy the minimum classroom attendance hour requirement under Guideline 5.9(A)(4). Administrators were unable to confirm the total academic units a student must complete to earn a JD. The law school does not clearly advise prospective or current students of the total units, title, unit value, or weekly class hours and duration in weeks, of each course in the curriculum.

In addition, at least one student was allowed to pursue his coursework in an accelerated manner, but the law school did not provide a fourth year of instruction for that student until nine months after the anticipated start of the student's fourth year of study. This violates Guideline 5.9(A)(4) which requires all fixed-facility law schools to provide a minimum of 270 hours of classroom attendance a year for four years.

12. Guideline 5.8 (2020): 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.

October 2023 Status: PCL is not compliant with Guideline 5.8, which states that a law school "must maintain a record for each student" that includes information such as the number of hours spent by the student participating in the activity, the amount of academic credit authorized for the activity, and more. PCL does not appear to maintain adequate specific records for each student. It discovered that clinical courses from summer 2020 were not fully entered into Populi and in some cases, did not appear on student transcripts. The State Bar learned that the law school had to call faculty and accept their representations as to whether the student attended because the law school lacked any records of their participation, though the student was able to produce a timesheet. In August 2023, it held an emergency meeting to decide how many credits to award for clinical study completed during the of summer 2020. The law school did not offer summer 2023 clinics.

13. Guidelines 5.17, 5.18, and 5.25 (2020): 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.

October 2023 Status: PCL is not compliant with Guideline 5.25, which identifies the criteria for evaluating the quality of examinations and the accuracy and reliability of grading at a law school. Under the guideline, the committee can determine the quality and reliability of grading using various factors: the degree of correlation between the grades received by students in the first-year courses of Torts, Contracts, and Criminal Law and their passage or failure of the FYLSX; the inspector or inspection team's independent judgment on the quality of the examinations and the accuracy of grading; and consistency in the application of the grading standards among members of the faculty.

There is not a sufficient correlation between the grades received by students in the first-year courses and students' FYLSX outcomes. The school's 2022 annual compliance report shows that of the 16

students who took the FYLSX in October 2021, none passed, even though REDACTED had a weighted GPA of 2.0 (C+) or higher and four had a weighted GPA above 2.7 (B). PCL further advised that it does not track the correlation between grades awarded and performance on State bar exams.

The inspection team's independent judgment on the quality of the examinations and the accuracy of grading also raises concerns about the law school's grading reliability. Regarding exam quality, PCL advised that the dean has begun reviewing exam questions and answer outlines prior to exam administration, but it should be noted that the dean lacks experience in teaching and does not appear to have the qualifications to perform this function effectively. On September 19, 2021, PCL adjusted its grading scale to address grade inflation and sent a communication urging instructors not to inflate grades, but it is unclear what steps the law school took to teach professors how to grade properly, and the law school has not compared its grading to results on State Bar exams. PCL also amended its policies to limit the weight of class participation to three percent of the course grade; however, these participation limitations have not been fully implemented. For example, participation continues to be as much as 25 percent in some doctrinal courses and clinical courses. After three years of effort, the law school cannot determine whether it has addressed grade inflation and continues to rely heavily on class participation rather than subject matter mastery in some courses. Therefore, it is the inspection team believes that the law school cannot demonstrate that its grades accurately measure student performance.

With regard to consistency in the application of the grading standards among members of the faculty, the school did institute an administrative review of grades before their release, in which the administrator inspected the faculty's tentative returned grades and discussed the grades with the dean and the instructor if the administrator determined that the grades appear to be abnormally high relative to student achievement. However, this policy is subjective, unwritten, and is neither data-driven nor conducted by an individual with experience in grading. Therefore, the law school has not demonstrated that it has improved the consistency of its grading.

Compliance issues related to Guideline 5.18 are described in detail in the following section 14.

14. Guidelines 5.18-5.20 (2020): 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.

October 2023 Status: The law school's policies on advancement and probation are not compliant with Guidelines 5.18-5.20, which enumerate requirements related to scholastic standards, academic standing, disqualification, advancement, graduation policy, and evaluation of students for advancement and retention. When a PCL student fails a course, PCL's policies state that students may raise grades by doing additional extra credit work with the permission of their instructor and the Faculty Curriculum Committee. Allowing extra credit or extra time that will conflict with study in future semesters does not satisfy the Guideline 5.18 requirement that a law school identify and disqualify those students who have

demonstrated they are not qualified to continue as soon as possible.

Under Guideline 5.20, students who do not meet the required grade average should not be allowed to earn academic credit by circumventing those expectations, and under Guideline 5.19, if special circumstances and good cause exist, they should be placed on probation and given clear expectations.

15. Guideline 5.24 (2020): To bring itself into full compliance, the school should revise and republish its course repetition policy to meet all requirements of the guideline.

October 2023 Status: PCL is not compliant with Guideline 5.24, which outlines the necessary components of a written course repetition policy. The policy stated in the 2023-2024 Catalog does not identify the specific circumstances under which a course must be repeated as required by the guideline, though it more clearly describes the effect on advancement than the prior policy. The policy also fails to state the effect that repetition will have on the student's grade point average, also required by Guideline 5.24.

16. Guidelines 6.2-6.4 (2020): 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 hard copy library as required under Guideline 6.2 and provide this timeline and proof of library purchase to the committee; 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 the syllabi attached to the self-study did not validate that statement.

October 2023 Status: The law school is not compliant with Guideline 6.3, which requires it to provide students with instruction in both physical publication and electronic-based legal research. While it has now purchased the library volumes required by Guideline 6.2, the interim dean indicated that the law school does not provide students with legal research instruction in both physical publication and electronic-based legal research in a mandatory and regularly offered course, despite a prior assertion to the State Bar that it did so. The interim dean acknowledged in correspondence to the State Bar during the October 2023 inspection that PCL's Catalog states that legal research is taught in several courses "but that this is not reflected in actual instruction."

17. Guidelines 7.1 and 7.2: (2020): 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.

October 2023 Status: The school appeared to be compliant with Guidelines 7.1 and 7.2 at the time of the inspection. The team observed that PCL's facilities contained instructional equipment in

working order. Hard copy records were stored on site in fire-safe lockable cabinets. Many of the school's records were stored digitally on several online platforms with various degrees of security. Of greater concern is the fact that the files stored appeared to be incomplete because the law school failed to collect or check the required materials.

18. Guideline 9.1 (2020): 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).

October 2023 Status: PCL is not compliant with Guideline 9.1, which states a law school must maintain complete and accurate records of its programs and operations and these records must be readily accessible to the law school's administration and the committee. A common thread across almost all compliance issues was the failure of PCL volunteers and personnel to create, document, implement, and continually update sound processes, with clear timelines for action, to achieve and sustain compliance. This message has been conveyed across multiple periodic inspection reports and each month during probation.

A written policy has been adopted on transcript changes, but PCL lacks written policies and procedures on record-keeping and retention. Records are not consistently collected and maintained to be accessible and protected against loss, destruction, and corruption, and inaccuracies continue to create issues that affect compliance and impede student academic progress.

For example, as mentioned in section 12 on Guideline 5.8, summer 2020 courses were omitted from one student's transcript; the law school had to call faculty and accept their representations as to whether the student attended because the law school lacked any records of their participation. According to the Administrator, missing and incomplete documents were the result of the transition to Populi in which documentation was not accurately transferred to the system in 2020, and those changes were not effectively reviewed for accuracy. The State Bar ordered a transcript review, and an additional error was discovered in which another student's transcript showed a failing grade due to non-attendance that was inaccurate.

At least one former student has yet to receive their diploma after graduating in spring 2022. The student expressed frustration in a public comment at a Committee of State Bar Accredited and Registered Law Schools meeting. PCL's administrator stated that he submitted all spring 2022 diplomas to the dean and board president for signature, never saw the diplomas again, and did not know their status.

Also, the administrator could not locate the readmission file of a particular student requested by the State Bar, who had been previously academically disqualified. That student's transcript did not include the required information about the student's FYLSX history, as required by Guideline 9.1(D (7)).

Issues related to the law school's Catalog persist, as described above. Since 2020, catalogs have contained outdated material and were posted in obviously incomplete status.

Despite continuous turnover of personnel and volunteers, the school lacks written procedures to orient new staff about how to maintain accurate records in compliance with Guideline 9.1.

To bring itself into full compliance, the school must ensure that its records are fully compliant with Guideline 9.1 and that it has adopted written procedures—including oversight provisions—with respect to record-keeping processes and record retention requirements as required by Guideline 9.1(D).

Several priority tasks are enumerated below:

Admissions and permanent student files must be regularly maintained pursuant to the requirements of Guideline 9.1(A) through (C). The school should ensure that all mandated documents are collected, evaluated, and stored in student files, including official transcripts establishing eligibility for admission in accordance with Guideline 5.30. Files must include memoranda documenting all academic, administrative, and disciplinary decisions, including any disability accommodations granted by the school, or reasons why academically disqualified students were accepted.

Rule 4.241 Disclosures must also be included, and easily accessible in student files. In one recent instance, it took the law school eight months to complete an audit of student's signed disclosure documents – an indication that the records were not easily assessable as required.

Academic records should be timely prepared and available for their intended purpose. To be fully compliant, the school must ensure that the files of all PCL students, both past and current, contain an accurate, up-to-date, permanent transcript compliant with Guideline 9.1(D). The school must also ensure regular compliance with the several types of class records listed in Guideline 9.1(E), as well as maintenance of class records data for all current courses, including final grades, as required by Guideline 9.1(F). Faculty files must be reviewed and updated annually to include all information outlined in Guideline 9.1(H), including but not limited to transcripts of legal education and evaluations. The law school did not provide comprehensive faculty evaluation materials during the inspection.

CONCLUSION

The law school has not shown that it can engage in the sort of consistent planning and execution required of a registered, unaccredited law school. As highlighted throughout the report, PCL has not resolved the compliance issues raised during the 2020 inspection and while on probation. Of the 22 guidelines identified in the 2020 inspection report, the school remained noncompliant on 16, and 11 additional compliance issues were observed in 2023. As such, the school is not compliant with Rule 4.240 (N) which requires a law school to demonstrate compliance with committee requirements.

This affects the law school's ability to deliver a sound program of education in all aspects. For example:

1. The law school has been unable to assemble a team of volunteers and paid staff with the experience and capacity to establish and sustain compliance. An election and change of board members were intended to bring about improvement in 2017. In addition, since 2020, five deans and five administrators also sought to improve the law school's performance, but compliance issues remain.

Relying on annually elected board members who are not recruited for the skills needed, and volunteer faculty who lack sufficient time and dedication, has resulted in inconsistent procedures, succession planning, and strategy, and, more recently, financial uncertainty.

2. PCL lacks appropriate administrative oversight to ensure a quality law education for its students. For example, lack of oversight permitted at least one student to take additional courses during his first three years without adequately planning a course of study for the fourth year; the law school did not prioritize creating those courses until it received multiple communications from staff and the committee, and it communicated minimally with the student as to the terms of the study available.

The law school also appears to allow students multiple options to continue studying when they should be dismissed. As a result, students have been allowed to proceed to subsequent years of study without fully understanding whether they are making satisfactory progress toward licensure.

3. The school lacks honest communication with its students and prospective students. The Catalog, website, 6061.7(a) Disclosure, and Rule 4.241 Disclosure are inaccurate or incomplete. Students' refunds due to inaccuracies in Rule 4.241 Disclosures for the 2022-2023 school year were not issued timely, and the law school has yet to establish whether it complied during the period of 2020-2022, missing its own deadlines to complete a Rule 4.241 Disclosure audit on two occasions.
4. PCL lacks sound faculty oversight. PCL admits that it has limited control over its volunteer faculty who operate without contracts and with minimal training. Grades and syllabi continue to be provided to students late. Faculty evaluations do not provide sufficient feedback for improvement.
5. PCL's curriculum does not provide a sound legal education. The inspection team was unable to verify that the curriculum meets State Bar requirements, such as the number of units required for graduation. Courses are offered on an ad hoc basis depending upon who is available to teach, rather than according to a coordinated plan. Review of subject matter, syllabi, exams, and grading appears ad hoc and is conducted by individuals—including students and administrators—who lack the necessary experience and expertise.
6. The school's record-keeping process is inadequate, resulting in serious consequences for

students. While PCL began using a commercial learning management system, it failed to implement a quality check process to verify that courses and grades were entered adequately. When the first mistakes were discovered, the law school did not attempt to verify all potentially affected records until the State Bar required it to do so, and additional errors were discovered. Rule 4.241 Disclosures which should have been readily available in that system took months to gather, and many files were missing or incomplete.

In addition to an unsound education, student outcomes and satisfaction are poor. While 19 students have graduated since July 2017, just REDACTED have obtained licensure. For the 2022 academic year, none of the first-year students continued to a second year with PCL. There are at least three legal matters pending against the law school and REDACTED more students shared complaints with the State Bar since August 2023, despite having only seven students enrolled. The interim dean indicated she does not have a clear communication plan to deal with student complaints.

After thorough evaluation and inspection, the inspection team concludes that PCL is not in compliance with the Rules and Guidelines.



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PEOPLES COLLEGE OF LAW'S RESPONSE TO THE STATE BAR OF CALIFORNIA'S OCTOBER 2023 INSPECTION REPORT REGARDING PEOPLES COLLEGE OF LAW

RESPONSE TO THE STATE BAR OF CALIFORNIA'S OCTOBER 2023 INSPECTION REPORT REGARDING PEOPLES COLLEGE OF LAW

I. INTRODUCTION

The American legal system in the twentieth century up until today has been plagued by the specter of the role played by wealth in its premier legal institutions: the law schools and the courts. Generally, this corrupting factor has forged ahead without much debate, let alone correction. Still, the problem exists. Occasionally, a legal magazine, a law review post, a legal conference will detail the harsh reality that the American legal system denies access to most of the people under its jurisdiction. It seems as if most people in the field intuitively know that legal services are out of the price range of most people, and, therefore courts of law are not accessible to most people. The inevitable result of this dynamic is that vital issues affecting poor/middle litigants are decided without their informed input.

Legal education is also the province on the wealthy. Poor and middle class people with a desire to practice law are thwarted at every turn by the overwhelming cost of the education. Ironically, it is the very people that law schools tend to shun who are best equipped to understand and appreciate the great task of giving ordinary folks access to legal representation in the courts. The Peoples College of Law entered operation as an unaccredited law school in the summer of 1974. The School came into existence as the brain child of groups and individuals interested in fulfilling the American legal principle of equality under the law.

The Peoples College of Law ("PCL") addressed the problem of the underrepresentation of financially limited persons in courts of law by opening a law school accessible to those who are interested in representing the poor. The school specifically sought out students who voiced and/or demonstrated concern for social inequality in general. The school was also committed to obtain a student body consisting of the disadvantaged, mostly minorities, and, of those, half were to be women.

In order to make the school affordable to these committed persons, the tuition per student was \$300.00 for each semester. As a result of the low tuition the School operated on a shoe string budget. Professors received a mere ten dollars per hour (\$10.00). The operation of the school was conducted by one registrar who volunteered her services. All of the functions of the school such as recruitment and admission, faculty/curriculum and other activities were performed by students. Costs were cut simply due to the school's desire to make legal education affordable to all who desired to learn the law.

As uneven and chaotic as this dynamic was, the School continued on its path of graduating Peoples lawyers for several decades before the Committee of Bar Examiners (CBE) was mandated to oversee the operation of unaccredited law school in January of 2008. Prior to the arrival of the CBE, the Peoples College of Law sailed through decades under the supervision of the Department of Consumer Affairs. PCL went about the business of producing "Peoples Lawyers".

The Peoples College of Law's first class in 1974 contained sixty first year students. Of these many became licensed to practice law. Over the next four decades plus, PCL continued to graduate students who passed the California Bar Exam . Most of these students would not have completed a legal education qualifying for the Bar Exam in any other setting. Their educational and financial condition prevented access to accredited law schools. Without the presence of a law school like PCL, a portal towards the practice of the law is closed to a class who presence is desperately needed in the courts of California. As noted PCL functioned as a law school for several decades before the "Notice of Noncompliance" was handed down by the CBE. During the time preceding the disciplinary action, PCL functioned without any incidents producing scrutiny. The school moved forward on its mission.

PCL is well aware that its operational model is not in conformity with the strict letter of the Rules the CBE seeks to enforce.

Nevertheless, PCL is endeavoring to modify its operations so that it is in substantial conformity with the Rules governing its functions. PCL stresses that its functioning has always been motivated towards providing disadvantaged students with the opportunity to practice law; this primary motivation necessitated the use of volunteers. Today, and for several years before professors taught without financial remuneration. Additionally, it should be noted that when the school received its "Notice of Noncompliance" in 2020, it marked the onset of the COVID pandemic. As a result, PCL was faced with the difficulties of ironing out its untidy practices, while, at the same time, converting from an onsite educational facility to a vicarious teaching environment facilitated through classes conducted via Zoom. This double-edged sword proved far too difficult for PCL to maintain.

PCL does believe that it can right the ship and function under the good graces of the CBE. We ask for the CBE's patience and goodwill. PCL earnestly seeks to provide a legal education for those whose educational and economic conditions bar their attendance at most law schools. PCL provides this avenue because it believes that these students may flood the courts with lawyers able and willing to represent the many who have been deprived of legal representation due to a lack of financial resources.

This model is the only functioning concrete endeavor focusing on the need to supply the underrepresented with legal representation. PCL has produced many attorneys who fill agencies whose purpose is to bring representation to the needy. Closing the school on account of its perceived failure to keep accurate records, itself a product of its low tuition, is unreasonable. The school can make corrections, and should be allowed to do so.

II. PCL CURRENTLY

PCL currently has a student body of 7 students. All identify as persons of color and most attend PCL because they are barred from attending other institutions based on their status as non-traditional students. They are parents to young children, full-time working professionals, survivors of the criminal justice system, survivors of poverty, immigrants and children of immigrants. All of PCL's current students are survivors of PCL itself, having endured many years of study beyond that of the typical law student, enduring and persevering until they pass

the Baby Bar (FYLSX), a process that often takes several attempts, significant financial resources, and many additional years committed to their goal of becoming attorneys. These particular students are especially tough, enduring law school through an unprecedented global pandemic, social uprisings, and stay-at-home orders that forced their law school to transition to an online learning format after 50 years as a fixed-facility learning institution. Many students who originally chose PCL for its status as a fixed-facility were quick to find other law study programs that had existed as distance learning schools before the pandemic. These schools had more expertise in remote-learning and were often cheaper.

After nearly 3 years of struggling with not only running a law school remotely, but also managing staff and overseeing operations remotely, all the while with almost nothing but unpaid volunteers, PCL had to quickly return to its current facility after it had sat vacant for years. Due to old damage from fires, rain, and a homeless encampment that had to be moved out by police, the volunteers of PCL quickly got to work trying to make maintenance improvements such that the students could return to a comfortable learning environment. With a yearly investment of roughly REDACTED, PCL invested in necessary requirements to meet library needs.

Just when PCL thought it was beginning to turn itself around, the dean left her employment abruptly. The timing of her departure had a deeply negative impact, as PCL was only weeks away from an inspection and had many pending items due to the State Bar, including a massive request for document production in advance of the inspection. The administrator was tasked with doing not only his own job duties, but those of the dean. With approximately 2 weeks until the inspection, an interim dean was hired in the hopes of bringing organization and leadership to the school. With a glimmer of hope and a relentless intrinsic nature to keep going, employees and volunteers did their best to meet compliance demands while the interim dean informed herself of the many issues that PCL needed to overcome to remain in operation. Endless hours have been spent trying to improve the school's operations, improving lines of communication with faculty and students, establishing clear expectations and protocols for faculty and staff, making maintenance improvements to the school, its website, its policies, manuals, and handbooks, all while trying to meet compliance needs. Constantly saddled with the worry that the State Bar might close down the school, the impact of this level of stress on any organization would be expected, on PCL, an organization of 2 employees, the impact has been profound; the intensity of the pressure cannot be explained and has expressed itself in the mental and physical well-being of its employees and volunteers. Nonetheless, PCL has continued in its goal to gain and maintain compliance.

Significant improvement have been made in the 2 months since the interim dean has been hired. Final exams were properly administered, with faculty submitting exams ahead of time for review by the Faculty and Curriculum Committee (FCC); the website has undergone weekly updates in efforts to bring it to complete accuracy; disclosures were timely provided to students in advance of the new quarter; new faculty were recruited, interviewed, and hired in time to provide timely syllabi for the winter quarter; with the FCC's oversight and agreement that there were no negative long term effect to future course rotations, a course schedule was organized that fulfilled not only the needs of a transfer student who has taken most of PCL's class offerings but also a request by the 3L students that a class from their cluster plan be offered early.

While PCL recognizes its recent efforts, it also understands that its current status as on probation with the State Bar has been 5, arguable even 15, years in the making. The Peoples College of Law desires nothing more than to partner with the State Bar to improve its practices and continue to remain in operation, if only long enough to allow its current students an opportunity to finish their legal education. PCL would like the State Bar to consider a formal “teach out” option by which PCL will be allowed to remain in operation for at least long enough to allow its current students a meaningful chance to graduate and accomplish their J.D.s

III. COMPLIANCE ISSUES OBSERVED DURING THE PROBATIONARY PERIOD AND THE OCTOBER 2023 INSPECTION THAT WERE NOT ENUMERATED IN THE 2020 INSPECTION REPORT, LISTED BY LETTER;

A. Rule 4.241

Rule 4.241 states that a registered law school must provide each student, in the format required by the committee, a disclosure statement that includes a specific set of information enumerated in the rule and the student must sign the disclosure and receive an executed copy before making a payment to the law school.

In compliance with Rule 4.24, disclosures were provided to the students for the Winter 2023 quarter. Checks and balances have been put into place at PCL requiring students to sign the disclosure statement, currently via DocuSign, prior to being able to enroll in classes. A procedure has been established for the proper dissemination, signing and record keeping of disclosures. The current practice requires that the administrator receive a copy of the signed disclosure, and ensure one is provided to the student, before officially enrolling the student in their appropriate classes or accepting payment.

PCL was required to extend its timeline regarding the disclosure audit due to the untimely departure of Edith Pomposo, who left the school abruptly and without advanced warning. From the period of time from September 11, 2023, to September 27, 2023, PCL had no dean and it would not have been possible for the school to complete the audit by its originally intended date of September 25, 2023. The interim dean, who was hired and began work on Thursday, September 28, began a period of preparation for the inspections taking place the following week. The audit had to be rescheduled until such a time as the process could be done completely and accurately. Due to having been recently hired, the interim dean lacked the institutional knowledge and familiarity with PCL’s software, databases, and record keeping systems to be able to contribute to the audit process at the time of PCL’s originally stated deadlines. As of the date of this report, the interim dean has only been employed by PCL for 2 months and is responsible for a magnitude of varied, complex, and detailed job functions that are all very demanding of time. As such, the process of completing the disclosure audit has been necessarily prolonged. As of the time of this writing, the interim dean has provided to State Bar staff a list of names of students who have been identified as someone for whom PCL does not have a signed disclosure on file for at least one term.

In regard to the State Bar’s request that PCL review its Rule 4.241 disclosures for all students who attended school during the 2020 to 2021 and 2021 to 2022 academic years, PCL has been

able to verify that it did disseminate, and that students did **receive** appropriate disclosures at least once during each academic year of 2020-2021 and 2021-2022.

Rule 4.24(E) states that a refund is owed to students who did not **receive** a disclosure statement, not those who did not **sign** a disclosure. The Rule states “A law school that does not comply with this rule must refund all fees, including tuition, paid by a student who did not **receive** the disclosure statement.” The distinction in this rule between the word “sign” and “receive” is important as it will help distinguish who is owed a refund and who is not.

A question remains as to whether the word “term” refers to a quarter or an entire academic year. Rule 4.24 (B)(2) states that the “disclosure statement must be provided to each returning student, prior to payment of any fee for an **academic term**.” The definition of this word will greatly impact the refund process, as PCL has signed disclosures on file for most students for at least one academic year and has record of receipt of disclosure by all students for at least one academic year. A prior dean has asserted that, while he was dean, he interpreted the meaning of the word “term” to mean one academic year.

Additionally, there is a question as to how long a signed disclosure remains effective before a new disclosure is required to be signed. Currently, disclosures are more frequently updated due to advisement from State Bar staff that PCL needs to include “all of the committee’s notices related to noncompliance, including the probationary notices.” However, prior to each respective date upon which PCL was issued the notice of noncompliance and notice of probation, the information required to be included in the disclosures did not change as often. Would a student’s receipt of an accurate disclosure or a student’s signature on an accurate disclosure be effective for a longer period of time or more than one term if the information required to be stated in the disclosure remained unchanged? PCL believes it should.

As PCL considers these distinctions with the assistance of State Bar staff, it will finalize calculating how much is owed in refunds to each of the students who has been identified as someone for whom PCL does not have a signed disclosure on file for at least one term.

In the October 2023 Inspection Report (“Report,” “Inspection Report”) State Bar staff states “The inspection team also discovered that the law school included additional information along with the Rule 4.241 Disclosure that did not appear to be accurate. For example, In fall 2023, the document that students are required to sign before payment of any fee for an academic term asked students to confirm they had received their class schedules when neither the schedules nor the professors had been fully identified and not all syllabi were available until the end of the first night of class.”

PCL includes the disclosure statement as part of its Student Tuition, Enrollment, and Registration Agreement, which students are required to sign before making a payment. The agreement includes language that states that a student’s signature on the agreement verifies “that (the student) ha(s) been given a schedule of classes for the first quarter after the date (the student) sign(s).”

Students were provided with a class schedule via email by former dean, Edith Pomposo, on

August 24, 2023. The class schedule stated the class names and the day of the week that each class was to take place. Without a clear definition of what a complete class schedule is supposed to consist of, and considering that this language on the agreement is included voluntarily by PCL and not because it is required by the State Bar or the Rules or Guidelines, PCL does not agree with the State Bar's assessment that the information was inaccurate. (ATTACHMENT A)

In the October 2023 Inspection Report, State Bar staff states, "The disclosure also linked to the State Bar's exam outcomes page as a means of showing performance on exams, but the page does not state PCL's pass rates. The law school should have included the pass rates in the disclosure.

PCL has regularly included pass rates in its disclosures, including the Fall 2023 disclosure. The Fall 2023 Student Tuition, Enrollment, and Registration Agreement, which includes disclosures, includes FYLSX and CBX pass rates. An image of the passage rate tables included in the Fall 2023 agreement is attached. (ATTACHMENT A1)

B. Guideline 2.2(C):

Guideline 2.2(C) states a law school must establish reasonable safeguards against financial fraud and other financial improprieties.

PCL has made efforts to improve the protection of its digital files. For many months, PCL has been using a password protection app which is ISO 27001, SOC2 Type II, SOC3, BSI C5, TRUSTe compliant. PCL has also begun a trial period with an SOC2 compliant file transfer system, 2 Transfer, and data storage system, C2 storage, in order to ascertain if it suits PCL's needs.

C. Guideline 2.9 (E):

Guideline 2.9(E) requires a law school to advise each student of their final grades within a reasonable time after the student completes the course.

All Fall 2023 quarter final grades were submitted on time. The administrator has strengthened his lines of communication with the faculty and has begun reaching out to them earlier to remind them of upcoming deadlines.

The law school has previously failed to provide proper oversight to the administrator's position, but the addition of the interim dean's experience with over 20 years of management will help create procedures that allow the school to improve supervision. Faculty requires more direction and guidance which has not been provided consistently by all administrators. The school hired the interim dean specifically for her background in management and business organization. Already, with improved communication with the faculty, and clear guidelines and expectations communicated in a timely fashion, the school has seen improvement.

PCL began the process of considering paying faculty and/or requiring the use of faculty contracts around October of 2023. Research was done by a Community Board member to review

contracts provided to faculty at other schools. Sample contracts have been procured and are being utilized as a reference while PCL creates its own professor contract.

D. Guideline 4.2:

Guideline 4.2 states that a law school must have a competent dean and a competent faculty devoting adequate time to administration, instruction, and student academic counseling.

PCL's faculty all hold J.D.s. Of PCL's 13 faculty for the 2023-2024 academic year, 11 out of 13 are licensed attorneys. All of the faculty is regularly available to the students for academic counseling.

The interim dean brings years of experience to the position, having worked in for-profit business management of children's educational centers and programs for over 15 years. Her experience includes curriculum development and lesson planning. She has lead and trained staff of up to 70 employees at a time, creating employee manuals and training curriculums. She is a licensed attorney who has taken and passed both the First Year Law Student's Exam and the California Bar Exam. She has taken and passed all subjects tested on the California Bar Exam. Since the time of the inspection, both the interim dean and the administrator have participated in the Annual Registrars' Meeting for All California Law Schools on October 19, 2023. This meeting is an informational session that the State Bar described as a meeting to "discuss topics affecting the registrar's office, including current and planned changes in State Bar procedures, and new developments related to rules, the applicant portal, and records." Both the interim dean and the administrator learned a lot at this meeting and found it to be a very valuable resource in continuing to improve their roles.

The dean's role at PCL includes collaborating with the FCC, which consists of nearly all licensed attorneys, many of whom have backgrounds in higher education. The FCC plays an intricate and critical role in curriculum and exam development, grading, and faculty training. The FCC has guided the school's academic program to its highest FYLSX and CBX passage rates in at least a decade. A reliable faculty manual also helps guide faculty expectations.

Former Dean Pomposo did not fulfill a plethora of job functions for some time before she departed from the school. Her untimely departure had a greatly negative impact on PCL's operations and on its ability to timely meet compliance requirements. PCL believes that Pomposo may have informed the State Bar that she was leaving PCL before even notifying PCL of the fact. PCL would like more information concerning the impact of Ms. Pomposo's statements to the State Bar implicating her integrity, and by easy extension, the integrity of the School.

In its report, the State Bar states, "Mr. Aramayo was not aware of basic information that is critical to the registrar role, such as the number of credits needed to graduate."

PCL requires 114 total quarter units to graduate (33 quarter units in 1L year, 27 quarter units for each subsequent year). It is important to note that PCL adheres to the Business and Professions Code's requirement of 270 hours of instruction per year. Nearly all of PCL's handbooks, manuals, and published materials make reference to the requirements of PCL as being based on the 270 hours and not on the amount of units required. Similarly, there is nearly no mention of

units, though the 270 hour requirement is discussed, in the Title 4 Admission and Educational Standards, Division 3 Unaccredited Law School Rules (“Rules”) or the Guidelines for Unaccredited Law School Rules (“Guidelines”)

This statement that Mr. Aramyo is not aware of basic information is inaccurate and misleading. As both the staff and the Committee of Bar Examiners is aware, unaccredited institutions have a different set of rules and considerations imposed on them. It is entirely possible for a student to attend PCL and achieve the necessary amount of units towards graduation without attending for four years. Added to this, PCL sometimes expands unit load (for example in the second quarter of the first year) and this combination of different factors can sometimes lead to confusion. The governing rule, therefore, is that a law student needs four uninterrupted years of legal study, at a 2.0 GPA, and with 270 hours per year of instruction. The Report erroneously implies that the rule dictates units with regard to other considerations. The makers of the Report want to simultaneously hold the school accountable under special requirements while conveniently forgetting them when they apply in answering a specific question.

Furthermore, Administrator Aramayo clearly answered the question: the governing rule refers to the 270 hours of instruction and there have been cases when individuals have attempted to be certified for the Bar Exam, with the requisite number of "units," but have been denied certification because they did not possess the requisite number of instructional hours. This answer was ignored in favor of misreporting his answer.

The statement that the Administrator does not possess experience "such as course scheduling, determining eligibility for admission and graduation, reviewing students' academic progress, preparing compliant reports and disclosures, and maintaining student records," is once again misleading. Eligibility and admission is determined by a combination of school policy and Bar rules. Course scheduling is likewise also implemented through a pre-existing course map created by the FCC and master schedule created by the dean or FCC. There is no need for special training to schedule a class, though once again Bar staff simply implies there needs to be.

Finally, in terms of maintaining student records, the Administrator wants to make the undisputed facts clear: since he has been at PCL, multiple students have been cleared and certified to sit for the FYLSX and the California Bar Exam. That is to say, the California Bar itself has validated the Administrator's work. The mistakes that have been present in student records have been corrected and the Administrator has taken pains to reach out to students while maintaining transparency to State Bar staff.

This report simply repeats the tactic of implying there must be inadequacy by looking at the Administrator's work background in lieu of actual evidence that the record keeping process has not improved. In fact, record keeping has improved.

The State Bar further states: “Though the interim dean advised that she has a list of 88 potential faculty, PCL has struggled to fill its faculty positions and retain teachers.”

PCL was able to engage and hire faculty for both the winter and spring 2023-2024 quarters within one month of the interim dean's hiring and over a month before winter classes began.

Given that the interim dean had only been hired for about one month at that point, reliance on the faculty list was essential. A statement made in the report that that PCL has struggled to retain teachers, is not accurate. Of the 8 classes offered in the Fall of the 2023- 2024 academic year, 6 of the instructors were returning from previous years. Of the 10 classes offered this winter quarter, 7 of the instructors are returning instructors.

In the Inspection Report, State Bar staff frequently mentions that an Evidence instructor “quit” but this is not true. A class was canceled at the beginning of the quarter but it was an elective trial advocacy class, not an Evidence class. All of the Report's discussion of an Evidence class being canceled is inapposite, inaccurate and highly misleading. The conclusions the Report draws on this assertion are likewise flawed. Evidence was not a substantive course being offered for the 2023–2024, as is evidenced by the attached cluster plans (Attachment D and D1) and over 5 years worth of faculty recruitment flyers sent out by the FCC from 2018 to 2023. (Attachments D2 -D8) These flyers demonstrate that Evidence was never intended to be offered in the 2023-2024 school year, as the report asserts.

The Report states, “This last-minute change had a negative impact on students. In a meeting with students during the inspection, one student stated they wished to apply to be a certified law student under the State Bar’s Practical Training of Law Students program but were unable to do so due to the delay of the Evidence course, as they must enroll in Evidence to do so.”

The assertion that this student’s ability to be a certified law student was hindered due to an Evidence course that was canceled at the last minute is not true. It has long been the case that evidence is offered in adherence with the cluster plan because PCL does not have a large enough student body to support it being offered every year. A student who had a similar question about evidence before the quarter started posed her question to the former Dean Pomposo prior to the beginning of the quarter in an email, redacted for privacy and attached here as ATTACHMENT D9, and the student as informed at that time that evidence was not scheduled to be offered until the next year. ATTACHMENT D91

E. Guideline 4.7

Guideline 4.7 states that instructors must continually strive to improve their teaching skills and expertise in the subject(s) they teach.

PCL’s faculty strives to improve their skills and PCL provides faculty with comprehensive faculty meetings and trainings. While these trainings took place more frequently pre-pandemic, PCL held faculty meetings and training in 2022 and PCL is conducting a faculty training workshop focused on exam creation and grading this winter quarter of 2023. The agenda from a faculty meeting is attached (ATTACHMENT E) and a faculty exercise in grading that was completed at a separate faculty training is attached as well (ATTACHMENT E1).

F. Guidelines 5.1 and 5.2

Guidelines 5.1 and 5.2 state that the law school must maintain a qualitatively and quantitatively sound program of legal education.

PCL's JD program is coordinated, organized, and adheres to a course rotation developed by the FCC. (Attachment D) Faculty is provided with training and PCL has a significant faculty review process which allows for further opportunities for development.

The report rehashes wrongful assertions regarding an Evidence course which was never planned to be offered in the 2023-2024 school year. (Attachments D-D8)

The report states that the law school was unaware of a responsibility to offer 6 hours of practical skills training but this is incorrect. The FCC was aware of this requirement, which is why elective selection prioritized practical skills training courses. See faculty recruitment flyers from 2018—2023 (Attachments D2 -D8) all of which have some form of "competency/trial advocacy" listed along with the elective slot. Summer internships were all aimed to satisfy this requirement as well. It wasn't "happenstance" that we "met the requirement", but rather by design and existing practice.

PCL adopted a grading guideline provided by the CBE following the 2020 Report. The State Bar provided Dean Emeritus Spiro with a grading curve scheme that PCL implemented. The current grade review process in the handbook was created to comply with the State Bar's concerns of grade inflation. PCL has test grading rubrics that are held as a model for grading, and faculty trainings have been held regarding using rubrics for test grading, with another training planned for the winter quarter specifically to cover test grading and exam creation.

G. Guideline 5.11

Guideline 5.11 states that a law school must offer a balanced and comprehensive course of study with materials presented in an organized and logical manner and sequence.

PCL's JD program is coordinated, organized, and adheres to a course rotation developed by the FCC. The attachment is PCL's cluster plan, which dictates when course are offered based on purposeful planning by the FCC. (Attachment D)

As stated under D. Guideline 4.2 above, the report rehashes wrongful assertions regarding an Evidence course being offered out of sequence.

PCL students are able to take electives in a variety of legal topics. Electives are expressly part of PCL's cluster plans. Clinical courses provide additional variety and, this winter quarter, 3L students have the opportunity to choose to take an elective in Employment Law in addition to their substantive classes. Our cluster plan consistently offers both the substantive course and the electives. The Report is gravely mistaken here in all its assertions.

H. Guideline 5.12:

Guideline 5.12 states that a law school should offer instruction in various practical skills.

PCL offers a variety of courses that offer instruction in practical skills. For example, trial

advocacy was offered in 2017 and again in 2023. An employment law elective with a practical component was held in 2017-2018; in 2019-2020 the instructor of a special education course provided practical skills in pleading style work; there was a trial advocacy course in 2020-2021 and two summer clinical courses that year; a transactional track clinic was offered in 2021-2022 where the students worked on pleadings and practicum-style work. During the Fall 2023 quarter, PCL offered a family law externship, a course in trial advocacy, and a course in advanced criminal defense litigation which offered students an opportunity for practical learning in legal research, help preparing motions, development of defense strategies, preparation of trials, and fact investigations.

I. Guideline 8.1

Guideline 8.1 states that a law school must have adequate present and anticipated financial resources to support its programs and operations.

PCL has provided budget forecasting to the State Bar through the year of 2026, which will support our abilities to teach out our current upper division students and support our current 1L in taking the FYLSX before potentially transferring to another institution if PCL is not allowed to stay open long enough for the 1L to graduate from the institution.

IV. STATUS UPDATES RELATING TO THE LIST OF ACTIONS IDENTIFIED BY THE COMMITTEE FOLLOWING PCL'S 2020 INSPECTION, REQUIRED FOR THE SCHOOL TO ACHIEVE AND MAINTAIN COMPLIANCE, LISTED BY NUMBER.

1. Guidelines 1.9 and 2.10 (2020):

PCL has a disability accommodations policy which has recently been reviewed by a disability attorney for compliance with applicable laws and best practices. The PCL Community Board approved additions to the policy, including a recusal and conflict of interest policy and a policy that further clarifies that student committee members and/or student board members are not to participate in the accommodations request process. PCL believes that the adoption of these formal policies fully satisfies the disability accommodations and student privacy concerns expressed by the State Bar Inspection Staff.

Previously, PCL relied on the language in its Student Privacy Policy, which requires that the Administrator, Dean, officers, members of committees, member of the community board, employees, and faculty are to exercise "adequate caution" when speaking about students and student situations at PCL. "Adequate caution" in practice at PCL has included setting student issues at the end of a board meeting agenda and then addressing the issues in a closed session or closed meeting without student members present.

PCL's policy now expressly prohibits involvement by student board and student committee members. The policy states:

No student (including student members of PCL committees, the Community Board and the Executive Committee) shall participate in any of the functions, deliberations, or votes relating to any accommodations request, unless, before participation by any student, the student who submitted the request consents in writing to participation by students in those functions. If a

student's private health information is discussed in any context during a committee meeting or Community Board meeting, meeting minutes shared with student board or committee members will be redacted to protect the student petitioner's privacy.

PCL now has a formal policy regarding recusal and conflict of interest:

Members of committees and the Community Board should recuse themselves from deliberations, functions, or votes relating to any accommodations request where the member's impartiality in the deliberation, function, or vote might be reasonably questioned. Members who recognize a conflict should notify the other members of the committee or Community Board of their intent to recuse themselves of any matter where they believe a conflict may exist, and state their intent to seek recusal on the matter. If a member should choose to recuse themselves, the member should inform the committee or board Chair as soon as practical in a way that would not compromise or jeopardize the student's right to impartial deliberations, functions, or votes.

PCL has adopted an additional policy to create clear expectations of instructors in regard to disability accommodation:

School administration will provide express written notice of the accommodations that a student should receive to necessary individuals, such as an instructor or exam proctor. The notice will not disclose any other information. Information shared with an instructor or exam proctor relating to the student's disability should be limited to the contents of the notice and the directives in the notice are to be followed. The instructor/ exam proctor should not share the contents of the notice or divulge the student's status as receiving accommodations with anyone without the accommodated student's express consent.

In the Inspection Report, State Bar staff reports "ADA policy created in 2020 was not implemented until the beginning of 2023." PCL refutes this statement, as the creation of the policy in 2020 was also the implementation of the policy. It is possible that there have been challenges to the policy and/or failures by others to adhere to the policy, but this does not mean that PCL did not implement the policy until after that time. For many students who receive and have received disability accommodations at PCL, the policy has functioned as it is intended.

In the report, State Bar staff state: "Another student filed a complaint because the school's policy did not clearly indicate what documentation the school required to request an accommodation."

Since at least 2021, PCL has clearly stated what documentation is required. The following is an excerpt from the Handbook of Rules and Policies from 2021:

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

a minimum, what the disability is and what accommodations should be given. ”

As of October of 2023, in regard to documentation, the policy stated:

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

Currently, in regard to documentation, PCL’s disability accommodations policy states:

“The student must submit a written request for accommodation to the PCL Administrator. The request must state (a) what the disability is, (b) how it substantially limits one or more major life activities as broadly defined in 34 C.F.R. 104.3(j)(2)(ii), (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, what accommodations should be given, and should include the professional’s assessment of how the student’s disability limits one or more major life activities. ”*

In its report, State Bar staff state “Neither the dean nor the interim dean has prior experience with or knowledge about how accommodations requests are verified or decided.”

The interim dean had only held the position for about two weeks at the time of the inspection. Since then, the interim dean has become familiar with PCL’s disability accommodations policy and the process by which accommodations are granted or denied. Additionally, an administrative policy has been adopted requiring employees to read Section 504 and ADA Title III on an annual basis. PCL will seek to hold an annual training with either a disability attorney or organization such as dredf.org, thedrhc.org, or disabilityrightsca.org in order to build familiarity with accommodations best practices. Disability training has been scheduled for both PCL faculty and staff on Saturday, February 3rd, 2024.

PCL’s Disability Accommodations Policy, in full, states:

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

The request must state (a) what the disability is, (b) how it substantially limits one or more major life activities as broadly defined in 34 C.F.R. 104.3(j)(2)(ii)*, (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, what accommodations should be given, and should include the professional's assessment of how the student's disability limits one or more major life activities. 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 request for 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 the 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, are reviewable by the Executive Committee**.

The Executive Committee must review it if the student requests a 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.

School administration will provide express written notice of the accommodations that a student should receive to necessary individuals, such as an instructor or exam proctor. The notice will not disclose any other information. Information shared with an instructor or exam proctor

relating to the student's disability should be limited to the contents of the notice and the directives in the notice are to be followed. The instructor/ exam proctor should not share the contents of the notice or divulge the student's status as receiving accommodations with anyone without the accommodated student's express consent.

*Section 504 of the Rehabilitation Act, which predates the ADA, has the most expansive definitions of disability based on the concept of major life activities. While PCL is not subject to Section 504 because it does not receive federal funding, PCL prefers the more inclusive language provided by Section 504, and believes this language is better for students because it removes the burden of the person with a disability from making a legal conclusion about their disability in relation to exams and schoolwork.

**No student (including student members of PCL committees, the Community Board and the Executive Committee) shall participate in any of the functions, deliberations, or votes relating to any accommodations request, unless, before participation by any student, the student who submitted the request consents in writing to participation by students in those functions. If a student's private health information is discussed in any context during a committee meeting or Community Board meeting, meeting minutes shared with student board or committee members will be redacted to protect the student petitioner's privacy.

***Members of committees and the Community Board should recuse themselves from deliberations, functions, or votes relating to any accommodations request where the member's impartiality in the deliberation, function, or vote might be reasonably questioned. Members who recognize a conflict should notify the other members of the committee or Community Board of their intent to recuse themselves of any matter where they believe a conflict may exist, and state their intent to seek recusal on the matter. If a member should choose to recuse themselves, the member should inform the committee or board Chair as soon as practical in a way that would not compromise or jeopardize the student's right to impartial deliberations, functions, or votes.

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>)

2. Guideline 2.2(B) (2020):

In its Report, the State Bar agrees that PCL has adopted a compliant refund policy. Disclosures are discussed in further detail in section A. 4.241 Disclosures.

3. Guideline 2.3(A)-(C): (2020):

The State Bar agrees that PCL is in compliance with the recommended mandatory action from the 2020 inspection report, which required PCL to list, in its Catalog, only classes that are currently being offered at PCL and/or which have been offered within the past 3 years or will be offered within the next 2 years.

With regard to PCL's website, the interim dean has been transparent with the Bar about her process and her plans, including being trained in website design, creating review forms, and completing an initial website evaluation by October 27, 2023. With the goal of bringing the website completely up to date while still managing the day-to-day duties of the administration of the school and meeting compliance requirements, the website has been systematically receiving updates on a weekly basis since the week of October 19, 2023, and a record has been kept of all the changes that have been made since then. Significant recent updates have included uploading the current disclosure forms with the notices of noncompliance and probation attached.

In its Report, State Bar staff state "the financials webpage misstated the FYLSX exam fee." This is not true. PCL's website states that the FYLSX costs \$624.00 and that laptop computer fees are \$153.00. (ATTACHMENT 2.3A and ATTACHMENT 2.3B) This has not been updated since the interim dean began the website review process because the information is correct. As of November 30, 2023, the State Bar website states that the FYLSX costs \$624.00 and the laptop computer fee is \$153.00. (ATTACHMENT 2.3C) Additionally, this section of the PCL webpage has numerous disclaimers that the included information provides mere cost approximations. The table of costs is titled "The First Year at PCL" underneath which the description of the table's contents states "A cost breakdown including approximations of Non-PCL costs." The column under which monetary values are displayed is titled "COST*." The asterisk is defined beneath the table as meaning "All costs are subject to change. May be subject to late filing fees." Furthermore, the cost which the State Bar staff report as being incorrect, though it is correct, is listed as the cost for an item on the table titled "California State Bar** First year Law Student Exam (FYLSX) Fee." This cost has 2 asterisks next to it (**) which are defined beneath the table of costs as "approximation of Non-PCL costs (provided here as a guideline only.)" The fee of \$153.00, which the State Bar staff reports as being incorrect despite the fact that it is correct, is also listed as the cost for an item on the table titled, "California State Bar**- FYLSX Laptop Computer Fee." This cost has 2 asterisks next to it (**) which are defined beneath the table of costs as "approximation of Non-PCL costs (provided here as a guideline only.)"

In its report State Bar staff state, "PCL simply changed the title of the 2022-2023 Catalog to 2023-2024 Catalog and posted it without updating it." This is not accurate, PCL changed the date of the Handbook/Catalog in conjunction with updates it was making to the Catalog at the time.

In its report State Bar staff state, "PCL is not forthright when communicating its compliance status to students. The law school's original Notice of Noncompliance issued on June 17, 2022, is obscured on the PCL website under a heading titled "CalBar Motion."

PCL has been forthcoming about its compliance status. PCL students have received multiple communications from PCL in both written and verbal format, including a group meeting with the interim dean to discuss the school's status as on probation. The PCL website states PCL's status as having received a notice of non compliance and being on probation in at least 4 different places, including the home page, the home page scrolling bar, the "about" page, and the disclosure statement page. Prior to November 22, 2023, in addition to the places listed previously, the notice of non-compliance and probation information were also included on a second disclosure page under the "academics" tab and on a page titled "California State Bar

Motions.”

4. State Bar staff did not include a point number 4. In its monthly progress reports, PCL has reported Guideline 2.3(D) (below) in point 4 of the document. For the purposes of user ease and to be consistent with the formatting in the October 2023 Inspection Report, PCL has chosen to skip point 4 and provide its response on Guideline 2.3(D) in point 5.

5.. Guideline 2.3(D) (2020):

PCL’s disclosure form was updated accurately and included as part of the student’s enrollment agreement, which was disseminated and signed by students prior to the beginning of the winter 2023 quarter.

The disclosure errors noted by the inspection team in October of 2023 included an overstated fee by the law school. At the time, the total fees paid towards a J.D. degree should have been stated as \$2400.00 but were overstated as \$5600.00.

As stated above, under Rule 4.241, PCL did not inaccurately state the CBX passage rate, as is asserted here by State Bar Staff. Several PCL alumni, including PCL’s current contracts professor, who took and passed the exam in July of 2018, can confirm that they took that California Bar Exam Administration.

In regard to the State Bar’s request that PCL review its Rule 4.241 disclosures for all students who attended school during the 2020-2021 and 2021 to 2022 academic years, PCL has been able to verify that it did disseminate, and that students did **receive** appropriate disclosures at least once during each academic year of 2020-2021 and 2021-2022. This was discussed in detail in a. 4.241 above.

6. Guidelines 2.9(A)-(B) and 5.24 (2020):

PCL has maintained policies that it believes to be in adherence with the Rules and Guidelines, providing information about course repetition, when a course must be repeated, and the impact of the repetition.

PCL addresses course repetition in several parts of the Student Handbook. For example, in a section on Page 25 titled “Advancement in Good Standing” and in a section on Page 26 titled “Requirements for Graduation and Certification to Take Bar Exam” it states :

“The student must have received a passing grade for all quarters of each course the student took, except for courses from which the student withdrew using proper procedures.

In the student’s first year courses, the student must not have more than one grade lower than 70 (C-) for any course in any quarter.

The student must have a grade point average of 73 (C) or better for all final grades for the

quarter in all the student's courses combined."

Additionally, the h\Handbook states, on Page 30, when a course must be repeated :

"Repeating a Course or Quarter after Failing and Thus Not Completing 270 Hours: If (1) a student fails a course or a quarter of a course, and if (2) as a result of the failure the student does not successfully complete 270 hours in an academic year, then the following applies. Because of State Bar requirements that the required 270 hours per year must all be taken in the same 12 month academic year, the student, in order to be eligible for the J.D. degree and to take the FYLSX and the Bar Exam, cannot make up for the failed course or quarter by repeating only that course or quarter again in a later academic year, but instead must repeat the entire year's courses . (Note that failing a course might not result in failing to successfully complete 270 hours in an academic year, if during the academic year the student completed courses whose total hours exceed 270. As of 2020, PCL normally offers exactly 270 hours of classes for 2L, 3L, and 4L students, but 330 hours for 1L students.)"

In regard to how to repeat a course, Page 28 of the Handbook states:

"...students who failed a PCL course and want to repeat the course can begin repeating the course starting later than the start of an academic year, but this exception does not apply to students who have attended another law school."

Page 29 of the Student Handbook, addresses the issue of duplicate credit, which PCL has believed also addresses the issue regarding impact to GPA:

"No Duplicate Credit: Duplicate credit will not be given for repeating the same or substantially the same course or quarter, whether the courses or quarters are both taken at PCL or at another school, or partly at PCL and partly at another school."

Page 30 of the Student Handbook addresses the issue of repeating a course after a student fails or does not complete the 270 hour requirement:

"If (1) a student fails a course or a quarter of a course, and if (2) as a result of the failure the student does not successfully complete 270 hours in an academic year, then the following applies. Because of State Bar requirements that the required 270 hours per year must all be taken in the same 12 month academic year, the student, in order to be eligible for the J.D. degree and to take the FYLSX and the Bar Exam, cannot make up for the failed course or quarter by repeating only that course or quarter again in a later academic year, but instead must repeat the entire year's courses (Note that failing a course might not result in failing to successfully complete 270 hours in an academic year, if during the academic year the student completed courses whose total hours exceed 270. As of 2020, PCL normally offers exactly 270 hours of classes for 2L, 3L, and 4L students, but 330 hours for 1L students.)"

6. Guideline 2.9(C) (2020):

In regard to the Winter 2023 Quarter, syllabi were provided to the students before classes began on November 27th, 2023. The syllabi were reviewed for accuracy and adherence to PCL policy, and included clearly stated grading components of the class. The students were given access to syllabi in advance of their classes in order to provide enough time for them to buy the necessary textbooks and course materials.

The State Bar report makes mention of “at least one syllabus was not provided in advance of the course.” This reference is believed to be about a Fall quarter class in which the syllabus, via Populi, was available in advance to enrolled students who met PCL’s standards for advancement to the next quarter. A student has since confirmed that he had access to the syllabus via Populi before the beginning of class. The instructor did not bring printed versions to class due to technical issues he’d had. The administrator was able to correct the issue and provide the students with printed syllabi before the end of the first class.

7. Guideline 2.9(D) (2020):

PCL has had a written policy regarding authentication of student work since 2020. When PCL was functioning in a remote learning format due to the pandemic, it had a different policy that provided for exam authentication and security based in remote learning. That policy stated:

“POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK

Adopted by Faculty-Curriculum Committee October 20, 2020

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 must either (a) have

their video activated during the entire class, 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 online classes are given with Microsoft Teams. The students attend class through teams. The students' names are shown during the class. The students are on camera during the class. Students speak during the classes, and their voices also identify them.)"

PCL returned to in-person learning on campus in September of 2023, and, accordingly, the exam authentication policy has changed. A policy was intended to be introduced for approval at the October board meeting, but the policy was sent back to the FCC for review after the first set of interviews with the CBE Inspection team, based on feedback from the inspection team which suggested we should continue to utilize exam-testing software even for proctored exams taken in person .

The PCL Community Board approved the following policy change on November 18th, 2023:

Exam Authentication and Security Policy

On Campus Exams

All final exams will be proctored and administered live, on campus, by a PCL - approved proctor. A clear set of exam rules and instructions should be provided to the proctor by the instructor prior to the examination in order to ensure a seamless testing experience.

During examinations, students must leave all personal belongings, including books and all papers not provided by the proctor for purposes of the examination, outside of the testing room. Electronic devices, including cell phones, are not permitted in the exam room. Laptops and other electronic devices serving the purpose of typing on an exam are only permitted if the approved exam-testing software described below is utilized. Small clocks are permitted for time-keeping purposes. Cell phones, tablets, and other similar electronic mobile devices may not be used as clocks during the exam. Water and writing implements are permitted in the exam room.

Where the faculty member has elected to allow students to test electronically, students will be permitted to use their laptops only if they utilize approved exam-testing software. As of November 2023, the only approved testing software is TestInvite, though this is subject to change.

All exam papers, including the assessment (exam) itself, notes, and other papers associated with the exam, must be turned into the proctor before leaving the testing room.

Remote Examination

All exams performed remotely will be required to utilize testing software. Testing software will record a student's screen and the student's web camera will be turned on during the exam for authentication and security purposes. Students may not opt-out of recording unless they have been approved for testing accommodations that specifically provide for such an accommodation. In such cases where a student has an unavoidable reason not to test on campus, such as in the

case of a contagious illness, a student must request permission from the Administrator or Dean to be allowed to test remotely. The Administrator or Dean may request documentation in support of the student's request.

Exam Authentication

Students testing on campus must sign an attendance sheet, which will be made available by the proctor. The proctor must also sign the attendance sheet in attestation that the identity of the student named on the attendance sheet matches the identity of the person who took the exam.

The State Bar Report states "the law school allows students to bypass authentication at the discretion of each faculty member."

The interim dean has communicated with former administrative heads of the law school since 2020 who indicate that there has been no such policy of "allow(ing) professors to override the use of exam software or to accept submissions that were not monitored or authenticated." In fact, one of the benefits of Test Invite, the exam security software that is used by PCL, is that it provides video and picture monitoring during exams, which PCL utilized for a student who had to test off campus due to Covid during the Fall Quarter finals.

Currently, instructors have no access or involvement in the testing process at PCL at all. Exams are conducted on campus, without instructors present, and are proctored by a live proctor. In addition, exam security software is used for all exams administered electronically.

7A. Guideline 2.10 and 5.17

The Inspection Report does not make mention of what is usually reported as point 8 in PCL's monthly progress reports. This section recommends that "To bring itself into full compliance, the school should review, revise, and republish its grade review policy to meet guideline requirements."

Subsequent to this recommendation in 2020, PCL adopted a compliant grade review policy and has continued to update the bar as necessary regarding the policy.

8. Guidelines 2.11, 7.1, and 9.1 (2020):

PCL continues to utilize Populi to store digital student records. PCL has continued in its process of digitizing records that were formerly available only in physical format. Additionally, PCL has been utilizing a password management app for many months in order to control access to PCL's digital files. PCL strives to continue to improve in this area.

9. Guideline 3.1 (2020):

PCL has sufficient administrative capacity to achieve and sustain compliance. While the Inspection team's assessment of PCL is fair, it is important to note that, at the time of the October 2023 inspection, the interim dean had only been employed by the school for approximately two weeks. That period of time was especially challenging for the administrator as he had assumed the duties, in addition to his own, of the former dean, Edith Pomposo, who left abruptly at a time of heightened urgency as the staff and

volunteers were right in the middle of the school's preparations for the upcoming site visit and inspection. Her further failure to respond to PCL's attempts to communicate with her regarding her plans put PCL in an especially tough position, but its volunteers and staff persevered. Recently, students have stated how happy they are to have a more organized administration. PCL strongly desires to be able to provide these students with the opportunity to complete their J.D.s and PCL is of the belief that it has the capacity to operate soundly until they do.

The member of the FCC, nearly all licensed attorneys and many with backgrounds in higher education, continue to be pillars on the committee in terms of providing academic guidance to the J.D. program.

The interim dean has a professional background of working in for-profit business management and has the ability to build solid organizational framework which could lead PCL to thrive in the future, but additional time is needed to do so, as the interim dean has only been employed by PCL for a period of about 2 months. In that time, the interim dean has been able to conduct proper administration and implementation of final exam assessments, including advance review of the exams and rubrics/issue outlines/model answers by members of the FCC; has successfully organized the faculty to provide final assessments, grades and syllabi on time; has created and implemented a course schedule, while ensuring future adherence with the cluster plan, that has met the needs and preferences of several different categories of students, including a transfer student who has taken most of PCL's curriculum and 3L students who desire to be able to become certified law students before their 4L year; has memorialized administrative policies and procedures where there was no such manual before; has created and implemented policy which helps the school meet compliance standards; has produced accurate disclosures which were provided to students for certification prior to the beginning of the winter quarter; and has all the while continued updating the website and operating the school's day to day operations, amongst many other job functions.

It must be stated that PCL is a very small operation, it only employs 2 staff members, which puts a significant amount of strain on being able to meet deadlines in a timely fashion, but PCL continues to strive to meet all requirements and provide the State Bar with the information and documentation it requests.

10. Guidelines 4.8 and 4.9 (2020):

The Faculty and Curriculum Committee (FCC) continues to be involved in the interviewing, hiring, and review process of faculty. The FCC also provides continuing education and training to the faculty. Members of the FCC reviewed all final exams prior to the administration of exams at the end of the Fall 2023 Quarter. Throughout the year, the FCC provides faculty with periodic training and education opportunities, with a training on exam creation and grading taking place this winter quarter. Faculty are provided with three types of evaluations, a self evaluation, student evaluation, and an evaluation by the FCC or dean. PCL can strive to ensure that evaluations are based on classroom observation and course materials, already the FCC has provided evaluation of course materials this academic year. This feedback will be used towards the faculty's evaluations.

11. Guidelines 5.3(A)(1) and 5.9 (2020):

Students at PCL may be academically disqualified for failing to comply with PCL's 80 percent attendance rule. A student who is facing academic disqualification is formally considered to be on probation. A student on probation may file a petition to appeal disqualification due to failure to adhere to the 80 percent attendance rule. In accordance with Guideline 5.19, upon the student's demonstration of good cause and special circumstances, the FCC may approve the student's petition. If the student's petition is approved, the student is promptly informed of the decision and of the deadline for completion of additional classes to make up the class time missed. PCL has a policy, stated on Page 26 of the Student Handbook that states "under no circumstances may PCL offer students the opportunity to make up absences from regularly scheduled class hours with alternative activities."

In the October 2023 Inspection Report, State Bar staff states that "implementation of the improved (attendance) policy does not fully satisfy Guideline 5.3(A)(1) because students who miss more than 20 percent of classes are given the opportunity to appeal the decision and take make-up classes; the Guideline requires attendance of not less than 80 percent of "regularly scheduled class hours" in each course.

PCL has been of the belief that its attendance policy, requiring attendance at 80 percent or more of all class offerings, was in full compliance with Bar rules and expectations, as Guideline 5.19 states "policy may also provide for advancement on probation. Once adopted, the policy must be followed, with exceptions being rare and then only on a clear showing of special circumstance and good cause." PCL was not aware that the State Bar's interpretation of the term "regularly scheduled class hour" in Guideline 5.3 (A)(1) meant that a student, who could demonstrate good cause and a showing of special circumstances for having missed more than the permitted amount, could not make up the missed class with another scheduled class of the same length in time of that which the student missed.

If this is the case, and Guideline 5.19 does not apply, PCL will create a new policy and present it to the PCL Community Board for a vote in order to be in compliance with this interpretation of the rule.

PCL objects to this interpretation of the rule, as it is currently written, however. PCL is of the opinion that students with special circumstances who can show good cause for having missed a class, should be able to be given an opportunity to complete the class time that they missed. The State Bar requires that a student complete a minimum of 270 hours per year. At a school like PCL, where exactly 270 hours of classes per year are offered, if a student does not get credit for one course, they are subsequently required to repeat the entire year's courses. This seems wholly unfair to a student who might have a genuine and unavoidable reason for missing, for example, three classes in a quarter, as opposed to two classes.

Nonetheless, PCL strives to be in compliance with all the Rules and Guidelines, and will change its policy as necessary.

State Bar staff states that there was "an error showing a curriculum that does not satisfy the minimum classroom attendance hour requirement under Guideline 5.9(A)(4)."

This error was corrected subsequent to the inspection and now displays the correct unit value. This error was corrected as part of the interim dean's corrections to the website.

12. Guideline 5.8 (2020):

PCL's fall quarter clinical courses provided accurate timesheets and a policy for clinical classes has been created.

Externships, Clinical Programs, and Other Non - Classroom Activities Performed For Credit

At its discretion, PCL may permit students to enroll in externships, clinical programs, or other activities that do not involve instruction by a faculty member or involve participation in regularly scheduled course hours or classroom studies.

The time spent involved in these activities and studies may be used to satisfy the 270 hour requirement set by the Bar in Guideline 5.3 if the following criteria are met:

1. PCL's clinical courses will award credit commensurate with the time and effort expended by, and the educational benefits to, the participating student.
2. The studies or activities must be approved in advance by the Dean or the FCC.
3. A member of the faculty or the dean must supervise and periodically review each student's participation to ensure that the educational objectives are achieved.
4. The amount of credit may not exceed forty (40) percent of the hourly requirement for any year or more than ten (10) percent of the total hours required for graduation;
5. PCL must maintain an appropriate record for each student. At PCL, this is done by keeping a timesheet that is regularly submitted to the Dean or Faculty Advisor. The timesheet must be retained in each student's file.

Clinical Program or Externship Record Requirement

The law school must maintain a record for each student participating in the any of the above-mentioned activities. The record must include at least
the educational objectives,
the number of hours spent by the student participating in the activity,
the amount of academic credit authorized,
the name of the faculty member who conducted or reviewed the activity,
the name, address, telephone number, and qualifications of each person not on the faculty who directly supervised the student participating in the activity, and
the methods used to evaluate student performance, and
all other records as necessary to keep record of the criteria mentioned in point 1-5 above.

Enrollment a Clinical Program or Externship

Periodically, PCL will offer clinical courses or externships as part of its curriculum. These courses generally take place during a summer quarter, but may take place during other periods of time. The criteria for enrollment in these courses will be made available to students at that time. If a student seeks placement in a clinical program or externship that is not offered by PCL as part

of its curriculum, that student must submit in writing, to the Dean or FCC, their request to receive academic credit for the program. The written submission must be received as soon as practicable, but no later than 4 weeks before the beginning of a quarter if the student intends to replace classroom study hours with clinical hours. The written request should clearly demonstrate that the placement meets all of the above-mentioned required criteria. The student will only be able to receive academic credit from PCL upon the Dean or FCC's written approval of the student's participation in the program.

13. Guidelines 5.17, 5.18, and 5.25 (2020):

PCL has created policies that have established grading standards and policies that eliminate grade inflation. The enforcement of abiding by the school's policy is driven by the Dean, who coordinates with the faculty to ensure faculty timely submits the proper materials in order for the FCC to provide timely feedback. The FCC members continue to be the ones to evaluate the quality of exams and provide training to faculty. The administrator continues in his role as providing checks and balances of the process, making sure that syllabi accurately reflect school policy, checking grades for signs of inflation, ensuring exam and course grades are timely submitted and inputted into Populi, and communicating with the Dean or faculty as necessary if he finds something that requires correction.

All winter quarter syllabi have been properly reviewed by the administrator for adherence to PCL's participation grade cap of 3%.

14. Guidelines 5.18-5.20 (2020)

PCL does not allow students to repeat exams or do extra credit to improve a grade unless that student is on probation, submits a petition to appeal his grade, and the FCC approves his petition. In its inspection report, State Bar staff states under Guideline 5.19, "if special circumstances and good cause exist, (the student) should be placed on probation and given clear expectations." PCL's policy mirrors this statement exactly, as only a student on probation and facing academic disqualification has the opportunity to file a petition to remedy a disqualifying circumstance. This petition may only be approved upon a showing of special circumstances and good cause.

To summarize PCL's policy, any student who has a disqualifying circumstance is considered to be on academic probation. Any students who seeks to avoid academic disqualification must submit a written petition for an exception from disqualification or to challenge the grounds or the disqualifying circumstance. The petition is reviewed by the FCC and Instructor and may only be approved upon a clear showing of special circumstances and good cause. If the petition is approved, in accordance with the reasons for the disqualifying circumstance, it is then decided whether the approval is conditioned upon successful performance of something, like taking a new final exam, attending a make up class, or completing an assignment.

PCL's policy, on Page 25 and 26 of the Student Handbook, is provided in full below:

Section 6. Academic Disqualification

A student will not receive credit for a quarter unless the student has complied with all of the

following requirements (unless the student rectifies the non-compliance according to the provisions of this Section 6):

(A) The student must have complied with the State Bar's 80% attendance rule in all the student's courses at PCL (see below).

(B) The student must have received a passing grade for all quarters of each course the student took, except for courses from which the student withdrew using proper procedures, and

(C) In the student's first year courses, the student must not have more than one grade lower than 70 (C-) for any course in any quarter. as a first year student, the student gets more than one final grade below 70 for a quarter.

Any failure to comply with these requirements is referred to as a Disqualifying Circumstance. Within four weeks after the end of each Spring quarter, the Administrator must determine if any student has any Disqualifying Circumstance. If so, for each student who has a Disqualifying Circumstance, the Administrator (a) shall report the name of the student and the Disqualifying Circumstance in writing to Dean and the Registrar and (b) shall notify the respective student in writing of the Disqualifying Circumstance, that the student is in danger of Academic Disqualification and that the student must follow the procedures of this Section below.

Any student who has any Disqualifying Circumstance is considered to be on probation. In order to endeavor to avoid Academic Disqualification, the student must submit a written petition to the Dean and the Instructor to challenge the grounds for the Disqualifying Circumstance or for an exception from disqualification, or both. The student shall state in the petition whether or not the student consents to allow other students to participate in the functions of the FCC and other committees and bodies in connection with the petition. Those functions are described below..

The Dean shall promptly transmit the petition to the FCC, limiting access to the petition by student members of the FCC according to the petitioning student's statement on the subject in the petition. The Instructor and the FCC must promptly approve or disapprove the petition, but they may approve only on a clear showing of special circumstance and good cause and they must properly document the special circumstance and good cause. The documentation shall be placed in the student's files. If they approve the petition, they must decide whether the approval is conditioned on the student successfully performing an assignment, and if so, what the assignment is and a deadline for its completion. In determining the assignment, they shall adhere to the requirement that exceptions from Academic Disqualification may be allowed only on a clear showing of special circumstance and good cause. The assignments may be multiple. These decisions shall be at the reasonable discretion of the Instructor and the FCC. The FCC or the Instructor must promptly inform the student in writing of the decision, the assignment (if any), and the deadline for completion of the assignment (which can be the date of a new exam), and must also inform the Dean in writing.

If the Disqualifying Circumstance is the 80% attendance requirement described in (A) above, the time must be made up in an additional class session with some instructor, if PCL can arrange for some instructor to teach the make-up class. PCL does not require the faculty member who taught the course to conduct the make-up class, although we may ask if the instructor is willing. PCL

does at times succeed in arranging for another instructor to conduct a make-up session.

If the Disqualifying Circumstance is something other than the above 80% attendance requirement, the assignment can include taking a new final exam (but not re-taking any exam the student previously took), writing an essay, or some other work. If the Disqualifying Circumstance was caused by a poor grade on an exam or other work, the assignment must be an exam or other work that, in the judgment of the Instructor and the FCC, is at least as difficult as the exam or other work on which the student received the poor grade. If the reason for the student's petition was missed classes, the assignment must be a make-up class. Under no circumstances may PCL offer students the opportunity to make up absences from regularly scheduled class hours with alternative activities.

If the student performs the required assignment and submits it to the Instructor by the completion date, the Instructor must grade the assignment. (PCL recognizes that if the assignment for missing classes is attending other classes, it is possible the assignment cannot be graded.) The grader must inform the Student, the Administrator or the FCC, and the Dean, in writing, whether the student completed the assignment on time and the student's grade on the assignment. If the grade on the assignment is lower than 70, the student's grade for the course will not be raised. If

the grade is 70 or better, the Instructor must raise the student's grade for the course to higher grade, determined in the reasonable discretion of the Instructor.

If the Instructor cannot or will not perform the functions of the Instructor stated in this Section 6, the FCC or the Dean must assign a substitute, i.e. another suitable substitute person to perform them.

The student must rectify the Disqualifying Circumstance(s) during the quarter that follows the one for which the substandard grade(s) were received or the one in which the classes were missed, as the case may be. If a Disqualifying Circumstance arose in the Spring quarter, the student must rectify it during the summer, i.e. the period between the end of the Spring quarter and the start of the Fall quarter. Rectification requires a passing grade on the assignment, if any, given by the Instructor and the FCC under the provisions of this Section.

If the student does not so rectify the Disqualifying Circumstances within the period of time stated in the preceding paragraph, then the student is academically disqualified, except that the student may continue to completion the classes the student is taking in the quarter that follows the one for which the substandard grade(s) were received or in which the classes were missed. (For example, if the student received a failing grade in the Winter quarter, and during the Spring quarter fails to rectify the Disqualifying Circumstances, the student may complete classes in the Spring quarter, but may not take classes after the Spring quarter.)

However, academic disqualification under the above provisions is subject to review by the Community Board, which may, in its reasonable discretion, but only under unusual and special circumstances (which they must document), permit the student to advance to the next quarter under such probationary conditions as the Community Board determines. The conditions may include repeating one or more quarters of one or more courses. The documentation must be placed in the student's file.

Academic disqualification means that the student may not:

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.

All decisions of the Instructor, the substitute (if any) and the FCC under this Section may be appealed to the Community Board. The Community Board may delegate some or all of its functions under this Section to the Executive Committee, and it may receive recommendations for these functions from the Executive Committee or the FCC. In performing their functions under this Section, the Community Board, Executive Committee and FCC should consult with the Dean.

No student (including student members of the FCC, the Community Board and the Executive Committee) shall participate in any of the functions, stated in this section, of the FCC, the Instructor, the substitute, the Community Board or the Executive Committee the Community Board the Executive Committee or any other committee or body, unless, before participation by any student, the student who submitted the petition consents in writing to participation by students in those functions.

15. Guideline 5.24 (2020):

PCL reiterates its statement under point 6, Guidelines 2.9(A)-(B) and 5.24 (2020).

16. Guidelines 6.2-6.4 (2020):

Legal Research is, indeed, a part of PCL's cluster plan and it is offered to every student during their 4 years at PCL.

In October, the interim dean reported that a dedicated research class did not appear to have been taught in several years. This was an incorrect assertion based on the fact that the class offered to the current 3Ls during their 2L year titled "Legal Research" had the wrong syllabus uploaded into the course information on populi. Upon speaking with current 3Ls, the interim dean was informed that they did take a dedicated legal research class during the spring of 2023. The cluster plans and course schedules provided as attachments in D. Guideline 4.2 are evidence that Legal Research is regularly offered.

17. Guidelines 7.1 and 7.2: (2020):

PCL has continued to be in compliance with the State Bar's recommendation that it obtain fire-safe lockable cabinets.

18. Guideline 9.1 (2020):

PCL has vastly improved its record-keeping since preparing for the inspection. All fall and winter disclosures are on file and easily accessible, the administrator has been tasked with performing additional transcript reviews for accuracy, and PCL is in the process of identifying missing components in current and past student files. The administrator has improved his organization of physical files and the process of fully digitizing older files continues. PCL will further enforce this progress with a written administrative

policy regarding the keeping of records and duplicate records as necessary.

V. CONCLUSION

PCL acknowledges that it has struggled to prove its operational capacity to the State Bar. The effects of Covid and untimely turnover of leadership positions at critical times has hindered the school's ability to be proactive in demonstrating its ability to maintain compliance. PCL struggled greatly at the beginning of the Fall quarter of 2023-2024 due to the former dean's abrupt departure and PCL's sudden return to in-person learning in a facility that had sat vacant for almost 3 years due to covid and online learning. PCL has been under immense pressure to meet probation deadlines, while still providing its students with a quality academic program. PCL has persevered and has built on the school's operations, providing more organization and leadership which has resulted in improved student morale and faculty participation. While it strives for further improvement, PCL made progress on compliance, improving from the 22 points originally noted in the 2020 inspection to 16 points noted at the time of the October 2023 inspection.

PCL has the necessary operating capacity to continue to provide instruction to its students. The FCC's strong role at the school supports the school's ability to carry out its academic responsibilities. A willing administrator and interim dean are committed to improving PCL, creating policy as necessary, and enforcing adherence to policy. Improved communication with faculty has resulted in timely submission of exams and syllabi for review, faculty has enthusiastically and timely submitted grades from Fall finals in advance of their deadline, and all faculty began the winter quarter classes as expected. Despite the uncertainty that the students feel over the future of the program, they have expressed approval of the way that PCL is currently operating under the interim dean's leadership.

PCL asks that the Committee please consider allowing it to remain open long enough to, at a minimum, teach out its current students. PCL has REDACTED 4Ls set to graduate this spring and REDACTED 3Ls set to graduate next May of 2025. PCL's REDACTED 1L will qualify for the FYLSX at the end of the current academic year. The 1L will then have the capability, and PCL's support, in transferring to another institution. All of PCL's students will shortly face a competency exam that will determine the soundness of their academic preparations. All have elected to remain at PCL rather than transfer to other institutions, despite being offered support by the interim dean to help them do so. PCL requests to be able to continue as their academic institution, with the ability to grant the J.D.s they have worked so hard for, until May of 2025.

PCL will close by addressing a line included the State Bar's Inspection Report,

"[w]hile 19 students have graduated since July 2017, just REDACTED have obtained licensure."

This statement by State Bar staff is not correct. 24 students have graduated since 2017. With REDACTED of those students becoming licensed attorneys, 37.5% of our recent graduates have obtained licensure. REDACTED of those REDACTED students are persons of color. 67% of PCL's recent graduates are persons of color. Our current student body consists of 100% black and brown people. We couldn't be more proud to call ourselves The Peoples College of Law.

ATTACHMENT A

Dear Students,

As we gear up for the start of the new academic year, we want to keep you informed about some important updates and resources to help you prepare.

Please find attached a welcome back letter from PCL, which includes details about the outcome of the recent state bar meeting and upcoming orientation dates.

In addition, you'll also find attached:

- Academic Calendar
- List of Textbooks
- Course Schedule

Please be informed that we will be working on staffing throughout the weekend. An updated course schedule will be available after the weekend. Thank you for your understanding.

We're looking forward to welcoming you back to campus and embarking on another journey of learning and growth together.

Best regards,
Edith

4 Attachments • Scanned by Gmail ⓘ



ATTACHMENT A1

they finished their first year just before the exam or up to a year before. Also, if a person takes the exam on, for example, three different occasions, the person is counted as a taker on all three occasions. Thus, the total number of "Takers" in this chart is not equal to the total of all PCL students who took the exam in the past five years – the total number of "Takers" is a larger number because some students took the exam more than once in those five years.

First-Year Law Students' Exam			
Exam Year	Takers	Passers	Percentage
June 2023	REDACTED	REDACTED	REDACTED
October	REDACTED	REDACTED	REDACTED
June 2022	13	REDACTED	REDACTED
October 2021	14	REDACTED	REDACTED
June 2021	14	REDACTED	REDACTED
November 2020	0	0	0%
June 2020	0	0	0%
October 2019	0	0	0%
June 2019	14	REDACTED	REDACTED
October 2018	0	0	0%

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June 2018	13	REDACTED	REDACTED
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The number and percentage of students who have taken and passed the General Bar Examination in the previous 5 years is as follows. Note that for each exam listed, the number of takers includes all graduates of PCL who took that exam no matter what year they graduated, whether very recently before the exam or many years before. Also, if a person takes the exam on, for example, three different occasions, the person is counted as a taker on all three occasions. Thus, the total number "Takers" in this chart is not equal to the total of all PCL graduates who took the exam in the past five years – the total number of "Takers" is a larger number because some graduates took the exam more than once in those five years. Thus, this chart does not show PCL's Bar Exam pass rate as calculated by the State Bar for purposes of accrediting law schools, which, in July 2022 was 79%. (PCL is NOT an accredited law school.)

General Bar Exam			
Exam Year	Takers	Passers	Percentage
July 2023	TBD	TBD	TBD
February 2023	REDACTED	REDACTED	REDACTED
July 2022	REDACTED	REDACTED	REDACTED
February 2022	REDACTED	REDACTED	REDACTED
July 2021	REDACTED	REDACTED	REDACTED
February 2021	REDACTED	REDACTED	REDACTED
October 2020	13	REDACTED	REDACTED
February 2020	REDACTED	REDACTED	REDACTED
July 2019	14	REDACTED	REDACTED
February 2019	REDACTED	REDACTED	REDACTED

ATTACHMENT D

Possible Replacement to Existing PCL Course Cluster Plan for Upper Division Students							
Rotation A	Rotation B	Rotation C					
Constitutional Law (3Q)	Civil Procedure (3Q)	Real Property (3Q)					
Remedies (2Q)	Criminal Procedure (2Q)	Evidence (2Q)					
Shared Elective (1Q)	Shared Elective (1Q)	Shared Elective (1Q)					
Community Property (1Q)	Wills and Trusts (2Q)		MBE Oriented (1Q)				
Professional Responsibility (1Q)			Essay Oriented (1Q)				
Business Associations (1Q)	Legal Research (1Q)		Performance Test Oriented (1Q)				
			<i>(order these are taught immaterial)</i>				
2022–2023 (Rotation A)							
2L				2L's will take three courses			
2/3L		Wills and Trusts	Legal Research	3L's will take four courses this year to phase out old rotation			
2/3L		Constitutional Law	Constitutional Law	4L's will take three courses			
3L/4L	Real Property	Real Property	Real Property				
3L/4L	Shared Elective	Remedies	Remedies				
4L	MBE Oriented	Essay Oriented	Performance Test Oriented				
2023–2024 (Rotation B)							
All	Civil Procedure	Civil Procedure	Civil Procedure				
All	Criminal Procedure	Criminal Procedure	Shared Elective				
2/3L	Community Property	Professional Responsibility	Business Associations				
4L	MBE Oriented	Essay Oriented	Performance Test Oriented				
2024–2025 (Rotation C)							
ALL	Real Property	Real Property	Real Property				
All	Evidence	Evidence	Shared Elective				
2/3L	Wills and Trusts	Wills and Trusts	Legal Research				
4L	MBE Oriented	Essay Oriented	Performance Test Oriented				
2025–2026 (Rotation A)							
All	Constitutional Law	Constitutional Law	Constitutional Law				
All	Remedies	Remedies	Shared Elective				
2/3L	Community Property	Professional Responsibility	Business Associations				

Possible Replacement to Existing PCL Course Cluster Plan for Upper Division Students							
Rotation A	Rotation B	Rotation C					
4L	MBE Oriented	Essay Oriented	Performance Test Oriented				
2026–2027 (Rotation B)							
Cohort	Fall	Winter	Spring				
All	Civil Procedure	Civil Procedure	Civil Procedure				
All	Criminal Procedure	Criminal Procedure	Shared Elective				
2/3L	Wills and Trusts	Wills and Trusts	Legal Research				
4L	MBE Oriented	Essay Oriented	Performance Test Oriented				
2027–2028 (Rotation C)							
Cohort	Fall	Winter	Spring				
All	Real Property	Real Property	Real Property				
All	Evidence	Evidence	Shared Elective				
2/3L	Community Property	Professional Responsibility	Business Associations				
4L	MBE Oriented	Essay Oriented	Performance Test Oriented				

ATTACHMENT D1

PCL Cluster Plan
Fixed Fourth-Year with Bar Exam Prep
(Revised 2/2017)

Rotation A

Constitutional Law (3 qtrs)
Criminal Procedure (2 qtrs)
Wills & Trusts (2 qtrs)
Legal Research
Elective

2018 - 2019
2020 - 2021
2022 - 2023
2024 - 2025
2026 - 2027

Rotation B

Civil Procedure (3 qtrs)
Evidence (2 qtrs)
Community Property
Prof'l Responsibility
Corporations
Elective

2019 - 2020
2021 - 2022
2023 - 2024
2025 - 2026
2027 - 2028

Fourth Year (Fixed)

Real Property (3 qtrs)
Remedies (2 qtrs)
Elective (Trial Advocacy)
Elective (Multistates)
Elective (Performance)
Elective (Advanced Writing)

Fourth Year 2017-18

Fall Qtr

Property I

Corporations

Elective (Performance)

Winter Qtr

Property II

Remedies I

Elective (Multistates)

Spring Qtr

Property III

Remedies II

Elective (Advanced Writing)

Third Year 2017-18

Fall Qtr

Civil Procedure I

Corporations

Prof'l Responsibility

Winter Qtr

Civil Procedure II

Evidence I

Community Property

Spring Qtr

Civil Procedure III

Evidence II

Elective

Fourth Year 2018-19

Fall Qtr

Property I

Remedies I

Elective (Performance)

Winter Qtr

Property II

Remedies II

Elective (Multistates)

Spring Qtr

Property III

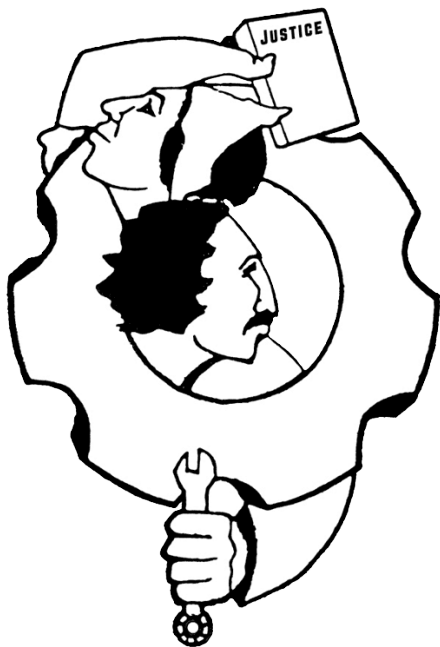
Elective (Trial Advocacy)

Elective (Advanced Writing)

Assignments Priority

1. Current Instructors
2. Past Instructors
3. Resume Pool
4. Open Call

ATTACHMENTS D2 – D8



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@peoplescollolaw 

(213) 483-0083

email resumé to dean@peoplescollegeoflaw.edu

PCL 2023-2024 ACADEMIC YEAR

Quarters are 10 weeks, plus a finals week

1L Courses

Legal Writing for 1Ls (3 quarters)

Contracts (3 quarters)

Torts (3 quarters)

Criminal Law (2 quarters)

2L/3L Courses (middle cohort)

Civil Procedure (3 quarters)

Community Property (1 quarter)

Professional Responsibility (1 quarter)

Business Associations (1 quarter)

Courses for All Upper Division

Wills and Trusts (2 quarters)

Shared Elective* (1 quarter)

4L Courses

Criminal & Family Law Externship

4L CBX oriented electives:

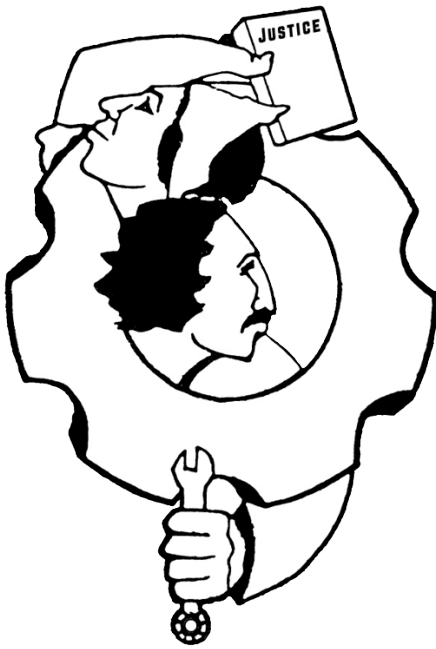
- Competency & Performance (1 quarter)

- Advanced Legal Writing (1 quarter)

- Legal Principles and Elements (1 quarter)

~~strikethrough-text~~ indicates course filled

* 2/3/4Ls suggest/vote on list of prospective elective courses. Competency/trial advocacy preferred.



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PCL 2022-2023 ACADEMIC YEAR

1L Courses

Quarters are 10 weeks, plus a finals week

Legal Writing for 1Ls (3 quarters)

Contracts (3 quarters)

Torts (3 quarters)

Criminal Law (2 quarters)

2L/3L Courses (middle cohort)

Quarters are 10 weeks, plus a finals week

Constitutional Law (3 quarters)

Legal Research (1 quarter)

Criminal Procedure (2 quarters)

Wills and Trusts (2 quarters)

Elective* (1 quarter)

4L Courses

Quarters are 10 weeks, plus a finals week

Property (3 quarters)

Remedies (2 quarters)

Elective* (1 quarter)

4L CBX oriented electives:

- Competency & Performance (1 quarter)

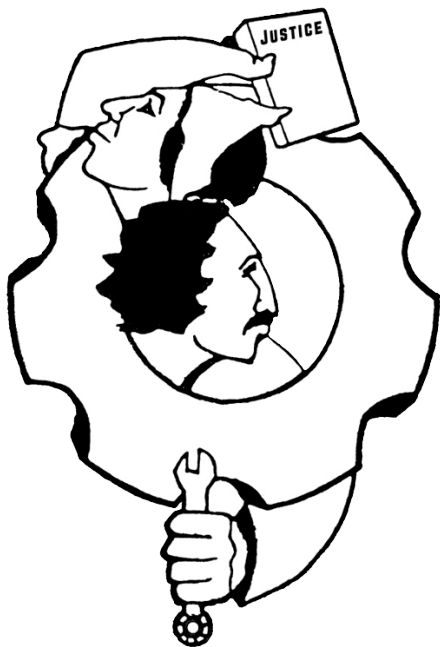
- Advanced Legal Writing (1 quarter)

- Legal Principles and Elements (1 quarter)

* 2/3/4Ls suggest/vote on list of prospective elective courses.

Competency/trial advocacy preferred.

~~strikethrough text indicates course filled~~



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PCL 2021-2022 ACADEMIC YEAR

1L Courses

Quarters are 10 weeks, plus a finals week

~~Legal Writing for 1Ls~~ (3 quarters)

Contracts (3 quarters)

Torts (3 quarters)

~~Criminal Law~~ (2 quarters)

2L/3L Courses (middle cohort)

Quarters are 10 weeks, plus a finals week

~~Civil Procedure~~ (3 quarters)

Evidence (2 quarters)

Community Property (1 quarter)

Professional Responsibility (1 quarter)

Business Associations (1 quarter)

Elective* (1 quarter)

4L Courses

Quarters are 10 weeks, plus a finals week

~~Property~~ (3 quarters)

Remedies (2 quarters)

~~Elective*~~ (1 quarter)

4L CBX oriented electives:

- ~~Legal Principles and Elements~~ (1 quarter)

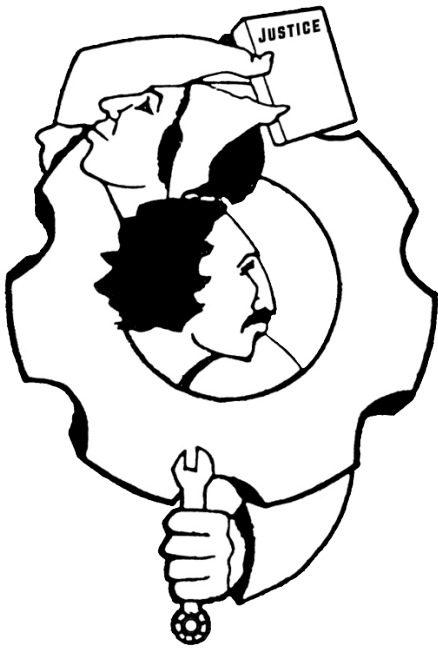
- Advanced Legal Writing (1 quarter)

- Competency & Performance (1 quarter)

* 2/3/4Ls suggest/vote on list of prospective elective courses.

Competency/trial advocacy preferred.

~~strikethrough text~~ indicates course filled



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PCL 2020-2021 ACADEMIC YEAR

1L Courses

Quarters are 10 weeks, plus a finals week

Legal Writing for 1Ls (3 quarters)

Contracts (3 quarters)

Torts (3 quarters)

Criminal Law (2 quarters)

2L/3L Courses (middle cohort)

Quarters are 10 weeks, plus a finals week

Constitutional Law (3 quarters)

Legal Research (1 quarter)

Criminal Procedure (2 quarters)

Wills and Trusts (2 quarters)

Elective* (1 quarter)

4L Courses

Quarters are 10 weeks, plus a finals week

Property (3 quarters)

Remedies (2 quarters)

Elective* (1 quarter)

4L CBX oriented electives:

- Competency & Performance (1 quarter)

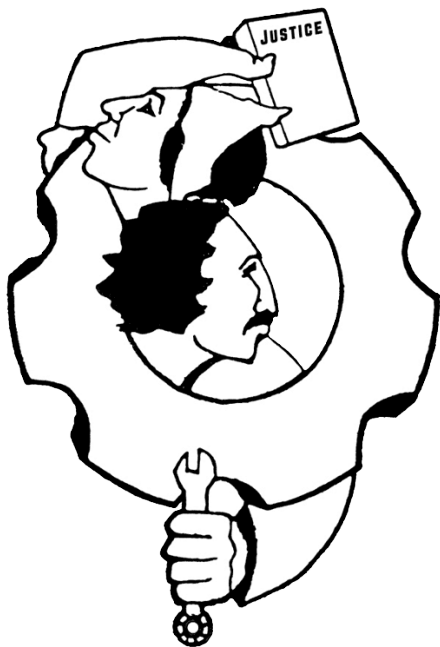
- Advanced Legal Writing (1 quarter)

- Legal Principles and Elements (1 quarter)

* 2/3/4Ls suggest/vote on list of prospective elective courses.

Competency/trial advocacy preferred.

~~strikethrough text indicates course filled~~



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PCL 2019-2020 ACADEMIC YEAR

1L Courses

Quarters are 10 weeks, plus a finals week

Legal Writing for 1Ls (3 quarters)

Contracts (3 quarters)

Torts (3 quarters)

Criminal Law (2 quarters)

2L/3L Courses (middle cohort)

Quarters are 10 weeks, plus a finals week

Civil Procedure (3 quarters) (Fall Filled)

Evidence (2 quarters)

Community Property (1 quarter)

Professional Responsibility (1 quarter)

Business Associations (1 quarter)

Elective* (1 quarter)

4L Courses

Quarters are 10 weeks, plus a finals week

Property (3 quarters) (Fall Filled)

Remedies (2 quarters)

Elective* (1 quarter)

4L CBX oriented electives:

- Competency & Performance (1 quarter)

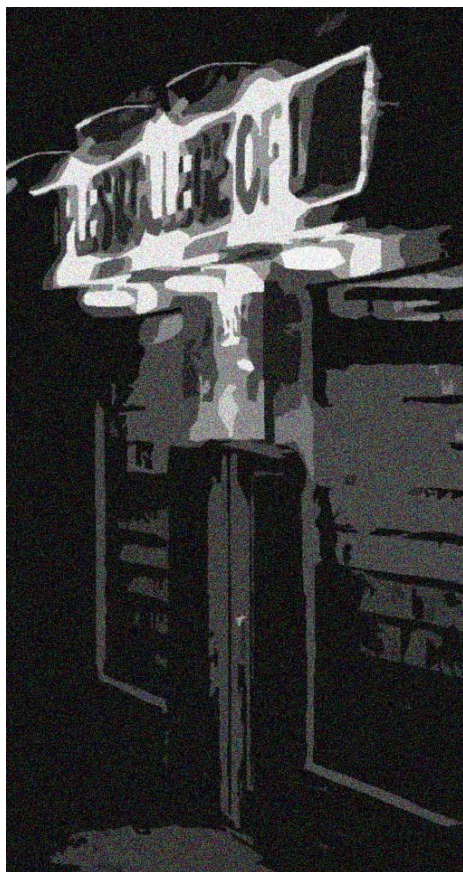
- Advanced Legal Writing (1 quarter)

- Legal Principles and Elements (1 quarter)

* 2/3/4Ls suggest/vote on list of prospective elective courses.

Competency/trial advocacy preferred.

~~strikethrough-text~~ indicates course filled



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ORIENTED ATTORNEY?**

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LIKE-MINDED STUDENTS SO THAT
THEY CAN PRACTICE IN THE
PUBLIC INTEREST, BUT DON'T
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FUTURES TO STUDENT LOANS?**

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PCL 2018-2019 ACADEMIC YEAR

1L Courses

Quarters are 10 weeks, plus a finals week

~~Legal Writing for 1Ls (3 quarters)~~

~~Contracts (3 quarters)~~

~~Torts (3 quarters)~~

~~Criminal Law (2 quarters)~~

2L/3L Courses (middle cohort)

Quarters are 10 weeks, plus a finals week

~~Constitutional Law (3 quarters)~~

~~Legal Research (1 quarter)~~

~~Criminal Procedure (2 quarters)~~

~~Wills and Trusts (2 quarters)~~

~~Elective* [Competency/~~

~~Trial Advocacy] (1 quarter)~~

4L Courses

Quarters are 10 weeks, plus a finals week

~~Property (3 quarters)~~

~~Remedies (2 quarters)~~

~~Elective* [Competency/~~

~~Trial Advocacy] (1 quarter)~~

~~4L CBX oriented electives:~~

~~Competency and Performance (1 quarter)~~

~~Advanced Legal Writing (1 quarter)~~

~~Legal Principles and Elements (1 quarter)~~

* 2/3/4Ls suggest/vote on list of
prospective elective courses

~~strikethrough~~ text indicates course filled



ATTACHMENT E

[REDACTED]
[REDACTED]@gmail.com>

Aug 25, 2023, 6:12 AM



Hello Edith,

Thank you for this information. Evidence is still missing from our courses. We are supposed to take that this year.

...

ATTACHMENT D91



hector

to me ▾

Aug 25, 2023, 12:12 PM



I replied separately to her. Evidence is on rotaion C, which is next year so, its not missing. She'll have to wait to her 4L year. Also, can you send her the civil procedure book info shes asking for? The name of all books should be on the Amazon purchas receipt REDACTED sent us that you included in the August bar report.

Here's what I sent her:



I saw your email just now and wanted to answer your question asap since I know it's important. Feel free to share. You should be taking evidence next year under the attached cluster plan, its listed as rotation C for the 2024-2025 academicyear, see attached.

-hp



ATTACHMENT E

Agenda Faculty Meeting – Friday, March 18, 2022, 6:00 pm

- I. Welcome — 1 min
- II. Introductions — 12 min
- III. Request for returning instructors — 10 min
 - A. Request help with recruiting
- IV. Reminder of the importance of submitting grades on time — 1 min
 - A. Spring is critical for FYLSX and CBX certifications
- V. What went well this year? — 10 min
- VI. What needs improvement — 10 min
- VII. CALI Excellence for the Future Award — 5 min
 - A. <https://www.cali.org/faq/15688>
 - B. Past Awards:
<http://www2.cali.org/index.php?fuseaction=excellenceawards.ViewAwardsPublic&school=1195&orderby=a.awardyear,%20a.lastname&whereclause=All&whereclause2=All>
- VIII. Request for faculty members to join the committee — 1 min

ATTACHMENT E1

Chowco v. Casa

Please IRAC Governing Law. Why is feed goods?

6

The Common Law governs contracts for services/real estate. This contract was to supply casa with all the feed it needs each month. Thus, the common law controls.

The UCC governs contracts for the sale of goods. Goods are defined as movable objects. This contract involves the sale of animal feed. Because animal feeds are goods, the UCC will govern this contract.

In addition, the UCC has special rules which apply when merchants are involved. Merchants are those who regularly deal in the particular goods. Here, both chowco and casa are merchants because they regularly buy and sell animal feed. Thus, the special rules for merchants apply to this contract

Please IRAC offer. What is your rule? Which facts go to which element of the rule?

2

Here we have Chowco making the offer based on its five years of operations that it would purchase between \$700 to \$900 of feed a month based on current market rates.

2

Chowco accepted by sending over their animal feed and holding the end of their bargain.

Chowco faxed over its standard form contract with NONE of the blanks filled in, Casa's executive director used the text from chowco's form and notes to create a memorandum with the details of their agreement. The terms of the contract from Chowco

What is the quantity term? Is there a way to overcome the UCC requirement for that?

Is there an issue about missing terms?

Is there an issue that addresses acceptance with differing terms under UCC?

ATTACHMENT 2.3A

The First Year at PCL

A Cost Breakdown including *approximations* of Non-PCL Costs

ITEM	COST*
Peoples College of Law – Application Fee (one-time)	\$50.00
Early Application (Before June 1,)	\$75.00
Late Application (After June 1)	
Peoples College of Law First Year Courses (33 quarter units – pay for 27 units, get 6 free)	\$5000.00
Peoples College of Law Accountability Fee	\$600.00
California State Bar**- Law Student Registration***	\$119.00
California State Bar** – First Year Law Student Exam (FYLSX) Fee	\$624.00
California State Bar** – FYLSX Laptop Computer Fee	\$153.00
Books** (approximate cost for the first year)	\$350.00
TOTAL	\$6,921.00

ATTACHMENT 2.3B

California State Bar** – FYLSX Laptop Computer Fee	\$153.00
--	----------

Books** (approximate cost for the first year)	\$350.00
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TOTAL	\$6,921.00
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*All costs are subject to change. May be subject to late filing fees

**Approximation of Non-PCL costs (provided here as a guideline only)

***Applies to first year only

To verify or for more information on the California State Bar fees [click here](#).

ATTACHMENT 2.3C



ADMISSIONS:

[Requirements](#) | [Examinations](#) | [Moral Character](#) | [Special Admissions](#) | [Law School Regulation](#)

October 24

First-Year Law Students' Exam
delivered by Prometric at test sites
across California

Fees

All applicants must pay the required fees:

First-Year Law Students' Exam	\$624
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Laptop computer fees	\$153
----------------------	-------

Late Laptop Computer Fee \$15*	\$15
--------------------------------	------

**Request received subsequent to filing application*

The transfer of fees from one exam to another is prohibited.

Refunds requested due to hospitalization, death, or call to active duty will be considered in accordance with the Committee of Bar Examiners' refund policy. The refund form and copies of the policy are available on the State Bar website. Withdrawal requests can be submitted by logging into the [Applicant Portal](#).

Address change



Peoples College of Law

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

Tel.: 213 483-0083 | Fax: 213 483-2981

E-mail: dean@peoplescollegeoflaw.edu

"Over 49 Years of Educating People's Lawyers"

December 1, 2023

Dear Ms. Natalie Leonard,

Please find the December 1, 2023, monthly progress report enclosed.

Sincerely,

A handwritten signature in black ink, appearing to read "Ana Maria Lobos", with a long horizontal flourish extending to the right.

Ana Maria Lobos, Esq.
Interim Dean

RECOMMENDED MANDATORY ACTIONS FROM 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 (SaaS) 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 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.

PCL'S Updated progress report as of 9/1/23:

The accommodations page on our website has been updated, as mentioned in the previous report. Students

can access the policy and accommodations request form under the “Current Students” tab, where they will find the school policy, a timeline for the accommodations process, and a downloadable form. The administrator is ensuring all forms are complete before sending them to the dean for review.

PCL will send an email to students at the beginning of the school year reminding them to review the student handbook and to remind the students of the process for requesting accommodations.

Updated Progress Report as of 10/1/23:

Based on student feedback, as of October 1, 2023, PCL has determined that emailing a copy of the Student Privacy Policy to the students once per month is excessive and counter-productive, as such emails end up getting deleted and ignored based on the student’s assumption that the email is a duplicate of emails they’ve received in the many months prior. PCL agrees with student feedback that, to receive such an email every single month throughout the entirety of one’s 4 years as a student at PCL, is excessive and unnecessary. As such, PCL has updated its Student Privacy Policy to the following:

“Once per quarter and/or when changes are made, the Administrator shall distribute a reminder of this Student Privacy Policy, with its full contents, to the Registrar, Dean, Officers, members of committees, members of the Community Board, employees, faculty members, and students by automatically scheduled email or otherwise.”

The Student Privacy Policy (SPP) is currently distributed via PCL’s Student Information System, Populi, which has been programmed to distribute the email automatically to every student once per quarter by sending them an individual email and copying the Administrator. Prior to September of 2023, the SPP was sent to students every month. As of October 1, 2023, the students, Registrar, Dean, Officers, members of committees, members of the Community Board, employees, faculty members will receive this email once per quarter or as changes are made.

On September 29th, 2023, the SPP was emailed to all of the above-mentioned parties informing them that the SPP will now be sent out once per quarter or as changes are made to the SPP.

Updated Progress Report as of 11/1/23

As of November 1, 2023, PCL has continued to be compliant with Guideline 1.9 and 2.10. In regard to these guidelines, the State Bar’s recommendation for mandatory compliance specifies 3 areas- security of health records, administration of student privacy policy, and accommodations documentation and filing.

SECURITY OF HEALTH RECORDS

PCL continues in its use of digital file storage through its student information system, Populi. Physical files continue to be stored in locked, fire-safe filing cabinets in order to ensure the safety and privacy of student files.

ADMINISTRATION OF STUDENT PRIVACY POLICY

Our student privacy policy continues to be adhered to and is emailed to students, staff, faculty, and Board members every quarter or as changes are made.

ADEQUATE PROCEDURES TO DOCUMENT APPLICATIONS FOR ACCOMMODATIONS AND DECISIONS IN STUDENT FILES

PCL continues to strictly enforce and adhere to its accommodations policies and has recently added steps and procedures to ensure PCL’s administration properly files and processes accommodations requests. All such procedures and policies are included in greater detail below:

PCL has appropriate accommodations policies in its Faculty Manual (Exhibit A- Faculty Manual Accommodations Policy) and Student Handbook (Exhibit B- Student Handbook Accommodations Policy.) These policies are strictly enforced at PCL. All relevant information pertaining to a student's request for accommodations, PCL's decision on whether or not to grant the accommodation, and the process by which that decision was made are documented and kept in the student's file, both digitally and in the student's physical file.

Some examples of the type of documentation that would be kept in a student's file regarding an accommodation request are an Accommodations Request Form (Exhibit C- Accommodations Request Form), which the student is provided with by the administrator or via PCL's website; the Dean's decision in writing; and, if appropriate, an "Accommodations Granted" form, which is placed on the inside cover of the student file. (Exhibit D- Accommodations Granted Form)

Most recently, we have memorialized the procedures by which accommodations and related decisions and documents are to be processed and filed in our soon-to-be-completed Administration Manual. (Exhibit E- Administration Manual Accommodations Policy)

EXHIBIT A- FACULTY MANUAL ACCOMMODATIONS POLICY

Faculty Manual, Page 7, Section VII

Whether or not the Americans with Disabilities Act or California laws on disability and disability discrimination apply to PCL, PCL encourages students, faculty, and our entire community to know the California and Federal laws pertaining to the rights of people with disabilities. Per our mission statement, we are training lawyers and advocates to defend and expand the rights of those traditionally underserved, and that includes people with disabilities. Students, faculty, employees and volunteers who need accommodations for their disabilities should notify the Administrator. and may consult the Dean for additional assistance in obtaining accommodations. PCL will provide reasonable accommodations in classes, exams and other matters at PCL.

It is not uncommon for students at PCL to request disability accommodations for exams. The procedures for requesting and deciding on accommodations are in the Student Handbook & Catalog, which is on the PCL website. The Dean makes the decision, but it is reviewable by the Executive Committee. That committee is composed of the officers of PCL, including the Dean. PCL's policies and procedures on accommodations for disabilities are in the Student Handbook & Catalog, located on the PCL website

EXHIBIT B- STUDENT HANDBOOK ACCOMMODATIONS POLICY

Student Handbook, Catalog, Page 38, Section XX.

AMERICANS WITH DISABILITIES ACT

Whether or not the Americans with Disabilities Act or California laws on disability and disability discrimination apply to PCL, PCL encourages students, faculty, and our entire community to know the California and Federal laws pertaining to the rights of people with disabilities. Per our mission statement, we are training lawyers and advocates to defend and expand the rights of those traditionally underserved, and that includes people with disabilities.

Students, faculty, employees and volunteers who need accommodations for their disabilities should notify the Administrator. Students, faculty, employees and volunteers may consult the Dean for additional assistance in obtaining accommodations. PCL will provide reasonable accommodations in classes, exams and other matters at PCL. PCL will also help students access information and forms to apply to the State Bar for accommodations during examinations the Bar administers.

A student who has a disability, long term or short term, and wants an accommodation for it at PCL in taking exams or doing other academic work, must submit a written request for accommodation to the PCL Administrator. The request must state (a) what the disability is, (b) how it interferes with the student's ability to take exams or do other academic work, (c) what accommodations are requested and (d) how long the student requests the accommodations to be in effect. The request must be accompanied by a statement from a physician or other qualified professional stating, at a minimum, what the disability is and what accommodations should be given. The student may, in addition, submit other types of support for the request, such as verification of accommodations from undergraduate institutions or on the LSAT, and any other information and documentation the student believes is relevant to the request. Students must not send original documents, but should keep their original documents along with copies of everything they send submit.

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

information. PCL may determine to request independent evaluations before granting or extending a request accommodation.

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

The decision, whether denying the accommodation, or granting it in whole or in part, and the time during which it is in effect, is reviewable by the Executive Committee. The Executive Committee must review it if the student requests review within thirty days after receiving the decision from the Dean. The Executive Committee may review the decision even without a request for review, if the Executive Committee decides to do so thirty days after receiving the decision from the Dean. The Executive Committee must notify the student and the Dean of its decision on review within sixty days after the student's request for review or the Committee's own decision to review. There is no further right to review in PCL. However, the student may submit to any member of the Community Board a written request that the Community Board review the decision of the Executive Committee, and the Community Board may decide to review or not to review, in whole or in part.

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

In general, PCL will try to follow the policies of the State Bar of California for the Bar Exam and the First Year Law Students Exam regarding types of disabilities and types of accommodations in exams. As of February 2020, the State Bar's website states the following about those policies

(at <http://www.calbar.ca.gov/Admissions/Examinations/Requesting-Testing-Accommodations>):

“If you have a disability that could affect your ability to take a test administered by the Committee of Bar Examiners, you may want to file early for testing accommodations. Testing accommodations are available to those with mental or physical disabilities as defined in Title 4, Division 1, Chapter 7, Rule 4.82 of the Rules of the State Bar of California (Admissions Rules). Applicants with temporary medical conditions, such as a pregnancy or broken leg, and mothers who are nursing may also file requests for accommodations.

“Depending on the nature of your disability, accommodations may include things such as: wheelchair access, permission to dictate to a typist or digital recorder, extended testing schedule, separate testing room, customized examination materials (i.e., Braille, large print, etc.), extended testing days, permission to bring and use specific items or medical aids.

“When completing the online testing accommodations application and required forms, you and your physician or specialist should request what you think is necessary to allow you to compete on an equal basis with all other applicants. You must also provide adequate documentation and rationale to support the requested accommodations and their relationship to the effects of your disability.”

Below are links to laws and information on the ADA and related California laws

Americans with Disabilities Act (ADA): <https://www.ada.gov/pubs/adastatute08.htm>

California Fair Employment and Housing Act and Related Laws and Regulations

<https://www.dfeh.ca.gov/legal-records-and-reports/laws-and-regulations/>

State Bar Testing Accommodations:

<http://www.calbar.ca.gov/Admissions/Examinations/Testing-Accommodations>

As stated above, all student applications and requests for accommodations, and all decisions on them, must be in writing. All such applications, requests, and decisions shall be placed in the student’s PCL file. A hard copy shall be placed in the physical file, which is stored in the locked file cabinets, and the electronic version shall be placed in PCL’s Student Information System,

which has its own security protections. No such applications, requests, and decisions, and no student health records, are to be stored on any computer outside of PCL’s Student Information

System.

EXHIBIT C - ACCOMMODATIONS REQUEST FORM



People's College of Law

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

213 483-0083 Fax: 213 483-2981

E-mail: administrator@peoplescollegeoflaw.edu

"Over 49 Years of Educating People's Lawyers"

SPECIAL ACCOMODATIONS REQUEST

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

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

Student's Name: _____

Address: _____

Home Telephone: _____ Alternate Telephone: _____

1. Disability Status

a. Are you (check all that apply):

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

b. When did your disability start? _____

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

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

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

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

5. Attach whatever current or recent documentation from a physician, psychologist, or other appropriate professional certifying your disability you have. (Required)

I certify the above information is true and correct.

Signature of Student

Date: _____

EXHIBIT D - ACCOMMODATIONS GRANTED FORM



People's College of Law

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

213 483-0083 Fax: 213 483-2981

E-mail: dean@peoplescollegeoflaw.edu

"Over 49 Years of Educating People's Lawyers"

ACCOMMODATIONS GRANTED

ADMIN NOTICE: This form should be attached to the very front of the inside of the student's file by two-prong fastener or otherwise. This will allow for easy visibility to the Administrator in reviewing the student file and serve as a reminder that the student has been granted accommodations. The form should be removed from the front of the file and placed with the rest of the accommodations documentation once the agreed-upon accommodations period has concluded.

INSTRUCTOR NOTICE: Instructors should be informed of granted accommodations as soon as possible after a decision has been made. An instructor should be made aware of this form so they may accommodate their student as necessary. The instructor is to be reminded that a student's accommodations are sensitive, personal, and private. Information shared with an instructor relating to the student's disability should be limited to the contents of this form. The instructor should not share the contents of this form or divulge the student's status as receiving accommodations with anyone.

STUDENT NAME: _____

|

ACCOMMODATIONS ARE IN EFFECT UNTIL: _____

WHAT ACCOMMODATIONS HAVE BEEN GRANTED?:

EXHIBIT E- ADMINISTRATION MANUAL ACCOMMODATIONS POLICY

PCL ACCOMMODATIONS APPLICATION PROCESS

1. PROVIDE THE STUDENT WITH THE ACCOMMODATIONS REQUEST FORM

The Administrator should provide the student with the appropriate 'Accommodations Request Form' (included in the Attachments section at the end of this manual under the heading "Accommodations Materials") This form is also available on PCL's website under "Accommodations Request Form."

<https://www.peoplescollegeoflaw.edu/accommodations>.

2. REMIND STUDENT TO ATTACH SUPPORTING DOCUMENTS

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.

3. UPON COMPLETION, STUDENT SUBMITS FORM AND SUPPORTING DOCUMENTS TO

ADMINISTRATOR.

4. ADMINISTRATOR SUBMITS TO DEAN

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.

FILING

1. THE ADMINISTRATOR MUST STORE THE DOCUMENTS IN STUDENT'S FILE

All applications, requests, and decisions regarding accommodations shall be placed in the student's PCL file.

A hard copy shall be placed in the physical file, which is stored in the locked file cabinets.

The electronic version shall be placed in PCL's Student Information System, Populi.

No such applications, requests, and decisions, and no student health records, are to be stored on any computer outside of PCL's Student Information System.

2. IF ACCOMMODATION IS GRANTED

1. FILE FORM

The Administrator should attach the ACCOMMODATIONS GRANTED form to the very front of the inside of the student's file by two-prong fastener or otherwise. This will allow for easy visibility to the Administrator in reviewing the student file and serve as a reminder that the student has been granted accommodations. The form should be removed from the front of the file and placed with the rest of the accommodations documentation once the agreed-upon accommodations period has concluded.

2. INFORM INSTRUCTORS

Instructors should be informed of granted accommodations as soon as possible after a decision has been made. An instructor should be made aware of this form so they may accommodate their student as necessary. The instructor is to be reminded that a student's accommodations are sensitive, personal, and private. Information shared with an instructor relating to the student's disability should be limited to the contents of this form. The instructor should not share the contents of this form or divulge the student's status as receiving accommodations with anyone.

Progress Report as of 12/1/23

The PCL Community Board has voted in agreement of adding the following additional language to PCL's accommodations policy:

In regard to barring student participation in accommodations request functions in order to protect private student health information:

No student (including student members of PCL committees, the Community Board and the Executive Committee) shall participate in any of the functions, deliberations, or votes relating to any accommodations request, unless, before participation by any student, the student who submitted the request consents in writing to participation by students in those functions.

If a student's private health information is discussed in any context during a committee meeting or Community Board meeting, meeting minutes shared with student board or committee members will be redacted to protect the student petitioner's privacy.

In regard to creating a recusal and conflict of interest policy:

Members of committees and the Community Board should recuse themselves from deliberations, functions, or votes relating to any accommodations request where the member's impartiality in the deliberation, function, or vote might be reasonably questioned. Members who recognize a conflict should notify the other members of the committee or Community Board of their intent to recuse themselves of any matter where they believe a conflict may exist, and state their intent to seek recusal on the matter. If a member should choose to recuse themselves, the member should inform the committee or board Chair as soon as practical in a way that would not compromise or jeopardize the student's right to impartial deliberations, functions, or votes.

In regard to informing instructors about a student's need for accommodated testing:

Instructors should be informed of granted accommodations as soon as possible after a decision has been made. An instructor should be made aware of the submitted Accommodation Granted Form ("form") so they may accommodate their student as necessary. The instructor is to be reminded that a student's accommodations are sensitive, personal, and private. Information shared with an instructor relating to the student's disability should be limited to the contents of the form. The instructor should not share the contents of the form or divulge the student's status as receiving accommodations with anyone without the accommodated student's express consent.

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. **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**.

PCL'S Updated progress report as of 9/1/23:

As of August 1, 2023, PCL has done a complete compliance audit of Rule 4.241 and has issued the appropriate refunds for the 2022-2023 as requested by the June 2023 CBE motion. Our previous report mentioned one student who was not issued a report. This refund was not for the 2022-2023 school year. PCL is being proactive and in preparation of its October 2023 site visit, has begun auditing student records for the 2020-2021 and 2021-2022 school years. This additional audit will be complete by September 25, 2023. As appropriate, PCL will issue any potential refunds or fee reversals at the conclusion of this audit.

REDACTED REFUND NOT PAID ON August 1, 2023 (paid on August 8, 2023): On August 1, 2023, PCL was not aware that a refund was due to REDACTED pursuant rule 4.241 for the 2022-2023 school year as mandated by the CBE motion passed in June 2023 because REDACTED did not enroll for the 2022-2023 school year. Instead, PCL conducted a 4.241 audit of REDACTED records dating back to the 2020-2021 school year. Furthermore, his account required investigation of bank records that were not available prior to August 1, 2023. REDACTED has a history of requesting refunds for tuition fees that he has not paid; therefore, prior to August 1, 2023, PCL contacted Bank of America (BoFA) to verify all payments made by or on behalf of REDACTED. At that time, a BoFA telephone representative could not verify a payment made by REDACTED on 12/31/2021. Based on this information, a refund was not due; however, PCL, believing it received erroneous information from BoFA, requested bank records that were unavailable until August 4, 2023. After reviewing the newly available bank records on the

next business day on August 7, 2023, PCL verified that REDACTED made a payment on 12/31/2021. Based on this verified information, it was determined that REDACTED was owed a refund pursuant rule 4.241 and a check was issued and mailed to REDACTED the next business day on August 8, 2023. No further funds are due to REDACTED.

To ensure future compliance with Rule 4.241, PCL will strictly enforce its existing policy of requiring a signed disclosure and adhering to all requirements of rule 4.241 before allowing students to register for an academic term and creating an invoice. In addition, PCL has adopted a policy of quarterly audits to ensure the enforcement of such policy and immediate refund or reversal of fees for any payment not in compliance with Rule 4.241.

PCL'S Updated progress report as of 10/1/23:

PCL's website and Student Handbook, which is available to students at any time via PCL's website, currently states our policies for refunds. The following is copied and pasted from PCL's current Student Handbook:

9. Withdrawals, Cancellation and Refunds: PCL's refund policy is set out in the Agreement for Enrollment and Tuition, as follows

(a) At any time beginning with the start of the fall quarter covered by this agreement, the student may cancel this agreement and receive a prorata refund calculated on the basis of a 9 month "refund year," defined as the fall, winter and spring quarters (i.e. excluding summer sessions, if any). There are 11 weeks per quarter (ten weeks plus finals week), three quarters per academic year, and thus 33 weeks per academic year. That is 77 days per quarter, 231 days per academic year. Thus, for example, if a student has paid all amounts for the academic year and cancels this agreement on the 60th day of the fall quarter, there would be 191 days left in the refund year. Thus, the refund will be 171/231 of the amount the student has paid (the student paid all amounts for a full year). But the application fee is not refundable.

(b) Also, with the written permission of PCL signed by an officer or the Registrar or the Administrator, a student may withdraw from less than all the student's courses and receive a prorata refund calculated using the same formula as in the preceding paragraph, but modified. The modification is to account for the fact that the student is withdrawing from less than all courses. For example, suppose (a) a student has paid all amounts for a full quarter (11-weeks, 77 days); (b) the student has enrolled for three courses for the quarter, (c) the student withdraws, from one course only, on the 37th day of the quarter (with 40 days left); then (d) the refund of the charges for the quarter would be 40/77 divided by 3. But the application fee is not refundable.

(A rare exception would be if the student has 270 classroom hours in the academic year in the courses the student did not withdraw from, which is nearly always impossible at PCL because of the limited number of courses and hours PCL offers each year).

(c) All cancellations, withdrawals and rests for refunds must be stated in writing, must be signed by the student, and must be delivered to the PCL Administrator, Registrar or Dean, whose signature must appear on the cancellation, withdrawal or request, indicating that it has been delivered.

(d) No refunds are allowed except those described in the three paragraphs immediately above. Refunds will be paid within 30 days after cancellation.

As of October 1, 2023, the Student Handbook (available on the website) reflects that all students shall be provided with the most current disclosure statement every quarter. If a student pays tuition prior to signing the disclosure statement, the student may be entitled to a refund of their tuition payment for that quarter.

In compliance with Rule 4.24, all of the current students enrolled in classes for the 2023-2024 school year have signed the disclosure statement. Checks and balances have been put into place at PCL requiring students to sign the disclosure statement, currently via DocuSign, prior to being able to enroll in classes. The current practice is, the Administrator receives a copy of the signed disclosure, at which point the Administrator officially enrolls the student in their appropriate student course and grants the student access to their current course schedule. The Administrator will not accept tuition payment for that current quarter unless the Administrator has received a signed disclosure statement.

PCL'S Updated progress report as of 11/1/23:

There have been no changes. Our refund policy is clearly stated in our Student Handbook and on our website. PCL's practices are in line with the stated policy.

PCL'S progress report as of 12/1/23:

In regard to the State Bar’s request that PCL review its Rule 4.241 disclosures for all students who attended school during the 2020-2021 and 2021 to 2022 academic years, PCL has been able to verify that it did disseminate, and that students did **receive** appropriate disclosures at least once during each academic year of 2020-2021 and 2021-2022. A question remains as to whether the word “term” refers to a quarter or an entire academic year. Rule 4.24 (B)(2) states that the disclosure statement must be provided to each returning student, prior to payment of any fee for an *academic term*.

Rule 4.24(E) states that a refund of owed for students who did not **receive** a disclosure statement, not those who did not **sign** a disclosure. The Rule states “A law school that does not comply with this rule must refund all fees, including tuition, paid by a student who did not **receive** the disclosure statement.”

As PCL considers these distinctions with the assistance of State Bar staff, it will finalize calculating how much is owed in refunds to each of the students listed below who has been identified as someone for whom PCL does not have a signed disclosure on file for at least one term.

[illegible]

[illegible]

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.

PCL'S Updated progress report as of 9/1/23:

As explained in the previous reports PCL came into compliance by deleting from the Student Handbook & Catalog the courses required to be deleted.

Updated progress report as of 10/1/23:

The Student Handbook & Catalog, which is also posted on our website, currently lists only classes that are currently being offered at PCL and/or which have been offered within the past 3 years or will be offered within the next 2 years.

Updated progress report as of 11/1/23:

For an unspecified period of time until October of 2023, there appear to have been 2 different versions of the Student Handbook displayed on PCL's website. Since then, the out-of-date handbook has been removed and the current handbook has been revised to ensure that only courses offered since 2020 and in PCL's immediate plans are displayed in the course catalog. The students have been made aware of the situation via an email sent by the interim dean on October 12, 2023.

Updated progress report as of 12/1/23:

This recommendation from the State Bar requested that PCL 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. PCL has adopted this language on its website and in its publications.

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.

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.

PCL'S Updated progress report as of 9/1/23:

Disclosures on the website and the handbook are up to date. As previously stated, they have been updated with the most current information. Furthermore, PCL no longer rely on volunteers for website updates and the Administration now manages and maintains our website. Furthermore, the Administration has calendared quarterly reviews of the website to ensure compliance.D

PCL'S Updated progress report as of 10/1/23:

As of September 29, 2023, all of the current students enrolled in classes for the 2023-2024 school year have received the current disclosure statement and have signed the disclosure statement. The students signed the statement via DocuSign, prior to being able to enroll in classes. Upon receipt of the signed disclosure, the Administrator officially enrolled the student in their appropriate student course and granted the students access to their current course schedule.

As of September 29, 2023, PCL's website currently displays the Notice of Probation, January 2023 Annual Disclosure by Unaccredited Law Schools, and the Disclosure Required by Rule 4.241 For Unaccredited Law Schools.

Upon Interim Dean Lobos' review, PCL is no longer using Jostle but is in the practice of using Google Calendar, Gmail, and the digital recording of Zoom meetings in order to memorialize meetings and other law school operations.

PCL's Update Progress as of 11/1/23:

As PCL prepares to enter into a new quarter on November 27, 2023, we are in the process of updating our disclosures and student agreements.

PCL's Update Progress as of 12/1/23:

PCL's disclosure form was updated and included as part of the student's enrollment agreement, which was disseminated and signed by students prior to the beginning of the winter quarter.

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.

PCL'S Updated progress report as of 9/1/23:

PCL has updated its website and publications and continues to make updates to its catalog and website.

PCL'S Updated progress report as of 10/1/23:

The Interim Dean's review of the Student Handbook has determined that the current PCL Student Handbook and Website reflect accurately and clearly the academic standards and student assessment policies. Policies are clearly stated regarding grading standards, grading anonymity, written exam standards, student absence from an exam, the basis of grades, dates by which Faculty must submit grades, withdrawal from courses, plagiarism, student inspection of exams, and students showing inadequate academic progress. The Handbook also lists all subjects currently tested on the California Bar Exam.

PCL'S Updated progress report as of 11/1/23:

PCL remains in compliance with this guideline. The school's academic standards and student assessment policies are stated accurately, clearly, consistently, and as mandated.

PCL'S progress report as of 12/1/23:

PCL's policies are in adherence with these guidelines.

In the October 2023 Inspection Report, State Bar staff states that "the Catalog omits information about course repetition, such as the specific circumstances under which a course must be repeated and the impact of repetition on grade point average."

PCL addresses course repetition in several parts of the Student Handbook.

For example, in a section titled "Advancement in Good Standing" on Page 25 of the Student Handbook, it states :

"The student must have received a passing grade for all quarters of each course the student took, except for courses from which the student withdrew using proper procedures.

In the student's first year courses, the student must not have more than one grade lower than 70 (C-) for any course in any quarter.

The student must have a grade point average of 73 (C) or better for all final grades for the quarter in all the student's courses combined."

Student Handbook, page 26, states these same requirements as listed above as "Requirements for Graduation and Certification to Take Bar Exam." As of the end of the student's fourth year courses, the student must have satisfied all the above requirements in order to be permitted to advance graduate with a J.D. degree and be certified to take the California Bar Exam.

Additionally, the handbook states on Page 30:

"Repeating a Course or Quarter after Failing and Thus Not Completing 270 Hours: If (1) a student fails a course or a quarter of a course, and if (2) as a result of the failure the student does not successfully complete 270 hours in an academic year, then the following applies. Because of State Bar requirements that the required 270 hours per year must all be taken in the same 12 month academic year, the student, in order to be eligible for the J.D. degree and to take the FYLSX and the Bar Exam, cannot make up for the failed course or quarter by repeating only that course or quarter again in a later academic year, but instead must repeat the entire year's courses

(Note that failing a course might not result in failing to successfully complete 270 hours in an academic year, if during the academic year the student completed courses whose total hours exceed 270. As of 2020, PCL normally offers exactly 270 hours of classes for 2L, 3L, and 4L students, but 330 hours for 1L students.)"

Page 28 of the Handbook states, "...students who failed a PCL course and want to repeat the course can begin repeating the course starting later than the start of an academic year, but this exception

does not apply to students who have attended another law school.”

On Page 29 of the Student Handbook, addresses the issue of duplicate credit:

“No Duplicate Credit: Duplicate credit will not be given for repeating the same or substantially the same course or quarter, whether the courses or quarters are both taken at PCL or at another school, or partly at PCL and partly at another school.”

Page 30 of the Student Handbook addresses the issue of repeating a course after a student fails or does not complete the 270 hour requirement:

“If (1) a student fails a course or a quarter of a course, and if (2) as a result of the failure the student does not successfully complete 270 hours in an academic year, then the following applies.

Because of State Bar requirements that the required 270 hours per year must all be taken in the same 12 month academic year, the student, in order to be eligible for the J.D. degree and to take the FYLSX and the Bar Exam, cannot make up for the failed course or quarter by repeating only that course or quarter again in a later academic year, but instead must repeat the entire year’s courses

(Note that failing a course might not result in failing to successfully complete 270 hours in an academic year, if during the academic year the student completed courses whose total hours exceed 270. As of 2020, PCL normally offers exactly 270 hours of classes for 2L, 3L, and 4L students, but 330 hours for 1L students.)

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.

PCL'S Updated progress report as of 9/1/23:

As explained in previous reports 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.

Updated progress report as of 10/1/23:

Per our most recent review, we have verified that PCL's current practice requires that each course instructor is required to provide PCL with a course syllabus prior to the beginning of the first class of the quarter. PCL has set out a standard for the syllabus which requires that the course's grading components be clearly stated on the syllabus. Each syllabus is required to be turned into the Administrator prior to the first instructed class of the course. The Administrator then reviews the syllabus and verifies that the grading components are clearly stated. The Administrator specifically checks to make sure that the grade is based on academic merit and not in large part on class participation. Class participation is not to exceed 3% of a student's grade. In situations in which the Administrator has not provided such a syllabus, a syllabus is created by the Dean and provided to the students by the Administrator. Once the syllabus has been distributed, the instructor is not allowed to amend the syllabus.

Per PCL's review of this policy, it is clear that this policy is working well. Of the 9 current classes offered during the Fall Quarter of 2023, 8 of the 9 faculty members complied with the policy in a timely manner. One Instructor had technical issues and was unable to provide PCL with the syllabus prior to the beginning of the instruction of his first class. The Dean and Administrator were able to correct the technical difficulty and the students were provided with a syllabus prior to the end of instruction of the first class of the quarter. It is clear that PCL's policy of employing an Administrator who is on-location and always available to the students and faculty during class hours is an effective and necessary policy.

The Student Handbook and Website provide very clear academic standards regarding student grading and assessment.

Updated progress report as of 11/1/23:

Students continue to be provided with written statements of the components of course grades, via their syllabi and student handbook.

Updated progress report as of 12/1/23:

In regard to the Winter 2023 Quarter, syllabi were provided to the students before classes began on November 27th, 2023. The syllabi were reviewed for accuracy and adherence to PCL policy, and included clearly stated grading components of the class. The students were given access to syllabi in advance of their classes in order to provide enough time for them to buy the necessary textbooks and course materials.

7. Guideline 2.9(D) Bar's Inspection Report

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

PCL'S Progress Report

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

POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK

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

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

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

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

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

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

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

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

PCL continues its contract with Test Invite to provide testing services. Test Invite provides a platform in which students can take their exams in which exam integrity will be in place. PCL continues to use Test Invite's consulting services. Test Invite takes an exam from PCL and individually programs each exam into their system. When the students take the exam utilizing the Test Invite system there are several features that provide for exam security for instance notification to the test proctor that another screen has been utilized, in which case the exam is immediately

terminated. PCL also pays for live proctoring services in which a member of the PCL team can proctor live exams and catch any glitches or discrepancies. Students are only allowed to take exams utilizing the Test Invite software.

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

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

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

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

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

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

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

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.

PCL'S Updated progress report as of 9/1/23:

PCL retains the same policy and no change has been made. PCL continues to use Test Invite to protect its test integrity. Additionally, when PCL returns on campus for in person instruction there will be a proctor present during the testing session. This will be in addition to the use of Test Invite. Further, PCL is exploring the option of transitioning its exam software to Examsoft in the future.

PCL'S Updated progress report as of 10/1/23:

The State Bar has requested that, in order for PCL to bring itself into full compliance, the school should adopt, publish, and implement a policy on authentication of student work, and discontinue its current practice of allowing students to take in-class exams using devices that are not protected by exam-security software.

PCL has not yet administered any exams during the Fall Quarter of 2023. The first in-person exam since the Fall Quarter started is scheduled to take place on October 10, 2023, at which time TestInvite will continue to be utilized in order to provide the CBE's requested additional layer of exam-security.

PCL'S Updated progress report as of 11/1/23:

PCL will offer 2 layers of exam security on its upcoming final exams by using Test Invite and a live proctor.

PCL'S Updated progress report as of 12/1/23:

My interviews of former administrative heads of the law school since 2020 indicates that there has been no such policy of "allow(ing) professors to override the use of exam software or to accept submissions that were not monitored or authenticated."

In October, PCL sent a response to Natalie Leonard and Law School Regulations titled "Response to 10.6.23 Email From Natalie Re: Follow Up Items For Committee." In this communication, PCL addressed the following question, sent to PCL by Natalie Leonard.

Natalie Leonard's Question: "(Item 7): Authentication: The law school uses TestInvite or live proctors to ensure authentication, but the handbook appears to provide discretion to avoid these authentications, and the law school does not discuss how this affects authentication. Will such exceptions be continued?"

PCL's response: "No, PCL has been very stringent about requiring testing software and proctored exams. We have solely used testing software since the Covid pandemic until returning to in-person class instruction this Fall. Since then, two Fall midterms (in which there was only one student) were proctored."

Currently, instructors have no access or involvement in the testing process at PCL at all. Exams are conducted on campus, without instructors present, and are proctored by a live proctor. In addition, exam security software is used for all exams administered electronically."

During the years of remote exam administration due to Covid, PCL abided by the following exam authentication and security policy which has been reported previously in this progress report document.

"POLICY/PROCEDURES TO AUTHENTICATE STUDENT WORK

Adopted by Faculty-Curriculum Committee October 20, 2020

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 must either (a) have their video activated during the entire class, 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 online classes are given with Microsoft Teams. The students attend class through teams. The students' names are shown during the class. The students are on camera during the class. Students speak during the classes, and their voices also identify them.)”

Currently, PCL has returned to in-person learning on campus, and, accordingly, the exam authentication policy has changed. A policy was intended to be introduced for approval at the October board meeting, but the policy was sent back to the FCC for review after the first set of interviews with the CBE Inspection team, based on feedback from the inspection team which suggested we should continue to utilize exam-testing software even for proctored exams taken in person .

The PCL Community Board approved the following policy change on November 18th, 2023:

Exam Authentication and Security Policy

On Campus Exams

All final exams will be proctored and administered live, on campus, by a PCL - approved proctor. A clear set of exam rules and instructions should be provided to the proctor by the instructor prior to the examination in order to ensure a seamless testing experience.

During examinations, students must leave all personal belongings, including books and all papers not provided by the proctor for purposes of the examination, outside of the testing room. Electronic devices, including cell phones, are not permitted in the exam room. Laptops and other electronic devices serving the purpose of typing on an exam are only permitted if the approved exam-testing software described below is utilized. Small clocks are permitted for time-keeping purposes. Cell phones, tablets, and other similar electronic mobile devices may not be used as clocks during the exam. Water and writing implements are permitted in the exam room.

Where the faculty member has elected to allow students to test electronically, students will be permitted to use their laptops only if they utilize approved exam-testing software. As of November 2023, the only approved testing software is TestInvite, though this is subject to change.

All exam papers, including the assessment (exam) itself, notes, and other papers associated with the exam, must be turned into the proctor before leaving the testing room.

Remote Examination

All exams performed remotely will be required to utilize testing software. Testing software will record a student's screen and the student's web camera will be turned on during the exam for authentication and security purposes. Students may not opt-out of recording unless they have been approved for testing accommodations that specifically provide for such an accommodation. In such cases where a student has an unavoidable reason not to test on campus, such as in the case of a contagious illness, a student must request permission from the Administrator or Dean to be allowed to test remotely. The Administrator or Dean may request documentation in support of the student's request.

Exam Authentication

Students testing on campus must sign an attendance sheet, which will be made available by the proctor. The proctor must also sign the attendance sheet in attestation that the identity of the student named on the attendance sheet matches the identity of the person who took the exam.

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.

PCL'S Updated progress report as of 9/1/23:

The law school continues to document the grade review policy and has placed the form on the PCL website in order to make it easily accessible to all students.

Additionally, PCL has updated its website to include a specific tab under Current Students with a drop-down menu dedicated to the grade review process. This page provides students with all necessary information regarding the process, as well as access to the required forms.

This is the link that explains the grade review process. The students have access to this link 24 hours a day on the website. <https://www.peoplescollegeoflaw.edu/gradereview>

PCL'S Updated progress report as of 10/1/23:

Per our most recent review of the website, the current policy regarding a student's request for grade review continues to be displayed as follows:

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

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

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

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

Executive Committee, the FCC, the Dean, and others.

No student (including student members of the FCC, the Community Board, and the Executive Committee) shall participate in any of the functions, stated in this section, of the FCC, the instructor, the substitute, the Community Board, the Executive Committee, or any other committee or body unless, before participation by any student, the student who submitted the grievance consents in writing to participation by students in those functions. In addition, all persons, including students, who participate in those functions must have had one academic year of experience (at least nine months) in teaching or grading examinations in postsecondary education.

Complete the form below and send to administrator@peoplescollegeoflaw.edu.

The following form is available for download and submission on the website:

**PEOPLES COLLEGE OF LAW
PETITION FOR GRADE REVIEW**

Please see the appropriate sections of the [Peoples College of Law \(PCL\) Student Handbook & Catalog](#) for full instructions for this process. You may also contact the Dean, Administrator, or Faculty and Curriculum Committee (FCC) for assistance.

Student Name: _____ Student ID: _____

Quarter and Year: _____ Date Form Signed: _____

Course Subject: _____ Instructor's Name: _____

I have received a grade in a class that places me in Disqualifying Circumstances and on Academic Probation, or received a grade with which I am dissatisfied and want to contest. I respectfully request that the FCC and other PCL authorities consider my petition for the following (check all that apply):

- I want : ☐ To be granted an exception from disqualification and opportunity to amend my grade (I had special circumstances).
☐ To be granted an exception from disqualification and opportunity to make up attendance (I had special circumstances).
☐ To challenge the grounds for an assigned grade (I have a reasonable belief that I was graded unfairly).

If you are claiming special circumstance, please describe them here. You may attach additional pages and supporting documents.

☐ I am including (#_____ of) attachments.

If you are challenging a grade, please provide your rationale here. You may attach additional pages and supporting documents.

☐ I am including (#_____ of) attachments.

I submit this petition in good faith and attest that the foregoing is true. Student Signature: _____

By default student members of the FCC and other PCL positions are **not** permitted to be part of the petition review process for privacy reasons. You may submit a separate, signed statement if you wish to waive your rights to privacy in this regard.

PCL Administration Only

Date Received: _____ Date Final Disposition: _____

☐ Approved ☐ Denied

Notes: _____

Reviewed by: ☐ Dean ☐ Administrator ☐ FCC ☐ Community Board ☐ Other

PCL'S Updated progress report as of 11/1/23:

In August of 2020, PCL implemented its first version of an Administrative Review Policy. This policy was updated again in September of 2021 and is stated on Page 73 of the Student Handbook as follows:

Administrative Grade Review Revised Policy

1. Before exams are administered, faculty will need to submit their exams and rubrics/issues outlines/model answers to the Faculty and Curriculum Committee (FCC) to review. The FCC will then assign reviewers, which can include the Dean, and other members of the FCC to review the exams and rubrics/issues outlines/model answers. Current faculty or student members of FCC cannot review their own exams and rubrics/issues outlines/model answers. Faculty will be informed of this policy at the orientation, and/or upon coming on board as a PCL faculty member.
2. Faculty will be provided a copy of the grading policy, and will be reminded of the grading policy for exams to be anonymous. Prior to grades being due, the faculty will once again be sent a reminder of the school's grading policies and to be mindful of grade inflation.
3. Once final exams have been conducted and after grades are entered in Populi, but before they are published (Populi calls this "finalizing"), the Administrator will review the grades to ensure they adhere to PCL grading policies, that grades are not inflated, and that there is no wide disparity in the grades among several instructors teaching the same group of students. The Administrator can use the grading matrix below as a general guide when considering grade inflation. The Administrator will notify the Dean and the FCC if there are grades that appear to have been inflated and if there is such a disparity so the committee can review.
4. The reviewers would include members of the FCC, the Dean, and former faculty members, but faculty would not, review their own grades.
5. If an instructor's grades appear to be inflated, the instructor will be sent a courtesy courteous letter asking them to review and reconsider their grades. This courtesy letter should be sent along with the same grade inflation notice that was sent prior to grade submission regarding grade inflation.
6. The instructor will review their grades and notify the FCC of any grade changes following their own review. If the instructor does not find any changes to be made, they will be asked to provide a short narrative explaining why they determined grade inflation is not present, or confer with the FCC and the Dean regarding the revisions. The reviewers will respect the faculty's professional judgment and may not override the grades, unless it is such a substantial departure from accepted academic norms as to demonstrate that the faculty did not actually exercise professional judgment.
7. Once the grades have been decided, they will then be sent to the Administrator to be published/finalized in Populi, and sent to the students. Faculty must use the grading matrix set out below. The matrix provides considerable flexibility. We are also providing a sample grading rubric for the exams to all faculty as a template.

90 - 100 (A+, A and A-)	Grades in this range should be only for very superb, outstanding work, not merely the best work among the students. The best work is often not in the A range. On an essay exam, the student should not only have identified all issues, but should have done a very superb, outstanding job of analyzing the issues. Sometimes there will be no grades in this range on an exam or for a quarter. This range is usually under 15% of the grades, occasionally as much as 15%, but in classes with a small number of students, it can exceed 15%.
80 – 89 (B+ , B and B-)	Grades in this range should be only for excellent work, not merely good work. On an essay exam, the student should have identified all issues, and should have done an excellent job of analyzing the issues. This range is usually under 25% of the grades, occasionally as much as 25%, but in classes with a small number of students, it can exceed 25%.
73 – 79 (C+ and C)	Grades in this range usually comprise the largest share of the grades, sometimes higher than 50% but sometimes it is not the largest share. In classes with a small number of students, it is often not the largest share. These grades are for good work, not necessarily average work, because the average might be less than good. A PCL student must have a C average or better, not C-, for all quarters, in order to advance to the next academic year and in order to graduate.
60 - 72 (C- to D-)	Grades in this range are for work that is somewhat less than good (C-) to work that is poor (D+ and D) to work that is marginally passing (D-). Unfortunately, this range sometimes comprises 15% to 20% of the grades, sometimes higher than 20%, but sometimes lower than 15%. In classes with a small number of students, it can be less than 15%.
59 and below (F)	Failing. Unfortunately, there will sometimes be multiple failing grades, even in a small class. A failing grade is not just for work that is entirely lacking – it is also for work that shows some grasp of the subject of the exam or course, but very little. On an essay exam, the student might have identified and discussed some issues but still receive an F. In a multiple choice exam, if a student has correctly answered up to 59% of the questions, the grade will still be an F.

PCL'S progress report as of 12/1/23:

In the 2020 Inspection Report, the State Bar recommended that” To bring itself into full compliance, the school should review, revise, and republish its grade review policy to meet guideline requirements.

Subsequent to the 2020 inspection, the school adopted a compliant policy, provided the State Bar with a copy of that policy, and has continued to update the bar as necessary regarding the policy. There are no new updates to report since the last progress report in October 2023.

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.

PCL'S Updated progress report as of 9/1/23:

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 10/1/23:

PCL is continuing the extensive process of digitizing paper student files and uploading all available materials to form permanent and easily accessible records. We will do this utilizing hard drives and the Populi system to keep records secure.

PCL continues to utilize Populi as its platform to protect its digital student records. The school uses Populi to

generate transcripts, keep class records, and record grades as well as the system used to generate automatic privacy notices on a quarterly basis. The system also keeps track of financial information per student. Additionally, the student can use the platform both to access assignments/notices from the instructor and consult the syllabus page. The system is easy to use and efficient. It is also convenient method by which an Instructor may communicate with their students and an automatic record is created of such communications.

Included below is an example (Identifying information redacted) of a student transcript that is currently being stored and accessed via Populi. This transcript can be accessed by the student or school administration at any time. The image has been included here as an example of Populi's capabilities and ease of use. The student and school administration can easily see the student's class schedule, grades, professors, etc. it has proven to be an effective, invaluable, and highly-preferred tool by the PCL student body, administration, and faculty.



REDACTED

PCL'S Updated progress report as of 11/1/23:

There has been no change, the school continues to preserve its digital files on Populi.

PCL'S progress report as of 12/1/23:

PCL continues to utilize Populi to store digital student records. PCL has continued in its process of digitizing records that were formerly available only in physical format. Additionally, PCL has been utilizing a password management app for many months in order to control access to PCL's digital files. This helps protect PCL's files, as recent statistics state that over 80 percent of digital breaches are caused by weak password security.

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](#) 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.

PCL officially entered into escrow on 6/28/23 for the sale of its building on 660 Bonnie Brae Avenue. 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.

PCL'S Updated progress report as of 9/1/23:

PCL continues to have two full-time staff members and two contractors who work in development and student bar prep respectively. Job descriptions for the two full time positions are attached.

At present, our faculty is composed of volunteers. For the upcoming academic school year PCL has hired nine licensed attorneys to teach the necessary classes. The overwhelming support for PCL has allowed us to fill faculty positions for the upcoming fall semester with volunteers. Moreover, we have staffed most of the classes for the winter and spring.

PCL's Updated progress report as of 10/1/23:

The State Bar has requested that PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the CBE's standards.

PCL has recently undergone a change as Dean Pomposo has taken an unexpected leave of absence. PCL's Board Members quickly appointed a formal Search Committee to search for Dean applicants. As a result of

the Board's swift action, an Interim Dean was quickly vetted and hired. Dean Ana Maria Lobos has a J.D. degree and is a licensed California Attorney with a background in management and education. As a result of her expeditious hiring, the Interim Dean has been able to compile the electronic documents requested by the State Bar, has produced the October 1st State Bar Progress Report, has ensured that all changes requested by the State Bar and previously reported to the State Bar are in fact in practice at PCL, and has conducted an FCC meeting in which pertinent academic issues were resolved.

Administrator Roger Aramayo continues to be a vital part of the school's administration. He is present at the PCL facility during all class times. Students utilize Administrator Aramayo to access their transcripts, class schedules, syllabi, and for other services as required for their academic endeavors. Administrator Aramayo is involved in producing materials as requested by the State Bar. His J.D. degree allows for intelligent analysis and judgment calls that are necessary to the effective administration of the school.

PCL's Board Members are deeply dedicated to the daily operations of the school. They are readily available to assist in any situation. Volunteer members make up the faculty and school committees, which keep PCL on a strict academic trajectory. They meet regularly to keep the school's operations and academics in line with the school's ideals, policies, and procedures. The school's faculty members are reliably present for the classes they conduct and are readily available to their students for additional academic counseling, and hold office hours by appointment.

PCL's Updated progress report as of 11/1/23:

PCL has continued to improve its administrative capacity by working to create transition plans and operational framework that will ensure that future transitions in leadership and staff will not lead to gaps or fluctuations in the school's ability adhere to regulations. PCL has had written job descriptions for the Dean and Administrator positions since at least April of 2023. (Exhibit A- Dean Job Description, Exhibit B- Administrator Job Description) PCL is also in the process of creating an Administration Manual to help guide day-to-day operations.

PCL's progress report as of 12/1/23:

PCL continues to strive to improve its administrative capacity. Doing the work required to meet probation deadlines has made it more challenging for PCL to continue to prove its operating capacity to the State Bar. Having a new interim dean, hired within the last 2 months, and a relatively new administrator, hired in March of 2023, makes the process of responding to the State Bar with accurate information more time-exhaustive than it would be for an individual with more institutional knowledge of PCL. However, both the interim dean and the administrator strive to meet the deadlines, with accurate and complete reporting at the forefront of their intentions, while also managing PCL's daily operations and providing services, guidance, and support to the faculty and students.

EXHIBIT A- DEAN JOB DESCRIPTION



People's College of Law

660 S. Bonnie Brae, L.A., CA 90057 Tel.:
213 483-0083 Fax: 213 483-2981
E-mail: administrator@peoplescollegeoflaw.edu

"Over 49 Years of Educating People's Lawyers"

The People's College of Law seeks an exceptional individual to become the dean of its School of Law. This is a full-time salaried position.

The next dean should be an innovative thinker and approachable leader who welcomes the opportunity to articulate a vision for the growth of the law school that builds on its 49-year history of preparing social justice lawyers.

The People's College of Law, PCL, was founded in 1974 as a non-profit 501(c)(3) under the corporate name *The Guild Law School*. The school exists to bring legal resources to under-represented communities by training legal advocates dedicated to securing progressive social change and justice in society.

Centrally located near downtown Los Angeles' PCL is close to, many nonprofits dedicated to under-represented people, and a community historically underrepresented by legal representation, and close to research universities, and state and federal courts.

PCL is a registered, unaccredited law school regulated by the State Bar of California. PCL is authorized by the State Bar to confer the Juris Doctor (J.D.) degree and to qualify graduates to take the California Bar Exam.

Scope of Work

Reporting to our Community Board of Directors and working closely with the school Administrator and Registrar, the Dean is the School of Law's chief academic and regulatory officer, with overall responsibility for its academic programs and compliance with State Bar regulations, However, major decisions for the school are made by the Community Board, or subject to its decisions.

The next dean will be presented with the opportunity not only to propel PCL to higher levels of prominence and distinction but also to advance the school's academic programs.

The Dean's leadership skills will be essential to taking on the following opportunities and challenges:

- Executing a comprehensive and proactive strategic plan for the School of Law that meets the challenges of a highly competitive market and aligns with the broader objectives of the College;
- Garnering additional private and public funding and other resources that will enable the School of Law to make continued advances in its programs and facilities and faculty;
- Enhancing PCL's strong sense of community among its principal constituents, including faculty, staff, students, alumni, and other schools;



People's College of Law

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

213 483-0083 Fax: 213 483-2981

E-mail: administrator@peoplescollegeoflaw.edu

"Over 49 Years of Educating People's Lawyers"

- Continuously improving student outcomes—including bar passage and job placement—;
- Advancing the law school's commitment to social justice, access to justice, and equality before the law.
- Maintaining compliance with State Bar regulations and requirements. Writing new and revised rules and policies for the school.
- Attending meetings of the State Bar and its committees.
- Communicating and meeting with deans of other law schools

The People's College of Law

The People's College of Law was officially founded in 1974, making it the oldest law School in the nation with a specific focus on social justice.

Faculty

PCLS's diverse, collegial, and highly accomplished faculty is currently, and has always been, all-volunteer.

PCL alumni and faculty make law and policy as well as write about it. They are, and for many years have been active leaders in organizations engaged in the study and application of law, such as, the California Legislature, the Los Angeles City Council, the Los Angeles Superior Court, the Los Angeles County Federation of Labor, the UCLA Labor Center, the Legal Aid Foundation of Los Angeles, Neighborhood Legal Services of Los Angeles County, the Los Angeles County Public Defender, California Rural Legal Assistance, Council on Foundations (Washington D.C.), Community Lawyers (Compton), the National Lawyers Guild and ASOSAL (Central American immigration rights group).

Students & Alumni

The PCL student body currently consists of approximately 25 students, the large majority from non-traditional educational backgrounds. The quality and diversity of the student body are key components of the educational experience at PCL. The school is proud of the supportive environment it provides to all students, including women, minority students, older students, LGBTQ students, and students from nontraditional backgrounds.

A strong network of 120 alumni and strong relationships with the community of progressive attorneys in Los Angeles in beyond affords excellent career prospects for PCL's graduates in private practice, academia, business, government, and public interest.

Unique to PCL



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Qualifications and Characteristics

PCL seeks a visionary dean with exceptional leadership credentials to meet the opportunities and challenges outlined above and to lead the law school into the future. The position requires an individual who can lead effectively and manage the school in the complex California law school regulatory environment.

Leadership

Demonstrated senior-level experience with responsibility for strategic management of programs and resources is strongly preferred.

The ideal candidate will also demonstrate:

- A commitment to innovation in legal education and a broad knowledge of the legal profession and emerging trends in the practice of law and social justice;
- Strong fundraising skills, including the ability to engage alumni, foundations, the legal community, and other donors in the school's mission;
- The ability to recognize and develop opportunities to enhance revenues from contracts, grants, non-J.D. programs, and other sources in light of the changing market for legal education;
- A commitment to fostering the PCL's core values of diversity and inclusion, at the school in the legal profession and in society at large; and
- Outstanding interpersonal skills, leadership skills, emotional intelligence, personal ethics, and professional integrity.

Applications, Nominations, and Inquiries

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

Search Committee c/o Hector C. Pena via email at hpena@peoplescollegeoflaw.edu

Please include a letter of interest and a current CV. Candidate materials will be reviewed on an ongoing basis up to the application deadline. All correspondence will be held in strict confidence. The anticipated start date is as soon as possible.

The People's College of Law values equality of opportunity, human dignity, and diversity.



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Job Posting

Administrator/Registrar, Peoples College Law

The Administrator/Registrar of Peoples College of Law (PCL) is a full-time, salaried (exempt) position based in Los Angeles, CA. The Administrator/Registrar performs the bulk of the day-to-day work of PCL, and therefore is a key contributor to achieving PCL's mission to bring legal resources to under-represented communities by training legal advocates dedicated to securing progressive social change and justice in society. PCL is a small, nonprofit, fully licensed law school in Los Angeles, CA authorized to grant the Juris Doctor (J.D.) degree, which qualifies its graduates to take the California Bar Exam. Classes take place in the evening to accommodate working students.

The Administrator/Registrar reports to the PCL Board of Directors and the Officers of PCL (Chair, Vice-Chair, Secretary, Treasurer and Dean). The Administrator/Registrar customarily and regularly exercises discretion and independent judgment and works under general supervision of the President of the PCL Board of Directors, officers, including the Dean.

The position requires transparency, as well as consultation and collaboration with PCL's students, faculty, committees, alumni, Dean, Board of Directors, Officers, and other community members. The expected start date is as soon as possible.

Salary Range: \$60,080 to \$65,000 depending on experience and qualifications

Responsibilities include, but are not limited to:

- Carry out the day-to-day business and administrative affairs of PCL.
- Act as the primary contact person and representative of PCL via telephone, mail, and email.
- Be present at the school Monday through Friday from 12:30 p.m. to 8:30 p.m. from September through May and occasionally for a few hours on the weekends to assist with open house events (during the COVID-19 emergency, presence is by remote electronic means).
- Collect tuition and other fees and monies from students and manage corresponding records.
- Manage and update PCL's Student Information System (Populi).
- Manage and update student and faculty records and files in both paper and digital formats.
- Manage and maintain the school's finances and bookkeeping, including accounts payable and accounts receivable and assist with developing budgets; work with the bookkeeper, accountant, and Treasurer to achieve this.
- Attend PCL board meetings once per month on Sunday and be prepared to: present a financial report, an Administrator Report and other reports as needed.
- Become familiar with PCL's bylaws, policies, rules and handbooks.
- Be familiar with the laws and rules of the State Bar of California that govern the school; work with the Dean, Board of Directors, and Officers to maintain and improve PCL's compliance with applicable laws and rules.

- Work with the Dean and others on the inspections by the State Bar and the self-study reports required for them. The next inspection is in October 2023.
- Provide information to and support students, faculty, and other community members in accessing the school's resources and in complying with the school's community agreements.
- Manage and update the academic calendar, course schedule, student handbook, and other documents in collaboration with the Dean, PCL President, Board of Directors, and Officers.
- Maintain student attendance records and supervise student and faculty compliance with attendance record requirements.
- Respond in a timely manner to official requests for student records and transcripts while upholding the school's privacy policy.
- Support and assist PCL's committees in the areas of fundraising and development, admissions and recruitment, communications, and implementation of committee programs.
- Support and assist with the management of PCL's website, marketing efforts, and social media presence.
- Support and assist with establishing relationships with community organizations, unions, cooperatives, and like-minded organizations for the advancement of PCL and the surrounding communities.
- This position reports to both the PCL President and the Dean.

Qualifications

- Master in Higher Education or Master in Public Administration (suggested).
- Juris Doctor (J.D.) degree from (1) an American Bar Association-approved law school or (2) a law school accredited or registered by the Committee of Bar Examiners of the State Bar of California. (the Administrator need not be an attorney or Bar member).
- Three years experience as an administrator or executive director on behalf of organizations seeking progressive social, political, or legal change. One year prior experience working in an administrative capacity at a graduate level (or higher) educational institution; preferably as a registrar Three years experience as a community organizer or advocate for a progressive political agenda, and commitment to it, including support for civil liberties, workers' rights, and social justice.
- Ability to work cooperatively and courteously with our various constituents, including coworkers, volunteers, board directors, officers, and supervisors Ability to work under pressure and maintain professionalism under stress.
- Excellent organizational skills and attention to detail Strong written and verbal communication skills.
- Experience in strategic planning and management of programs Experience in public relations and social media management. Experienced with Software and Technology such as, Microsoft 365, Excel, Qualtrics, Gsuite, Docusign, Adobe Acrobat, Asana or other project management tools, social media management tools such as, MeetEdgar or Hootsuite, CRM, ie. Salesforce. Grant writing experience a plus. Program development and student/faculty/volunteer recruitment experience a plus. Spanish language proficiency a plus.

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**

PCL'S Updated progress report as of 9/1/23:

PCL's Updated progress report as of 10/1/23:

PCL's policy is in practice as using faculty evaluation forms to assess faculty performance and identify eligibility to return for future academic terms. These evaluations serve the dual purpose of guiding our selection process and developing a professional development roadmap for our instructors. This evaluation approach, implemented by PCL, has enabled us to make informed decisions about faculty retention, resulting in a more refined teaching cohort.

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

In an FCC meeting held on September 29, 2023, standards for interviewing prospective faculty members were reviewed. A faculty interview panel was created for the 2023-2024 academic year, consisting of one current faculty member, the dean, and two students.

PCL's Updated progress report as of 11/1/23:

Faculty undergo a very thorough performance review policy at PCL.

Students are provided with a form by which to anonymously review faculty.

Instructors are reviewed by the Dean and/or FCC and provided with a performance evaluation. (EXHIBIT A- Faculty Evaluation Form)

Faculty is also asked to complete a self-evaluation. (EXHIBIT B - Faculty Self - Evaluation Form)

Evaluations are placed in files and emailed to instructors, as evidenced by the attached images.

(EXHIBIT C- Final Evaluation Form, EXHIBIT D - List of sent faculty evaluations)

EXHIBIT A- FACULTY EVALUATION FORM

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.*

Number of years of teaching experience: _____

☐
☐
☐
☐

probationary/tenure track

☐
☐
☐
☐

1. Workload

Scheduled

:

Scholarly/Research

Activity

Activities

2.

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

_____ and exceptional _____ excellent student reviews, community service to the school). Supporting evidence must be presented in the narrative.

_____ and frequently

their

Meets

_____ of high quality, fulfills expectations, and periodically may exceed them as described in his/her position description.

Requires Development

_____ does not consistently meet expectations and

_____ and include goals to get there.

Unsatisfactory

_____ work is below the basic requirements of the job description and improvement is required,

SCHEDULED

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

EXHIBIT B - FACULTY SELF - EVALUATION FORM



Faculty Self-Evaluation Form

Instructions for Administrative Faculty Self-Evaluation

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

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

Employee Information

Robert D
First Name: _____
Skeels
Last Name: _____
Adjunct Instructor
Current Title: _____
N/A
Department/Unit: _____
Faculty and Curriculum Committee
Supervisor Name: _____
September 5, 2023
Evaluation Period Start Date: _____
May 20, 2023
Evaluation Period End Date: _____

Essential Functions from Your faculty job description

Discuss your performance of the essential functions of your position.

This was my fifth year teaching this subject and my second full year teaching using remote instruction technology. I've been able to further utilize experiences from actual practice of law in my instruction, and have further refined lesson plans and slides for remote classes.

EXHIBIT C: Image of an email sent to an Instructor with a faculty evaluation attached.

Edith Pomposo <dean@peoplescollegeoflaw.edu>

Tue, Sep 12, 4:18 PM

to PCL

Dear Professor Laura,

I've attached the Final Faculty Evaluation Form for 2022-2023, for your records.

Best regards

Edith

One attachment • Scanned by Gmail

Faculty Evaluation Form

This form is for internal purposes only. It is not to be distributed outside of the college.

All faculty are required to be evaluated annually. Please fill out this form by the deadline.

Department: Legal Writing Date of Review: 7/9/2023

Faculty member: Laura Boudreau Effective rating date: _____

Academic rank: _____ Title: _____ Highest degree: _____

Number of years of teaching experience: _____

Reasons for rating: _____

Overall rating by the review (include the year):

2022-2023 Academic Year: _____

Rating: _____

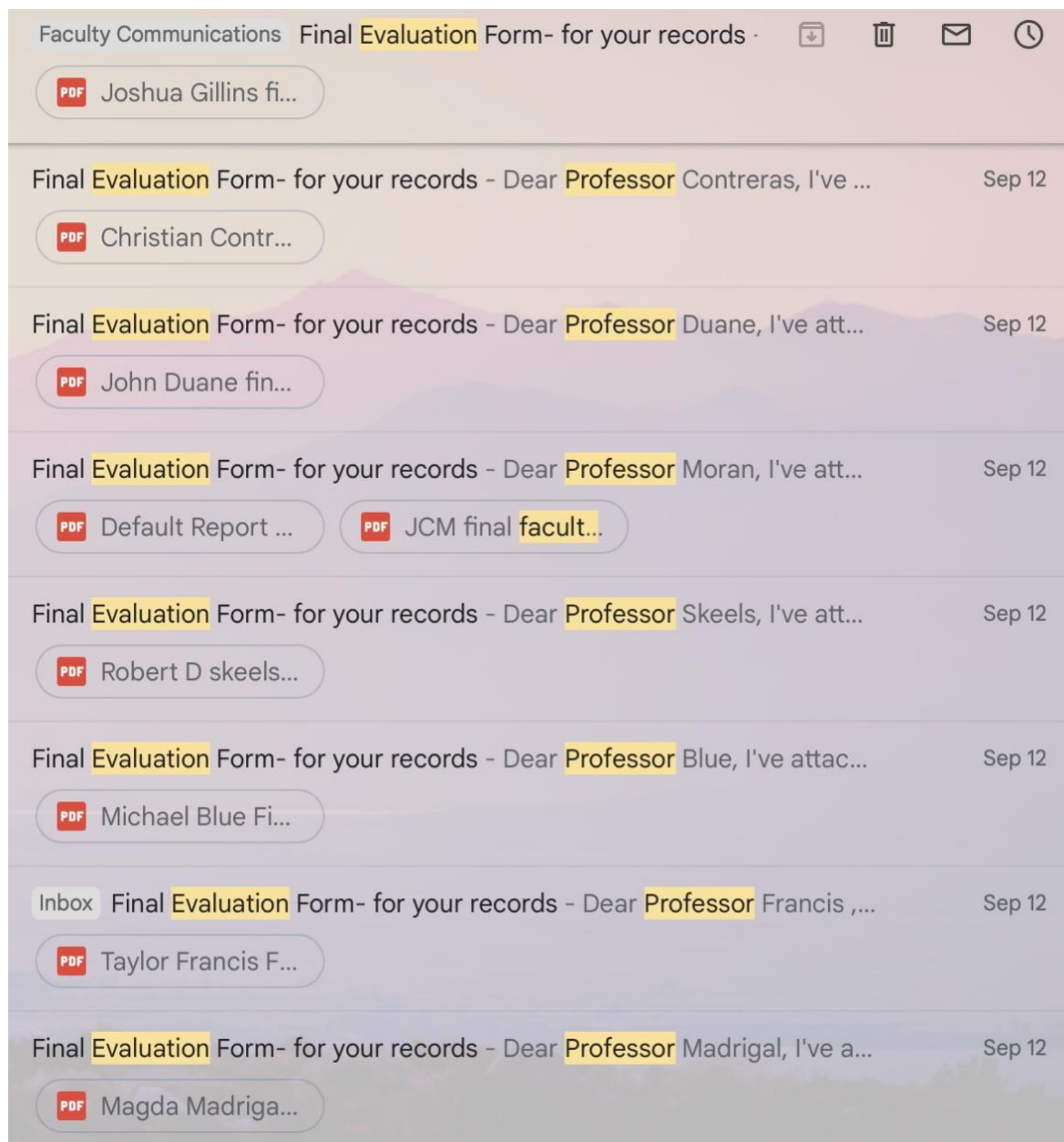
Comments: _____

Signature: _____

L. Boudreau

PDF Laura B final facu...

EXHIBIT D- Image of a list of faculty evaluations that were sent on September 12,2023.



PCL's progress report as of 12/1/23:

The Faculty and Curriculum Committee (FCC) continues to be involved in the interviewing, hiring, and review process of faculty. The FCC also provides continuing education and training to the faculty.

Most recently, the FCC assembled a panel to interview, and has been interviewing, new instructors for the upcoming quarters.

Members of the FCC reviewed all final exams prior to the administration of exams at the end of the Fall 2023 Quarter.

Throughout the year, the FCC provides faculty with periodic training and education opportunities, with a training on exam creation and grading taking place this winter quarter.

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.

PCL's Updated Progress Report as of 9/1/23:

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

PCL's Updated Progress Report as of 10/1/23:

This Rule makes several requests of PCL which have been delineated as follows:

1. 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;
2. Provide for accurate and timely maintenance of records;
3. Eliminate the policy of permitting students to make up absences from regularly scheduled class hours with alternate activities.

PCL's has addressed the above 3 points as described below:

Require student attendance at no less than 80 percent of the regularly scheduled class hours for each course during a particular term

PCL's Student Handbook, which is displayed on the website, states that all students must comply by the State Bar's 80% Attendance Rule. The following is posted on the website and published in student materials and continues to be the practice at PCL:

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

Provide for accurate and timely maintenance of records

PCL’s current practice requires the Administrator to input all syllabi, course materials, exam grades, and course grades in a timely manner using the Populi system.

Eliminate the policy of permitting students to make up absences from regularly scheduled class hours with alternate activities.

The former policy of allowing students to make up absences with alternative activities is no longer permitted. The PCL Student Handbook prominently reflects this change in bolded font on page 26 of the Student Handbook:

“Under no circumstances may PCL offer students the opportunity to make up absences from regularly scheduled class hours with alternative activities.”

PCL’s Updated Progress Report as of 11/1/23:

There are no further updates at this time, as our practices continue to align with our policies and procedures.

PCL’s Progress Report as of 12/1/23:

Students at PCL may be academically disqualified for failing to comply with PCL’s 80 percent attendance rule. Currently, students may file a petition to appeal disqualification due to failure to adhere to the 80 percent attendance rule . With proper documentation and the student’s demonstration of good cause and special circumstances, the FCC may approve the student’s petition. If the student’s petition is approved, the student is promptly informed of the decision and of the deadline for completion of additional classes to make up tclass time missed. PCL has a policy, stated on Page 26 of the Student Handbook that states *“under no circumstances may PCL offer students the opportunity to make up absences from regularly scheduled class hours with alternative activities.”*

In the October 2023 Inspection Report, State Bar staff states that “implementation of the improved (attendance) policy does not fully satisfy Guideline 5.3(A)(1) because students who miss more than 20 percent of classes are given the opportunity to appeal the decision and take make-up classes; the Guideline requires attendance of not less than 80 percent of “regularly scheduled class hours” in each course.

PCL has been of the belief that its attendance policy, requiring attendance at 80 percent or more of all class offerings, was in full compliance with Bar rules and expectations. PCL was not aware that the State Bar’s interpretation of the term “regularly scheduled class hour” in Guideline 5.3 (A)(1) meant that a student, who could demonstrate good cause and a showing of special circumstances for having missed more than the permitted amount, could not make up the missed class with another scheduled class of the same length in time of that which the student missed.

Accordingly, a new policy will be prepared and presented to the PCL Community Board for a vote in order to

be in compliance with this interpretation of the rule.

PCL objects to this rule, as it is currently written, however. PCL is of the opinion that students with special circumstances who can show good cause for having missed a class, should be able to be given an opportunity to complete the class time that they missed. The State Bar requires that a student complete a minimum of 270 hours per year. At a school like PCL, where exactly 270 hours of classes per year are offered, if a student does not get credit for one course, they are subsequently required to repeat the entire year's courses. This seems wholly unfair to a student who might have a genuine and unavoidable reason for missing, for example, three classes in a quarter, as opposed to two classes.

Nonetheless, PCL strives to be in compliance with all the Rules and Guidelines, and will change its policy as necessary.

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.

PCL's Updated progress report as of 9/1/23:

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

PCL's Updated progress report as of 10/1/23:

PCL last completed clinical course took place in the Summer of 2022. At that time, the above-mentioned policies were put into practice.

PCL's Updated progress report as of 11/1/23:

While it appears that PCL has not previously adopted a formal written policy regarding clinical programs, in its actual practice, the programs have performed in accordance with Guidelines 5.8 based on the instruction and implementation methods established by former deans of the law school. All clinics and externships have provided a faculty supervisor and required time sheets, which include records of the student work being performed, for example. Student involvement in clinical courses has been monitored to ensure they do not surpass the permitted amount of course credits allowed for clinical classes.

A formal policy has been written and is being evaluated by the Faculty and Curriculum Committee (FCC). The completed policy will be included as an agenda item for a vote by the PCL Board at its next meeting on November 19th, 2023. On approval, the policy will then be added to the student and faculty handbooks. The policy will ensure that clinical courses award credit commensurate with the time and effort expended by, and the educational benefits to, the participating student; that the studies or activities must be approved in advance; that a member of the faculty must supervise and periodically review each student's participation, to ensure that the educational objectives are achieved; that the amount of credit may not exceed forty (40) percent of the hourly requirement for any year or more than ten (10) percent of the total hours required for graduation; and that the law school must maintain an appropriate record for each student.

PCL's Progress Report as of 12/1/23:

Students who were enrolled in the fall externship met all of the clinical course requirements, including keeping timesheets. Their participation in the program was periodically supervised by a faculty member, and PCL has all of the appropriate records on file.

PCL's policy on clinical courses states:

Externships, Clinical Programs, and Other Non - Classroom Activities Performed For Credit

At its discretion, PCL may permit students to enroll in externships, clinical programs, or other activities that do not involve instruction by a faculty member or involve participation in regularly scheduled course hours or classroom studies.

The time spent involved in these activities and studies may be used to satisfy the 270 hour requirement set by the Bar in Guideline 5.3 if the following criteria are met:

1. PCL's clinical courses will award credit commensurate with the time and effort expended by, and the educational benefits to, the participating student.
2. The studies or activities must be approved in advance by the Dean or the FCC.
3. A member of the faculty or the dean must supervise and periodically review each student's participation to ensure that the educational objectives are achieved.
4. The amount of credit may not exceed forty (40) percent of the hourly requirement for any year or more than ten (10) percent of the total hours required for graduation;
5. PCL must maintain an appropriate record for each student. At PCL, this is done by keeping a timesheet that is regularly submitted to the Dean or Faculty Advisor. The timesheet must be retained in each student's file.

Clinical Program or Externship Record Requirement

The law school must maintain a record for each student participating in the any of the above-mentioned activities. The record must include at least
the educational objectives,
the number of hours spent by the student participating in the activity,
the amount of academic credit authorized,
the name of the faculty member who conducted or reviewed the activity,
the name, address, telephone number, and qualifications of each person not on the faculty who directly supervised the student participating in the activity, and
the methods used to evaluate student performance, and
all other records as necessary to keep record of the criteria mentioned in point 1-5 above.

Enrollment a Clinical Program or Externship

Periodically, PCL will offer clinical courses or externships as part of its curriculum. These courses generally take place during a summer quarter, but may take place during other periods of time. The criteria for enrollment in these courses will be made available to students at that time. If a student seeks placement in a clinical program or externship that is not offered by PCL as part of its curriculum, that student must submit in writing, to the Dean or FCC, their request to receive academic credit for the program. The written submission must be received as soon as practicable, but no later than 4 weeks before the beginning of a quarter if the student intends to replace classroom study hours with clinical hours. The written request should clearly demonstrate that the placement meets all of the above-mentioned required criteria. The student will only be able to receive academic credit from PCL upon the Dean or FCC's written approval of the student's participation in the program.

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%
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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.

PCL’s Updated Progress Report as of 9/1/23:

The policy remains the same.

PCL’s Updated Progress Report as of 10/1/23:

The policies as stated above appear to be in practice at PCL as of October 1, 2023. They are clearly stated in the Student Handbook as stated in great detail in past Progress Reports.

PCL’s Updated Progress Report as of 11/1/23:

There have been no changes.

PCL’s Progress Report as of 12/1/23:

PCL maintains the same Administrative Grade Review Policy, adopted in 2021, which is on page 70 of the Student Handbook. This Administrative Review of grades includes reviews of exams and their corresponding rubrics, issue outlines, or model answers before the exam is administered to the students. The policy also includes procedures for reviewing grades for grade inflation and provides an opportunity for faculty to change their grades if grade inflation before the grades are made available to students.

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.

PCL’s Updated Progress Report as of 9/1/23:

PCL’s policies have remained in effect.

PCL’s Updated Progress Report as of 10/1/23:

The State Bar requests that PCL 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. As the former policies have since been deleted, changed, and are no longer published or in practice, it is the Interim Dean’s assessment that the revised policies have remained in effect.

PCL’s current policies and practices provide for academic advancement in a way that complies with the guidelines. 1L students have a strict schedule that provides them with diligent instruction of 1L courses. These courses prepare them for legal reading and writing, which are often brand new skills, akin to learning a foreign language. PCL provides instruction in Torts, Contracts, and Criminal Law, which ensures students have built a solid foundation in the subject and are not being exposed to these topics for the first time during their preparation for the FYLSX. Further along, in addition to doctrinal courses, students receive classes in bar

preparation and experience the practice of law in their fourth year, via externships and clinical courses. The courses and opportunities better prepare them to be successful practitioners of law upon graduation. Such clinical courses and externships were added after feedback from former alumni regarding feeling a lack of confidence as they entered the legal profession. In this way, PCL is not only achieving the goal of providing academic advancement, but staying true to its mission, and each student's personal mission, of becoming confident, practicing lawyers.

PCL's Updated Progress Report as of 11/1/23:

There are no additional updates at this time.

PCL's Progress Report as of 12/1/23:

There are no additional updates at this time.

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.

PCL's Updated Progress Report as of 9/1/23:

As of the present date, no students have utilized the aforementioned course repetition policy, which reads:

Section 11. Repeating Courses and Quarters: No Duplicate Credit: Duplicate credit will not be given for repeating the same or substantially the same course or quarter, whether the courses or quarters are both taken at PCL or at another school, or partly at PCL and partly at another school.

Repeating a Course or Quarter after Failing and Thus Not Completing 270 Hours: If (1) a student fails a course or a quarter of a course, and if (2) as a result of the failure the student does not successfully complete 270 hours in an academic year, then the following applies. Because of State Bar requirements that the required 270 hours per year must all be taken in the same 12 month academic year, the student, in order

to be eligible for the J.D. degree and to take the FYLSX and the Bar Exam, cannot make up for the failed course or quarter by repeating only that course or quarter again in a later academic year, but instead must repeat the entire year's courses (Note that failing a course might not result in failing to successfully complete 270 hours in an academic year, if during the academic year the student completed courses whose total hours exceed 270. As of 2020, PCL normally offers exactly 270 hours of classes for 2L, 3L, and 4L students, but 330 hours for 1L students.)

The law school continues to monitor the situation and remains prepared to provide necessary information regarding the implications of taking a leave, as well as any proposed plans that students may undertake after the leave period.

PCL's Updated Progress Report as of 10/1/23:

As of the present date, no students have utilized the aforementioned course repetition policy, which is clearly stated in our Student Handbook as well as in our previous progress report.

PCL's Updated Progress Report as of 11/1/23:

PCL's policy was stated in the 9/1/23 progress report. It is in adherence with Guideline 5.24, as it has a clearly stated policy on course repetition.

PCL's Updated Progress Report as of 12/1/23:

PCLs policies related to course repetition are stated above under Guidelines 2.9(A)-(B) and 5.24.

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 F** 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®)

PCL's Updated Progress Report as of 9/1/23:

The books we ordered for the library have now arrived. Students will be required to submit a legal research assignment each semester utilizing both the online and hard copy of the legal research tools. Students also continue to use caseText, which is a free legal research tool.

PCL's Updated Progress Report as of 10/1/23:

The State Bar's request is delineated as follows:

1. ***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;***
2. ***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.

In regards to the above, PCL's current policies and practices are as follows:

Return to compliance regarding the library

PCL has purchased the required library texts. These books are being housed at PCL's fixed facility and the students have regular access to the books as needed. PCL's Board President amended the lease agreement with the tenant downstairs from PCL to ensure that PCL students have the necessary access to the library.

PCL should also demonstrate that students are receiving instruction in both physical publication and electronic-based legal research

Upon further assessment, we agree with the State Bar's point that PCL's handbook states that legal research is taught in several courses but that this is not reflected in actual instruction. PCL appears to occasionally offer a Legal Research class but it doesn't appear to have been offered in some time and has thus been removed from the Course Catalog to remain in compliance with Bar standards.

PCL will remedy this discrepancy by:

1. Removing the inconsistent language from the Course Catalog. The language currently states:
LEGAL WRITING, ANALYSIS AND RESEARCH
Several courses throughout the four years of instruction. provides practice in issue spotting, legal analysis and legal research, test-taking skills and study techniques, with special emphasis on the First Year Law Students Exam and the Bar Exam.

This will be updated to the following:

LEGAL WRITING AND ANALYSIS

Several courses throughout the four years of instruction. provides practice in issue spotting, legal analysis, test-taking skills and study techniques, with special emphasis on the First Year Law Students Exam and the Bar Exam.


2. To remain in compliance with Guideline 6.3, a dedicated Legal Research Class will be added to the curriculum in either Winter or Spring of 2024. This class will offer instruction in both physical and electronic-based research. This item will be addressed at the next FCC meeting, tentatively scheduled for November of 2023.

PCL's Updated Progress Report as of 11/1/23:

1. ***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;***

There have been no changes.

Attached are images of PCL's invoice from Thomson Reuters.

 THOMSON REUTERS™	Order Form		Order ID: [REDACTED]
	Contact your representative [REDACTED] with any questions. Thank you.		

Sold To Account Address

Account #: [REDACTED]
 PEOPLES COLLEGE OF LAW DTP
 660 S BONNIE BRAE ST 2ND FL
 LOS ANGELES CA 90057-3710 US

"Customer"

Shipping Address

Account [REDACTED]
 PEOPLES COLLEGE OF LAW DTP
 660 S BONNIE BRAE ST 2ND FL
 LOS ANGELES CA 90057-3710 US

Billing Address

Account #: [REDACTED]
 PEOPLES COLLEGE OF LAW DTP
 660 S BONNIE BRAE ST 2ND FL
 LOS ANGELES, CA 90057-3710
 US

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".

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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)
[REDACTED]	West Complete Library Subscription	[REDACTED]	60
West Complete Term			

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2. 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 Interim Dean has reviewed the issue regarding legal research and can confirm, based on transcript review and personal interviews of all upper division students, that all current students, apart from PCL's 1L, have received a legal research class.

Legal research has been re-added as a required component for future 1L Legal Writing classes and future syllabi are required to reflect as such. Students also have access to casetext, a digital legal research tool.

PCL's Updated Progress Report as of 12/1/23:

There are no further updates regarding the library or legal research classes at this time.

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.

PCL's updated progress report as of 9/1/23:

There have not been any further changes and PCL continues to adhere to safekeeping of records. PCL has some files stored in fire-proof filing cabinets on the school premises, which are located in the main hallway on the second floor of the school. The fire-proof filing cabinets are in a closet and the key is only in the possession of administration.

PCL's updated progress report as of 10/1/23:

There have not been any further changes and PCL continues to adhere to safekeeping of records in fire-safe cabinets.

PCL's updated progress report as of 11/1/23:

There are no changes to report. PCL continues to adhere to safekeeping of records in fire-safe cabinets.

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.

PCL's updated progress report as of 10/1/23:

The above mentioned policies are still clearly stated in the Student Handbook. PCL continues to utilize Populi for digital file management of student and academic records, administrative records, and financial records, amongst others.

PCL's updated progress report as of 11/1/23:

There are no changes to report.

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

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.

PCL's updated progress report as of 11/1/23:

Currently, all of PCL's classes utilize a standard syllabus, with the exception of electives and clinical courses. In order to promote consistent communication of course requirements, the Dean will work to standardize syllabi for all classes in the upcoming quarters.

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

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.”

PCL’s updated progress report as of 11/1/23:

PCL continues to utilize Populi and fire-safe locking file cabinets for physical files.

The Dean has placed an item on the agenda for the November 2023 Board Meeting in which to discuss data security in more detail.

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.

PCL’s updated progress report as of 11/1/23:

This continues to be the practice at PCL. Exams are provided to the Dean for review, along with answer keys, issue outlines, or model answers, prior to being administered to the students.

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.

PCL's updated progress report as of 9/1/23:

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

PCL's updated progress report as of 10/1/23:

The following addendum is currently published in the Student Handbook, which is available on PCL's website. It addresses the State Bar's suggestion 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:

Administrative Grade Review Revised Policy – Approve by the PCL Board
September 19, 2021

The Committee of Bar Examiners (CBE) has notified Peoples College of Law (PCL) and many other law schools to guard against grade inflation. This has led to an administrative grade review policy as described below.

1. Before exams are administered, faculty will need to submit their exams and rubrics/issues outlines/model answers to the Faculty and Curriculum Committee (FCC) to review. The FCC will then assign reviewers, which can include the Dean, and other members of the FCC to review the exams and rubrics/issues outlines/model answers. Current faculty or student members of FCC cannot review their own exams and rubrics/issues outlines/model answers. Faculty will be informed of this policy at the orientation, and/or upon coming on board as a PCL faculty member.
2. Faculty will be provided a copy of the grading policy, and will be reminded of the grading policy for exams to be anonymous. Prior to grades being due, the faculty will once again be sent a reminder of the school's grading policies and to be mindful of grade inflation.
3. Once final exams have been conducted and after grades are entered in Populi, but before they are published (Populi calls this "finalizing"), the Administrator will review the grades to ensure they adhere to PCL grading policies, that grades are not inflated, and that there is no wide disparity in the grades among several instructors teaching the same group of students. The Administrator can use the grading matrix below as a general guide when considering grade inflation. The Administrator will notify the Dean and the FCC if there are grades that appear to have been inflated and if there is such a disparity so the committee can review.
4. The reviewers would include members of the FCC, the Dean, and former faculty members, but faculty would not, review their own grades.
5. If an instructor's grades appear to be inflated, the instructor will be sent a courtesy courteous letter asking them to review and reconsider their grades. This courtesy letter

should be sent along with the same grade inflation notice that was sent prior to grade submission regarding grade inflation.

6. The instructor will review their grades and notify the FCC of any grade changes following their own review. If the instructor does not find any changes to be made, they will be asked to provide a short narrative explaining why they determined grade inflation is not present, or confer with the FCC and the Dean regarding the revisions. The reviewers will respect the faculty's professional judgment and may not override the grades, unless it is such a substantial departure from accepted academic norms as to demonstrate that the faculty did not actually exercise professional judgment.

7. Once the grades have been decided, they will then be sent to the Administrator to be published/finalized in Populi, and sent to the students.

Faculty must use the grading matrix set out below. The matrix provides considerable flexibility. We are also providing a sample grading rubric for the exams to all faculty as a template.

PCL's updated progress report as of 11/1/23:

There has been no change.

From: administrator administrator@peoplescollegeoflaw.edu
Subject: Re: URGENT PCL: Disclosures
Date: August 30, 2023 at 12:26 PM
To: REDACTED
Cc: Treasurer . treasurer@peoplescollegeoflaw.edu, Edith Pomposo dean@peoplescollegeoflaw.edu

REDACTED

The disclosures are not technically a legal commitment to attend. They are simply an acknowledgement that allows us to collect fees in the event you do decide to attend and make a payment. Therefore, you should sign as soon as possible and we will work with you on accepting payment when you feel informed and comfortable with the setting after the school year starts.

As for your other concerns, I would be happy to schedule a call with the Dean and I so that we can communicate with each other and respond directly to your questions.

I hope this clarifies things a bit,

....R

On Aug 30, 2023, at 11:41 AM, REDACTED wrote: _____

Roger-

We (I) have not even been provided with the times when our classes are supposed to take place in less than a week or who the instructors will be, much later than this information was promised to us. I am not sure why PCL has been so late to provide this information and these disclosures, but I do not appreciate the attempt to bully us into signing them less than 24 hours after they finally reached us.

I am not sure I am ready to commit to attending PCL this year, but I have not been contacted by anyone about whether I intended to enroll. What are we committing to by signing the disclosure? Also, am I supposed to sign both disclosures that were sent to me or is one duplicative? Also, my name is misspelled in the disclosure--it is REDACTED can you correct the disclosure before I sign it?

And finally, I have no intention of making payment for any classes until after I have had the opportunity to assess the quality of the reopened school. Being new to PCL, you may not be aware that last year's quality of education, at least for the first years, was unsatisfactory. The continued lack of organization and communication suggests this year is likely to be more of the same, which would not be acceptable to me.

I am willing to sign a disclosure in which I acknowledge the school's probationary status before the school year begins, but I do not intend to make any payments for at least the first two weeks, until I can be sure that we are being provided with a worthwhile product at a time and in a place that is accessible and appropriate.

REDACTED

On Wed, Aug 30, 2023 at 11:06AM administrator <administrator@peoplescollegeoflaw.edu> wrote: _____

Dear Students,

I am writing today because some of you have either not looked at your disclosure agreement, are not communicating, or are simply looking at the disclosures without signing or communicating.

As you guys know I am the new person, relatively, to the school. One of the issues that I have identified is that going forward, documents *must* be properly signed in a timely manner.

There seems to be a reticence to sign documents however. One of the primary issues the school ran into this year was the proper signing of disclosures.

The disclosures have to be signed in order for any business to be accomplished. This year, this is doubly important not just because we are under a regulatory onus, but because we need all resources available in order to bring the school in line with conditions for instruction.

Please sign the disclosures documents **immediately** if you wish intend to attend classes at PCL as otherwise you will not be processed.

If any past accounts are in arrears, email our treasurer and cc me. Please communicate.

....Roger

Attachment E

The Committee of Bar Examiners
of
The State Bar of California

**2022 ANNUAL REPORT FOR
REGISTERED, UNACCREDITED LAW SCHOOLS**
Pursuant to Unaccredited Law School Rule 4.242

Law school name: Peoples College of Law

Law school website: www.peoplescollegeoflaw.edu

Fax number: _____

Registrar name: Adriana Zuniga Nunez

Registrar phone number: REDACTED

Registrar email address: administrator@peoplescollegeoflaw.edu

The Annual Report must be signed and dated by the Dean of the reporting school.

I hereby declare under penalty of perjury under the laws of the State of California that the answers and statements provided in the following report are true and correct. And further, I hereby certify that this law school is in compliance with the *Unaccredited Law School Rules* and the *Guidelines for Unaccredited Law School Rules*, except as specifically identified herein.

Dean name: Edith Pomposo

Dean phone number: REDACTED

Dean email address: dean@peoplescollegeoflaw.edu

Signed: Edith Pomposo Digitally signed by Edith Pomposo
Date: 2022.11.16 14:59:56 -08'00'

Date: _____

The Committee of Bar Examiners
of
The State Bar of California

**2021 ANNUAL REPORT FOR
REGISTERED, UNACCREDITED LAW SCHOOLS**
Pursuant to Unaccredited Law School Rule 4.242

Law school name: _____
Law school website: _____
Fax number: _____
Registrar name: _____
Registrar phone number: _____
Registrar email address: _____

The Annual Report must be signed and dated by the Dean of the reporting school.

I hereby declare under penalty of perjury under the laws of the State of California that the answers and statements provided in the following report are true and correct. And further, I hereby certify that this law school is in compliance with the *Unaccredited Law School Rules* and the *Guidelines for Unaccredited Law School Rules*, except as specifically identified herein.

Dean name: _____
Dean phone number: _____
Dean email address: _____
Signed: _____
Date: _____

The Committee of Bar Examiners
of
The State Bar of California



**2020 ANNUAL REPORT FOR
REGISTERED, UNACCREDITED LAW SCHOOLS**
Pursuant to Unaccredited Law School Rule 4.242

Name of Law School: _____
Law School website: _____
Telephone number: _____
Fax number: _____
Registrar: _____
Email address: _____

The Annual Report must be signed and dated by the Dean of the reporting school.

I hereby declare under penalty of perjury under the laws of the State of California that the answers and statements provided in the following report are true and correct. And further, I hereby certify that this law school is in compliance with the *Unaccredited Law School Rules* and the *Guidelines for Unaccredited Law School Rules*, except as specifically identified herein. **

Name: _____
Title: _____
Telephone number: _____
Email address: _____
Signed: _____
Date: _____

**And except as shown in pages 1-4 of the 2020 State Bar inspection of our school under the heading "Recommended Mandatory Actions" and in our Update on Compliance Status submitted with this Annual Report.

Attachment F

From: REDACTED

Sent: Thursday, November 16, 2023 10:54 AM

To: hectorpena@ucla.edu <hectorpena@ucla.edu>; C Franco <cfranco7@hotmail.com>;
administrator@peoplescollegeoflaw.edu <administrator@peoplescollegeoflaw.edu>

Cc: Natalie.Leonard@calbar.ca.gov <Natalie.Leonard@calbar.ca.gov>

Subject: Past due Invoice

Hello everyone

On June 26, 2024, Mr. Héctor Candelario Peña Ramírez, J.D. signed an agreement with REDACTED to pay REDACTED for the accommodation of the requested loan with REDACTED (see attached signed agreement)

The loan has been fulfilled and an invoice has been generated for payments on August 24, 2023, to which it has been ignored

Several attempts were made to collect the invoice with no avail (see attached invoice)

Can you please take care of this as it is way overdue

Your prompt attention to this matter will be greatly appreciated

REDACTED

Leonard, Natalie

From: REDACTED
Sent: Monday, December 4, 2023 8:22 PM
To: Ana Maria Lobos, Esq.
Cc: Leonard, Natalie; REDACTED (administrator@peoplescollegeoflaw.edu)
Subject: The file you sent me contained tax records for other former employees

Hi Ms. Lobos,

Last October, I only glanced at the info I needed to use to file my tax return and did not print it, But today, after printing the PDF documents you sent me for my file, I noticed the PDF *included the tax records for 2 other individuals*.

To wit: the file you sent me contained the **W-2 tax forms of former Dean Edith Pompano, and another staffer (REDACTED)** as well as mine. I urge you to modernize your record keeping practices so that you are not sharing private information like income, the last 4 digits of our social security numbers and addresses on those tax forms.

I am not sure why I was sent the tax forms of other former or current employees, but at the very least private information should have been redacted, if you were not able to separate the documents. There is a way to separate pages of a PDF, and if you like, I can look up a tutorial for you. That way, if they or other staffers request their tax records in the future, you won't be circulating mine too. There was a long list of people that you already circulated my W-2 to. I presume it was the current board of PCL, which also includes students.

Thank you,

REDACTED

Disclosure:

This message, as well as any attached document, contains information that is confidential and privileged, and may contain attorney work product. The information is intended only for the use of the addressee named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, or distribution of this email or attached documents, or taking any action in reliance on the contents of this message or its attachments is strictly prohibited, and may be unlawful. If you have received this message in error, please (1) immediately notify me by reply email, (2) do not review, copy, save, forward, or print this email or any of its attachments, and (3) immediately delete and destroy this email, its attachments and all copies thereof. Unintended transmission does not constitute waiver of the attorney-client privilege or any other privilege.

On Oct 16, 2023, at 8:00 AM, Ana Maria Lobos, Esq. <dean@peoplescollegeoflaw.edu> wrote:

Thank you, Natalie.

The documents have since been sent to REDACTED

Ana Maria Lobos

On Sun, Oct 15, 2023, 5:25 PM Leonard, Natalie <Natalie.Leonard@calbar.ca.gov> wrote:

Dear Dean Lobos and Roger, See the email below from REDACTED. You may have spoken with her already, but she is contacting you to get a copy of her W2 needed to file her taxes due Monday. If you have already connected with her and solved the problem, then thank you!

Sincerely, Natalie

From: REDACTED

Sent: Saturday, October 14, 2023 6:14:51 PM

To: Leonard, Natalie <Natalie.Leonard@calbar.ca.gov>

Subject: Do you know who is in charge at PCL? They failed to issue my last W-2, which I need for my tax return

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Natalie,

I am so sorry to bother you with this. Are you still in touch with the Dean at *People's College of Law*? Could you possibly forward this message to them? Or ask them to get in touch with me ASAP?

Dear Dean (or person in charge):

I urgently need to get my 2022 W-2 and discovered PCL did not issue one for my work for 2022. I resigned around REDACTED. I am so disappointed that PCL never informed me that I would not have a way of getting my W-2 from PCL's payroll service.

To refresh your recollection, I worked at PCL, as the Administrator/Registrar from REDACTED to REDACTED.

Today, as I was preparing my tax return, due this Monday, 10/16/23, I discovered that **PCL did not notify me that they had abandoned the payroll app they were using** (called "Gusto") therefore, I was not sent a W-2 for 2022. I sent my letter of resignation on REDACTED and was never informed of this fact. I always believed I could access the form online, as is customary, even after leaving.

However, I tried to log in today, and got the below message. Now I run the risk of incurring penalties for late filing of my tax return. I hope the Dean can at least inform me of the **amount they declared they paid me in 2022**. That is really all I need urgently.

From <https://app.gusto.com/help>:

Where is my W-2?

THE GUILD LAW SCHOOL stopped using Gusto, so we didn't create your 2022 tax forms. If you have questions or need copies of your form, contact the company directly.

Old tax forms can be found on the [Documents](#) page. If you were paid through Gusto by more than one company, click your name in the top right corner to switch companies.

As you know:

By law, employers must furnish W-2s to employees and the Social Security Administration by January 31 each year. Penalties start at \$50 per each incorrect or late W-2 for the tax year 2022 (and rise to \$60 starting in 2023). Late filers may apply for an extension with Form 8809 and wait for a response from the IRS.

Sincerely,

REDACTED

REDACTED