

# **ST. FRANCIS SCHOOL OF LAW**

## **PERIODIC INSPECTION REPORT**

Inspection conducted on September 7-8, 2016

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

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A Registered, Unaccredited Distance-Education Law School

**EXECUTIVE SUMMARY AND RECOMMENDATIONS**

An inspection of the St. Francis School of Law (“SFSOL”) was conducted over a day and a half, September 7-8, 2016, by Sally Perring, Educational Standards Consultant (“Consultant”). This was the law school’s first, five-year periodic inspection since its founding and registration by the Committee of Bar Examiners (“Committee”) in 2011. After opening and following its initial enrollment of students, SFSOL was subject to an interim inspection in 2013, during which it was confirmed that the school was operating compliantly.

SFSOL is a registered, unaccredited, distance-learning law school with administrative offices located in Newport Beach, California. Its stated mission is “to produce graduates who are capable of practicing law immediately upon graduation through an accessible, high quality program that emphasizes practical skills.” At the time of the inspection it had an enrollment of 49 students and charged tuition of \$36,000 to earn a J.D. degree

Since its founding in 2011, SFSOL has experienced a number of important changes. In 2013 it was acquired by Baker College, a regionally-accredited, private, non-profit undergraduate and graduate academic institution located in Flint, Michigan, which resulted in the law school’s conversion from a for-profit into a non-profit entity. In May 2014, it appointed a new Dean with extensive prior academic and administrative experience and the law school’s administrative offices were relocated from Northern California to Orange County. Its first students were enrolled in September 2011, who then graduated in May 2016 and were the first to take the California Bar Examination (CBX) this past July. As a distance-learning law school, SFSOL’s curriculum is taught through a combination of synchronous, online classes and asynchronous written work product.

As confirmed by the inspection, and with only minor exceptions, SFSOL was found operating compliantly with the Committee’s *Unaccredited Law School Rules* (Rules) and its *Guidelines for Unaccredited Law School Rules* (Guidelines). The law school offers its students a sound program of legal education taught by a very well-qualified faculty led by a dedicated, experienced and capable full-time administrator, Dean Carole Buckner. SFSOL’s admissions policies, along with its scholastic and academic standards are found to be compliant since it strives to admit, educate and then produce only those graduates who are expected to pass the CBX.

While it awaits the CBX pass rate for its first class of graduates, SFSOL is proud to report that, since its founding, its students have achieved a cumulative pass rate on the First-Year Law Students’ Examination (FYLSX) of 65.38%. This rate also appears to be

improving further given the results of a recent cohort of first-year students who achieved a pass rate of 87.5% (7/8) on the October 2015 administration of the FYLSX.

**Recommendation:**

It is recommended that the Periodic Inspection Report of SFSOL prepared by the Educational Standards Consultant be received and filed; that the recommended, mandatory and suggested actions listed below be adopted; that subject to confirmation within sixty days after the Report is received by the Committee that the law school has taken sufficient efforts to address and correct the mandatory actions listed, registration of the SFSOL be continued; that the law school consider the Recommended, Suggested Actions noted below; and that its next periodic inspection be scheduled for the spring of 2021, unless the Committee determines an earlier inspection is required

**Recommended Mandatory Actions:**

- 1) To comply with Guideline 2.9(B)(2), the law school must adopt and publish a Pass/Fail grading policy in order to provide students proper notice as to when a course will be offered and then graded on a pass/fail basis;
- 2) To comply with Guidelines 2.9(B)(6), 2.9(B)(7) and 5.19, the law school must revise its academic policy to provide students with proper notice of when they are subject to academic disqualification or academic probation and, if placed on probation, when they will be allowed to remain enrolled while on probation; and
- 3) To comply with Guidelines 2.9(G) and 2.9(H), the law school must adopt and then publish a compliant grade review policy that provides students the right to have all such appeals heard and decided by a compliant committee of faculty.

**Recommended Suggested Actions:**

- 1) To achieve better compliance with Guidelines 2.9(B), 5.17, and 5.25, the law school should review and revise its current grading standards to provide students with better defined distinctions between grade averages at minimum good standing, above-average and superior academic performance so that both students and faculty are better able to differentiate each such performance and to offers students a more clear distinction between class performance and success on the FYLSX and, eventually, CBX;
- 2) To achieve better compliance with Guidelines 5.26, and 5.27, the law school should review and reconsider continuing its current admissions policy, which grants the Dean discretionary authority to rescind the admission of and dismiss any student without cause, within ten weeks of starting classes.

### **Submission of a Self-Study:**

As required by Unaccredited Law School Rule 4.243, SFSOL submitted a timely self-study to assist in the assessment of its compliance with the Rules and Guidelines. As submitted, the self-study was well drafted, comprehensive and organized to address all items appearing in the general instructions for preparation of a self-study. In response to questions and issues that arose after the inspection, Dean Buckner was both very prompt and helpful in providing additional information needed for this report.

### **Conduct of Site Visit:**

The site visit took place over two days, September 7 and 8, 2016. On the first day the Consultant toured the administrative offices and met with the Dean Buckner about the information set out in the self-study. The consultant then met with Dr. Bart Daig, President and CEO of Baker College, Dr. Jill Langen, Chief Academic Officer for Baker College, along with Dean Buckner. Though a series of remote and face-to-face meetings, the Consultant spoke to administrative staff involved in technology and support, recordkeeping, as well as with members of the SFSOL faculty and its advisory council.

The Consultant also met with Dean Buckner and full-time Professor Karen Travis, who both teaches and provides students with academic support. On the second day, the Consultant reviewed student files and transcripts, student study logs, class syllabi, final examinations and student answers, faculty and administrative files and the minutes of faculty meetings. To conclude the inspection, an exit interview with Dr. Daig, Dr. Langen, Prof. Travis, Registrar Tammy Carr and Dean Buckner took place during which the Consultant's findings, observations and probable recommendations were discussed.

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

#### **(A) Lawful Operation. The law school must operate in compliance with all applicable federal, state, and local laws and regulations. (Guidelines 1.9)**

As a subsidiary of Baker College, SFSOL operates as a non-profit entity, doing so under a current business license issued by the City of Newport Beach. SFSOL has adopted and maintains compliant policies to protect student privacy and confidentiality and it appears compliant with its obligations under the American with Disabilities Act (ADA) in offering and providing students with physical disability accommodations.

The law school has an appropriate student discipline policy to deal with any inappropriate online behavior. Since it is a distance education law school, however, there are other policies, such as a substance abuse policy, that are really not needed. As a non-profit entity, the law school operates as a 501(c)(3) tax-exempt entity.

**(B) Integrity. The law school must demonstrate integrity in all of its programs, operations, and other affairs. (Guidelines 2.1, 2.2, 2.3, 2.8 - 2.12)**

SFSOL demonstrates honesty and integrity throughout its operations, policies, procedures and in how it communicates with the public, applicants and its students. The law school maintains compliant policies regarding tuition refunds, student discipline and it uses proper financial safeguards and state-of-the-art online technology to protect the integrity of its financial and technological operations. It has prepared and provides students with a compliant Rule 4.241 student disclosure statement; copies of which are posted on its website and catalog; the form, content and information provided in its statement are compliant as is the enrollment agreement.

The law school is compliant with the mandatory disclosure notice required by Guideline 2.3(D). As found on its website and within its admission application form and enrollment form, the notice is, as required, reproduced “without alteration.”

The law school’s academic policies are compliant. It maintains appropriate academic standards, enforced through sound grading policies and good standing requirements. Except for its first-year students, academic good standing is a minimum grade point average of 3.0. To achieve good standing in their first-year, students are required to attain a GPA of 2.75 for their first 16 units of study, and then a GPA of 2.87 for the next 16 units of study.

The law school’s probation policy is strictly enforced, mandating probation for any student who fails to achieve a cumulative GPA of 3.0, or the lower, minimum standard required for first-year students. If students on probation achieve overall good standing during the following quarter, their probationary status is ended; if they achieve good standing within a quarter, but their cumulative GPA remains below good standing, they are permitted to continue on probation. The SFSOL probation policy however, permits the Dean to deny probation to any student “whose level of achievement makes it inadvisable for the student to remain enrolled.” While Dean Buckner indicated she has never denied probation on these grounds, it does allow for the dismissal of students without clear and definite academic standards and, as such is not compliant with the requirement of Guideline 5.19, which provides that a “law school must have a written policy clearly defining academic standing, academic disqualification, [and] advancement in good standing.”

Given this omission, it is recommended that the law school be required to revise and adopt a new academic policy that sets out definitive, minimum cumulative GPAs that will subject students to probation and then academic disqualification compliant with the requirements provided in Guideline 5.19.

The current SFSOL grade review policy is also in need of revision to become compliant. Currently, the policy as published provides that the final decision in any grade appeal is the final decision of the Dean, who “may” consult with other faculty members. The faculty minutes confirmed there is an Academic Affairs Committee that appears capable

of handling such appeals. As required by Guidelines 2.9(G) and 2.9(H), all such grade appeals and all final decisions are to be decided by a faculty committee. It is therefore recommended that the law school revise its grade review policy to be compliant with these Guidelines.

Policies and procedures compliantly authenticate student work, syllabi provide students with a statement for the basis for the final grade, and the catalog provides a statement of student services. The school has an excellent, proactive system of student support, ensuring each motivated student has the best opportunity to succeed.

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

SFSOL is well governed under the leadership of Baker College and Dean Buckner. She is qualified as the law school's full-time, onsite administrator; she received her J.D. degree from Hastings College of the Law and has years of legal experience in both public and private practice, working in both private law firms and as a federal prosecutor. Her prior academic experience includes teaching at the ABA-approved, Western State College of Law; and she later served as dean and chief academic officer of the Abraham Lincoln University School of Law and at Concord Law School as the academic dean, both of which are registered, unaccredited law schools.

Many of Baker College's resources are made available to and used by the law school, which includes providing necessary administrative support to SFSOL. The College lends its academic expertise to support SFSOL's curriculum and the communication between Baker's staff and the SFSOL administration is constant through conferences held both online and by telephone, as well as regular visits by Dean Buckner to Baker's home campus and by Baker administrative personnel visiting SFSOL's administrative offices. Despite such support, the law school technically operates independently of the College given the 2014 decision of Baker's accreditor, the Higher Learning Commission (HLC), not to permit the law school's Juris Doctor degree program to be assimilated into the College's curriculum. As a result, the law school is not a part of Baker's educational program, nor is it accredited by the HLC.

The law school's governance also benefits from being under the supervision of both a Board of Trustees and in having an advisory council comprised of practicing California attorneys. The five-person council meets twice a year to provide practical insight and suggestions to Dean Buckner in how to improve the SFSOL program. Its members are all licensed attorneys.

The Consultant had the opportunity to meet personally with several of Baker's senior academic officers and administrators including Dr. Bart Daig, President and CEO of Baker College, who also serves as SFSOL's President. Dr. Daig has extensive experience in developing and running well respected, online educational programs. His enthusiasm and commitment to the law program was obvious. Dr. Jill Langen, Chief

Academic Officer, was also present during the inspection. She oversees the system of assessment used by Baker for all of its schools and colleges including SFSOL.

**(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)**

SFSOL is well administered by Dean Buckner. As noted, she joined SFSOL with many years of prior academic and administrative experience as a law school dean, administrator and professor of law. Dean Buckner is assisted by Professor Karen Travis, a faculty member and SFSOL's Director of Academic Excellence, and by Tammy Carr, SFSOL Registrar, who works on the Baker campus in Flint, Michigan.

As confirmed by the record of its minutes and agendas, SFSOL holds regular faculty meetings, conducted online, to ensure that each professor is fully informed of all academic policies and procedures and its current and future curriculum. During such meetings, ideas and suggestions regarding changes and improvements are discussed and, as confirmed by Dean Buckner, input from the entire faculty is strongly encouraged. To provide regular feedback from students, Dean Buckner conducts a "town hall meeting" several times a year to discuss issues of concern and interest to all of the students.

Individual faculty members interviewed by the Consultant were all clearly engaged and enthusiastic about the SFSOL curriculum. All courses have standardized syllabi to ensure that regardless of which professor teaches a particular course, the same, required material will be covered. Faculty members who wish to develop new courses receive guidance from the Dean and are encouraged to do so and to use a well-developed course development process. All new faculty members are required to complete an online course that instructs them in both the technical capabilities of the SFSOL online platform but also in how to teach law online effectively. Finally, all members of the faculty participate provide input regarding academic policy.

Faculty hiring procedures involve the faculty, Dean Buckner and the senior administrators at Baker. All new faculty members are required to complete an online course that instructs them in both the technical capabilities of the SFSOL online platform, but also in how to teach law online effectively and to grade consistently with the law school's standards. SFSOL utilizes a standardized form to collect student evaluation of faculty effectiveness at the end of each class.

Based upon their individual legal education and professional experience, the quality of the SFSOL faculty is impressive. As listed on its website, all SFSOL professors earned their respective J.D. degrees from a wide array of ABA-approved law schools, including Stanford Law School, University of Michigan School of Law, U.S.C. School of Law, U.C.L.A. School of Law, Pepperdine University School of Law, George Washington University School of Law and Loyola University School of Law, among others. Most

also have extensive professional experience and expertise in the areas of law which they teach, and have either prior or concurrent law school teaching experience.

Members of the faculty receive regular evaluations. In addition to those from students, each is evaluated by Dean Buckner. As discussed, she individually observes all new and existing faculty members while teaching their respective classes. She mentioned that she promptly checks on any faculty member whenever there is a student complaint. Since its acquisition by Baker College, the law school has adopted a set of written procedures, as required by Guideline 4.8, to carry out all of its faculty evaluations.

Faculty independence is protected by means of a compliant academic freedom policy.

**(E) Educational Program. The law school must maintain a sound program of legal education. (Guidelines 5.1-5.16)**

SFSOL's J.D. degree program of legal education, offered through a four-year, online curriculum, is compliant. The program is designed so that a student must complete no fewer than the 864 hours of study and preparation annually for a minimum of four years, which is the minimum required by statute. Students at SFSOL meet this requirement by completing a set curriculum of required and elective courses. To confirm their class participation and study, students are required to maintain and submit logs and each is monitored weekly to ensure timely progress and completion of all required coursework.

The SFSOL J.D. program consists of a combination of synchronous and asynchronous class-related instruction. Students are required to attend and participate in live "classroom" sessions and then must also complete a series of "asynchronous" activities. Individual classes are limited to 15 students to maximize student/faculty engagement. Through the use of WebEx, an online teaching platform widely used by many online business entities, professors are able to see and then call on all of their students and students are also able to text questions to their professors during class. The SFSOL curriculum contains required classes that cover all subjects tested on the CBX, along with a growing list of elective courses, most emphasizing practical skills.

To complete various writing and other class assignments, students use another program, Blackboard, to submit their work product. All final examinations are proctored using a feature provided by WebEx. The law school, however, has contracted with a vendor, RPNOW, that has developed software that both authenticates each student's identification and records students, both thorough audio and video technology, while they take their examinations. The RPNOW program is widely used at many universities and colleges. At SFSOL, this program is being used only in classes offered after the first year but is expected to be used by all students soon.

While the school has compliant materials for doing a clinical externship, as of the writing of the self-study, no student had utilized the course.

Faculty members are required to counsel students, and students are able to interact with faculty before, during and after class. Online chat rooms allows for additional student interaction with the faculty. During the inspection, several faculty members confirmed that some have even had physical meetings with students in both San Francisco and Washington D.C., while each of the students to whom the Consultant spoke with reported having an excellent rapport with both the faculty and the Dean. Student responses to a confidential email request submitted and reviewed by the Consultant uniformly contained praise for the faculty, program and administration and it obvious that students are well supported by SFSOL in their efforts to become attorneys.

**(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)**

SFSOL has adopted and enforces compliant scholastic standards. Each student's academic good standing is evaluated on a quarterly basis and, as such, the law school is compliant in its efforts to identify, as early as possible, those who may not be qualified to continue their enrollment. In such cases where a student is identified as being at risk of dismissal, the law school offers counselling and academic support immediately. Appropriate academic dismissals take place as early as possible. Students who do not pass the FYLSX are permitted to enroll in second-year classes, which is permitted under the Rules and Guidelines.

All first-year students are required to take a ten-week FYLSX preparation course and their certification to take the FYLSX is dependent upon their adequate performance during the preparation course. The course has undergone several revisions over the course of the last five years in an effort to make it more effective. Such efforts have clearly succeeded given the pass rates that SFSOL students have achieved on the FYLSX since the first students took the examination in October, 2012.

**FIRST-YEAR LAW STUDENTS' EXAMINATION PASS RATES:**

Exam Date:	All Takers			First Time			Repeat		
	Took	Passed	% Passed	Took	Passed	% Passed	Took	Passed	% Passed
12-Oct	3	1	33.30%	3	1	33.30%	NA	NA	NA
13-Jun	3	2	66.60%	2	2	100%	1	0	0%
13-Oct	6	2	33.30%	4	0	0%	2	2	100%
14-Jun	3	1	33.30%	2	1	50%	1	0	0%
14-Oct	4	2	50%	3	1	33%	1	1	100%
15-Jun	5	1	20%	4	1	25%	1	0	0
15-Oct	12	8	66.60%	8	7	87.50%	4	1	25%
16-Jun	14	8	57.14%	10	5	50.00%	4	3	75%

A review of grades and examinations confirmed that SFSOL's academic standards are maintained at a very high level. Final examinations are typically a combination of multiple-choice questions with one or two essay questions. Essays are graded using a detailed skills rubric with a weighted average of four scores: issue spotting, correct and complete recitation of relevant law, reasoned analysis and communication skills. Individual scores and comments are given to students once examinations are graded.

Professors use a variety of methods to provide additional feedback, including specific feedback to individual students through individualized rubrics and the use of model answers. This unique and labor-intensive method of examination grading is unique among unaccredited law schools and has clearly produced a high correlation between a student's first-year cumulative GPA and the student's first-time pass rate on the FYLSX. As its students start taking the CBX, SFSOL should continue using such rigorous grading practices to produce a similarly high correlation between cumulative grade averages and success on the CBX.

As noted above, however, the law school's published standard for good standing is somewhat difficult to discern. For students enrolled after the first year, a cumulative GPA of 3.0 or a B average is required. As a result, students with a C or even a B-average are not in technical good standing. However, as described, a grade of C is considered acceptable and satisfactory, which is contrary to what is normally defined as good standing, while a the grade of B usually denotes an above-average mastery of a subject.

While it is not recommend that the law school's faculty start grading at a lower standard, SFSOL's current, academic good standing policy is somewhat ambiguous and appears to make it difficult for both students and the faculty to distinguish a truly superior student from one in current good standing with a 3.0 GPA from one barely passing with a C or C- average. Since grade correlations with the FYLSX confirm that those with a GPA of below a 3.2 are less likely to pass the first time, while those with a 3.5 or above are very likely to pass on the first try, the Dean and faculty should review and revise the current grading scale and standard of good standing to better inform students of their academic performance throughout the curriculum.

While first-year classes emphasize examination writing skills, all courses after the first year contain a wide variety of writing exercises that emphasize practical skills. In addition to several legal writing and drafting courses, students are given extensive experience in drafting and editing a wide array of professional documents related to the substantive law being taught in each course. For example, Real Property students draft mock client letters, draft real property documents and do actual title searches; Civil Procedure students draft civil complaints and motions. In doing so, students gain not just basic legal knowledge, but real practical skills that are needed in the practice of law. To provide additional mastery of such skills, students receive timely feedback on each such exercise. Given a maximum class size of 15 students, professors are able to give each student a significant amount of individual attention and substantive feedback.

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

SFSOL maintains a sound admission policy well above what is needed to be compliant. The law school admits only those who have earned Bachelor degrees from accredited colleges or universities and graduated with a GPA of at least 2.5. The law school will no longer admit any special students and all foreign students must demonstrate mastery of English proficiency at a college level. An applicant's pre-law transcripts must be submitted to the law school before an admission decision is made.

The application requires applicants to disclose any prior law study and the law school will not admit to an advanced level any student with prior law study who was academically dismissed. For transfer students otherwise in good standing, the transfer policy requires that the student have received a "B" in any course accepted for transfer.

SFSOL does not require that applicants take the LSAT. Applicants must, however, submit an essay explaining their background and reasons for pursuing a law degree. Applicants who meet admission requirements are interviewed to discern their capabilities, motivations, and whether they have the time to complete successfully the program. The limitations on receiving a J.D. degree from a registered school are explained to them as well. Notes from the interview as well as the remainder of the admission file are then considered by the admission committee, which consists of Dean Buckner and Professor Travis. Together they look for and consider all indicia of future success in law school, paying close attention to the writing abilities of each applicant.

As confirmed by its Admission Certificates, the law school has been successful in enrolling students from a wide-array of public and private universities, including Northwestern University, the University of Michigan, U.C. Irvine and San Diego State University. A significant number of those admitted have earned graduate degrees (including Ph.D. degrees) from institutions such as the University of Chicago, the University of Southern California and U.C. Berkeley. Once admitted, all first-year students must take and pass a non-credit, three-week orientation class, which covers not only preliminary law school skills but also technological capabilities and time commitment required to complete the SFSOL curriculum.

The admission policy also contains a unusual provision that allows Dean Buckner, for any reason, to rescind the admission (with full return of tuition and fees) of any student within the first 10 weeks after the start of their classes. The Dean confirmed that she has never rescinded the admission of any student. Because this policy is not supported by any reasonable basis and offers no set standards, however, its broad discretion

appears to be unnecessary and subject to arbitrary application. As such, the need for such a policy should be reconsidered.

**(H) Library. The law school must maintain a library consistent with the minimum requirements set by the Committee. (Guidelines 6.1, 6.2, 6.3, 6.5)**

As a distance learning law school, the law schools offers its students a compliant, electronic library that permits access to all required legal texts and authorities. It does so by providing each student an account that offers 24/7 access to the Lexis/Nexus online system. The law school also offers students the support of an online, law librarian, Mr. Patrick Mullane. Students receive instruction and have multiple opportunities to use the library, including extensive use of the online practice materials in their upper division courses. Given the online nature of the program, students are not currently offered any instruction in the use of a physical, hardcopy law library or legal research.

The law school's expenditures for its library are adequate and are part of the Baker College budget. All required texts and hornbooks are kept in the Dean's office on site.

**(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 physical resources used by SFSOL are compliant and adequate. The law school operates from a suite of commercial offices in Newport Beach, California. The offices used by Dean Buckner and Professor Travis were spacious and additional office and conference room space adjacent to their offices are available on an as-needed basis.

All of the law school's technological equipment and support comes from Baker College, which provides technical support staff to ensure that student and faculty needs are met while online classes are in session. Online tutorials for both students and faculty are available for those having any on-going technological challenges.

**(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)**

The law school's financial resources appear adequate and compliant since they are now a part of the Baker College budget. While no separate budget for the law school exists, Dean Buckner confirmed that while the law school is currently not currently operating at a profit, any and all revenue deficits are covered by Baker College, which has committed a sum of at least \$2,000,000 to support SFSOL for the time needed for it to be able to grow its enrollment so that it begins operating with a net profit.

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

A review of SFSOL's files confirmed that it maintains all required records and files compliantly. All files, transcripts, class records, grades and examinations are kept electronically, as are all administrative and faculty files. SFSOL has adopted an excellent operating procedure for student recordkeeping to ensure full compliance with Guideline 9.1. Applicant files were found to contain all the required materials, including correspondence or notes on any conversations. Student files contained all needed material and memoranda. All student transcripts were found to be compliant.

Faculty meeting agenda and minutes were available electronically. Faculty and on-site administrative personnel files were available for the site visit as well. These files are kept only with the human resources department at Baker College and not regularly available on site. All faculty files contained both transcripts of law schools and faculty evaluations, as well as a history of classes taught. All faculty files are maintained electronically and each reviewed was found to be complete and compliant.

Committee correspondence is kept both digitally and physically. All other committee business reports were also available.

**(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)**

The law school appears compliant with Guideline 10.1. As reported, 30% of its 2016 enrollment was identified with a minority race or heritage, while 57% of its students were female. However, its faculty is less diverse with only 15% of those currently teaching are identified as non-white.

There is no indication of discrimination and there appears to be equal opportunity for all.

**(M) Compliance with Committee Requirements. 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. (Guidelines 11.1-11.5)**

Since its founding, SFSOL has been diligent and timely in its efforts to comply with the Committee's mandatory reporting requirements. 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. students it admits.

The law school has a history of compliantly seeking the prior approval of the Committee before making a major change to its operations or curriculum. Most recently, the law school in 2015 sought and received the Committee's prior approval to move its administrative offices from its former location in Irvine to Newport Beach.

Finally, in preparing for its periodic inspection, the law school's Dean and its entire administrative 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 the inspection, Dean Buckner 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.