

Abraham Lincoln University School of Law

PERIODIC INSPECTION REPORT

October 14, 2015

Inspection conducted
Pursuant to *Rule 4.244* of the
Unaccredited Law School Rules

George C. Leal, Director, Educational Standards
Office of Admissions, the State Bar of California

**Abraham Lincoln University School of Law
3530 Wilshire Blvd., Suite 1430, Los Angeles, California 90024**

A Registered, Unaccredited Distance-Learning Law School

EXECUTIVE SUMMARY AND RECOMMENDATIONS

An inspection of Abraham Lincoln University School of Law (ALU) was conducted in two phases. The initial inspection took place on November 19, 2013; soon thereafter the dean resigned and a new dean was appointed followed by a series of staff, curriculum and operational changes. A second inspection then took place on October 14, 2015. Both inspections were conducted by George Leal, Director of Educational Standards, Office of Admissions on behalf of the Committee of Bar Examiners (Committee) pursuant to Rule 4.244(A) of the *Unaccredited Law School Rules*.

During each visit ALU was found operating generally compliantly. As a distance-education law school, it offers students a sound, four-year program of online legal education leading to a Juris Doctor degree with a total tuition expense of \$32,000. The law school's mission is "to educate qualified individuals through advanced educational technology to gain a comprehensive command of the fundamental areas of law." To achieve this goal, ALU's curriculum is taught by a well-qualified faculty consisting of three full-time and 14 adjunct professors. The law school is administered by an experienced Dean and a full-time administrative staff. It has adopted compliant admissions criteria that exceed the minimum standards and, since the initial visit, its academic standards have improved.

ALU was founded in 1996 and initially approved by the former Bureau for Private Postsecondary and Vocational Education and was, at that time, given degree-granting authority to offer both a J.D. degree as well as both associate and bachelor's degrees in paralegal studies, criminal justice and legal studies. Since 2008, ALU has been under the Committee's oversight as a registered, unaccredited distance education law school. In 2011, ALU received accreditation from the Distance Education Training Council, now the Distance Education Accrediting Commission, a national accreditor of distance learning institutions offering vocational, undergraduate and graduate degree programs.

ALU's online J.D. degree curriculum requires the successful completion of four years of law study consisting of 140 quarter units of both required and elective courses. It has a stable and growing enrollment; in 2014, 117 students were enrolled in its J.D. program, while at the time of the second visit its enrollment had increased to 168 students. Its administrative offices are located in a modern commercial office building in mid-Wilshire district of Los Angeles where the law school operates classrooms so that local students may attend classes that are also being streamed videotaped for the remainder of its online students.

Recommendations:

It is recommended that this Periodic Inspection Report be received and filed by the Committee; that the recommended, mandatory and suggested actions listed below be adopted; that subject to confirmation that the school has taken efforts to address and correct each mandatory action, registration of Abraham Lincoln University School of Law be continued; and that its next inspection take place in fall of 2020, unless the Committee determines that an earlier inspection is required to assess compliance with the Rules.

Recommended, Mandatory Actions:

1. To comply with Guideline 2.8, the law school must develop, adopt and publish notice of a written policy regarding the imposition of student discipline consistent with the mandatory procedural requirements;
2. To comply with Guidelines 4.8 and 4.9, the law school must develop, adopt and publish notice of a written policy and associated procedures to conduct the regular and compliant evaluation of all active members of the faculty; and
3. To comply with Guideline 5.34, the law school must adopt an express policy that permits the compliant re-admission of students previously academically disqualified from any law school including ALU.

Recommended, Suggested Actions:

1. To better comply with Guideline 2.3, the law school should regularly review and revise the content of its website to verify that all information posted therein is current, accurate, honest and forthright;
2. To better comply with Guideline 2.9(D), the law school should publish notice in its Catalog of all policies and procedures used to authenticate the identity of students submitting work, examination answers and their participation in synchronous and asynchronous law school activities;
3. To better comply with Guideline 5.31, the law school should require that every student admitted and given credit for prior law school study submit official transcripts of all such study; and
4. To better comply with Guideline 9.1(A) – 9.1(D), the law school should audit the files of all transfer students admitted with prior law study to confirm that the files are complete as to the basis supporting their admission.

Findings of Compliance with the Committee's Standards and Guidelines

(A) Lawful Operation, Honesty and Integrity: Rules 4.240(A), 4.240(B), 2.241 and Guidelines 2.1 – 2.12. The law school must operate lawfully and be honest and forthright in all activities and must demonstrate such honesty and integrity in its financial affairs, communications, and operations.

ALU operates as a for-profit, California corporation, Abraham Lincoln University, Inc. It is in current good standing with the California Secretary of State and it operates under a current business license issued by the City of Los Angeles.

ALU appears to be operating lawfully under all relevant state and federal laws. To comply with the Americans with Disabilities Act (ADA), ALU maintains a written policy to provide students with a legally-cognizable disability reasonable accommodations as required by law. All requests for accommodations reviewed during the inspection were found properly documented and handled appropriately. ALU also maintains appropriate written policies to protect students' privacy and to ensure the confidentiality of their academic records.

The law school was found operating in an honest and forthright manner in both its financial affairs and in how it communicates with the public, applicants and its students. Its academic policies and operational procedures are compliantly transparent. ALU publishes an online Catalog that provides a description of its admission policies, academic requirements, scholastic standards, current tuition, fees, refund policy and the rights and responsibilities of students. In regard to tuition refunds, as required by Guideline 2.2(B), the law school maintains a written refund policy, which allows students to cancel their enrollment agreements at any time and receive a *pro rata* refund depending on when they cancel, e.g., 100% if before they start classes, 80% after the first week, etc.

The ALU website offers applicants and students a comprehensive description of the law school's academic programs, its admission requirements and its application process. The ALU website, Catalog and admissions application all contain the mandatory language required by Guideline 2.3(D) noting the geographic limitation of earning J.D. degree at ALU to those who may be interested in practicing law in a jurisdiction other than California.

ALU is accredited by the Distant Education Accreditation Commission (DEAC), a nationally-recognized accreditor of online educational institutions. As required by Guideline 2.3(F), ALU's website properly provides notice that, while accredited by DEAC, its degree granting authority that permits its graduates to take the California Bar Examination (CBX) is based on its registration with the Committee.

During both the initial and subsequent inspection, the ALU website was found to contain data regarding the pass rates of ALU graduates on the CBX and its students' pass rates on the First-Year Law Students' Examination (FYLSE) that

did not contain the most recent test results, which were also presented in a manner that was confusing. While all the data posted was technically accurate, it was found in charts with ambiguous and confusing headings, which made the data hard for the reader to understand and verify. In discussing this issue with Dean Park and Administrator Jessica Park, they agreed to revise the website so that all CBX and FYLSX pass rate data posted would be as current as possible and be set out in charts with more understandable column headings.

The ALU Disclosure Statement, required by Rule 4.241, is compliant in both its format and content, and it is properly and timely given to all ALU students. As required by Guideline 2.3(B), the law school maintains a compliant refund policy that is fair and reasonable. Students are entitled to receive a 100% refund if they withdraw by the end of the first week they participate in classes. Thereafter, they receive a prorated refund of tuition (e.g., a 50% refund if a student withdraws by the end of the fifth week) up through the ninth week of classes.

The law school also maintains compliant safeguards against financial fraud and maintains compliant policies to protect student privacy and the confidentiality of student communications. ALU has written policies to meet these obligations and it abides by the Family Educational Records Privacy Act (FERPA) to maintain the privacy of its students' records and information. The law school also provides compliant notice to its applicants and students as to what student services and activities it provides, including academic counseling.

The law school maintains compliant examination grading standards, which provide students adequate notice as to the type of system used, the fact that they are graded anonymously and the circumstances under which they will be subject to academic probation and disqualification. Students are also fully informed as to the basis upon which all final grades are calculated.

ALU has compliant grade review procedure. Students may file a "Re-Grade Petition" that offers them the right to petition for the review of a disputed grade, which, as required by Guideline 2.9(G), is then heard by an appropriate committee, the Academic Standards Committee. If granted such relief, the examination in question is assigned to a different professor who may then grant a grade higher or lower, which will be recorded as the permanent grade.

As to the overall integrity of ALU's operational policies, only two mandatory policies were found to be missing and in need of immediate attention.

First, as required by Guideline 2.8, the law school is to have a written policy for the imposition of student discipline that is "fair." A review of the ALU Catalog confirms that it has no policy that deals with student discipline, and no procedures that provide students accused of inappropriate behavior with appropriate procedural rights as set out in Guideline 2.8(A)–2.8(D).

To ensure that its students have such rights if discipline is deemed appropriate, it is recommended that ALU adopt and publish procedures, and then provide students appropriate notice, intended to govern the process of such discipline.

Lastly, as required by Guideline 2.9(D), the law school is required to 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.” While ALU has a policy dealing with academic integrity and informs students that they are subject to an honor code that expressly prohibits cheating and plagiarism, the ALU Catalog has no written policies or procedures to authenticate or verify a student’s work product, participation in online activities or examination answer.

The lack of written policies in the Catalog appears to be an oversight since ALU uses procedures to verify its students’ identities and their participation in online activities. In regard to taking examinations, the law school requires that its students use a password and answer a series of security questions to access test materials. The internet protocol addresses of students’ computers are also recorded. As for class participation, students must maintain a weekly study log to record and self-verify their hours of class participation, offline study and class preparation. In addition to their own verification, ALU also tracks students’ online presence in all class sessions and online activities. Finally, after a pilot project involving examinations given in fourth-year classes, the law school has recently adopted a policy to require that all final examinations be taken under the direct supervision of a live proctor, using the remote proctoring service called ProctorU, or by having students take their examinations at an approved proctoring center.

To provide clear notice to its students as to the various means used by the law school to authenticate and verify both their identity and online participation, it is recommended that the ALU Catalog be revised to describe each and every procedure used to authenticate a student’s identity and their work product and how students’ online attendance is electronically tracked and verified.

(B) Governance: Rule 4.240(C) and Guidelines 3.1-3.3. The law school must be governed, organized, and administered so as to maintain a sound program of legal education.

ALU is compliantly governed and administered. Hyung J. Park is the president and C.E.O. of the corporate entity that operates ALU. The corporation is governed by its Board of Directors, which is comprised of Mr. Park, his wife Soon Hee Park and one outside director, Mr. Roy Winter. Mr. Park is the majority shareholder of the corporation and therefore is also the ALU Board’s chairman.

ALU students receive academic and administrative support through the efforts of a staff of experienced and well-qualified administrators. They include: full-time administrator and Director of the J.D. Program, Jessica Park; Registrar Elizabeth

Gomez; Associate Director of Operations Susan Lomeli; Director of Compliance Lisa Ingoldsby; Academic Support Director Daniel Jung. Both Mr. Park and Ms. Park hold J.D. degrees; Ms. Park earned her degree at Stanford Law School, while Mr. Jung is a graduate of Western State University School of Law.

Both the ALU administrators and its faculty are actively involved in its academic and operational decision-making process. All admission decisions are made by a committee comprised of a full-time faculty member, while proposals to change or augment the ALU curriculum are reviewed and discussed with the Academics Standards Committee, which is comprised of Dean Park, Professors Park and Jung, Registrar Gomez and Director of Compliance Lisa Ingoldsby.

In regard to the law school's corporate governance, President Park, along with ALU's Board of Trustees, maintain direct oversight over the law school. The law school also relies upon a large Advisory Council consisting of both licensed attorneys, academics and individuals involved in various business ventures.

(D) Dean and Faculty: Rule 4.240(D) and Guidelines 4.1 – 4.10. The law school must have a competent dean, a qualified administrator and a competent faculty devoting adequate time to its administration and to compliant instruction and student counseling.

Mr. Park was appointed dean of ALU in February 2014 following the departure of the former dean. Dean Park earned his J.D. degree from Loyola Law School and is a licensed California attorney. Dean Park is also a member of the faculty. ALU's full-time administrator is its Director of the Juris Doctor Program, Jessica Park. Director Park is a graduate of both Stanford University and the Stanford Law School and she, too, is a full-time member of the faculty.

Since the initial phase of the inspection, ALU has replaced the majority of its faculty. The law school's faculty now consists of three full-time and 14 part-time professors. Their academic qualifications exceed the minimum requirement of Guideline 4.6 since each professor holds a Juris Doctor degree and almost all are graduates of ABA-approved law schools including those at UCLA, USC, U.C. Berkeley, University of San Diego, Southwestern University, Santa Clara University, Stanford, Pepperdine University and several others. Two current faculty members are graduates of ALU. All faculty members are licensed attorneys with all but three admitted to practice law in California.

All members of the faculty are expected to maintain and advance their professional competence and participate in professional development by means of attending professional conferences. As licensed attorneys, faculty members are also expected to remain compliant with their mandatory continuing legal education. As confirmed in the Faculty Handbook, ALU will pay the full cost of the professional development and training of its faculty upon prior approval.

All members of the faculty are encouraged to counsel and tutor individual students when such assistance is requested and, as confirmed by comments made by individual students, members of the faculty are very receptive to such requests and are generous with their time when communicating and counseling students. As confirmed by emailed responses received from ALU students, members of faculty are responsive to their students in responding to questions or comments relating to class sessions or substantive class content. Starting in 2014, faculty members are now required to hold office hours on the evening they teach their regularly scheduled class.

The ALU Faculty Handbook also confirms that it maintains an express policy to protect the academic freedom of each member of the faculty. The ALU faculty participates in the formulation, implementation and the administration of the law school's academic policies since Professors Jessica Park and Daniel Jung, as full-time faculty, take primary responsibility for administering all changes in the curriculum and academic standards. The law school also relies on its Academic Standards Committee to oversee its admissions decisions, academic standards and its probation process by which students may be academically disqualified.

Faculty evaluations are compliantly conducted through the use of both periodic peer review and students evaluations provided after each class taught by either a full-time or part-time, adjunct faculty member. The Dean regularly reviews the results of student evaluations with each adjunct faculty member. As to peer evaluations, the Faculty Handbook confirms that "personal observations by the dean, associate dean or other regular faculty members is strongly encouraged."

As required by Guideline 4.8, however, beyond merely "encouraging" peer evaluations, the ALU faculty should be subject to "regular" evaluations as to their teaching competence and effectiveness. Guideline 4.8 also requires that the law school "adopt written procedures" for such evaluations taking into consideration each of the various factors listed therein. Moreover, Guideline 4.9 requires that peer evaluations must also require the regular observation of class instruction and an evaluation of each professor's course materials and final examinations.

In the absence of such mandatory, written procedures, it is recommended that ALU be required to propose and adopt written procedures for the regular and compliant peer evaluations of all full-time and part-time members of the faculty.

(E) Educational Program: Rule 4.240(E) and Guidelines 5.1 – 16. The law school must maintain a sound program of legal education that is qualitatively and quantitatively compliant.

ALU's J.D. curriculum is compliant with both the qualitative and quantitative requirements set by statute and the Guidelines. Graduates must complete four years of study consisting of no less than 864 hours of study and preparation. To meet this requirement, ALU students must successfully complete at least 140

quarter units covering courses in all fourteen subjects tested on the California Bar Examination and they must pass each course with a grade of 70. If they fail to achieve a 70 in each class, they must repeat each such class (at half tuition) or petition the Academic Standards Committee for relief through either an independent study program or a proficiency examination in the course material.

Each year of study must be completed within the 48-52 week requirement of Guideline 5.3(C). As a distance-learning law school that offers synchronous class sessions, ALU has an additional graduation requirement for students to attend or participate in at least 80% of all regularly scheduled, synchronous class sessions held in each course. Students may meet this requirement by either participating in each class as it's being taught, actually attending the class in person at the ALU offices as it is being streamed online or by watching archived, videotaped class lectures and sessions.

The first year curriculum is comprised of Torts, Criminal Law, Contracts and a brief, two-day orientation session. Students may enroll in the ALU curriculum on one of three start dates, in January (winter quarter), mid-April (spring quarter) or mid-August (fall quarter). Students then study one course during each quarter.

First year students are required to pass each course with a grade of 70 or better to receive credit and be certified for the FYLSX. At the end of their first year, if a student attains a grade point average of 77 or better, they are certified to take the FYLSX and may enroll in second year classes. If their grade average is below 77, students are not allowed to enroll in second year classes so that they may concentrate on studying to take and pass the FYLSX. Such students, however, may petition the Academic Standards Committee for permission to continue into their second year. If permitted, they are counseled as to the risks associated with not passing the examination within the three-administration rule.

Classes offered in the second through fourth years of study include those covering all subjects tested on the California Bar Examination. The entire ALU curriculum is offered through a combination of synchronous, virtual classroom sessions that include lecture and discussions, with many professors using a typical Socratic method of teaching. Most classes also require written work assignments, which are graded and then included in a student's final grade. Professors are encouraged to improve the quality and increase the quantity of graded homework assignments and, to provide additional content to students who are unable or choose not to attend synchronous class sessions, asynchronous content, in the form of online discussion boards, is now available.

The curriculum is compliant with Guideline 5.12 in offering a number of classes that teach and help develop practical skills. Such classes included Trial Techniques, Advanced Writing (which emphasizes all forms of written work product prepared by attorneys) and Civil Litigation before Trial and Product Liability Litigation. Several "practice-ready" elective classes are also offered,

including Communications Law, a class emphasizing the First Amendment and International Business Law. The law school, however, offers no credit for work performed in a legal clinical or externship.

Syllabi for a number of classes (including all first-year courses) were reviewed and found to be comprehensive, informative and well formatted. A review of a sample of final examination questions confirmed that most were well drafted and offered a fair test of the legal principles being tested. First-year examination questions are drafted in the form of FYLSX questions and were found to contain a fair and appropriate number of issues. Casebooks used in the courses were standard works used in many law school classes. A brief survey of ALU's proprietary online teaching platform confirmed that it offers a reliable and effective means to offer synchronous and asynchronous

Since the initial visit ALU has taken a number of steps to improve its academic support and help its students improve their chances to pass both the FYLSX and the California Bar Examination. In 2011, the law school developed an Academic Success Program, which tracks both class attendance and assignment completion, offers academic support workshops, personal counseling, practice examinations and a dedicated webpage with online academic support services.

Since 2013, participation in the Academic Support Program has been mandatory for all students on academic probation. The law school also redesigned its FYLSX review course and entered into a partnership with BarBri to offer academic support and examination review to students in each year of study, including a mock FYLSX. Finally, the law school has added a new member of the faculty with prior teaching experience at ABA-approved law schools to assist fourth-year students prepare to take and pass the CBX.

Overall, the ALU program of legal education offers both a sound and innovative curriculum that is designed to meet the needs of its students and prepare them for success on the California Bar Examination.

(F) Scholastic Standards: Rule 4.240(F) and Guidelines 5.17 – 5.25. The law school must maintain sound scholastic standards that ensure accuracy, validity, reliability and consistency in its evaluation of student performance and must, as soon as possible, identify and disqualify those who are not qualified to continue under these standards.

ALU has established and works to maintain compliant scholastic standards. It relies upon its Academic Standards Committee to ensure both the scholastic quality of the final examinations given in the J.D. program and the integrity of its established grading standards used by faculty to assess students' performance.

As described in is Faculty Handbook, ALU faculty members are instructed to use a combination of objective multiple-choice questions and essay question on final examinations, along with written work assignments, to determine a student's final

grade in each class they complete. The law school has established and uses a traditional grading scale of A through F with 90-100 warranting an A (outstanding); 80-89 a B (above average); 70-79 (average); 60-69 (below average) a D; and below 60, F (fail).

A review of ALU's 2015 Annual Compliance Report confirms that final grades are relatively well distributed, with only 8.95% (60/670) of all final grades given during the 2014-2015 academic year being an A+/A-; 31.8% (213/670) a B+/B-; 39% (261/670), a C+/C-; 13.34% (90/670), D+/D- (90/670) and 6.9% (46/670) being an F. While showing no significant grade inflation, there were a couple of minor grade anomalies, such as significantly more grades of B- (117) than grades of C+ (77), and grades of A- (47) than B+ (44) being given.

Good standing for first-year students is attained with a cumulative grade point average (GPA) of 70 or above. First-year students who fail to attain a GPA of 60 are academically dismissed. All students, both first year and upper level students who have a GPA of between 60 and 69 are placed on probation. Students on probation who do not raise their GPA to 70 by the end of year of the academic year they are in are also dismissed.

As provided by the Catalog, students academically dismissed are permitted to petition for reinstatement and may be reinstated "based upon a clear showing of special circumstances and good cause." This standard of re-admission for those academically disqualified is not, however, fully compliant with the specific requirements set out in Guideline 5.34. In order to give those ALU students academically dismissed clear guidance on the basis upon which the law school may compliantly readmit them, it is recommended that the Catalog be revised to expressly adopt the specific requirements set out in Guideline 5.34(A) and (B).

Since 2011 ALU has taken several efforts to strengthen its scholastic standards. In the hope of improving the pass rates of its students taking the FYLSX. The law school eliminated its prior grading policy that curved the grades of first-year students who had earned a failing grade to that of a passing grade of D so that they would qualify and could be certified to take the FYLSX. Given how few ALU students were previously passing the FYLSX, the decision was made to eliminate this questionable grading policy.

Since 2012, all ALU first-year students have been required to earn at least a 70 in each first year course to be certified for the FYLSX. The law school does, however, allow students who do not attain a grade of 70 in each first-year class to meet this requirement by retaking the class the next time it is offered, taking a proficiency examination under proctored conditions or taking the course again as an independent study. To further strengthen its grading standards, the faculty has been instructed to grade more rigorously and closer to how the FYLSX is graded to give students a better chance to pass the examination.

More recently, the law school has adopted another policy aimed at improving its students' chances of passing the FYLSX. Students who do not have a first-year GPA of 77 or better are not permitted to enroll in second-year classes until and unless they pass the FYLSX. Students affected by this policy who wish to enroll in second-year classes must petition the Academic Standards Committee for a waiver if they believe they will be able to pass the FYLSX on their first attempt.

The law school strictly enforces the requirement of Guideline 5.22 by dismissing all students who fail to pass the FYLSX within the first three administrations for which they are eligible to take the examination. Moreover, as confirmed by the results of the most recent administrations of the FYLSX, more students are passing the examination.

The pass rates for ALU's students on the ten most recent administrations of the FYLSX are as follows:

Date	All Takers	All Passers	% Passing	First-time Takers	First-time Passers	% Passing
Oct. 2015	31	7	22.6	14	2	14.3
Jun. 2015	38	10	26.3	19	7	36.8
Oct. 2014	32	7	21.9	15	4	26.7
Jun. 2014	31	9	29.0	5	5	100.0
Oct. 2013	47	10	21.3	18	7	38.9
Jun. 2013	55	11	20.0	19	5	26.3
Oct. 2012	45	3	6.7	22	3	13.6
Jun. 2012	34	14	11.8	11	2	18.2
Oct. 2011	47	6	12.8	8	4	50.0
Jun. 2011	70	10	14.3	27	5	18.5
Five-Year Totals	430	77	17.9%	158	44	27.85%

ALU's first-time pass rate of 27.85% for students taking the FYLSX is virtually identical to the overall 27.7% average for students attending all distance-learning law schools. With regard to the "all passers," the rate of ALU students taking the FYLSX multiple times is, at 17.9%, below the 22.74% rate for students from all distant-learning law schools who took the same administrations.

The pass rates for ALU graduates on the ten most recent administrations of the California Bar Examination are as follows:

Date	First-time Takers	First-time Passers	% Passing	Repeat Takers	Repeat Passers	% Passing
Jul. 2015	5	1	20.0	48	2	4.0
Feb. 2015	7	4	57.0	47	3	6.0
Jul. 2014	6	0	0.0	50	1	2.0
Feb. 2014	6	1	17.0	51	5	10.0
Jul. 2013	10	1	10.0	61	4	7.0
Feb. 2013	7	3	43.0	56	2	4.0
Jul. 2012	11	1	9.0	65	6	9.0
Feb. 2012	11	4	36.0	67	8	12.0
Jul. 2011	17	6	35.0	76	5	7.0
Feb. 2011	25	4	16.0	61	3	5.0
Five-Year Totals	105	25	23.8%	582	39	6.7%

The 23.8% first-time pass rate for ALU graduates on the CBX over each of the 10 administrations listed above was below the overall average of 26.3% for graduates from all registered, distance-learning law schools.

(G) Admissions: Rule 4.240(G), Guidelines 5.26 – 5.36. The law school must adopt and maintain a sound written admissions policy and must not admit any student who is obviously unqualified or who does not appear to have a reasonable prospect of completing the degree program.

ALU maintains compliant admissions standards that generally exceed the educational requirements of Guidelines 5.26 through 5.33; ALU generally admits only those with a bachelor's degree earned at an accredited college or university recognized by the U.S. Department of Education. The law school will, on a case by case basis, admit students without a bachelor's degree who have earned at least 60 units of acceptable college credit. ALU also admits applicants who were previously disqualified for academic reasons from other law schools if they qualify for admission under the requirements found in Guideline 5.34.

Since 2013, the law school has sought to raise its admission standards by further reducing the number of applicants admitted without a four-year college degree and it now requires all foreign applicants for whom English is not their first language to take the Test of English as a Foreign Language (TOFEL).

Applicants must fill out and submit an application, a personal statement, two letters of recommendation and complete an online assessment test and, if they have taken the Law School Admissions Test (LSAT), their score. The online ALU application form is compliant with Guideline 5.31 in asking applicants to confirm whether they have ever attended another law school and, if so, whether the applicant was in good standing. Applicants seeking admission to ALU may apply by submitting only unofficial undergraduate transcripts, but they are informed of the mandatory requirement that the law school is to have their official transcripts within 45 days of when they start classes. As to those admitted with prior law school study, while not a mandatory requirement of Guideline 5.31, it is recommended that the law school request that such students also submit their official transcripts from their former law schools.

ALU admits students continually through a rolling admission process, although those admitted must wait until the start of either the winter, spring or fall quarter. Professor Daniel Jung is the primary decision maker for all admissions where an applicant clearly meets ALU's admission standards. For those applicants who present more borderline qualifications, including foreign applicants or those academically dismissed from another law school, Professor Jung consults with the Academic Standards Committee (ASC), which is comprised of Dean Park, Director Park, Registrar Gomez, Director of Admissions Richard Ingle and Director of University Programs Dr. Susan Lomel. The ASC also reviews and decides all requests for reinstatement submitted by ALU students who have academically disqualified but who hope to return and complete the J.D. program.

Based upon this selection process, ALU maintains a very liberal admissions policy. As confirmed by its two most recent Annual Compliance Reports (2014, 2015), the law school admits almost all eligible applicants who complete their application. For the 2013-2014 academic year, ALU had a 100% admittance rate having rejected zero qualified applicants. For the 2014-2015 academic year, the acceptance rate was significantly lower at 84% (48/57), with a total nine applicants, out of 57 application completed, being rejected.

Despite the well-publicized drop in law school applicants nationally, the law school has been able to experience a recent increase in its enrollment. Over the past three years (2013-2015) ALU's enrollment in its J.D. degree program has increased 52%, from 110 J.D. students in 2013 to 168 students enrolled in 2015.

(H) Library: Rule 4.240(H) and Guidelines 6.1 – 6.6. The law school must maintain a compliant law library or compliant online library access.

As a distance learning law school, ALU offers all students individual access to a compliant online library containing all mandatory legal resources and services. With their admission, students are provided an account with Westlaw, as is each active member of the faculty, including adjuncts. To augment its online legal resources, the law school also maintains membership in CALI, a non-profit

consortium of law schools that researches, develops and publishes online legal educational content and academic support materials.

As required by Guideline 6.3, ALU offers its students instruction in legal research using both online and hard copy legal authorities. In ALU's current curriculum, instruction in both forms of legal research has been incorporated into two substantive classes, including the first-year class in Torts and, in later years, the class in Wills and Trusts. While somewhat unorthodox, the law school believes that providing such instruction in this manner offers a more effective means to teach research within the context of substantive legal theory and principles.

Additional, mandatory instruction in legal research is offered in the fourth year class of Advanced Writing where students are required to perform the legal research needed to write a series of assignments (client correspondence, legal memoranda and an appellate brief) similar to what a practicing attorney drafts.

(I) Physical Resources: Rule 4.240(I) and Guidelines 7.1 – 7.2. The law school must have physical resources and an infrastructure adequate and appropriate for its program of legal education and operations.

ALU operates from a suite of offices located in a modern, commercial office building located in the mid-Wilshire Blvd. district of Los Angeles. Its suite contains a sufficient number of administrative offices for use by Dean Park and the other administrators and support staff. There is also a reception area and adequate file storage space. Given that it allows local students to attend classes as they are being offered online synchronously, ALU had built out two classrooms. Each is equipped with tables and chairs and each contains the audio-visual technology used to stream and videotape class sessions.

In offering a distance learning curriculum, ALU has constructed and maintains a reliable, Internet-based teaching platform that offers synchronous online classes and academic support. Known as the Student Learning Center (SLC), ALU offers its students 24/7 access to its online classroom content. The law school's online technology is current and well supported by two, onsite technology and software engineers. In addition to offering students a virtual classroom environment, the SLC also offers a means for students, faculty and administrators to communicate with one another through email and chat rooms.

As offered to its students, ALU's physical and technological resources were found to offer its students both a sound and compliant means to offer and support both its online program of legal education and online operations.

(J) Finances: Rule 4.240(J) and Guidelines 8.1 – 8.3. The law school must have adequate present and anticipated financial resources to support its programs and operations.

As noted above, ALU operates as a for-profit corporation. As such, it is reported to be both sufficiently capitalized and financially secure. In its 2015 Annual Report, ALU submitted a financial statement prepared by an independent auditor, Kim & Lee, Inc., dated April 30, 2015. As reported, on December 31, 2014, ALU, Inc. had assets valued at \$3.72 million, shareholder equity of \$3.5 million including a cash balance of \$636,907. As of December 31, 2015, ALU's auditors reported to Dean Park that the cash balance had increased to \$1.35 million.

Given its corporate structure and reported financial resources, it appears that that ALU is financially solvent and thus compliant with and able to meet its obligations needed to provide its students with a sound program of legal education and to provide prompt tuition refunds where requested and warranted.

(K) Records: Rule 4.240(J) and Guidelines 9.1(A) – 9.1(Q). The law school must maintain current, complete and accurate records and files in support of its programs and operations.

All student enrollment records and transcripts are maintained in a combination of hard copy files and computerized records. At the time of the initial inspection, the law school was in the process of developing and consolidating the four separate electronic filing systems then being used into a single system. That project was completed by the time of the second visit and appears to be functioning well.

All hard copy records are stored in locked file cabinets, including a number that are fireproof. A review of the school's records during the initial inspection confirmed that ALU maintains all records and transcripts mandated by Guideline 9.1. They include all applications received, a class syllabus and all examinations given for each class taught and class records confirming the name of the professor, dates of the term it was offered and student attendance. The law school also compliantly maintains a file of all examinations given over the past five years and, for the required one-year period, all final examination and mid-term answers used to calculate a student's final grade. Individual class grade tabulations are electronically maintained on a secure drive in the administrative office, which are then regularly backed up remotely.

A sample review of randomly selected student files confirmed that the files reviewed were compliantly maintained; each was found to contain all required records and information. The files reviewed were also found to contain signed student disclosure statements, as required by Rule 2.241, which also functions as each student's enrollment agreement. All undergraduate transcripts and other admission materials were also properly filed. On at least one instance, the admission of a transfer student with prior law school study was found without

official transcripts of such study. Based upon this one omission, it is recommended that the law school conduct an audit of all files of transfer students admitted with prior law study to confirm that the law school has proper evidence of such study, preferably, as noted in Guideline 5.31, their official transcripts.

The review of a sample of faculty files confirmed that such files are also compliantly maintained by containing proof of the faculty members' credentials and qualifications, their law school transcripts, law licensure and evaluations.

The law school maintains a file of the minutes of all faculty and faculty committee meetings and a permanent file of all catalogs and brochures sent to prospective students. Finally, it has a good record of timely filing its admission certificates.

(L) Equal Opportunity and Non-Discrimination: Rule 4.240(L) and Guideline 10.1. The law school should demonstrate a commitment to providing equal opportunity to study law and in the hiring, retention, and promotion of faculty without regard to sex, race, color, ancestry, religious creed, national origin, disability, medical condition, age, marital status, political affiliation, sexual orientation, or veteran status.

Since students at ALU are not required to report their ethnicity, an accurate accounting to confirm the diversity of the law school's enrollment is difficult to ascertain. However, based upon those who are willing to identify their heritage, ALU's student enrollment appears very diverse. In 2015, 40.4% of its students reporting their ethnicity identified as minority, with the remaining 59.6% of ALU students identified as being White. Among its minority students, 19.2% were Asian, with 14.4% reported that they are African-Americans.

As noted in its Faculty Handbook, ALU is committed to equal opportunity and nondiscrimination in the recruitment and hiring of its faculty. As a result, the ALU faculty is similarly diverse. Its current faculty consists of 17 full-time and part-time adjunct professors with eight identified as being non-White (47%), four identified as being White (23.5%) and five (29.4%) were unknown. As to gender, the ALU faculty is also relatively diverse at 47.0% female.

The law school also appears to be operating compliantly with all state and federal laws to protect the rights of both its students and faculty from unlawful discrimination and to promote equal opportunity. As found in both its Catalog and Faculty Handbook, ALU has adopted and provides notice that does not discriminate on the basis of race, color, national origin, sex/gender or disability. It is also expressly committed to comply with Title IX of the Civil Rights Act of 1964.

(M) Compliance with Committee Requirements: Rule 4.240(M) and Guidelines 11.1 – 11.5. The law school must demonstrate its compliance with all reporting and academic notice requirements required by each of the Rules and Guidelines found applicable to its programs and operations.

ALU has been and continues to be both diligent and timely in complying with the Committee's mandatory reporting requirements found in the *Unaccredited Law School Rules*. Such efforts include the law school's timely submission of its Annual Compliance Report before or by November 15th.

In preparing for its periodic inspection, the law school's staff compiled a comprehensive and timely self-study that provided valuable assistance needed to evaluate its operational compliance with the relevant *Guidelines for Unaccredited Law School Rules*. Both during and after the inspection, including following the second phase of the inspection, ALU staff provided prompt and comprehensive responses to several staff inquiries regarding various operational, scholastic and academic issues addressed in this report.