



**OPEN SESSION
AGENDA ITEM V.D.
JUNE 2024
COMMITTEE OF BAR EXAMINERS**

DATE: June 1, 2024

TO: Members, Committee of Bar Examiners

FROM: Natalie Leonard, Principal Program Analyst

SUBJECT: Action on Major Change – Add Full-Time JD Division – Purdue Global Law School

EXECUTIVE SUMMARY

Purdue Global Law School (Purdue Global Law) has filed an application seeking the Committee of Bar Examiners' (committee) approval to add a full-time JD division, while continuing to offer its part-time JD division. The law school seeks to implement the full-time JD division beginning in January 2025.

BACKGROUND

Purdue Global Law is an accredited law school headquartered in Los Angeles, California.¹ Purdue Global Law currently offers a four-year part-time JD division, as well as a three-year non-bar-qualifying Executive JD degree.² All Purdue Global Law programs are offered solely in distance-learning format.

Rule 4.165(A) requires that a law school "adding a new division, full- or part-time . . . must notify the Committee and obtain that approval at least 180 days before making the change. The notice must explain in detail any effect the change might have on the law school's compliance with these rules [for accredited law schools]."

¹ Purdue Global Law School has been associated with Purdue University Global, Inc., a separately accredited part of the Purdue University System since the committee approved this combination a number of years ago. Recently, the law school changed its name from Concord Law School to Purdue Global Law School, effective November 8, 2023, and timely advised the committee of the change in advance, presented to the committee in August 2023.

² The Executive JD program has more flexible admissions standards than the JD program and requires 72 credits over three years. The Committee has acquiesced to this program, which has been in operation for many years.

Here, the law school seeks to add a full-time JD division starting in January 2025, and is seeking timely prior approval from the committee of its request to add a full-time JD division which may award degrees in 24-45 months, depending on the schedule agreed upon with the student. Most students would finish in two and two-thirds years, or eight trimesters. The law school offers courses in a trimester format, with three trimesters per year.

Purdue Global Law hopes to implement this new full-time JD division beginning with the January 2025 trimester.

DISCUSSION

EVALUATION STANDARDS

Accredited Law School Rule 4.160(B)(12)(a) specifies that JD programs must take place over no less than 24 months and no more than 84 months in length, and may exceed 84 months in certain specified circumstances.³ The program must also be operated in full compliance with all applicable rules.

Purdue Global Law was last inspected in 2020 and found to be in full compliance with the Accredited Law School Rules. It will next be inspected in 2025.

Because the law school's proposed full-time division will incorporate those same components, it appears that it will also contain all elements required as part of any accredited JD program.

Therefore, the committee should focus on whether the new division will be operated in a sound and logical manner that allows the law school will remain in overall compliance with the rules. These rules are built around the four purposes for accreditation: Transparency (Rule 4.160(A)); Student Success (Rule 4.160(B)); Diversity, Equity, and Inclusion (Rule 4.160(C)); and Preparation for Licensure and Civil Practice (Rule 4.160(D)).

PROPOSED PROGRAM

The accredited rules allow the committee the option to approve compliant JD programs with a standard length of 24 to 84 months. (Rule 4.160(A)(12)(a)).

Here, the full-time JD division will use the same curriculum content already approved by the committee for the part-time division. This JD curriculum required completion of 92 credits of study, 80 of which are standard for all students, while 12 are electives.

³ While this is the first request to offer an accelerated JD program from a California Accredited Law School, ABA-approved schools have offered such programs. Both Pepperdine Law School and Southwestern Law School, ABA approved schools, offer a 24-month JD division, accomplished by having students study continuously without breaks.

Purdue Global Law offers its part-time JD division in a trimester system, with three trimesters offered per year over four years. During each trimester, students take three courses per term totaling 7 to 9 credits. This results in roughly 17 to 24 hours per week of study according to estimates from the law school, which is consistent with a part-time program. Students may begin study during any trimester because all doctrinal courses are offered each term. t-time load.

The proposed full-time division would order its courses over eight trimesters, or two and two-thirds years, with the option for exceptional students to petition to complete the program in seven trimesters, or two and one-third years. Students in the full-time JD division would take four or five courses totaling 10 to 13 credits per trimester, for eight trimesters. Their average weekly study load would be at least 28 to 37 hours per week, which would exceed the expectations of a part-time student, but would be wholly appropriate for a full-time student."

Students in the full-time JD division will be required to attest that they will limit limiting outside commitments during business hours to no more than 20 hours per week while enrolled in the full-time program.

Students in both the full- and part- time divisions will take classes together. Because Purdue Global Law already offers all required courses every semester, it will be logistically easy to co-schedule the programs. This format also allows students to transfer between the full- and part-time programs if necessary.

COMPLIANCE ANALYSIS

The program already contains the overall elements required of an accredited JD program, as it will be using the building blocks of the courses involved in the approved part-time program.⁴ These will be shared and organized in a logical manner inside the compliant framework of the law school.

Staffing appears adequate to support the program. The law school will not need to add additional courses, but rather will use the same scheduled courses, enrolling students in the proper load depending upon whether they are studying in the full-time or part-time division. As the law school has grown in recent years, it has added five additional staff members and is willing to add more if needed for academic and administrative support.

The law school has also placed priority on improving retention in a number of significant ways:

First, the law school will adjust its communications to prospective students to more clearly advise of the nature of the program and time commitment required. Students entering the full-time program must sign a statement indicating that they will not maintain more than 20 hours of outside commitments during the business week, as mentioned above.

⁴ These elements include: 80 total credits; 1200 hours of verified academic engagement; at least six credit hours of practical skills training and the opportunity to take up to 15 hours of practical skills training; the opportunity to take electives.

Next, the law school will modify its admissions criteria in several relevant ways. First, regarding the law school's proprietary admissions exam, the law school is raising the minimum score required for admission. The minimum score was previously 21 out of 40 and is now 26 for outright admission or 23 to 25 for those entering the FLEX Academic Support Pre-Admission Program.⁵ Students entering the full-time program directly must have an undergraduate GPA of at least 3.0 and a score on Purdue Global Law's proprietary admission exam of at least 26. Students transferring into the full-time program must demonstrate that they have completed at least two trimesters and earned a cumulative GPA of at least 2.75.⁶

Purdue Global Law has also modified its course structure to offer more intermediate feedback, and the course load for the first two trimesters was reduced by one credit each for both the part-time and proposed full-time division. The law school made this change after noticing that attrition spiked after the first grades were returned about seven weeks into the trimester. The school hopes that providing more opportunities for feedback and grading over a number of assessments will reduce stress and increase retention. It will also provide more opportunities for the faculty to understand when or whether a student needs additional help or should consider switching from the full-time to the part-time program.

The law school will be closely studying the progression of students in all of its programs and agrees to share this data with the State Bar. Each student's study term will be coded to denote whether the student was in the full- or part- time program, on leave, or transferred into the non-bar-qualifying Executive JD program.

It appears that the proposed full-time program is constructed in compliance with the rules, and that the law school has taken specific steps designed to ensure success for the new division, and to continue to enhance the law school's overall performance.

Therefore, staff recommends that the request be approved, and the law school be directed to provide an update as to the utilization, retention, and licensure rates for each of its programs as part of the law school's periodic compliance report each year until further notice. The need to continue to provide such reports can be reevaluated at the law school's next inspection in 2025.

PROPOSED MOTION

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

MOVE, that the Committee of Bar Examiners approves Purdue Global Law School's request to add a full-time JD division effective January 2025 as set forth in Attachment A.

FURTHER MOVE, that the law school be required to submit progress reports as to the utilization, retention, and licensure rates of those students in the full-time

⁵ The committee approved the addition of the FLEX program JD division, and it began operation on May 15, 2024.

⁶ The minimum good standing cumulative GPA is 2.5 at Purdue Global Law.

division as compared to the part-time division, and to include those reports with its annual periodic compliance report until further notice.

ATTACHMENT LIST

- A. Purdue Global Law School – Request for Major Change – Add Full-Time JD Division

The State Bar of California
ATTN.: Natalie Leonard
Principal Program Analyst, Educational Standards
180 Howard St.
San Francisco, CA 94105

May 31, 2024

RE: Petition for Approval of Major Change - New Full-Time Option [Rules 4.164, 4.165(A)]

Dear Natalie:

On behalf of Purdue Global Law School (“PGLS”), I respectfully request that the Committee of Bar Examiners (CBE) approve PGLS to offer a full-time JD program in addition to its current part-time JD program. This will enable students whose work or other outside commitments are no more than 20 hours per week to complete their JD program in slightly less than three years, as opposed to the current four years. This furthers our mission of providing needed flexibility for non-traditional students and puts us on par with other California Accredited Law Schools (CALS).

To provide some context for our request for a full-time JD program, the proposal begins below by describing our current part-time program and reporting on our transition to accredited status. It then discusses the proposed full-time program and how we plan to implement it.

I. Background on PGLS and Transition to Accredited Status

PGLS was founded in 1998 as the first fully online law school in the nation. For years, PGLS operated as an unaccredited, registered law school in the “distance learning” category. In August 2020, PGLS was granted full accreditation by a unanimous vote of the CBE as one of the first fully online law schools to be granted such accreditation after the rules governing accredited law schools were changed in 2019 to allow online law schools to pursue accreditation.

The transition to accredited status is now complete. All JD students in the unaccredited program have either graduated or transferred into the accredited JD program. Starting in January 2021, we began transitioning from an academic calendar based on two 24-week terms per year (which was designed to comply with the “qualifying half-year of study” mandated for unaccredited registered law schools) to three 16-week terms per year (January, May, and August/September). As of January 2022, all students have been on the three-term, 16-week term schedule.¹

¹ Our catalog (available from our website) and our enrollment materials disclose that a student who completes one or two 16-week terms with us and then seeks to transfer to an unaccredited registered law school likely will not be deemed to have satisfied either a qualifying year or qualifying half-year of study. And as has long been the case, in our marketing materials, admissions calls, enrollment application, and initial disclosures, we endeavor to clearly explain to all JD applicants the bar licensure limitations that come with attending a non-ABA, California-accredited law school.

Under our three-terms-per-year structure, our part-time JD program is designed so that students graduate in twelve terms, or four years. Students typically take three courses per term. For the first two terms, their schedule is fixed (Contracts I and II, Torts I and II, and Legal Analysis I and II.) After that, there is a recommended sequence that students are enrolled in by default, unless they have unusual circumstances that require a deviation, which would be discussed with their student support advisor or the Dean of Students' office.

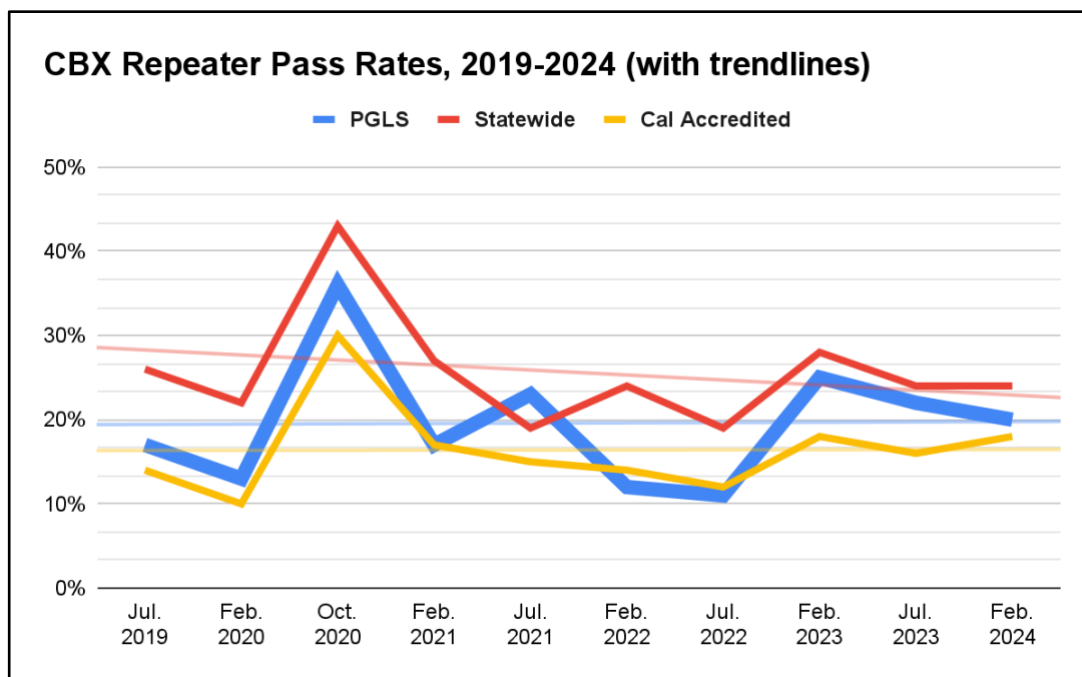
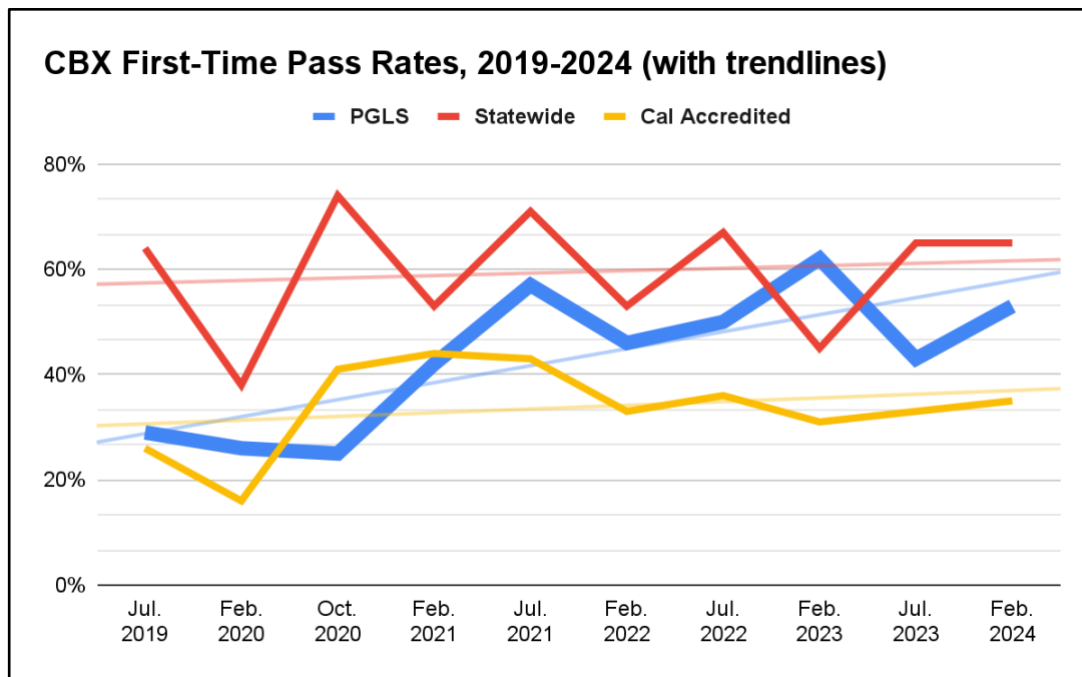
The required curriculum includes at least 18 credits of experiential learning, and it includes all subjects tested on the California Bar Exam, as well as courses in Legal Research, Legal Analysis and Writing, Advanced Legal Analysis and Writing, Professional Responsibility, Future of Law Practice, Family Law Practicum, and a Capstone course. If a student decides to take a leave of absence, when they return they can pick up where they left off in their degree plan, since all required courses are offered every term. Required courses account for 80 of 92 credits. There are a variety of electives, ranging from Artificial Intelligence Law to Employment Discrimination to Trial Advocacy, and students can participate in our competitive moot court program and externship program.

Students typically have one hour of live class per week per course, scheduled either for 5:00 p.m. - 6:00 p.m. PT or 6:15 p.m. - 7:15 p.m. PT, Monday through Thursday. Since students usually take three courses per term, they generally have three hours of live classes per week. All other course content (save for certain experiential exercises) is asynchronous. So long as students follow the default course sequence, we ensure that they will have no live class scheduling conflicts among required courses.

Overall, the transition to our accredited JD program has been quite successful.

- **Growth:** In the last several years, PGLS' student body has grown by about 75%, mostly in the JD program. (Students in our non-licensure-based, three-year part-time Executive Juris Doctor (EJD) program make up about 15% of our overall student body.) During that time, we have hired five new full-time faculty members, including a full-time Director of Bar Support, and added a third full-time staff member to our Dean of Students office.
- **Bar Passage.** Our bar pass rates have also improved. When I joined as dean in 2016, only one in three of our JD graduates passed the California bar exam (CBX) on the first try, and slightly over half ultimately passed the exam. In the past several years, our first-time pass rate has increased to about 50%, and **our 5-year MPR is currently at 74%.**

The following two charts compare our graduates' first-time and repeater pass rates on the last ten administrations of the CBX, as compared to all California Accredited Law Schools and the statewide averages:



As the data shows, our first-time takers almost always outperform the CALS average, and the trendline is approaching the statewide average (which includes mostly ABA law school graduates). Indeed, on the February 2023 administration of the California Bar Exam, our graduates' first-time pass rate of 62% exceeded the first-time pass rate of all California ABA law schools (49%) as well as that of out-of-state ABA law schools (47%). So, too, our repeater rates consistently meet or exceed the average of CALS schools, and are often not far behind the statewide average.

As a fully online law school, our biggest challenge is retention. Voluntary attrition (withdrawals) is harder to combat than involuntary attrition (academic dismissals)—the opportunity cost of trying law school online for a term or two is relatively low. In some instances, it is the highest performing students who withdraw, possibly because they are the most professionally successful and thus the busiest. But within the past year, PGLS has undertaken a multi-faceted campaign to combat both involuntary and voluntary attrition, including several components that were just recently launched.

- **Raised Admission Standards and Launched New Pre-Admission Program.** In 2019, in anticipation of possible California accreditation, PGLS raised its good standing standard for the JD program from a 2.0 to a 2.5 CGPA. (This was based on data showing that many students with a 1L CGPA of 2.5 or above passed the FYLSE, whereas very few students with below a 2.5 CGPA passed.) The rigor of PGLS' admissions exam was increased around the same time. However, because it was unclear how scores on the new exam equated to scores on the old exam, the minimum score on the admissions exam was adjusted from 24 out of 40 to 21 out of 40 (or 20 out of 40 if an applicant's UGPA was high enough).

In January 2024, after reviewing several years' worth of data on correlations between admissions exam scores and student performance and persistence, PGLS raised its minimum admissions exam score for JD program eligibility to 26 out of 40. In other words, PGLS is now more selective than it has ever been.

Applicants who score 22 out of 40 or below are no longer eligible for our JD program. Applicants who score 23 to 25 out of 40 will not be admitted outright, but may be if they take and successfully complete our new pre-admission program, Future Lawyers Excellence (FLEX). The first cohort of approximately 30 prospective students began the FLEX program on May 15, 2024.

Notably, last year we looked at the average entering admissions exam score of JD applicants who applied before and after we earned California accreditation. Prior to accreditation, the average exam score was 25.9; in the two years after accreditation, it had increased somewhat to 26.3. This indicated that the applicant pool was slightly more qualified (in terms of entering predictors). By raising the minimum score needed to enter the JD program (without first having to pass FLEX) to a 26, *we are effectively making the former average the new floor*. We expect this to substantially improve retention rates.

- **Changes to Early-Term Curriculum and Admissions Exam.** To help new students better manage the transition to law school, last year Torts I and II were each reduced from four credits to three credits, so that students would take eight total credits in their first two terms instead of nine. No foundational or bar-tested content was eliminated.

We also recently observed that voluntary attrition has tended to spike around Week 7 or 8 of the term. We realized that this is when students would get back their grade on their first essay quiz, which occurs in Torts I, and which was worth 200 points, or 20% of their grade. At PGLS, we calibrate our essay grades to match as much as possible grading on the California Bar Exam, on which the bulk of grades given are a 60, 65, or 70. Under our grading scale, grades of 80 or above are in the A range, and such grades are achievable,

notwithstanding typical essay grades of 70 or below, because roughly 50% of a course grade consists of multiple-choice questions, on which students can and often do score in the 90s. Despite introducing students to our grading scale and essay grading system at the start of law school, some students apparently felt dejected by their low initial essay grade in Week 7, particularly given that it was worth one-fifth of their course grade. Although we have been reluctant to change our essay grading scale, the faculty has sought to address the issue of student expectations and its retention impact through two measures.

First, since January 2024, our admissions exam has included an essay component. (Essay scores will not be factored into admissions decisions until sufficient data has been collected and analyzed to ensure reliable correlations with law school performance.) In preparation for the admissions exam, applicants now watch a video that not only prepares them to take the essay, but explains our grading system in depth. Students must also take a practice essay before taking the admissions exam itself.

Second, also starting in January 2024, we have increased the number of essays students write in their first-term doctrinal courses prior to the final exam, and lowered their point values. Previously, students would write one interim essay in Torts I worth 200 points and one in Contracts I worth 150 points. Now, students write two interim essays in these courses (in addition to the five they write in Introduction to Legal Analysis I). The first of these is only worth 50 points, and the other three are worth 100 points each. This should help students get better acclimated to legal writing and to our grading scale, with more practice and in a lower-stakes environment, thereby reducing drops.

Student Engagement Initiatives. 1L faculty more actively encourage students to form study groups with each other than they have in the past. They also promote a series of bi-weekly academic support workshops targeted to second-term students. Last year, we began conducting in-person networking events at restaurants or similar venues in dozens of cities all over the country to give students, alumni, faculty, and staff an opportunity to socialize with each other. We also gave our students access to GetSet, a social networking platform that lets students with similar interests or characteristics easily find and connect with each other. And earlier this year, we launched a quarterly student newsletter to keep students informed about important events and each others' successes. These efforts should help students be more engaged, which should make them more motivated to persist.

Our hope is that over the next year, these efforts, collectively, will dramatically reduce voluntary and involuntary 1L attrition. (Students who persist past the first year rarely withdraw or are disqualified.)

II. Impetus for a Full-Time Option

As an unaccredited registered law school, PGLS had always been required to offer only a part-time, four-year JD program. For the large majority of PGLS students, this is all they could accommodate in their schedules since many have full-time work or family commitments.

However, there are some PGLS students who could handle a full-time commitment to their studies. They may be teachers, police officers, firefighters, or other civil servants in their 40s or 50s who are “retired” but are looking to embark on a second career; “empty nesters” who suddenly have significantly more free time now that their children are no longer at home; or others whose life circumstances allow for a greater time commitment to their studies, and who want or need the flexible online format. While difficult to predict, we anticipate that perhaps as much as 20% of our students would want the full-time option.

In addition, PGLS’s online students tend to be older than traditional law students. Their average age at enrollment is 43, and some are even in their 50s and 60s. For such students, each additional year of study is a more significant encroachment on the duration of their law career than the typical 26-year-old law school graduate. And because older, working students are more likely to have disruptive life events (divorce, job loss or changes, health problems, etc.), shortening the time to graduation may even serve to *reduce* student attrition, as there are fewer opportunities for life to “get in the way.”

Anecdotally, in the last year or so, our admissions advisors have reported that more applicants are inquiring about the possibility of a full-time program. It could be that since the pandemic, more prospective law students are comfortable attending law school full-time online.

III. Proposed Full-Time Program Option

PGLS requests approval to offer, in addition to its current part-time JD program, a full-time JD program option. The total 92-credit hour requirement for our JD program, and the courses required to graduate, would be identical for both the full- and part-time program options. So, too, all electives and co-curricular opportunities and all services, including those of our Director of Bar Support, would be equally available to students in either program option.

As noted above, PGLS operates on three 16-week terms per year (January, May, and August/September). Students on a part-time schedule now take three courses per term totaling 7 to 9 credits per term. This results in roughly 17 to 24 hours per week of study, which is consistent with a part-time load. Part-time students thus take a total of 12 terms, and so complete the 92-credit program in **forty-eight (48) months**, or four years.

For those students who wish to accelerate their pace and graduate sooner, PGLS would like to be able to offer an accelerated track, in which students would take four (or occasionally five) courses totaling 10 to 13 credits per term, for eight total terms. Their average weekly study load would be at least 28 to 37 hours per week, which would exceed the expectations of a part-time student, but would be wholly appropriate for a full-time student.

Since the eight terms would each be 16 weeks long and run at three per year, these students could graduate in as early as **thirty-two (32) months**, or $2\frac{2}{3}$ years, assuming they attended courses year-round, as most do. (If a full-time student wanted to, say, take a May term off to work or participate in an externship, total program length would increase accordingly.) Granted, 32 months is slightly shorter than the three years one typically thinks of for a full-time JD program. However, schools on a traditional academic calendar begin in August or September of Year 1 and end in May or June of Year 3, so the typical full-time JD program duration is actually 33 months.

PGLS would also seek permission to allow students, in rare instances, to graduate in 7 terms, or twenty-eight (28) months. Occasionally, some part-time JD students take higher-credit electives and/or advance their elective sequence somewhat, and so are able to graduate in 11 terms rather than 12. It is possible that a full-time JD student might do something similar and so be able to graduate in seven terms rather than eight. We would like to have the flexibility to allow this, although it would be the exception rather than the rule. We would only allow this for students who have a CGPA of 3.00 or higher, and only with permission from the Dean's office.

The current part-time and proposed full-time JD course sequencing are reflected in Appendices A and B, respectively. The proposed full-time sequence is essentially exactly what PGLS had as an unaccredited registered school when it had eight qualifying half-years of study, but instead of eight 24-week terms, there would now be eight 16-week terms.

As discussed below, there will also be an option for JD students to transfer from the part-time JD program to the full-time JD program after their first year if their GPA is high enough. (The default course sequence for these students is reflected in Appendix C.) Assuming no terms taken off, these students could expect to graduate in nine terms, or **thirty-six (36) months**, i.e., 3 years.

Admissions Process and Criteria

PGLS plans to ask full-time JD program applicants to sign an acknowledgment at the time of enrollment verifying that they will not spend more than approximately 20 hours per week on outside work or other commitments during regular business hours, and to notify the school if their circumstances materially change so that they can change to part-time status. (This is much like what many ABA law schools do with full-time students, at least in their first year.) In addition, as part of their admission application, applicants will be asked to provide a narrative explaining their outside commitments and how they expect to manage their study load on top of those commitments. The PGLS Admissions Committee will review and consider this narrative (along with all other application materials) for each full-time JD program applicant.

All applicants must take our free online admissions exam, a 2-hour exam that consists of 40 multiple-choice questions and one essay. At least at the outset, until we can collect data on student performance, admissions criteria for the full-time JD program will be somewhat more stringent than those for the part-time JD program, in two respects.

First, applicants will need to score at least a 26 on our admissions exam to be eligible for admission to the full-time JD program. If a student scores between 23 and 25, they may take

FLEX to pursue the part-time JD program, but will not be enrolled in the full-time JD program, at least not at the time of admission.

Second, applicants with a UGPA below 3.00 currently may be admitted to the part-time JD program based on a review of post-graduate studies, work experience, or other factors. However, applicants will need to have a UGPA of at least 3.00 to be eligible for the full-time JD program.

Although the opportunity cost of trying an online law program, even full-time, is still relatively low (our per-credit tuition is currently \$540, which is about three-fifths that of the average CALS school and one-third the average ABA law school), PGLS is mindful of the fact that full-time students taking more courses per term will incur costs faster than part-time students. Our more stringent entrance criteria should help keep attrition in the full-time program to a minimum.

Program Option Transfers

If a student admitted to the full-time JD program finds the pace to be too demanding, PGLS could relatively easily transition them into the part-time JD program, since PGLS's program of legal education is already designed with a primary focus on part-time students.

If a part-time JD student wishes to transfer to the full-time JD option, they will need to have been enrolled with us for at least two terms and have a law school CGPA of 2.75 or above. (*See* Appendix C, recommended course sequence for students who wish to transfer to the full-time JD program option after their first year.) This way, if such a student does have difficulty transitioning to the full-time pace and their grades suffer, they will not be likely to fall out of academic good standing and can revert back to part-time status without having been placed on academic probation.

We plan to make the full-time JD program a different program version in our student information system (SIS) than the part-time JD program, with its own default course sequence. Accordingly, students will need to get approval to switch between program versions. A student in the full-time program need not switch to the part-time program if in one particular term they want to, say, take a lighter load and take only three courses instead of four or five. (Tuition is charged per credit, i.e., there will be no "banded" tuition for a full-time or part-time load, so this would not affect overall tuition costs for the student.) So, too, conversely, a student in the part-time program will not need to switch to the full-time program if they want to take an extra elective in a given term. However, students who want to change their overall pace and course sequencing will need to change their program version accordingly and get approval to do so.

Assessment

Because the full-time JD program and part-time JD program will each have their own program versions in our SIS, we should be able to track the number of students in each program, as well as the number of students who switch between programs. Withdrawals, dismissals, and leaves of absence are also recorded separately, so we should be able to measure any differences in voluntary or involuntary attrition for the two program versions as well.

As we gather data about the number and qualifications of full-time JD applicants admitted, as well as their performance and persistence in law school once enrolled, we will be more than happy to report it to the Committee, either through our annual reports or in any other format or on any other timetable the Committee may request.

Implementation Timeline

Accredited Rule 4.164 provides that “[a]n accredited law school contemplating a major change must notify the Committee and obtain its approval at least ninety days before making the change.” If PGLS can obtain approval of its request by June 2024, it will be too late to offer the full-time JD program option for its upcoming August 2024 term. So PGLS would plan to first offer its accelerated program to students beginning in the January 2025 term.

IV. Conclusion

Given that PGLS has been accredited for nearly four years, we believe it should be permitted to offer a full-time program option, just like campus-based CALS. This will provide valuable flexibility to our students, for whom each additional year in law school has an opportunity cost in terms of time and money. This is entirely consistent with our mission of making law school accessible and affordable for non-traditional students and is consistent with the policies underlying the regulation of CALS.

I thank you and the Committee for considering this request. Please do not hesitate to let me know if I can provide further information or answer any questions.

Sincerely,



Martin Pritikin
Dean and Vice President

Appendix A

Current Part-Time JD Course Sequence (12 Terms = 4 Years)²

Term	Courses	Units	Term	Courses	Units
1	Torts I Contracts I <u>ILA I</u> TOTAL	3 4 <u>1</u> 8	7	Constitutional Law I Corporations & Bus. Orgs. I <u>Future of Law Practice</u> TOTAL	3 2 <u>2</u> 7
2	Torts II Contracts II <u>ILA II</u> TOTAL	3 4 <u>1</u> 8	8	Constitutional Law II Corporations & Bus. Orgs. II <u>Evidence I</u> TOTAL	3 2 <u>3</u> 8
3	Civil Procedure I Legal Analysis & Writing <u>Legal Research</u> TOTAL	3 2 <u>2</u> 7	9	Evidence II <u>[Elective(s)]</u> TOTAL	3 <u>4</u> 7
4	Civil Procedure II Adv. Legal Analysis & Writing <u>Real Property I</u> TOTAL	3 2 <u>4</u> 9	10	Community Property Estates, Wills & Trusts I Remedies <u>[Electives]</u> TOTAL	2 2 2 <u>2</u> 8
5	Criminal Law I <u>Real Property II</u> TOTAL	3 <u>4</u> 7	11	Capstone I Estates, Wills & Trusts II <u>[Electives]</u> TOTAL	2 2 <u>4</u> 8
6	Professional Responsibility Criminal Law II <u>Criminal Procedure</u> TOTAL	2 3 <u>4</u> 9	12	Capstone II Family Law Practice <u>[Electives]</u> TOTAL	2 2 <u>2</u> 6

² In each chart, students have some flexibility not shown here as to when to take electives.

Appendix B

Proposed Full-Time JD Course Sequence (8 Terms = 2 ⅔ Years)

Term	Courses	Units	Term	Courses	Units
1	Torts I Contracts I Criminal Law I <u>ILA I</u> TOTAL	3 4 3 <u>1</u> 11	5	Constitutional Law I Corporations & Bus. Orgs. I Evidence I Professional Responsibility <u>Future of Law Practice</u> TOTAL	3 2 3 2 <u>2</u> 12
2	Torts II Contracts II Criminal Law II <u>ILA II</u> TOTAL	3 4 3 <u>1</u> 11	6	Constitutional Law II Corporations & Bus. Orgs. II Evidence II <u>[Elective(s)]</u> TOTAL	3 2 3 <u>4</u> 12
3	Civil Procedure I Real Property I Legal Analysis & Writing <u>Legal Research</u> TOTAL	3 4 2 <u>2</u> 11	7	Estates, Wills & Trusts I Remedies Capstone I Community Property <u>[Elective(s)]</u> TOTAL	2 2 2 2 <u>4</u> 12
4	Civil Procedure II Real Property II Adv. Legal Analysis & Writing <u>Criminal Procedure</u> TOTAL	3 4 2 <u>4</u> 13	8	Estates, Wills & Trusts II Capstone II Family Law Practice <u>[Elective(s)]</u> TOTAL	2 2 2 <u>4</u> 10

Appendix C

Proposed Sequence for Students Moving from Part-Time to Full-Time JD After 1L (9 Terms = 3 Years)

Term	Courses	Units	Term	Courses	Units
1 (PT)	Torts I Contracts I <u>ILA I</u> TOTAL	3 4 <u>1</u> 8	6 (FT)	Constitutional Law I Corporations & Bus. Orgs. I Evidence I <u>Future of Law Practice</u> TOTAL	3 2 3 <u>2</u> 10
2 (PT)	Torts II Contracts II <u>ILA II</u> TOTAL	3 4 <u>1</u> 8	7 (FT)	Constitutional Law II Corporations & Bus. Orgs. II Evidence II <u>[Elective(s)]</u> TOTAL	3 2 3 <u>4</u> 12
3 (PT)	Civil Procedure I Legal Analysis & Writing <u>Legal Research</u> TOTAL	3 2 <u>2</u> 7	8 (FT)	Estates, Wills & Trusts I Remedies Capstone I Community Property <u>[Elective(s)]</u> TOTAL	2 2 2 2 <u>4</u> 12
4 (FT)	Civil Procedure II Criminal Law I Adv. Legal Analysis & Writing <u>Real Property I</u> TOTAL	3 3 2 <u>4</u> 12	9 (FT)	Estates, Wills & Trusts II Capstone II Family Law Practice <u>[Elective(s)]</u> TOTAL	2 2 2 <u>4</u> 10
5 (FT)	Criminal Law II Criminal Procedure Real Property II <u>Professional Responsibility</u> TOTAL	3 4 4 <u>2</u> 13			