



April 13, 2016

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

Re: 2014 Concord Law School Periodic Inspection Report

To the Committee of Bar Examiners:

Concord Law School of Kaplan University thanks George Leal, Director of Educational Standards, for his Periodic Inspection Report and responds to his recommendations as follows:

### **Recommended, Mandatory Actions**

#### **Mandatory Recommendation #1**

To comply with Guidelines 2.3(F), the law school must revise its website so that it informs the public, applicants and students that its degree-granting authority to offer a J.D. degree that qualifies recipients to take the California Bar Examination be admitted to the practice of law in California is due to its registration as an unaccredited law school with the Committee[.]

#### **Concord's Response**

Concord will change the language on its website as follows (new language in italics), and expects this change to be made before the Committee's April 29, 2016 meeting.

#### **State Bar of California Registration**

Concord is registered as a Distance Learning Law School in the unaccredited category with the Committee of Bar Examiners of the State Bar of California. Concord's method of delivering instruction—via the Internet without a fixed classroom facility—places it in the Distance Learning Law School category under the State Bar rules. *While the State Bar of California does not accredit and the American Bar Association (ABA) does not approve distance learning schools, the Committee registers schools in this category. Concord Law School is registered as such. Concord's authority to offer a Juris Doctor degree that qualifies recipients to take the California Bar Examination to be admitted to the practice of law in California is due to its registration as an unaccredited law*

*school with the Committee.* Its Juris Doctor (JD) program is designed to meet the legal education requirements of the Committee and JD graduates, who meet the regulatory requirements, are eligible to apply for admission to the State Bar of California.

## **Mandatory Recommendation #2**

To comply with Guidelines 2.8(C), the law school must revise its student discipline policy to provide students notice of their right to the assistance of counsel and to call witnesses in their defense during a discipline hearing[.]

### **Concord's Response**

Concord's Report/Complaint Procedure currently states:

Students do not have the right to be represented by counsel in any School investigation, hearing, or other proceeding.

Administration will work with the faculty to develop language, without delay, which conforms to Guideline 2.8(C). Concord will keep the Committee informed on the status of this change through communication with Mr. Leal.

## **Mandatory Recommendation #3**

To comply with Guideline 4.2, the law school must appoint a permanent Dean who will be able to provide sufficient time to the administration of the law school on a permanent basis;

### **Concord's Response**

Concord's dean designate, Martin Pritikin, will assume duties effective July 5, 2016. The members of this Committee have been informed of this dean change by separate letter.

## **Mandatory Recommendation #4**

To comply with Guideline 5.3(C), the law school must develop and adopt procedures to verify all time spent by students in their study and preparation not performed while engaged in online, academic activities and, further, said policy must provide a means for the law school to keep accurate records of all time spent by students in both online and offline study[.]

### **Concord's Response**

Concord has carefully calibrated the time students are expected to take to move through the curriculum and in fact has added in extra time to ensure compliance with the requirement that its students successfully complete at least 864 hours within 48-52 weeks. Students

routinely respond to surveys indicating they spend between 25-30 hours a week on law studies, which over the course of 48 weeks totals 1200 to 1440 hours—well in excess of the required minimum of 864.

Concord partly relies upon “gating” of course modules to ensure students are putting in the necessary time in their studies. “Gating” of the modules means that students cannot move forward to a new module of study until all items in the current module have been marked as complete. Some of the items can be self-checked by the student but others are auto-checked by Concord’s learning management system (LMS) when the task has been completed such as a video/audio lecture has been fully reviewed or an essay assignment has been uploaded.

However, Concord will add time logs in the courses for students to complete and their information will be captured on the LMS. Concord will keep the Committee informed on the status of this change through communication with Mr. Leal.

### **Mandatory Recommendation #5**

To comply with Guideline 5.31, the law school must amend its application form to ask whether an applicant has ever attended another law school and, if so, whether the applicant left in good standing.

### **Concord's Response**

Concord believes it is already in compliance with Guideline 5.31. Please see the attached screenshot of the relevant section of Concord’s online application, where applicants are asked not only about prior law studies but also whether they were in good standing when they left the school.

### **Recommended, Suggested Actions**

With a new dean starting on July 5, 2016, Concord expects that many of its current policies and operations will be reviewed, including those areas covered by suggested actions.

### **Suggested Action #1**

To better comply with Guideline 5.2(H), the law school should consider a revision of its grading system by altering the current grade ranges for individual grades given in classes offered in Juris Doctor degree program[.]

### **Concord's Response**

Concord is reviewing a change to its current grade scale.

## **Suggested Action #2**

To better comply with Guideline 5.25(C), the law school should conduct a review of all grades given in the Juris Doctor degree program so that students are graded at a higher degree of consistency by all members of the faculty, most importantly those teaching in the first year curriculum[.]

## **Concord's Response**

Concord regularly holds calibration sessions with its faculty members and regularly monitors correlation of grading to licensing exam performance, and will take appropriate action where warranted.

## **Suggested Action #3**

To better comply with Guideline 10.1, the law school should seek to recruit and retain additional female and minority faculty members.

## **Concord's Response**

As Mr. Leal indicated in his report, Concord has had low turnover in faculty and a declining enrollment in the past few years, which is a situation facing every most law schools. The need for greater diversity among its faculty members is important and will be given great weight in the hiring of new faculty, whether full-time or adjunct.

Sincerely,



Larry David  
Interim Dean

Attachment

- STEPS TO FINISH
- CONTACT INFO
  - PERSONAL STATEMENT
  - PERSONAL HISTORY
  - ACADEMIC HISTORY
  - ADDITIONAL INFO
  - SUBMIT APPLICATION

\*Please indicate all post-secondary education you have completed to date. Make sure to list all degrees received, or, if you have not received a degree from a particular school, list the number of credit hours you have completed.

**If you are uncertain about your GPA, please contact your school before submission of this application.** Your submission will be compared to your official transcript and any discrepancies could effect your admissions status at Concord.

Should you be unable to finish all of the required items during this session, you may save your application by clicking the "Save" button bottom of the screen. You may complete any missing items at a later time.

Tell us about your education

|                         | School Attended         | City, State          | Degree or Number of Units Completed | GPA                  |
|-------------------------|-------------------------|----------------------|-------------------------------------|----------------------|
| Undergraduate           | 1. <input type="text"/> | <input type="text"/> | <input type="text"/>                | <input type="text"/> |
|                         | 2. <input type="text"/> | <input type="text"/> | <input type="text"/>                | <input type="text"/> |
| Graduate, if applicable | 3. <input type="text"/> | <input type="text"/> | <input type="text"/>                | <input type="text"/> |

Last School Attended  Degree  Year

\* Are you currently a student?  Yes  No

If yes, where?

Will you complete that program before your requested date to begin at Concord?  
 Yes  No

Anticipated Date of graduation  
 Month  \*Year

Concord strongly encourages applicants to the JD program to conclude other programs before beginning their law studies. Applicants who propose concurrent studies should include a statement describing their concurrent degree program and explaining how they intend to balance that program with their law studies.

Tell us about your experience with law school

\* Have you taken the LSAT?  Yes  No

If yes, you may choose to list the date(s) and score(s):

\* Have you ever attended law school?  Yes  No

If yes, where?

Date of last law school attendance?  
 Month  Year

Were you in good standing when you last attended?  Yes  No  Don't know

Good Standing Question

If no or don't know please explain why you left law school or provide a letter of good standing from your prior law school

2048 characters left

\* Do you plan to request admission with advanced standing at Concord?  
 Yes  No

Applicants to the JD program must provide transcripts of all prior law study. Applicants seeking admission with advanced standing will be required to obtain evaluation and approval of their proposed law study from the State Bar of California before beginning courses. Admission with advanced standing in the JD program is only available for students who have received a waiver or passed the California First Year Law Student Exam.

Choose your Degree Program

\* Select the degree program or individual subject that you plan on studying at Concord:

Send Us Your Transcripts

Please send all your official transcripts to:

Concord Law School Admissions Department  
 1601 SW 80th Terrace  
 Plantation, FL 33324

Please have your official transcripts and any LSAT examination scores forwarded to CONCORD LAW SCHOOL.

\*LSAT is a registered trademark of Law School Admission Council, Inc.

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