

**California Southern University School of Law**  
A Registered, Correspondence Law School

**PERIODIC INSPECTION REPORT**

December 1, 2015

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

George Leal, Director, Educational Standards  
Office of Admissions, The State Bar of California

ATTACHMENT A

Report on the Periodic Inspection of  
**California Southern University School of Law**  
930 Roosevelt, Irvine, California

**EXECUTIVE SUMMARY AND RECOMMENDATIONS**

An inspection of the California Southern University School of Law (CSUSOL) took place in two phases: an initial visit on April 2, 2014 conducted by George Leal, Director, Educational Standards (Director), which was not reported, and a subsequent visit conducted on December 1, 2015 by Sally Perring, Educational Standards Consultant (Consultant). The following report is based upon findings made during each visit, the law school's 2015 Annual Compliance Report and follow-up email correspondence and telephone discussions with the law school's Dean.

California Southern University (CSU) operates as a for-profit, educational entity offering undergraduate and graduate degrees, primarily in the field of psychology and business administration, exclusively through online curricula. It operates from administrative offices located in Irvine and was founded in 1978. The University was once accredited by the Distance Education Accrediting Commission (DEAC). In 2015, however, the University and each of its schools became accredited by the Western Association of Schools and Colleges (WASC) and it has since relinquished its DEAC accreditation.

CSUSOL opened in 1994 to offer a four-year, online Juris Doctor (J.D.) degree program that qualifies graduates to take the California Bar Examination (CBX). Current J.D. tuition is \$37,400. In 2016, CSUSOL received the acquiescence from the Committee of Bar Examiners (Committee) to offer an LL.M degree and a Master of Science in Dispute Resolution (MSDR) degree, along with its Masters of Science in Law degree. CSUSOL is administered by Dean Ellen Sampong and Associate Dean Bernadette Agaton.

Students (referred to as learners) complete their annual study requirements through a curriculum taught over a sixteen-week, trimester basis; students typically enroll in two or three courses per trimester. Students are required to complete 88 semester units, including eight units of electives. Professors (referred to as mentors) video tape their class lectures and then individually work with students by grading their class assignments and through individual counseling. Through its online technology, students are tracked to ensure each is maintaining appropriate progress. CSUSOL uses the University's in-house video facilities where professors tape their lectures and associated course work. Its online platform, referred to as CalSouthern Learning Center, offers students both a means to receive all curriculum content and individual feedback from the faculty as they attain the learning outcomes needed to pass each course.

Since its previous inspection, the law school has raised its admission standards and now admits only those with a four-year undergraduate degree. For the 2015-2016 academic year, CSUSOL had 38 students enrolled in its J.D. program taught by a faculty of 15 part-time professors, all of whom are licensed and practicing California

attorneys. Finally, the law school was able to report a cumulative, first-time pass rate of 44.4% for its graduates on the CBX from 2011 through 2015.

**Recommendation:**

It is recommended that registration of the California Southern University School of Law be continued; that the law school consider the Recommended, Suggested Actions noted below; and that its next periodic inspection be scheduled for the fall of 2020 unless the Committee determines an earlier inspection is required.

**Recommended Suggested Actions:**

1. For better compliance with Guideline 2.9(D), the law school should consider re-instituting the requirement, as is required by the University in each of its other schools, the use of an independent commercial proctoring service so that all final examinations are proctored to provide better assurance as the authenticity of each student's examination answers;
2. For better compliance with Guidelines 2.9(B)(1) and 5.17, the law school should revise and publish a clear description and explanation of its grading standards and the methodology used to define academic good standing and, in doing so, choose to use either a numeric scale of 100, a numeric scale of 1.0 - 4.0 or alpha letter grades (A-F);
3. For better compliance with Guideline 5.12, the law school should develop additional electives classes, using various online technologies, to teach students various practical skills, such as trial and appellate advocacy, law office management and client counseling, as is needed in the practice of law.

## **Findings of Compliance with the Committee's Standards and Guidelines**

**(A) Lawful Operation, Honesty and Integrity: The law school must operate lawfully and in an honest forthright manner and it must comply with all applicable federal, state, and local laws and regulations. (Guidelines 2.1 – 2.12)**

As one of the constituent schools of CSU, CSUSOL operates as part of a for-profit, California corporation registered with California's Secretary of State. The law school also operates under a current business license issued by the City of Irvine.

CSUSOL appears to be operating lawfully under all applicable state and federal laws. For example, it has adopted and maintains appropriate written policies to protect student privacy and to ensure the confidentiality of their academic records. The law school does not participate in the program that offers federally-insured student loans and, as such, it is not subject to the Family Educational Records Privacy Act (FERPA).

Both CSU and the law school operate under an express, written policy that confirms that each recognizes and accepts responsibility to offer students with documented disabilities appropriate accommodations under the Americans with Disabilities Act (ADA). The University and law school also operate under written policies that promote nondiscrimination in all of its operations and expressly prohibit unlawful sexual harassment of students, faculty and administrators.

With only a minor exception, as noted below, CSUSOL operates with integrity and in a forthright manner in all of its financial affairs, in how it communicates with the public, applicants and its students as to its policies and procedures governing its academic standards, grading and grade review. CSU publishes a comprehensive and well-written catalog that sets out a description of all such policies and procedures and the curriculum for each of its schools including the law school. J.D. students receive a detailed and comprehensive statement of the law school's current tuition and all fees incurred in enrolling along with a clear description of various payment options.

The catalog offers all CSU students a clear and compliant tuition refund policy that is fair and reasonable, offering refunds on a sliding scale based as to when a student withdraws from a class or the law school. For example, a student who cancels after enrolling, up through the first day of scheduled classes receives a full refund of all fees and tuition paid with a refund of tuition paid if the student withdraws within the next two weeks. Since CSUSOL is regulated by the Committee, and not the Bureau for Private Postsecondary Education, the Catalog provides an express disclaimer that law students are not protected by the State of California Student Tuition Recovery Fund (STRF).

The University maintains numerous financial and technology safeguards designed to protect against financial fraud and financial improprieties and it enforces an express policy designed to guarantee the authenticity of students' work and class participation. The University and the law school maintain a policy that ensures academic freedom.

CSUSOL communicates compliantly with the public, applicants and its students, doing so in an honest and forthright manner on both its website and in its catalog. Both, along with the application for admission, provide the specific disclosures mandated by Guideline 2.3(D), confirming that CSUSOL is an unaccredited, correspondence law school, the fact that for students to remain enrolled and then graduate requires timely passage of the First-Year Law Students' Examination (FYLSX) and that "study at or graduation" from the law school may not qualify a student to take the bar examination in jurisdictions other than California. The Disclosure Statement, as required by Rule 4.241, was found compliant in both its form and content and, as confirmed by the law school's files, it is signed by and disseminated to students in a timely and compliant manner.

The law school maintains a compliant policy regarding student discipline, one that offers students the due process safeguards (such as a written statement of charges, the assistance of counsel and a hearing to contest such charges) as are required by Guideline 2.8. Students are provided with all rules and procedures governing course repetition and the circumstances under which they are subject to academic disqualification and where they may be permitted to remain enrolled while on probation.

The law school has adopted and maintains a fair grading system that meets the specific requirements of Guidelines 2.9(A) and 2.9(B)(1). The law school uses a numeric scale of 100, a numeric scale of 1.0 - 4.0 and alpha letter grades (A-F);. The system used requires J.D. students to maintain a C (2.0) grade point average to be in good standing. Use of these three separate standards, however, may create some confusion. As noted below, given the potential for some confusion, it is recommended that the law school consider revising its system to use only a single standard.

CSUSOL students are not graded anonymously. Given its unique, one-on-one "mentor/learner" relationship between individual faculty members and the relatively small size of individual J.D. classes (most have fewer than 10 students), students are informed that anonymous grading is not feasible since, over a semester, a professor will grade and discuss with their students no fewer than 10 different written assignments and discuss their written work with them directly, making identification of the work and examination answers of individual students almost a certainty.

The law school maintains compliant procedures as required by Guideline 2.9(D) to confirm the authenticity of the work product submitted by each student. Each is given access to a secure, password-protected online portal on the University's website, referred to as the CalSouthern Learning Center. Each time a student logs on to view or participate in any of the law school's online content, an electronic record is maintained that confirms the student's participation in all course-related activities; all work assignments are also submitted through the Learning Center. As with many other online educational institutions, CSUSOL uses the services of Turnitin, a commercial provider of software that detects student plagiarism. Faculty members are required to use this software on a sample of each student's written work during each class.

To further confirm the authenticity of their work product, students must sign and submit an “academic integrity statement.” In regard to their examination answers, the law school previously required its J.D. students to use an independent testing service named ProctorU when taking their examinations. This service provides secure, online confirmation that the person taking an examination online is actually a CSUSOL student. It does this by having actual proctors monitor students through the use of webcams and audio feedback. Due to a testing limitation related to its ability to proctor lengthy, law school essay questions, however, the law school stopped using the services of ProctorU and now requires students to select a proctor of their own choosing who independently confirms that the examination answers submitted are authentic.

Given the online advantages of using a commercial service such as ProctorU, still used by all other schools within CSU, it is recommended to increase the security of its examination process, the law school consider reinstating use of this proctoring service or another similar service in order increase the security of its examination process.

The law school offers students compliant grade review procedures by offering them the right to appeal any grade issued they believe was the product of mistake, “unfairness” or a departure from established grading policies. Such procedures, as required by Guidelines 2.9(G) and 2.9(F), include having the appeal considered and reviewed by the law school’s Grade Review Committee, which is comprised of impartial faculty members. To ensure that students have proper access to their final examinations, as required by Guideline 2.9(F), the law school has a compliant policy that gives them the right to inspect and copy their examination questions and answers for a reasonable period of time after grades are posted and recorded.

The CSUSOL policy governing probation and academic deficiencies is compliant with the Guidelines, 2.9 (B)(6) and 2.9(B)(7). As stated in the catalog, students must attain a GPA of 2.0 to be in good standing. Thereafter, if a student falls below good standing during any academic year, they are placed on probation with specific conditions relevant to their specific academic deficiencies. While they may progress into the subsequent year of study, they must then attain and maintain good standing during that year otherwise they will be academically dismissed.

At the time of the initial site visit, not all course syllabi offered students a clear statement of the basis upon which final grades based, as required by Guideline 2.9(C). The law school promptly addressed this issue and revised the format of all syllabi and each was later confirmed to be compliant with this requirement. In being dependent upon the reliability and security of its online technology, CSU and the law school use the most sophisticated software and hardware available to protect its computer systems from unwarranted intrusions, security breaches and from the loss or corruption of data. It uses the services of an outside consultant to assist it in protecting its network and data.

The law school is compliant with Guideline 2.10 in protecting the privacy of its student’s information and educational records. The policy, as set forth in the CSU catalog, states that student records and information are not provided to anyone (other than as

requested by the Committee or a University accreditor) without the consent of the student or as otherwise required by legal process such as a court-issued subpoena.

Finally, as described on its website, CSUSOL provides, as required by Guideline 2.12, its prospective students, applicants and enrolled students a statement of all services and activities the law schools offered to students in the J.D. curriculum. Such services include assigned advisors who provide academic counseling, technological support and class discussion boards offered through the CSUSOL online technology.

**(C) Governance: The law school must be governed, organized, and administered so as to provide a sound educational program. (Guidelines 3.1 -3.3)**

As one of the constituent schools of CSU, the law school is compliantly governed and administered. The University's president, Carol Ryan, Ph.D. and its Chief Academic Officer, John Minchin, provide significant and meaningful oversight to the law school's administration and its efforts to operate compliantly. CSUSOL Dean Ellen Sampong reports directly to C.A.O. John Minchin. The University is governed by a board of directors comprised of accomplished academics and business executives.

CSUSOL Dean Ellen Sampong and Associate Dean Bernadette Agaton are well qualified for their respective positions. Dean Sampong is a 1997 graduate of the Thurgood Marshall School, an ABA-approved law school located in Houston, Texas and is a licensed Texas attorney. Associate Dean Agaton is a 2004 of the Southwestern University School of law, an ABA-approved law school located in Los Angeles.

CSUSOL students receive sound academic, administrative and technical support from the school's staff of experienced and well-qualified administrators. They include its long-serving Registrar and Records Supervisor, Lupe Alvarez, employed at CSU since 1994, and Elle Daniels, Director of Enrollment Service. Numerous other University staff members, such as those tasked with maintaining the University's computer system and providing student technical services, assist in the administration of the law school.

The law school's faculty also provides meaningful input into its academic governance. CSUSOL maintains two standing faculty committees, the Law Faculty Grade Review Committee, which hears all student petitions challenging final grades, and the Faculty Senate Committee, which, in collaboration with the University, assists in the development of the law school's curriculum and academic standards.

Finally, in an effort to provide additional guidance, the law school relies upon a seven-member Law School Advisory Board. The Board is racially and gender diverse and is comprised of both practicing attorneys and individuals with experience and expertise in academics, business and the military. Board members meet twice a year with the purpose of reviewing and commenting upon the law school's curriculum and operations.

**(D) Dean and Faculty: The law school must have a competent dean or other administrative head and a competent faculty that devotes adequate time to administration, instruction, and student counseling. (Guidelines 4.1- 4.10)**

Appointed in 2007, Dean Sampong, is responsible for the overall operational management and academic leadership of the law school. She is a full-time employee who oversees not only the J.D. program but its Master's degree programs as well. Throughout her tenure, Dean Sampong has offered the law school innovative leadership and a strong dedication to its unique program of legal education and she works well with its faculty, administrators and, collaboratively, with the University's senior administrators and each of its other schools, departments and deans.

Assisting Dean Sampong is Associate Dean Bernadette Agaton who has held this position since 2008. Dean Agaton's duties include drafting and formulating the law school's administrative and academic policies, revising and developing its curriculum, counseling students and assisting in the day-to-day operations of the law school.

Over the past several years, the law school's faculty has consisted of 15, part-time professors, all of whom are licensed attorneys. The law school has no full-time faculty. Each member of the faculty is a licensed attorney, with two thirds licensed in California and the rest in other jurisdictions. Most of the faculty are graduates of ABA-approved law schools, including Western State University School of Law, Loyola Law School, Thomas Jefferson School of Law and the McGeorge School of Law.

As noted, CSUSOL's curriculum is taught through a unique form of online teaching. Course content is offered through asynchronous lectures and, if needed, one-on-one interaction with a "faculty mentor" to discuss class content. After doing so within a prescribed period of time, students must then complete and submit a series of class assignments (between 10-12 a semester), which are then reviewed and graded by a Faculty Mentor who then communicates with each student individually, usually through an exchange of emails but often by telephone during posted "office hours." Through this process, the faculty offers a significant amount of individual counseling, considerably more than at many other law schools regardless of type.

As also noted, and as required by Guideline 4.3, the CSUSOL faculty take an active role in formulating, implementing and administering both the University's and the law school's academic policies and programs. The Faculty Senate maintains five standing committees on which faculty members serve. They include: the Nominating Committee, which coordinates the selection process for the Faculty Senate; the Personnel Committee, which recommends personnel policies posted in the Faculty Handbook; the Curriculum Committee, which makes recommendations to the University's chief academic officer and its Board of Directors in regard to proposed curriculum changes and enhancements; an Information Technology Committee, which assists in the evaluation of the use and needs of the University's technological platform; and a Library Advisory Committee, which serves to assist the University in regard to each of its libraries.

The law school has adopted compliant procedures to perform regular faculty evaluations. All members of the faculty are evaluated annually by Dean Sampong, who uses reviews of individual class content, feedback received from students, participation in faculty events and an assessment of a Mentor's grades and the time taken to grade their examinations to make an individual assessment of mentor effectiveness.

As set out in the Faculty Handbook, CSUSOL has adopted an express policy to ensure academic freedom. Finally, in an effort to maintain and improve the teaching skills and substantive legal expertise of its faculty members, the law school provides a modest subsidy, \$150 annually, to attend legal education and professional development.

**(E) Educational Program: The law school must maintain a sound program of legal education that is qualitatively and quantitatively compliant. (Guidelines 5.1-5.16)**

The CSUSOL J.D. degree program is quantitatively and qualitatively compliant. Students must complete four years of no less than 864 hours of study and preparation during each year of the J.D. curriculum. To do so, they must earn 88 semester units (80 in required classes and eight in elective classes) offered each year over three, 16-weeks semesters. To confirm that students meet this requirement, they are required to maintain, submit and verify (by a sworn declaration) an "Hours Log" to confirm the date and amount of time spent on all of their respective study, preparation and coursework.

As a correspondence law school, CSUSOL offers its curriculum exclusively through an asynchronous, online platform known as the "CalSouthern Learning Center," a proprietary teaching platform that incorporates video-taped course lectures and class assignments. After completing the assigned reading and watching the appropriate video, students follow a class syllabus to complete and submit a series of written assignments. Each is graded and returned to the student by the "Faculty Mentor" teaching the particular class. Faculty mentors are instructed to maintain regular and frequent contact with students and to document all such contact. Such interaction between faculty mentors and students is facilitated by email, Skype or telephone.

The first-year curriculum is comprised of Torts, Contracts Criminal Law and an Introduction to Law course, collectively taught over three semesters. Courses covering all subjects tested on the California Bar Examination are offered during the second through fourth year of the curriculum. For all courses, the law school's curriculum uses the same standard legal case books and texts used at accredited law schools.

In an effort to increase the success of its students on the FYLSX, the law school and its faculty mentors have significantly increased the use of various commercial test preparation companies, such as BarBri, AdaptiBar and CALI to provide substantive content into its first-year curriculum. In classes offered after the first year, the law school has also contracted with the National Conference of Bar Examiners to purchase multiple-choice questions for use in classes covering bar-tested subjects to help students on the CBX.

To improve their chances to pass the FYLSX, CSUSOL encourages its first-year students not to continue into their second year and, instead, to concentrate on preparing for the FYLSX. To do so, it has adopted a policy, referred to as the Baby Bar Leave of Absence (BBLOA), which allows students to stop taking classes and resume their studies after any of the first three administrations of the FYLSX they are qualified to take. Under this policy students are able to review and take advantage of the various commercial test preparation programs recommended by the law school. All first-year students also receive the benefits of a FYLSX workshop, at no additional expense, to help them review and prepare for the examination.

To improve its curriculum, the law school continues to incorporate new, online technology to teach and communicate with its students. The law school recently incorporated the online program known as “Yammer” that allows students and faculty mentors to form social networks, by class, to study and work with each other or their particular faculty mentor. It has also developed new ways to incorporate enhanced video and voice technology into class content. For example, in some classes students are required to complete oral assignments that they record and upload using Skype, which are then reviewed and graded by the faculty mentor teaching the class.

To augment its curriculum, the law school permits student to earn up to four semester units of credit for work performed during an approved externship at a public entity, public interest office or working for a judicial officer, a judge or court commissioner. While the student is responsible for arranging his or her externship, it must then be approved and a Faculty Mentor is assigned to monitor and supervise the student.

While allowing student learners to earn credit and learn practical skills through an externship, the law school’s own curriculum appears to be relatively limited in the number of elective courses offering such skills. As provided by Guideline 5.12, instruction “should be made available” to students to develop skills in various areas of the practice of law. As noted, such skills should include trial and appellate advocacy, law office management, client counseling and negotiations.

While the current CSUSOL curriculum offers a number of important substantive elective courses (Environmental Law, Domestic Relations, Real Estate Transactions and Federal Income Tax), its offers no class specifically designed to teach students any practical legal skills. To correct this situation, it is recommended that the law school’s Deans and its faculty consider using the law school’s online technologies to develop and offer classes that would give students the practical skills needed to practice law.

Class syllabi (including all first-year classes) were reviewed and found comprehensive and informative. A review of a sample of final examinations found that most were adequate, if formulaic, that offered a fair test of the legal principals being tested.

Other than individual counseling and advising students who have been identified through low grades as needing assistance, the law school offers relatively little

academic support. At the time students initially enroll, they are assigned “academic advisors” to review their completed work assignments and offer an assessment of the students’ study habits, time management skills in an effort to identify issues that may hinder or prevent academic success. For students who struggle to attain passing grades, their advisors will help them, through regular telephone conferences, to find and use various resources to assist in their efforts to learn. For example, students may be referred to commercial academic services, such as Flemings Writing Workshops. Finally, to provide a broader approach to academic support, the law school created the position of Lerner Success Advisor who can be assigned to individual students to provide additional, personalized academic support.

Overall, the CSUSOL J.D. degree program was found compliant in its content, its use of its proprietary online technology and its innovative use of faculty to assist students as they study and learn in an otherwise asynchronous curriculum.

**(F) Scholastic Standards: The law school must maintain sound scholastic standards and must as soon as possible identify and exclude those students who have demonstrated they are not qualified to continue. (Guidelines 5.17-5.25)**

The law school has adopted and works to maintain compliant scholastic standards. It has appropriate written grading, scholastic, academic standing policies and its students are evaluated annually to determine their academic standing. As noted above, CSUSOL uses a hybrid grading system that incorporates the traditional letter grades with a pre-determine range of numeric equivalents. They include: A (93-100); B (83-86); C (73-76); D (63-66); F (0-59), with grades of plus or minus, e.g., C+/77%-79% and C-/70%-72%. Since students start the J.D. program at different points in any given academic year, the law school does not use a curve to grade any of its courses.

As described in the catalog, however, J.D. students must maintain a cumulative grade point average of “2.0” to achieve good standing. At the end of each academic semester, students not in good standing are placed on probation for the next semester.

Use of a different numeric standard to define good standing appears ambiguous at best, or arbitrary at worse in light of the law school’s grading standard described above. As explained by Dean Sampong, the law school’s use of 2.0 to determine good standing is intended to incorporate the grading standard used by the University in each of its other schools. However, the portion of the CSU catalog dedicated to the law school fails to explain or describe how or why a “2.0” standard is used.

To eliminate any such ambiguity and provide a better explanation of how good standing is determined, the law school should, consistent with Guideline 5.17 (which mandates grading standards that ensure “accuracy, validity, reliability and consistency”), review and revise its grading standard and chose a methodology, using either alpha letter grades or single numeric system, to determine academic good standing.

Grades are issued to students by their faculty mentors on each of their written assignments, on any mid-term examination given and for the final examination in each class. The law school has developed and Faculty Mentors are given grading rubrics to provide specific identifiers and specific grade points to judge specific learning outcomes, which are listed in the syllabus of each course offered. Faculty mentors receive training in grading calibration and meaningful feedback to students. Dean Sampong evaluates the timeliness, quality and consistency of all grades issued.

Over the years CSUSOL has monitored the grade averages and grading standards of its various Faculty Mentors. It has apparently done so given concerns of a rising grade averages and the appearance of grade inflation in certain classes. As noted in the self-study, between 2009 and 2013, the mean grade average given by the entire CSUSOL faculty rose from a C+ to a B, with a number of Faculty Mentors (several teaching first-year classes) found to be above the law school's overall mean grade point average.

Since then, the law school's mean grade point average has remained at a B average, higher than what is needed for good standing, however defined. A review of all grades reported in the law school's 2015 Annual Report provides further evidence that there remains grade inflation. The clearest evidence is found in the statistic that of the 179 grades issued in all J.D. classes, 32.5% (58/179) were an A or A-, with more than twice the number grades of A than A-. At the same time, only 15% of all grades given were between C- and C+, although 14.5% of the grades issued were a grade of F.

Given this pattern of higher-than-average grading, Faculty Mentors are given training to improve grade calibration and, as noted above, Dean Sampong reviews all grades given. Based upon these efforts, but in light of the past and apparently current degree of grade inflation that appears to exist, it is recommended that the Deans and entire faculty conduct an analysis of all elements of the law school's grading standards and practices to better identify both the source and solution of systemic grade inflation.

The pass rates of CSUSOL's students on the ten most recently reported administrations of the FYLSX and the CBX are as follows:

**FYLSX:**

Date	All Takers	All Passers	% Passing	First-time Takers	First-time Passers	% Passing
Oct. 2015	5	0	0.0	1	0	0.0
Jun. 2015	10	3	30.0	7	3	42.9
Oct. 2014	4	0	0.0	1	0	0.0
Jun. 2014	7	2	28.6	3	1	33.3
Oct. 2013	5	0	0.0	2	0	0.0

Jun. 2013	5	3	60.0	1	1	100.0
Oct. 2012	4	1	25.0	3	1	33.3
Jun. 2012	6	1	16.7	4	1	25.0
Oct. 2011	7	0	0.0	3	0	0.0
Jun. 2011	9	2	22.2	2	1	50.0
<b>Five-Year Totals</b>	<b>62</b>	<b>12</b>		<b>27</b>	<b>8</b>	
				<b>Cumulative First Time Rate:</b>	<b>29.63%</b>	

The 29.63% cumulative, first-time pass rate of CSUSOL students on the FYLSX is nearly identical to the first-time, average pass rate of 30.26% for students attending all registered correspondence law schools on the same 10 administrations of the FYLSX.

**CBX:**

Date	First-time Takers	First-time Passers	% Passing	Repeat Takers	Repeat Passers	% Passing
Jul. 2015	2	2	100.0	2	0	0.0
Feb. 2015	1	0	0.0	4	0	0.0
Jul. 2014	2	1	50.0	3	0	0.0
Feb. 2014	1	1	100.0	6	1	17.0
Jul. 2013	2	1	50.0	8	2	25.0
Feb. 2013	5	3	60.0	8	0	0.0
Jul. 2012	2	0	0.0	7	0	0.0
Feb. 2012	1	0	0.0	5	0	0.0
Jul. 2011	1	0	0.0	5	1	20.0
Feb. 2011	1	0	0.0	6	0	0.0
<b>Five-Year Totals</b>	<b>18</b>	<b>8</b>		<b>54</b>	<b>4</b>	

	Cumulative First Time Rate:	44.4%				
--	-----------------------------	-------	--	--	--	--

The 44.4% cumulative, first-time pass rate for CSUSOL graduates on the CBX is significantly above the overall 31.7% average pass rate for the graduates of all registered, correspondence law schools on the same CBX administrations.

To improve its pass rates on the FYLSX and the CBX even further, the law school now offers its students and graduates additional resources to prepare for both examinations. For the FYLSX, students now have access to additional resources from BarBri, AdaptiBar and a private tutor to help the with subject review and examination practice. As to the CBX, the law school has recently spent additional resources to purchase a larger number of Multistate Bar Examination questions so that they can be incorporated and used in more classes covering subjects tested on the CBX.

**(G) Admissions: The law school must maintain a sound admissions policy. It must not admit any student obviously unqualified or who does not appear to have a reasonable prospect of completing the degree program. (Guidelines 5.26-5.35)**

CSUSOL maintains compliant admissions standards that exceed the educational requirements of Guidelines 5.26 – 5.27. Its website contains a complete explanation of its admission requirements and procedures to apply online. Applicants must prepare and submit both detailed personal statements and their undergraduate transcripts. While applicants are not required to take or report an LSAT score, consistent with Guideline 5.30, they must submit their official undergraduate transcripts before their file is considered complete and ready for review and consideration.

Since 2007, the law school has admitted only applicants who hold a bachelor’s degree from an accredited college or university. As required by Guideline 5.31, applicants must confirm whether they have ever attended a prior law school and, if so, whether or not they left in good standing.

For those seeking admission as a transfer student after attending another law school, each applicant is evaluated individually and all transfer credit requested is granted depending on the timing of the classes completed and the individual grades received. Based upon such information, the law school occasionally admits transfer students, including those who left in good standing and some who did not, if they are found qualified and have either passed the FYLSX or are exempt having successfully completed a year of law study at an accredited law school. For those admitted after academic disqualification, if they meet the requirements for admission under Guideline 5.34, the appropriate memorandum is prepared and then signed by Dean Sampong.

Over the past several years, the law school has sought to raise its admission standards. It now places significantly more weight upon the quality of an applicant’s personal statement in judging whether they appear to have the requisite writing skills to succeed in law school. As a result, fewer but better-qualified applicants are now admitted in the

hope that they will have a better rate of success on both the FYLSX and the CBX. Evidence of these admissions was confirmed during the 2014-2015 academic year when only 34 of the 45 applicants were admitted for a relatively high rejection rate of 24%.

All applications are reviewed and acted upon by the Admissions Committee, comprised of Dean Sampong and Associate Dean Agaton. All admission decisions are made on a rolling basis, with those admitted able to enroll and start the J.D. curriculum at the start of each subsequent semester. Despite a well-publicized drop in law school applications, CSUSOL's enrollment has remained steady and, over the past three years, it has experienced larger first-year classes. As a result, the law school's J.D. enrollment is up over 40%, going from a total of 26 students in 2013 to 38 enrolled in 2015, although 65% of its enrollment consists of students in their first year of study.

**(H) Library: The law school must maintain a library compliant with the minimum requirements set by the Committee. (Guidelines 6.1-6.5)**

As a correspondence law school offering its curriculum exclusively online, CSUSOL offers each of its students access to a compliant electronic library containing all mandatory legal resources and research services. With their admission, students (and all faculty members) receive personal accounts with and have 24/7 access to both Lexis/Nexis and Westlaw. Each of these online databases provide access to all materials required by Guideline 6.2 and, in addition, they offer students additional study aids and resources such as CALI, a non-profit, student-oriented consortium of law school resources that develops and posts online academic support materials.

As required by Guideline 6.3, students receive instruction in legal research and writing. In the second and third semesters of their first year of study, students are required to take two classes in legal writing; in their second year, a class in legal research, which offers instruction in both online and hardcopy research, which requires students to go to a hardcopy law library to complete at least one research exercise.

**(I) Physical Resources: The law school must have physical resources and an infrastructure adequate for its programs and operations. The law school must, at a minimum, maintain its primary administrative office in the State of California. (Guidelines 7.1 - 7.2)**

The law school operates within a large suite of offices it shares with the University. Together they occupy space in a modern office building located in a commercial office park. The law school has the use of an appropriate number of offices needed for Dean Sampong, Associate Dean Agaton and all other law school administrators and staff. All offices, meeting and file rooms used by law school are well-equipped and provide more than adequate support for its J.D. curriculum and all student services provided. In regard to its anticipated future growth, the University is expected to continue supporting the law school with all necessary facilities and equipment as needed.

As a University offering a wide range of undergraduate and graduate programs, CSU has invested heavily in developing and maintaining a state-of-the art online teaching, computer data center and video-recording facility. All of the law school's online teaching functions, including class message boards and video-taped curriculum content, are developed and produced by the University's staff using its extensive electronic resources. Each of these systems and all of the technology needed to support its online programs are well protected by various systems and support personnel who are able to address and correct any technology-related problems in the shortest time possible.

**(J) Financial Resources: The law school must have adequate present and anticipated financial resources to support its programs and operations.** (Guidelines 8.1 - 8.3)

As one of the constituent schools of CSU, CSUSOL operates as part of a for-profit, California corporation. As such, all of the financial statements submitted by the University to the Committee, both annually and as part of the law school's self study, are independently audited by a certified public accountant.

As reported in the CSUSOL 2015 Annual Compliance Report, at the end of calendar year 2014, the University reported total assets of \$12.9 million, shareholder equity of \$8 million, a cash balance of \$380,000 and net income of \$1,092,000. Apparently, due to sizable operating losses in past years, the University is able to offset its current net income by carrying over approximately \$18.7 million in deductible net operating losses.

Given its corporate structure and reported financial assets, liabilities and resources, it appears that the University and the law school are financially solvent. CSUSOL is able to provide its students with a sufficiently supported and sound program of legal education and, when necessary, to provide prompt tuition refunds when requested.

**(K) Records and Reports. The law school must maintain adequate records of its programs and operations.** (Guidelines 9.1)

All student enrollment records and transcripts are maintained in a combination of hard copy files and computerized records. All hard copy records are stored in locked file cabinets, including a number that are fireproof. Consistent with Guideline 2.11, all electronically-stored files and records are securely maintained, subject to appropriate password protection and properly secured by state-of-the-art procedures.

All law school records were found to be compliantly maintained under a document retention policy adopted and enforced by the University. Consistent with this policy, and as confirmed by a review of the law school's records during the initial inspection, it maintains all records and transcripts required by Guideline 9.1(A) – 9.1(O). They included files containing all applications received, class syllabi 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 final 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.

A sample review of randomly selected student files confirmed that they are compliantly maintained; each was found to contain a comprehensive checklist of all required records, transcripts and admission information required by Guideline 9.1(C). The files reviewed contained signed student disclosure statements required by Rule 2.241 and the official undergraduate transcripts and other admission materials for each student enrolled. The file of a transfer student admitted with prior law school study was found to be supported with the appropriate memorandum signed by Dean Sampong.

The review of all faculty files confirmed that all compliantly maintained by containing proof of the faculty members' credentials and qualifications, copies of their law school transcripts, proof of their admission to practice law and copies of their 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. The law school maintains compliant files containing its Annual Compliance Reports and admission certificates.

**(L) Equal Opportunity and Non-Discrimination: Consistent with sound educational policy and these rules, 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. (Guidelines 10.1)**

CSUSOL is compliant with this registration requirement. As reported in its 2015 Annual Compliance report, its enrollment is quite diverse with 38% (16/38) of its J.D. student enrollment identified as being in a member of a minority population (African-American, Hispanic, Asian, American Indian) while in regard to gender, 60% of students are women.

As to its faculty, the law schools is similarly diverse. Of the 15 part-time adjunct professors as among its faculty for the 2015-2016 academic year, 46.6% were identified as being non-White. As to its gender diversity, the CSUSOL faculty is even more diverse with 66.6% (10/15) of its professors being female.

In regard to its administrative and educational operations, the law school has adopted and is operating compliantly with all state and federal laws that protect the rights of both students and faculty from unlawful discrimination and promote equal opportunity. Both in its catalog and faculty handbook the law school expressly confirms that it maintains a policy that bars all forms of unlawful discrimination in the recruitment and admission of students and in the hiring, retention and promotion of faculty.

**(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.**

CSUSOL is both diligent and timely in its efforts to comply 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 each November 15<sup>th</sup>, as well as the regular submission of its Admissions Certificates confirming the identities and qualifications of the J.D. student it admits.

The law school also has a history of compliantly seeking the prior approval of the Committee before making a major change to its operations or curriculum. Most recently, as noted above, the law school in 2016 sought and received the Committee's prior approval to offer two additional Master's degree programs.

Finally, in preparing for its periodic inspection, the law school's Dean and administration staff compiled a comprehensive and timely self-study that provided assistance in the evaluation of its operational compliance as to all relevant *Guidelines for Unaccredited Law School Rules*. During and after each of the inspection visits, and while this Report was being prepared, the Dean Sampong was prompt in providing additional and updated information and responses to inquires relating to the current operational status of various scholastic, academic and operational matters.