

REPORT OF THE WSCUC VISITING TEAM SEEKING ACCREDITATION VISIT 1

For Institutions Seeking Initial Accreditation

California Western School of Law

September 10-13, 2018

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The team evaluated the institution under the WSCUC Standards of Accreditation and prepared this report containing its collective judgment for consideration and action by the institution and by the WASC Senior College and University Commission. The formal action concerning the institution's status is taken by the Commission and is described in a letter from the Commission to the institution. Once an institution achieves either candidacy or initial accreditation, the team report and Commission Action Letter associated with the review that resulted in the granting of either candidacy or initial accreditation and the team reports and Commission Action Letters of any subsequent reviews will be made available to the public by publication on the WSCUC website.

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SECTION I – OVERVIEW AND CONTEXT

A. Description of Institution and Visit

Located in San Diego, the California Western School of Law (CWSL) is one of a dozen independent law schools in the country that are fully accredited by the ABA (since 1962) and is a member of the American Association of Law Schools (since 1967). Founded in 1924 as the Balboa Law College, it later evolved into Balboa University, closing the law school in 1946. Balboa University became CWSL University in 1952, reopened its law school in 1960; the university became United States International University in 1968 and the law school separated from it in 1975, and it has been independent ever since.

The law school has 685 full-time students in its JD program and 100 students in its LLM, MCL, and Maestria programs, and 12 “others” (including visitors). The full-time faculty numbers 34, with 85 adjunct faculty and 92 staff members. The law school offers joint JD/MBA and JD/MSW degree programs with San Diego State University, LLM/MCL programs for foreign lawyers, and an Online LLM Program in Oral Advocacy for Spanish-speaking attorneys. It also has an LLM program in Trial Advocacy which is not currently offered.

CWSL is seeking WSCUC accreditation after being granted eligibility effective January 5, 2017 in hopes that it will improve the marketability of its graduate legal programs and increase the resources available to students, especially federal student loans. The school also sees the value in developing more robust assessment methodologies that will improve its educational programs. CWSL is committed to implementing best practices in legal education.

The WSCUC team visited the San Diego campus September 10 - 13, 2018. The institution’s hospitality to the team was greatly appreciated.

B. The Institution’s Seeking Accreditation Visit 1 Report: Alignment with the Letter of Intent and Quality and Rigor of the Review and Report

The team found the Seeking Accreditation Visit 1 Report to be consistent with the Letter of Intent. CWSL made efforts to address each of the seven areas of concern (Criteria 7, 8, 9, 11, 13, 14 and 11 & 14 together) outlined by the WSCUC Eligibility Review Committee in the January 18, 2017 Eligibility Action Letter which found CWSL to have met the 16 Eligibility Criteria at a sufficient level. Section 3 of the Seeking Accreditation Institutional Report clearly outlined basic steps taken to address these issues, and the institution's response under the standards provided further evidence of attention to these key areas.

Overall, the team found the report to contain a broad scope of sincere reflections on the institutional changes CWSL faces as they seek accreditation. Participation from every level of the CWSL leadership and faculty seems to have had appropriate input in and engagement with the accreditation process to date. The current president/dean is stepping down in 2020 and as the board and faculty look toward the search for a new president/dean, all manner of issues related to governance and administration will be reviewed. Numerous steps have been undertaken to address financial resources and accountability as the law school has faced the severe pressures placed on all institutions of legal education in the past ten years. Strategic planning is a matter for discussion at the institution. It is evident that assessment is in the very beginning phases for while there was some discussion of program review, no evidence was available at the time of the site visit. The need for disaggregated data associates with the need for a more robust institutional research functionality and the law school is pondering the best way to meet this need.

The institutional report was well organized and clearly written to provide the team in advance of the visit a helpful introduction to the conditions of the institution. Each standard and CFR was addressed, available supporting documents were embedded and provided as appendices, and discussion of each standard ended with a section on synthesis and reflections that demonstrated the institution's understanding of the significance of their responses. Evidentiary support was somewhat uneven. The school lacks some of the formalized infrastructures necessary to demonstrate initial accreditation; however, interviews during the visit indicated that CWSL is becoming increasingly aware of the work that will need to be done to continue to build educational effectiveness, support systems of quality improvement, and ensure student learning and success.

The report was transparent in its portrayal of the law school's progress towards addressing the concerns of accreditation, and CWSL seems aware of issues of compliance. The report

appropriately highlighted several of the institution's strengths, and some institutional weaknesses.

The team members were impressed at the generally positive attitude towards the process of seeking accreditation exhibited by everyone they talked to during their visit. A check of the WSCUC confidential email account established for this visit revealed 16 communications from alumni who were very positive about the quality of legal education they received from CWSL. Two emails expressed concerns about specific aspects of CWSL but neither email rose to a level to require further investigation.

C. Response to Issues Raised in the Eligibility Review Committee Letter

The Eligibility Review Committee (ERC) made seven specific recommendations. CWSL responded to each. The team found that each of the recommendations was addressed at a basic level, and further analysis and discussion can be found in subsequent sections of this team report.

1. Criterion 7. Governance and Administration – "... Although the Board is evaluating the Dean/President on a regular basis, the panel recommends that this Board obligation be added to the bylaws."

According to the institutional report, the corporate bylaws now require periodic reviews of the dean at intervals not to exceed three years. The trustees discussed their intention to utilize a 360-degree review during these period reviews, which is laudable. The team suggests that the board consider revising this intended practice to include an annual evaluation of the president. According to the Association of Governing Boards, assessing the president is one of the board's most important responsibilities, and an annual assessment is recommended. A 2009 AGB survey found that annual presidential assessment is a well-established practice, with 86 percent of all institutional boards conducting these assessments.¹

C.2. Work to eliminate budget deficits; and

C.3 Include timeline and budgets in strategic plan

The Eligibility Review Committee (ERC) indicated in its initial assessment that CWSL's application "did not contain a plan with timelines for how CWSL plans to reverse this trend [of budget deficits]. On the call, plans to reduce the discount rate, to diversify revenue streams and

¹ AGB Governance Brief "Annual Presidential Assessment", <https://www.agb.org/briefs/annual-presidential-assessment>

increase development efforts were mentioned as possible solutions. By the time of SAV1, the institution will need to make progress in eliminating budget deficits and provide a detailed and realistic plan with timelines.”

As discussed in greater detail in the team’s evaluation of CFRs 3.4 and 3.5, CWSL has developed a plan to balance its budget using a set of reasonable assumptions and timelines that appear achievable. Their plan does not assume growth in JD enrollment but instead addresses the deficit through a combination of gradual declines in the tuition discount rate coupled with annual fee increases of 3.5%. The amount of budgetary relief forecast from revenue growth from non-JD programs (e.g., fundraising, grants and contracts, LLM and masters programs) is appropriately minimal as these revenue flows are largely untested.

CWSL has demonstrated progress in reducing operating deficits. The approved budget for 2017-18 programmed a budget shortfall of -\$5.5 million. At year end close on July 31, 2018, preliminary, unaudited figures indicate a deficit of -\$2.8 million; a result of lower than projected operating expenses, favorable investment returns and higher than anticipated student fee revenues. CWSL’s Five Year Budget Projections forecasts a budget that is substantially balanced, with an operating deficit of -\$147,000 (-0.6% of net revenue) by 2019-20 with surpluses resuming in years following. Further ameliorating concerns as to financial sustainability is CWSL’s budget practice of including in its spending plan depreciation, a noncash expense, which averages \$1.8 million annually. Earmarking revenues for the future renewal of the physical plant is a financially prudent practice although its inclusion in the operating budget, while conforming to accounting standards, does amplify the presentation of operating loss.

C.4. Continue developing a comprehensive approach to educational effectiveness

The Eligibility Review Committee (ERC) recommended that CWSL “continue developing a comprehensive approach to educational effectiveness through development of curriculum maps, assessment of learning outcomes, ‘closing the loop’ approaches for making improvements on the basis of assessment results, and development of a comprehensive program review process.” CWSL has developed program learning outcomes for the JD, the LLM/MCL, and the Maestria en Litigacion degree programs. An assessment schedule has been developed for the JD degree program with plans to assess two of the twelve program learning outcomes in the

2017-2018 academic year. The JD curriculum map was provided during the site visit. The LLM/MCL and the Maestria en Litigacion Oral programs' curriculum maps were not produced. The team observed that the JD program has yet to complete an assessment cycle. The assessment of learning outcomes for the LLM/MCL and the Maestria en Litigacion Oral programs have not begun. The team found this area in need of continued attention, particularly the development of a program review and inclusion of the Maestria en Litigacion Oral and the LLM/MCL programs in the assessment process. The educational effectiveness and assessment of student learning outcomes are further discussed under Standards two and four.

C5. Explain faculty governance model

The Eligibility Review Committee made the following recommendation:

5. Criterion 13. Faculty – "... The panel understands that CWSL probably has a robust faculty governance model, but in the SAV1 report, this important WSCUC emphasis will need to be explained in greater detail."

Discussions with the faculty and summaries in the institutional report reflect a strong faculty governance model at CWSL. Faculty have a clearly defined role in the selection of the president/dean, two individuals serve as faculty representatives to the board, standing faculty committees are in place regarding academic affairs and curricula, academic policy development, and promotion and tenure decisions. Discussions with the faculty members confirm that their committees meet regularly and that their decision-making role is a respected and appropriate part of the decision making at the school.

C.6. Provide disaggregated data for student achievement and plans for reducing gaps, if any; and

C.7. Develop robust IR function.

The ERC panel recognized the "good bar pass rates provided in the application." The ERC recommended that CWSL "provide[s] disaggregated data for retention, graduation rates, and bar passage rates including plans for reducing achievement gaps, if any." In other words, CWSL should "develop a more robust institutional research function with strong analytics used for strategic planning, student success efforts, and assessment of learning outcomes." While CWSL provided various reports to the team related to student success, CWSL lacks a dedicated institutional research function and infrastructure that prohibits the institution from having ready access to comprehensive data and analysis of student success metrics in order to create an evidence-based culture and to engage in institutional reflection and planning. The team

recommends that CWSL continue its efforts in these areas, which are further discussed under Standards two and four.

SECTION II – EVALUATION OF INSTITUTIONAL COMPLIANCE WITH WSCUC STANDARDS

The institution defines its purposes and establishes educational objectives aligned with those purposes. The institution has a clear and explicit sense of its essential values and character, its distinctive elements, its place in both the higher education community and society, and its contribution to the public good. It functions with integrity, transparency, and autonomy.

A. Standard 1. Defining Institutional Purposes and Ensuring Educational Objectives.

A.1 Institutional Purposes

CFR 1.1 *The institution's formally approved statements of purpose are appropriate for an institution of higher education and clearly define its essential values and character and ways in which it contributes to the public good.*

The institution has a published mission statement on their web site that is different than the mission statement in the institutional report. The website mission statement “*Our mission is to train ethical, competent and compassionate lawyers, representative of our diverse society, who can use the law effectively and creatively*” adequately describes the purpose of the institution and is included in the corporate bylaws. In discussion with the steering committee, the team learned that the mission statement in their institutional report is a paraphrase of the actual, published CWSL mission statement.

CFR 1.2 *Educational objectives are widely recognized throughout the institution, are consistent with stated purposes, and are demonstrably achieved. The institution regularly generates, evaluates, and makes public data about student achievement, including measures of retention and graduation, and evidence of student learning outcomes.*

CWSL has identified educational objectives for the JD program as well as the LLM/MCL and Maestria programs in the institutional report. While the educational objectives for the JD program are publicly accessible on the website, as are the Maestria program objectives, but the team did not find public statements regarding the LLM/MCL objectives. The team encourages the school to refine learning outcomes to better accommodate measurement. CFR 1.2 requires that the institution generate, evaluate and make public data about student achievement, including measures of retention and graduation, and evidence of student learning outcomes.

Some indicators of student achievement are published on the website (bar passage and graduated student outcomes) but graduation rate, retention rate and evidence of student learning outcomes (beyond the bar exam) are not made public.

The team recommends that the institution ensure all programs have their learning outcomes publicly available and that, as they regularly generate and evaluate student achievement of the learning outcomes, the results become publicly available.

A.2 Integrity and Transparency

CFR 1.3 The institution publicly states its commitment to academic freedom for faculty, staff, and students, and acts accordingly. This commitment affirms that those in the academy are free to share their convictions and responsible conclusions with their colleagues and students in their teaching and writing.

The institution has a published statement regarding academic freedom for faculty, students and staff and has a formal policy for full time faculty in the Academic Freedom and Tenure policy. Discussions with full time and adjunct faculty, as well as students, confirmed that they enjoy academic freedom.

CFR 1.4 Consistent with its purposes and character, the institution demonstrates an appropriate response to the increasing diversity in society through its policies, its educational and co-curricular programs, its hiring and admissions criteria, and its administrative and organizational practices.

CWSL demonstrated a strong commitment to diversity through its Statement of Diversity, supporting the position of associate director of diversity and inclusion, the increase in the number and amount of diversity scholarships, impressive LSSSE statistics on diversity and strong student support and mentoring opportunities for their underrepresented students. This is an area of strength for CWSL.

CRF 1.5 Even when supported by or affiliated with governmental, corporate, or religious organizations, the institution has education as its primary purpose and operates as an academic institution with appropriate autonomy.

The institution states in its report that CWSL is an independent private law school that was formed as a public benefit non-profit corporation under California law. It has no religious affiliation, and it is not a subsidiary of any other corporation. The Board of Trustees, administration, faculty, and staff of the law school make their governance and administrative decisions free from the control of any government, religious organization, or other corporate entity.

CFR 1.6 The institution truthfully represents its academic goals, programs, services, and costs to students and to the larger public. The institution demonstrates that its academic programs can be completed in a timely fashion. The institution treats students fairly and equitably through established policies and procedures addressing student conduct, grievances, human subjects in research, disability, and financial matters, including refunds and financial aid.

Based on student feedback and a review of the student handbook, statement of course requirements, tuition and fees, and financial aid on the website, CWSL provides truthful representation to students and the public and provides fair and equitable policies – with one exception. According to the Scholarship Information contract signed by students accepting a scholarship award, “In the event that scholarship recipients transfer from CWSL at any time, they ... must repay to CWSL the total value of the scholarship awarded up to that point.” The requirement to repay the institution if transferring was disclosed to students in their acceptance materials but was not posted on the website nor does the team consider it to be a policy that would engender good will or reflect well on the institution in the legal community. The team encourages CWSL to be more transparent about this practice.

CFR 1.7 The institution exhibits integrity and transparency in its operations, as demonstrated by the adoption and implementation of appropriate policies and procedures, sound business practices, timely and fair responses to complaints and grievances, and regular evaluation of its performance in these areas. The institution’s finances are regularly audited by qualified independent auditors.

CWSL exhibits integrity and transparency in its operations, as demonstrated by its business, compliance and student policies posted on its website and student, staff and faculty feedback on the timely and fair responses to complaints and grievances. The institution’s finances are regularly audited by qualified independent auditors with oversight by a board Audit committee. Board members, faculty members and school administration participate in both the board Finance Committee that oversees and approves the school’s annual budgets, and several faculty representatives participate in the school’s Budget Working Group that is given reports and updates about the budget during the annual budgeting cycle.

CFR 1.8 The institution is committed to honest and open communication with the Accrediting Commission; to undertaking the accreditation review process with seriousness and candor; to informing the Commission promptly of any matter that could materially affect the accreditation status of the institution; and to abiding by Commission policies and procedures, including all substantive change policies.

CWSL has had honest and open communications with WSCUC throughout the seeking accreditation process.

Standard 2: Achieving Educational Objectives Through Core Functions

B.1. Teaching and Learning

CFR 2.1 *The institution's educational programs are appropriate in content, standards of performance, rigor, and nomenclature for the degree level awarded, regardless of mode of delivery. They are staffed by sufficient numbers of faculty qualified for the type and level of curriculum offered.*

CFR 2.2 *All degrees—undergraduate and graduate—awarded by the institution are clearly defined in terms of entry-level requirements and levels of student achievement necessary for graduation that represent more than simply an accumulation of courses or credits. The institution has both a coherent philosophy, expressive of its mission, which guides the meaning of its degrees and processes that ensure the quality and integrity of its degrees.*

CFR 2.2b *The institution's graduate programs establish clearly stated objectives differentiated from and more advanced than undergraduate programs in terms of admissions, curricula, standards of performance, and student learning outcomes. Graduate programs foster students' active engagement with the literature of the field and create a culture that promotes the importance of scholarship and/or professional practice. Ordinarily, a baccalaureate degree is required for admission to a graduate program.*

The degree programs offered at CWSL represent appropriate academic standards at suitable degree levels. CWSL has a long history with ABA accreditation for the JD program with the focus of preparing law students to pass the bar exam and become practitioners in the legal field. The most recent ABA visit on March 2-5, 2014 resulted in a seven-year reaffirmation. In addition to the JD program, CWSL offers the LLM/MCL and the Maestria en Litigacion Oral programs. The LLM/MCL program enrollment is under ten students while the Maestria en Litigacion Oral program enrollment is approximately 100 students on average per year; degree completion requirements are disclosed on the website or the student handbook. These programs are staffed by a sufficient number of faculty qualified for the type and level of curriculum offered.

CFR 2.3 *The institution's student learning outcomes and standards of performance are clearly stated at the course, program, and, as appropriate, institutional level. These outcomes and standards are reflected in academic programs, policies, and curricula, and are aligned with advisement, library, and information and technology resources, and the wider learning environment.*

CFR 2.6 *The institution demonstrates that its graduates consistently achieve its stated learning outcomes and established standards of performance. The institution ensures that its expectations for student learning are embedded in the standards that faculty use to evaluate student work.*

The learning outcomes for the JD program are published on the website with the assessment schedule arranged by the year in which the learning outcomes are to be assessed. The Assessment Committee and the Faculty Curriculum Committee indicated that the development of the assessment of JD program learning outcomes spanning a three-year period complies with ABA requirements. An ad-hoc faculty committee, led by the vice dean of academic affairs, worked together in developing the current JD program learning outcomes, which the faculty body approved along with the assessment schedule. An assessment schedule has been developed for the JD degree program with two out of twelve program learning outcomes slated for assessment in the 2017-2018 academic year. Those two program learning outcomes are 1) “demonstrating an understanding of substantive legal rules and doctrine” and 2) “communicat[ing] effectively, both orally and in writing.” For assessment of the first PLO, data on five common questions in the first-year doctrine course has been collected. Writing samples from approximately 50 1L students in the legal skills courses have been collected to assess the second outcome. Additionally, survey data from clinical externships for third-year students are used for assessment of all learning outcomes.

There is a plan for assessing learning outcomes in the LLM/MCL and the Maestria en Litigacion Oral programs but it has not yet been implemented. The assessment process at CWSL is at the initial stage with the JD program; the process has yet to mature. The JD assessment schedule is an effort to shift towards outcomes assessment; however, the team learned during the visit that data collection has been completed only recently, and has yet to be summarized and analyzed. The summary, analysis, and discussion of results are the next steps. The team encourages CWSL to continue its momentum in the assessment of student learning and in the utilization of the results for curriculum improvement. While CWSL is planning to include other programs in the assessment process in the future, the team did not find evidence of a plan to institutionalize a broader assessment process for all programs.

CFR 2.4 The institution’s student learning outcomes and standards of performance are developed by faculty and widely shared among faculty, students, staff, and (where appropriate) external stakeholders. The institution’s faculty take collective responsibility for establishing appropriate standards of performance and demonstrating through assessment the achievement of these standards.

CFR 2.5 The institution’s academic programs actively involve students in learning, take into account students’ prior knowledge of the subject matter, challenge students to meet high standards of performance, offer opportunities for them to practice, generalize, and apply

what they have learned, and provide them with appropriate and ongoing feedback about their performance and how it can be improved.

CWSL requires course learning outcomes to be stated in the course syllabus provided to students at the start of each course. It is not evident that faculty have been broadly oriented in shifting the focus to outcome based assessment and evaluation of student performance against expectations. A review of the course syllabi indicates an unevenness in the course learning outcomes, standards of performance, and connection between course learning outcomes and program learning outcomes, which are not specified. In discussions with faculty, the team recognized their commitment to foster student learning as well as their desire to maintain consistency in content delivery between course sections. The team learned that an external evaluator assessed the students' writing samples as part of the assessment of the communication (written and oral) program learning outcome. While leveraging external services to assess student learning, albeit while using a faculty-developed rubric, may yield useful information, the faculty needs to own their responsibility for assessing learning outcomes at the course and program levels. This will ensure active involvement in students' learning, challenge students to meet high standards of performance, offer opportunities to practice, generalize, and apply what they have learned, and provide them with appropriate and on-going feedback on their performance and how it can be improved.

CFR 2.7 All programs offered by the institution are subject to systematic program review. The program review process includes, but is not limited to, analyses of student achievement of the program's learning outcomes; retention and graduation rates; and, where appropriate, results of licensing examination and placement, and evidence from external constituencies such as employers and professional organizations.

The ABA accreditation review of the JD program is a longstanding practice at CWSL. The law school relies on the ABA's seven-year cycle of accreditation review, along with routine monitoring of the JD program's attrition rate, bar pass rate, and job placements. WSCUC member institutions are subject to systematic program review to reflect deeply on their programs both internally and externally with the goal of enhancing student learning and experience. It was not evident to the team from the institutional report or from the site visit that a program review process exists or is yet under development at CWSL. Assessment and program review are still very new for the ABA and their review processes are not yet fully formed, therefore reliance on an ABA accreditation review as a substitute for an external

evaluation of the law school would be incomplete. The team recommends that CWSL plan and implement program review for all its degree programs. CWSL may want to consult the Program Review Resource Guide and Program Review Rubric from WSCUC, which are posted on the WSCUC website, for guidance.

B.2.Scholarship and Creative Activity

CFR 2.8 *The institution clearly defines expectations for research, scholarship, and creative activity for its students and all categories of faculty. The institution actively values and promotes scholarship, creative activity, and curricular and instructional innovation, and their dissemination appropriate to the institution's purposes and character.*

CFR 2.9 *The institution recognizes and promotes appropriate linkages among scholarship, teaching, assessment, student learning, and service.*

Students. CWSL outlines expectations for research, scholarship and creative activity for its students via academic policies, based upon interviews with the faculty, administration and survey of course syllabi. The institutional report indicates that student scholarly work is in large part accomplished through classroom activity and independent scholarly research. JD and LL.M/MCL students are required to complete scholarly papers; JD students must also complete scholarly writing requirements and enroll in a non-credit legal scholarship training seminar. There is a program learning outcome for JD students that speaks to the ability to conduct legal research. MCL and Maestria students are excluded from these requirements since those programs target more post-JD, professional-level needs.

Faculty. CWSL expects tenure-track and tenured faculty to participate in ongoing research and scholarship related to their field. The team also noted that junior faculty are well-supported and encouraged to engage in scholarly work.

Expectations for scholarly research are found in the Faculty Performance Rubric. One primary basis for faculty evaluation is the Performance Rubric which was developed in collaboration with faculty. The rubric requires review of faculty work in the areas of Teaching, Scholarship, and Service to the field. The Faculty Executive Committee is the faculty voice responsible for the oversight of faculty promotion practices and policies.

CWSL provided examples of traditional faculty research for the team to review. There was evidence of scholarly work in publications including: *The Stanford Law & Policy Review*, *the Pepperdine Law Review*, and *The Journal of Criminal Law and Criminology*. CWSL also

publishes their own journals—the *California Western Law Review* and *California Western International Law Journal*—on a bi-annual basis. The CWSL publications afford opportunities for professors, students, as well as researchers outside the institution to collaborate and disseminate their work.

Based on the institutional report, faculty scholarship can be executed not only through traditional scholarly research but by, “retention, promotion, and tenure based on teaching effectiveness...service to the law school, and service to the community”. Connection between faculty work in scholarship, teaching, student learning and service is noted, for example, in faculty participation in co-curricular activities (e.g., moot court coaching, Innocence Project, advising students). Additional opportunities for faculty scholarship are described in Article V of the Faculty Handbook. The Handbook outlines research expectations, availability of scholarship funding opportunities for all faculty, and ideas for participation in various professional development activities (e.g., conferences).

Adjunct faculty are included in opportunities for scholarly or creative works and development. Adjuncts often serve as mentors, collaborate to discuss best practices in co-curricular spaces (e.g., Student Services’ STEPPs program), and can participate in brown bag learning opportunities.

B. 3. Student Learning and Success

CFR 2.10 The institution demonstrates that students make timely progress toward the completion of their degrees and that an acceptable proportion of students complete their degrees in a timely fashion, given the institution’s mission, the nature of the students it serves, and the kinds of programs it offers. The institution collects and analyzes student data, disaggregated by appropriate demographic categories and areas of study. It tracks achievement, satisfaction, and the extent to which the campus climate supports student success. The institution regularly identifies the characteristics of its students; assesses their preparation, needs, and experiences; and uses these data to improve student achievement.

CFR 2.11 Consistent with its purposes, the institution offers co-curricular programs that are aligned with its academic goals, integrated with academic programs, and designed to support all students’ personal and professional development. The institution assesses the effectiveness of its co-curricular programs and uses the results for improvement.

CWSL regularly reports attrition, first-time bar pass rates, employment rates, and other metrics reported to the ABA, which are disclosed on the website. Evidence examined by the team includes the attrition rate for the JD program, employment rate, bar exam first-time pass rate, and student satisfaction survey from the Law School Survey of Student Engagement (LSSSE).

The institution stated in the report and confirmed during the site visit that an attrition rate of 25% for the first-year JD students is relatively high, however this is expected with a diverse student population that the institution serves. CWSL has implemented various academic support services for at-risk students, such as small and large group tutoring, Advanced Skills and Analysis Program (ASAP) for first-year JD students, and tracking of students' performance, which includes behavioral and academic factors. Current at-risk student behavior data tracking is identified in eight categories: opt-out, professional conduct, external incident, undisciplined, ghosting, socialization, "I can do me," and "no skin in the game." This information is gathered at the individual student level by student life groups in their meetings. The team commends the proactive approach to support student achievement during their first year in the program.

In the recent data from the LSSSE, the students rated their overall satisfaction in their education experience in the mid-80%, which is higher than the peer institutions group. Based on the summer 2018 dashboard, the employment rate for 2016-2017 graduates is 82%. Over the span of the last four years, the employment rate has improved steadily. The first-time bar pass rate is above the statewide average. While these metrics are helpful and informative, the team observed that the shared data are primarily for the JD program. The tracking of student data, aggregation, and disaggregation for the Maestria en Litigacion Oral and the LLM/MCL programs are minimal. The team noticed that the graduation rate, on-time completion rate, and time-to-degree data by demographic and program have not been produced. CWSL has the first-year attrition rate by demographic for the JD program, and the school has stated that very few students attrite after the first year; therefore, the graduation rate can be estimated using the first-year attrition rate. The team encourages CWSL to formalize the student success metrics and the internal reporting that is inclusive for all programs by demographic with multi-year trend data.

A recent effort from CWSL to reduce the first-year attrition rate is the grade policy change regarding the grading curve, effective in fall 2018. The change is to reduce the percentage of below C grades by 10% in the first-year courses. The rationale for the grading change is driven by the ABA's new attrition rate standard for member law schools which cannot exceed 20%. In interviews with various stakeholders, the team learned that the institution was more selective in offering admission in the fall 2018 incoming class. The LSAT score for the new incoming students has increased by one point compared to previous intakes. While CWSL has made a

concerted effort to take actions to comply with the ABA's new attrition standards and is more selective in offering admission to incoming students, the team suggests that the institution closely monitor student performance in the second year, as well as the future bar pass rate

CFR 2.12 The institution ensures that all students understand the requirements of their academic programs and receive timely, useful, and complete information and advising about relevant academic requirements.

CFR 2.13 The institution provides academic and other student support services such as tutoring, services for students with disabilities, financial aid counseling, career counseling and placement, residential life, athletics, and other services and programs as appropriate, which meet the needs of the specific types of students that the institution serves and the programs it offers.

CWSL audits students' progress toward graduation multiple times during the last year. To date, this has been done manually by the registrar. It is one of the services that will be greatly welcome by staff and students alike when the new Enterprise Resource Planning system is installed. CWSL has several established co-curricular programs for student development that promote learning and success. Some examples of the co-curricular programs are Competitive Advocacy, STEPPS, Clinical Externship, and Career and Professional Development Office. Students spoke favorably during the visit of the disability services and the career services professionals. The co-curricular programs have not been formally or systematically reviewed. They are reviewed "on an ad-hoc basis in response to perceived needs and opportunities." Academic achievement program tracks behavioral and academic factors for at-risk students to help them be successful in their academics and bar exam performance. The student life professionals engage new students by sharing aggregated data of the academic performance outcomes of students participating in the academic achievement program, such as GPA and bar passage rate. This is an excellent example of proactive intervention to promote and support student diversity and success. The team suggests that once a plan and a cycle for assessment for the co-curricular programs have been established, an analysis from these reviews should be integrated into the planning and budgeting process.

CFR 2.14 Institutions that serve transfer students provide clear, accurate, and timely information, ensure equitable treatment under academic policies, provide such students access to student services, and ensure that they are not unduly disadvantaged by the transfer process.

The information on the website presented to prospective and current students is accurate in its depiction. The academic requirements are stated clearly on the website and in the student

handbook. Although, the institution has very few transfer students enrolling, the information for transfer students is disclosed on the website from general transfer information, credit valuation and academic standing, application deadlines, and required documents to apply.

Standard 3: Developing and Applying Resources and Organizational Structures to Ensure Quality and Sustainability

C.1 Faculty & Staff

CFR 3.1 The institution employs faculty and staff with substantial and continuing commitment to the institution. The faculty and staff are sufficient in number, professional qualification, and diversity to achieve the institution's educational objectives, establish and oversee academic policies, and ensure the integrity and continuity of its academic and co-curricular programs wherever and however delivered.

During the 2018-19 academic year, CWSL will have 34 full-time faculty members, 44% of them women, and 18% members of minority groups. Twenty-seven are tenure-track and 22 of those are tenured. Seven have renewable contracts, six of which are presumptively renewable. Fourteen faculty retired in 2014, encouraged to do so by the law school due to the downturn in student enrollments. The school does not anticipate hiring new faculty in 2018-19.

All full-time faculty have law degrees; fourteen have master's degrees as well, and three have non-law doctorates. Many have practiced law. Many have taught at other law schools. Many are actively engaged in scholarship and many participate in professional associations.

The student-faculty ratio at CWSL is about 19:1. First-year doctrinal classes are usually 75-80 students in size, while the 1L legal skills class number 20-22 students. The full-time faculty members participate extensively in the students' co-curricular activities. Student organizations have faculty advisors, moot court teams are coached by faculty members, and the law reviews are advised by faculty members.

The 85 adjunct faculty do not teach first year law courses or required upper level courses, but do bring their valuable practice experience to clinics and upper level courses. There is a

Faculty Adjunct Committee which monitors new adjuncts who are assigned a mentor from among the full-time faculty members.

The law school employs 82 full-time and 12 part-time staff members. 63% of the staff are women and 41% self-identify as non-white.

As a whole, the faculty and staff display a substantial and continuing commitment to the institution, particularly in light of recent challenges to all law schools including CWSL.

CFR 3.2 Faculty and staff recruitment, hiring, orientation, workload, incentives, and evaluation practices are aligned with institutional purposes and educational objectives. Evaluation is consistent with best practices in performance appraisal, including multisource feedback and appropriate peer review. Faculty evaluation processes are systematic and are used to improve teaching and learning.

At CWSL, a Faculty Appointments Committee oversees the recruitment of every new full-time faculty member. Potential faculty candidates interview on campus, give job talks related to their scholarship or practice experience, and are then evaluated and voted on by the faculty. New faculty members are given timelines for their contract renewals and tenure decisions. They are typically assigned mentors, and tenure-track hires are given a course load reduction in their first year. After their first year, they are assigned the standard teaching load of four courses per academic year, and tenure-track faculty are eligible for a sabbatical after their sixth year. Teaching assignments and schedules are typically allocated on a seniority basis. The dean annually evaluates all faculty members using a rubric, after soliciting information from the faculty members through a survey. The faculty evaluation rubric assesses the faculty members' work in four areas: teaching, scholarship, service to the law school, and service to the community. Promotion and tenure recommendations are made by the tenured faculty.

CWSL reviews and approves all new and replacement staff to ensure that it can meet its operational needs. New staff members are typically only hired after a hiring committee recommends them to the hiring manager. All new staff members receive individualized orientations. The institution is currently developing a "one stop" approach to orientation to reduce onboarding time and multiple appointments. Staff can receive performance bonuses as determined by the department head and approved by the vice president of human resources. A complete review of the existing staff evaluation process is currently underway with the goal of

implementing an online process. The evaluations will use internally developed competencies tied to institutional goals and objectives.

CFR 3.3 The institution maintains appropriate and sufficiently supported faculty and staff development activities designed to improve teaching, learning, and assessment of learning outcomes.

CWSL promotes faculty scholarship with publication awards for up to \$10,000 for the publication of a single article; \$150,000 was budgeted for these awards in 2017-18. Some adjuncts have also been reimbursed for professional development activities. For staff, there is an employee development program that focuses on both technical and soft skills. Librarians and academic achievement staff attend conferences and engage in professional development related to teaching and assessments of student learning outcomes. The team suggests that more professional development resources be directed to training in assessment skills for both faculty and staff.

C.2Fiscal, Physical & Information Resources

CFR 3.4 The institution is financially stable and has unqualified independent financial audits and resources sufficient to ensure long-term viability. Resource planning and development include realistic budgeting, enrollment management, and diversification of revenue sources. Resource planning is integrated with all other institutional planning. Resources are aligned with educational purposes and objectives.

CFR 3.5 The institution provides access to information and technology resources sufficient in scope, quality, currency, and kind at physical sites and online, as appropriate, to support its academic offerings and the research and scholarship of its faculty, staff, and students. These information resources, services, and facilities are consistent with the institution's educational objectives and are aligned with student learning outcomes.

The challenges confronting legal education are well documented. Nationally, applications to law school peaked in 2010 with 87,900 applications compared to 59,000 applicants seeking admission in 2018 according to figures from the Law School Admission Council. With increased applications in the past two years, law schools in general and CWSL, in particular, have some factual basis for optimism going forward given more people are applying for law school driven by modest improvements in the entry-level legal job market and the heightened prominence of the profession in light of political discord.

CWSL, like most law schools, has increased financial aid allocations for students in an effort to protect LSAT/GPA medians in a period of applicant decline. While it is obvious that tuition discounting benefits enrollment objectives, it does so in tension with the economic well-being of the law school. This trend is common in higher education as tuition discounting strategies have adversely affected the bottom line at many institutions. However, CWSL is an independent, standalone law school. Of the 202 law schools fully accredited by the American Bar Association, approximately a dozen operate as independent, standalone law schools not benefiting from financial and operational support from a larger campus or university setting. This institutional setting, the state of being untethered from a parent institution with deeper financial resources, increases risk and the criticality of fiduciary oversight by the governing board.

CWSL does derive great benefit from the financial prudence it has demonstrated over time. Many years of positive financial performance coupled with the thoughtful stewardship of these funds in the investment vehicles managed under the oversight of an active board of trustees has yielded substantial reserves. These reserves have inured to the benefit of the institution and has allowed CWSL to weather the market downturn being reasonably well positioned to participate in the slow recovery in the demand for legal education in the general marketplace.

Unrestricted Net Assets (In millions):

Year	Ending Unrestricted Net Assets	Change from Previous Year
2020 Budget	\$37.1	-\$0.1
2019 Budget	\$37.2	-\$3.8
2018 Authorized	\$41.0	-\$5.5
2017	\$46.5	-\$1.8
2016	\$48.3	-\$7.2
2015	\$55.5	-\$4.7
2014	\$60.2	N/A

Source: Audited Financial Reports

Notwithstanding the significant drawdown of reserves in recent years, the school still maintains ample reserves with capacity sufficient to fund the \$3.9 million in forecasted operating deficits in 2018-19 (\$3.8 million) and 2019-20 (\$147,000). By the time operating surpluses return with implementation of the multi-year budget plan, CWSL will have an unrestricted net position of \$37.1 million (assuming no realized/unrealized gain/loss on investments). When assessing the condition of reserves, it is important to note that operating expenses have been averaging \$28 million annually: reserves in place can cover in excess of one year's operating expenses. Hence, CWSL is well positioned financially and will resume positive budget outcomes with still substantial operating reserves assuming continued execution of their multi-year budget plan.

The CWSL multi-year budget plan is designed to more closely align revenues with expenditures such that deficit spending winds down (planned budget surpluses begin occurring in 2020-21 with a gain of \$981,000 projected).

As with any plan, an assessment of the reasonableness of the underlying assumptions is critical. The Budget and Five Year Projection Assumptions utilized by CWSL exhibits a tempered and reasoned approach using substantiated, modestly optimistic assumptions that withstand professional scrutiny. CWSL has adopted a series of planning assumptions intended to increase net student fee revenue adopting stable enrollment numbers; i.e., small but steady annual increases in tuition (+3.5%) equal to rates of increase achieved in the past coupled with a decline in the overall tuition discount rate from 44.7% to 33.6%. The double whammy positive impact on net tuition revenue per student is significant, going from \$27,398 in 2017-18 to \$37,211 in 2020-21, an increase of \$9,823 (35.8%).

The Five Year Plan assumes modest growth in fundraising and grants in absolute terms. Grants are expected to increase from \$275,000 in 2017-18 to \$300,000 in 2020-21. Similarly, fundraising increases from \$225,000 in 2017-18 to \$350,000 in 2020-21. While attainment of these growth targets would represent important institutional milestones, their relative import to the overall viability of the Five Year Plan is secondary to managing net tuition revenue.

CWSL has reduced operating expenses over time without resorting to major layoffs. Faculty and staff compensation growth has been frozen with the plan calling for a resumption of growth in 2019-20. It is important to note that while CWSL has chosen to manage through this difficult period without resorting to major staff reductions, the option is preserved should enrollment management and net tuition revenue assumptions prove themselves to be inaccurate and cost reductions need to be more aggressively pursued.

An area meriting further scrutiny relates to CWSL's infrastructure and physical plant. CWSL is to be commended for developing and maintaining a cohesive, urban campus with an emphasis on the student experience and creation of a community of learning that promotes interaction between and among students, faculty and staff.

The physical plant is well maintained with three buildings: the law library at 290 Cedar Street constructed in 2000, the administration building at 225 Cedar Street built in 1993, and the classroom building at 350 Cedar Street built in 1929. These structures are owned and operated by the school. Absent from the financial model are costs associated with physical plant upgrade and renewal. CWSL makes an effort to perform all maintenance when needed and has no deferred maintenance budget as a result. With the passage of time, aging facilities present challenges for items such as seismic performance, upgrades of heating, ventilation and air conditioning systems, code compliance in matters such as ADA/Title 24 standards as well as fire/life-safety system modernization. Efforts should be made to identify necessary upgrades and quantify their cost so that financial forecasting can be refined and planning for future capital outlay facilitated.

The documentation is silent on whether deferred maintenance or other capital upgrades of equipment or software will further burden operating reserves.

C.3 Organizational Structures & Decision-Making Processes

CFR 3.6 The institution's leadership, at all levels, is characterized by integrity, high performance, appropriate responsibility, and accountability.

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The institutional report summarizes robust processes for faculty input prior to an initial appointment or reappointment of the president/dean, the dean's evaluation of his staff and the faculty. While the staff evaluation system is on hold as an improved system comes into place in the fall, staff have been regularly reviewed.

The institutional report did not address matters of integrity, responsibility and accountability of the institution's leadership. The response of leadership to the existential threat of the significant decline in enrollments of the past five years reflect strong integrity, responsibility and accountability by the president and his leadership team. The school developed a plan to reduce spending significantly while also dipping into a strong reserve pool to allow a modest deficit so that the school could continue to make critical investments, such as the student information system, while operating on an austere budget. The law school was able to lessen the impact of declining tuition revenues by reducing operating expenses, implementing salary reductions, offering faculty and staff early retirement plans, and reducing the school's contributions to employee retirement plans. The team observed that the faculty and staff were well aware of the financial situation, were pleased that deficit spending should end in the near future, and none expressed dissatisfaction with their reduced compensation. The dedication of both the leadership and the faculty and staff to the long-term success of the institution was impressive.

CFR 3.7 The institution's organizational structures and decision-making processes are clear and consistent with its purposes, support effective decision making, and place priority on sustaining institutional capacity and educational effectiveness.

As described in the institutional report and consistent with the organization of leadership and by the corporate bylaws and faculty bylaws, CWSL's organizational structures allow clear delegation of responsibilities and decision making. The board has authority to select, appoint, reappoint or remove a dean; select, appoint, reappoint, promote, remove or demote, if necessary, all officers and non-faculty employees; approve or disapprove recommendations regarding faculty appointment-related matters; grant degrees and approve new degree and educational programs; approve annual budgets and oversee its administration; and take actions related to debt, real estate and all property, gifts, trusts and endowments of the corporation. Most decision-making authority over non-academic matters vests in the president and dean,

who is advised by a small group of senior administrators. The dean serves as the chief academic officer who is advised by the faculty.

Most decisions at the law school are made in accordance with the goals and objectives set forth in its current strategic plan.

CFR 3.8 The institution has a full-time chief executive officer and a chief financial officer whose primary or full-time responsibilities are to the institution. In addition, the institution has a sufficient number of other qualified administrators to provide effective educational leadership and management.

The institution has a full-time chief executive officer and a chief financial officer whose primary or full-time responsibilities are to the institution. In addition, the institution has a sufficient number of other qualified administrators to provide effective educational leadership and management. The president/dean has given 2 year's notice of his intention to step down and join the faculty in 2020, allowing the institution ample time to identify and hire a new leader.

CFR 3.9 The institution has an independent governing board or similar authority that, consistent with its legal and fiduciary authority, exercises appropriate oversight over institutional integrity, policies, and ongoing operations, including hiring and evaluating the chief executive officer.

CWSL has an independent governing board with 22 members with a diverse set of qualifications. The board meets quarterly for 3 hours and exercises appropriate oversight regarding the institution's operations. The board hires the CEO through a search committee process and evaluates the CEO at least every three years. The team is concerned that reviewing the CEO less than annually in frequency, as stated in the revised Corporate Bylaws, is not a good practice, especially during these risky and rapidly changing times in higher education generally and law schools specifically. The team encourages the board to implement some form of annual evaluation of the CEO.

CFR 3.10 The institution's faculty exercises effective academic leadership and acts consistently to ensure that both academic quality and the institution's educational purposes and character are sustained.

CWSL full-time faculty ensure that both academic quality and the institution's educational purposes and character are sustained through their governance responsibilities defined by CWSL corporate bylaws and affected by processes defined in the faculty bylaws via faculty meetings and faculty committees. According to the institutional report, CWSL does not have any faculty categorized as part-time, but does have adjunct faculty. Adjunct faculty have no

administrative responsibilities or governance responsibilities or voting rights. While the institution may be missing out on insights from the adjunct faculty in the governance process, CWSL clearly defines the governance roles, rights, and responsibilities of all categories of faculty.

Standard 4: Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement

D. 1. Quality Assurance Processes

CFR 4.1 The institution employs a deliberate set of quality-assurance processes in both academic and non-academic areas, including new curriculum and program approval processes, periodic program review, assessment of student learning, and other forms of ongoing evaluation. These processes include: collecting, analyzing, and interpreting data; tracking learning results over time; using comparative data from external sources; and improving structures, services, processes, curricula, pedagogy, and learning results.

While CWSL tracks a set of quality metrics, such as bar first time pass rate, new JD students LSAT data, graduate employment rate for JD, LSSE, and enrollment data, the assessment process in the academic areas are at the initial level with the focus on the JD program. An assessment plan for the LLM/MCL and Maestria en Litigacion Oral programs does not exist, nor is there an ad-hoc assessment approach in the co-curricular programs or the program review process. Due to the institution shifting from ABA practices to an outcome-based approach; the team found weak linkage in utilizing student learning data to institutional-level planning and budgeting. It is essential that CWSL continues until completion the first cycle of assessment for the JD program, integrates and initiates a cycle of assessment for the LLM/MCL, Maestria en Litigacion Oral, and the co-curricular functions, and creates a quality-assurance process in order to use the findings for improvements in educational effectiveness.

CFR 4.2 The institution has institutional research capacity consistent with its purposes and characteristics. Data are disseminated internally and externally in a timely manner, and analyzed, interpreted, and incorporated in institutional review, planning, and decision-making. Periodic reviews are conducted to ensure the effectiveness of the institutional research function and the suitability and usefulness of the data generated.

The team found that the data gathering and reporting were done by several administrators including the admissions office, registrar, student and diversity services, career planning and development office, and the vice dean's office. The institution did not have a dedicated

institutional research function at the time of the visit. During the visit, the institution shared that the student information system is a “homegrown” system. Therefore, extraction, aggregation, and disaggregation of historical trend data over time are challenging to organize and summarize.

CWSL recently concluded the Enterprise Resource Planning review and selection process involving input from the various campus stakeholders with an implementation plan in phases. The student information system (SIS) is in the process of data migration to the new system, and is anticipated to be completed in early 2019. The finance and human resource systems are scheduled to migrate and implement after SIS. The new SIS should ease the process to extract student data and summary in the future. In the site visit interviews, the staff expressed the “need to keep the personal touch with the students” when changing to an enterprise SIS because they “do not want to lose the interaction with students.” The team applauds the institution’s mindfulness in wanting to maintain the personal interaction with students when moving towards the new SIS, which will allow students to process the majority of their transactions through an online portal as opposed to reaching out to staff and faculty on campus.

When data are disseminated on a regular cycle, analyzed, interpreted, and incorporated in an institutional review, planning, and decision-making process, meaningful discussions about student achievement and attainment are possible to facilitate a culture of learning and using evidence for improvement. CWSL can benefit by having a dedicated institutional research function and infrastructure to support the systematic data collection, reporting, analysis of data, disaggregation, and dissemination to support the institution’s mission and progress towards its strategic objectives. Moreover, it is a critical step in building a culture of evidence-based decision making, utilizing information into the process of planning and budgeting.

D.2. Institutional Learning and Improvement

CFR 4.3 Leadership at all levels, including faculty, staff, and administration, is committed to improvement based on the results of inquiry, evidence, and evaluation. Assessment of teaching, learning, and the campus environment—in support of academic and co-curricular objectives—is undertaken, used for improvement, and incorporated into institutional planning processes.

CFR 4.4 The institution, with significant faculty involvement, engages in ongoing inquiry into the processes of teaching and learning, and the conditions and practices that ensure that the

standards of performance established by the institution are being achieved. The faculty and other educators take responsibility for evaluating the effectiveness of teaching and learning processes and use the results for improvement of student learning and success. The findings from such inquiries are applied to the design and improvement of curricula, pedagogy, and assessment methodology.

CFR 4.5 Appropriate stakeholders, including alumni, employers, practitioners, students, and others designated by the institution, are regularly involved in the assessment and alignment of educational programs.

CFR 4.6 The institution periodically engages its multiple constituencies, including the governing board, faculty, staff, and others, in institutional reflection and planning processes that are based on the examination of data and evidence. These processes assess the institution's strategic position, articulate priorities, examine the alignment of its purposes, core functions, and resources, and define the future direction of the institution.

CFR 4.7 Within the context of its mission and structural and financial realities, the institution considers changes that are currently taking place and are anticipated to take place within the institution and higher education environment as part of its planning, new program development, and resource allocation.

While the institution's demonstration of efforts in Standard 4 showed areas for growth, it was evident that the CWSL faculty, staff, and leadership have invested time and a sincere interest in addressing items in this Standard. Moreover, while systems to support the criteria in Standard 4 are still in inchoate stages, the team recognizes that CWSL's perspective of assessment has necessarily been defined by ABA accreditation standards. With regards to strategic planning, the team also recognizes CWSL's history. CWSL needed to revamp operations after an anticipated, then unrealized, merger that disappointed its operational and strategic cadence. Once merger conversations were concluded, the institution moved from what one leader referred to as a mode of "treading water" to a strategic plan that is "tactical" in nature.

Based on the institutional report and the team's observations during the visit, there continues to be a need for all levels of leadership to further engage in a culture of institutional learning -- a practice whereby improvements across academics, co-curricular departments, and strategic planning are based on the results of inquiry, evidence, and evaluation.

Institutional-level Assessment. There is indication of emerging efforts towards thoughtful inquiry across the institution. For example, student services is an area that utilizes data to inform program development. Meeting with the student services team, under the leadership of the vice president of student life provided the team with examples of how data helped to drive both standard and customized programming opportunities for students. Similarly, a thriving

externship program staff has encouraged mentors from the community to submit evaluations from their mentorship experience. This feedback with additional data revealed a positive relationship between bar passage rates and externship participation. Since then, the institution has changed their practice to encourage externship participation. Again, with a lens informed by ABA accreditation, CWSL tracks attrition, employment, and bar pass rates.

Currently the registrar, assistant dean of admissions, and the assistant dean for career and professional development serve as the body to coordinate and carry institutional research responsibilities. Because a cultural shift will likely take place to deeply embrace student outcome assessment, the team suggests that CWSL develop an institutional research function. The institutional research function should be separated in duties, responsibility, and skill from the function required in managing the assessment of learning outcomes. While it is not a requirement from WSCUC, the institution may consider developing institutional-level learning outcomes as they mature in their assessment and data-driven practices. In addition, at the institutional level, it is important to measure the efficacy of their co-curricular programs. Feedback on co-curricular programs, as begun by the student services and externship teams, should shape the institution's strategic plan.

Program-level Assessment. The team noted evidence of planning, collecting, and analysis of data for teaching, learning, and institutional improvement. There are indications of this work at an emerging level in the JD program where thus far, there has been identification, web publication, mapping, and a regularly scheduled assessment plan of the 12 identified program learning outcomes.

CWSL faculty and leaders are actively seeking advice on next steps in the assessment process and want to find ways to improve this process. In addition, the current assessment plan was informed in part by having a member from senior leadership attend WSCUC ARC and an Assessment 101 Workshop.

While the institution is engaged in efforts to embrace the practice of assessing student learning at a program level, it is evident that CWSL would benefit from additional assessment training. For example, the current approach to program learning outcome analysis entails a pre-post sampling of legal writing skills. To measure the outcome-- *Communicate Effectively both Orally and in Writing*-- writing samples from Fall 2017 entering JD students (n=50) were collected before the trimester began, at the end of the first trimester, and then at the end of the last trimester. Student work was then assessed via rubric by independent grading consultants.

The team finds that the areas of improvement regarding program assessment is in the **method** of how the assessment is currently being conducted. In addition, designing programs around assessments with key and formative assignments, assuring that the assessment and feedback therein is faculty-owned, and thoughtful alignment of program learning outcomes to course learning outcomes are other spaces for program level assessment growth.

Course-level Assessment. CWSL showed evidence of emerging work at the course level. The institution readily provided syllabi from courses taught by full- and adjunct-faculty for team review. A sampling of these syllabi confirmed that courses had goals, aims or objectives. The syllabi and conversations with faculty, the Assessment Committee and the Institutional Review Committee gave the team an impression of faculty's interest in identifying learning goals.

An interview with the Assessment Committee showed that the exercise of analyzing program outcomes for the JD degree helped faculty to uncover differences between what students may be learning in courses that were taught by different instructors. Further investigation and input from conversations is currently leading to faculty work to assure similar learning outcomes regardless of which instructor teaches a course.

However promising these beginning efforts, currently course outcomes are rarely structured as measurable, the level of learning expected relative to outcomes is unclear, and there is little evidence that shows course to program outcomes within their largest program. The other CWSL program offerings are even less developed in their levels of assessment. Overall, there is need for a systematic and structured approach to learning outcome assessment.

Summary of 4.3 and 4.5. CWSL has made efforts to comply with WSCUC Standard 4 criteria. With ABA accreditation, their assessment practices have necessarily been aligned to these ABA standards that track key indicators (e.g., bar exam pass and attrition rates) as well as those concerning assessment of learning outcomes.

Oftentimes, this current level of inquiry is not readily measurable, is not properly measured, not aligned between course and program, and/or is without opportunity for reflection. Going forward it will also be important that the assessment data and implications are fed back into the system, assuring that there is an intentional utilization of results to close the data loop.

CFRs 4.6 and 4.7. CFRs 4.6 and 4.7 are focused on assuring that there is an intentional and systematic institutional reflection process that is based on the regular examination of

data/evidence, which feeds into a practice of continuous improvement. Further, this process of institutional-level analysis should be housed in a strategic plan that incorporates a vision and the agility to respond to the changing field of higher education as it plans, develops programs and allocates resources.

The team observed that the institution is yet at an emerging level in the access, planning, collection, and dissemination of information that can be applied to institution growth and effectiveness. For example, there was indication during the visit with faculty and staff, that Maestria's predominantly online, synchronous hybrid model seems to be thriving with its unique mission of educating international attorneys in trial advocacy. And while seemingly effectively functioning with a full staff there was little indication of forward planning. The impetus for additional planning for this and CWSL's other (somewhat auxiliary) programs is not to increase enrollment. Instead the viability and sustainability of the program needs to be assured, learning outcomes measured, and data used to inform utmost functioning for the sake of the student and sustainability of the program.

As a next step, the team recommends that CWSL focus on building a strategic plan. At this point, the plan should be developed in alignment to the institution's mission, vision, purpose, and pillars of character. And while CWSL has done an admirable job of addressing challenges (e.g. downturns in enrollment, financial concerns), a strategic plan is important to continued viability and sustainability of the institution.

As a general suggestion, the plan could also address recommendations raised from the Eligibility Committee as well as those highlighted from this first Seeking Accreditation Visit. The strategic plan may also include, but not be limited to, phases, i.e.:

- **Analysis assessment** of the state of the institution's current standing regarding internal operations and competing external forces.
- **Documentation** of the strategy where high level strategy is aligned to mission and vision of the institution. The plan would be documented and connect every department and team to the strategies.
- **Strategy execution** where the high-level plan is translated into operational planning, identified and measurable benchmarks, and action items. Communication and implementation of the plan should be detailed and infused throughout all leadership and support levels, and pervasive amongst staff, faculty, and administration.

- **Evaluation** of the plan where ongoing refinement and evaluation of performance, culture, communications, data reporting, and other strategic management issues occurs.

The team also recommends that the work related to strategic development is soon initiated, rather than waiting two years for the completed hiring of a new dean/president.

The team recommends that CWSL focus continuing efforts to improve the quality of the degrees by fortifying its culture of data-driven decisions, assessment, and continuous improvement by:

- implementing a comprehensive program review process beyond annual assessment while establishing policies and practices for gathering, analyzing, and interpreting information to support a culture of evidence.
- including appropriate stakeholders who continue to be regularly engaged in the assessment and alignment of educational programs to the priorities, purposes, core functions and resources that define the vision of the institution within a strategic plan.
- anticipate the changing nature of higher education within the context of its mission, and to plan its resources accordingly.

SECTION III. PREPARATION FOR ACCREDITATION UNDER THE 2013 HANDBOOK OF ACCREDITATION

CWSL is preparing for these three areas as follows:

--Degree programs: Meaning, Quality and Integrity of Degrees

The description of their response in this area focuses on the tension of being ABA-accredited while also wanting to be bold and innovative.

--Educational Quality: Core Competencies, and Standards of Performance at Graduation

The brief description is an excellent look at how they developed the JD learning outcomes.

--Sustainability: Preparing for the Changing Higher Education Environment

Due to the unsettled nature of legal education today, significant changes could occur rapidly and CWSL must be nimble in meeting those challenges. It may want to expand its online course offerings, modify and strengthen its part-time programs, and offer a variety of new non-degree educational programs, while maintaining focus on its central program: the JD degree.

SECTION IV. INVENTORY OF EDUCATIONAL EFFECTIVENESS INDICATORS

CWSL has completed the Inventory of Educational Effectiveness Indicators (IEEI) that listed the JD, LLM/MCL, and the Maestria en Litigacion Oral. The IEEI document asks for the learning outcomes, where the learning outcomes are published, evidence used to determine whether graduates have achieved stated outcomes, who interprets the data and the process, how are the findings used, and the date of the last program review for the degree program.

The program learning outcomes for the JD and Maestria en Litigacion Oral programs are published on the institution's website. The program learning outcomes for the LLM/MCL program are not published. There are no assessment results for the JD, LLM/MCL, and Maestria en Litigacion Oral degree programs indicated. The first assessment cycle for the JD degree program is underway, but there is no result thus far. No degree programs at CWSL have undergone program review beyond the ABA review of the JD program.

SECTION V. FINDINGS, COMMENDATIONS AND RECOMMENDATIONS

FINDINGS REGARDING STANDARDS:

STANDARD 1: Defining Institutional Purposes and Ensuring Educational Objectives

The team's finding, which is subject to Commission review, is that California Western School of Law has presented evidence to demonstrate compliance with Standard 1 that is sufficient for initial accreditation.

STANDARD 2: Achieving Educational Objectives Through Core Functions

The team's finding, which is subject to Commission review, is that California Western School of Law has presented evidence to demonstrate compliance with Standard 2 that is sufficient for candidacy.

STANDARD 3: Developing and Applying Resources and Organizational Structures to Ensure Quality and Sustainability

The team's finding, which is subject to Commission review, is that California Western School of Law has presented evidence to demonstrate compliance with Standard 3 that is sufficient for initial accreditation.

STANDARD 4: Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement

The team's finding, which is subject to Commission review, is that California Western School of Law has presented evidence to demonstrate compliance with Standard 4 that is sufficient for candidacy.

COMMENDATIONS

The team commends California Western School of Law in particular for the following:

1. Demonstrating prudent financial management in the period leading up to, and during an unprecedented period of constriction experienced nationally in the market for legal education. The collaborative approach undertaken by the law school's dean and senior administration, in partnership with faculty and staff, under fiduciary oversight by its Board of Trustees, is exemplary.
2. Developing and maintaining a cohesive, urban campus with an emphasis on the student experience and creating a community of learning that promotes interaction between and among students, faculty and staff. Against a backdrop of financial limitations, California Western succeeds in the presentation of a well-maintained physical plant that supports the institution's goal of highlighting its prominence in the civic fabric of San Diego.
3. Providing students with opportunities for meaningful and valuable experiential learning experiences, such as the California Innocence Project and the Internet Media & Law Clinic, that develop students' legal skills in real-world settings.
4. Supporting student diversity and emphasizing student success through an array of academic support services, focused analyses of behavioral and academic factors for at-risk students, and programmatic interventions designed to promote student achievement.
5. Building a community of faculty and staff who are deeply committed to students as evidenced by their continued dedication to California Western through seasons of financial challenge, the loyalty displayed by alumni and their ongoing service to the school, and the philosophy of care from those who work with students.

RECOMMENDATIONS

1. Develop a comprehensive and robust assessment function.

CWSL has developed student learning outcomes for its three degree programs (JD, LLM/MCL, and MAESTRA) and mapped these outcomes to the curriculum in the case of the JD program. However, course learning outcomes need to be measurable, standards of performance clearly identified, and the alignment between course learning outcomes and the program learning outcomes readily apparent. (CFR 2.3)

Similarly, if co-curricular learning experiences contribute to program learning outcomes, systematic outcomes assessment needs to be in place and the results used for improvement. (CFR 2.11)

The team recognized the participation of many faculty members in defining program and course learning outcomes, but the institution needs to demonstrate that faculty take collective responsibility for establishing appropriate standards of performance and demonstrate the achievement of these standards through assessment (CFR 2.4). In addition, these expectations for student learning are to be embedded in the standards that faculty use to evaluate student work. (CFR 2.6) While utilizing external individuals to assess student learning may provide useful indicators of student learning, faculty need to own their responsibility to assess learning outcomes in courses and/or in co-curricular learning experiences throughout the degree program. This will provide more robust direct assessment of learning and allow faculty to respond promptly to improve both individual and collective student learning.

By developing and rewarding institutional champions with expertise in assessment of learning outcomes, CWSL can foster a pervasive, faculty-led culture that values assessment of student learning and educational effectiveness. (CFR 4.1)

2. Develop a comprehensive and robust program review process.

It was not evident to the team that a program review process is in place or under development. CWSL needs to plan and implement a comprehensive program review of all programs which includes a reflective program-level self-study. The review should be a systematic, cyclical process with a clearly defined set of criteria that includes, but is not limited to, analysis of

student achievement of the program's learning outcomes, retention and graduation rates, and, where appropriate, results of licensing examination and employment and evidence from external reviewer(s). (CFR 2.7) While undergoing the periodic ABA accreditation review contributes to understanding of the JD program, an accreditation review is not sufficiently comprehensive to meet WSCUC expectations for program review.

3. Develop a comprehensive and robust institutional research function.

As was stated in the January 18, 2017 letter from WSCUC regarding CWSL's Eligibility Review, it is important that the school develop a more robust institutional research function with strong analytics to be used across the institution to inform strategic planning, enrollment management, student success efforts, and assessment of learning outcomes. While the institution has some data and people are asking many of the right questions, the lack of a dedicated and robust IR function and infrastructure prevents leaders, faculty and staff from having access to appropriate data and the analysis of the data to create an evidence-based culture, from assessing student learning, understanding student success factors, or for adequate institutional reflection and planning. (CFR 4.2)

While CWSL demonstrated that data are used to improve educational and operational efforts on an ad-hoc basis, the school needs to develop an evidence-base culture with respect to institutional planning and functioning with systematic cycles of data collection and analyses, and with feedback loops to revise and improve institutional planning and educational effectiveness. (CFR 4.3) In addition, appropriate stakeholders should be regularly involved in the assessment and alignment of educational programs (CFR 4.5).

4. Develop a strategic plan that incorporates a vision for CWSL in a changing higher education and legal landscape.

California Western School of Law is "front and center" in the changing higher educational environment. The school has weathered difficult financial circumstances over the past five years while strengthening its internal operations. It is now essential that CWSL consider the current and future changes likely to take place in legal practice and legal education and create a vision for how CWSL can thrive in that environment. (CFR 4.7) The team is concerned that the institution is not setting a clear vision or developing a strategic plan to set a direction for its

academic programs, co-curricular learning, support functions, and facilities and technology infrastructure for a robust future. In this challenging climate for legal education, the team recommends that Cal Western not wait until the new dean/president is in place to assess the institution's strategic position, articulate priorities, and examine the alignment of its purposes, core functions and resources to chart the future direction of the institution. (CFR 4.6)

APPENDICES

FEDERAL COMPLIANCE FORMS

OVERVIEW

There are four forms that WSCUC uses to address institutional compliance with some of the federal regulations affecting institutions and accrediting agencies:

- 1 – Credit Hour and Program Length Review Form
- 2 – Marketing and Recruitment Review Form
- 3 – Student Complaints Form
- 4 – Transfer Credit Policy Form

Also included is the Distance Education Review for Maestría en Litigación Oral (Spanish Language LLM in Trial Advocacy).

1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)
Policy on credit hour	Is this policy easily accessible? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, where is the policy located? The policy is not on the website but faculty are informed about the policy and the Registrar is the one who makes sure all classes are in compliance.
	Comments: CWSL complies with ABA Standard 310 governing credit hour requirements at ABA accredited law schools and provided a copy of the ABA credit hour policy.
Process(es)/ periodic review of credit hour	Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	The Curriculum Committee reviews all new course proposals before recommending new courses to the faculty. The faculty must approve all new courses by a majority vote. The Curriculum Committee and the faculty ensure that all new courses meet ABA credit hour requirements. The ABA reviews the school's compliance with the ABA's credit hour requirements during its re-accreditation process.
	If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Comments: The institution provided a copy of the ABA Accreditation Site Team Report-June 2014 that verified the ABA's review of credit hours.	
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: A review of Fall 2018 course schedule and CWSL Academic Calendar Summer 2018- Fall 2019 verified that courses meet for prescribed number of hours.
Sample syllabi or equivalent for online and hybrid courses <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed? Community Property , Remedies , and Trusts and Estates .
	What kind of courses (online or hybrid or both)? These are the only online JD courses and they are hybrid. The Maestria Program also offers online courses.
	What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS <input type="checkbox"/> MA <input checked="" type="checkbox"/> Doctoral
	What discipline(s)? Law.

	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input type="checkbox"/> XXYES <input type="checkbox"/> NO Comments:
Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated) <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed?. Two
	What kinds of courses? Clinical Externship and Trademark Clinic
	What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS <input type="checkbox"/> MA X Doctoral
	What discipline(s)? Law
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? X YES <input type="checkbox"/> NO Comments: The ABA has credit hour requirements for all courses. CWSL's experiential courses are reviewed by the Associate Dean for Experiential Learning to ensure that they comply with the requirements.
Sample program information (catalog, website, or other program materials)	How many programs were reviewed? Two
	What kinds of programs were reviewed? JD, LLM/MCL
	What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS <input type="checkbox"/> XXMA X Doctoral
	What discipline(s)? Law
	Does this material show that the programs offered at the institution are of a generally acceptable length? X YES <input type="checkbox"/> NO Comments: All of CWSL's programs and their requirements are described in the school's Statement of Academic Policies . They are also described on the school's website: JD , LLM/MCL , and Maestria .

Review Completed By: *Jenni Parrish*
Date: September 13, 2018

2 - MARKETING AND RECRUITMENT REVIEW FORM

Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution's recruiting and admissions practices.

Material Reviewed	Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.
**Federal regulations	<p>Does the institution follow federal regulations on recruiting students? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments: CWSL complies with all ABA Standards governing the recruitment and admission of students. These include provisions governing non-discrimination, equal opportunity, diversity and inclusion, reasonable accommodations, admissions, disclosure, student services, and student complaint. The school provided a copy of the ABA Standards and Rules of Procedure for Approving Law Schools.</p>
Degree completion and cost	<p>Does the institution provide information about the typical length of time to degree? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Does the institution provide information about the overall cost of the degree? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments: CWSL provides extensive information about its program requirements and costs on its website for its degree programs: JD, LLM/MCL, and Maestria. CWSL also provides Consumer Information required by the ABA that lists, for example, bar pass rates.</p>
Careers and employment	<p>Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>

	Does the institution provide information about the employment of its graduates, as applicable? X YES <input type="checkbox"/> NO
	Comments: The school has a large Career and Professional Development Office , which provides extensive job placement counseling to students. The school also posts on its website employment and outcome data.

*§602.16(a)(1)(vii)

**Section 487 (a)(20) of the Higher Education Act (HEA) prohibits Title IV eligible institutions from providing incentive compensation to employees or third party entities for their success in securing student enrollments. Incentive compensation includes commissions, bonus payments, merit salary adjustments, and promotion decisions based solely on success in enrolling students. These regulations do not apply to the recruitment of international students residing in foreign countries who are not eligible to receive Federal financial aid.

Review Completed By: *Jenni Parrish*
Date: September 13, 2018

3 - STUDENT COMPLAINTS REVIEW FORM

Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution's student complaints policies, procedures, and records.

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Policy on student complaints	<p>Does the institution have a policy or formal procedure for student complaints?</p> <p>X YES <input type="checkbox"/> NO</p>
	<p>If so, is the policy or procedure easily accessible? Is so, where? CWSL has posted its Student Handbook on its website. The Student Handbook provides information about the school's Sexual Harassment Policy, Code of Student Professional Conduct (Honor Code), and Student Grievance Procedure.</p> <p>The Code of Student Professional Conduct governs complaints by students about other students, and the Student Grievance Procedure governs complaints by students about faculty or staff.</p>
	<p>Comments:</p>
Process(es)/ procedure	<p>Does the institution have a procedure for addressing student complaints?</p> <p>X YES <input type="checkbox"/> NO</p> <p>If so, please describe briefly: The school encourages informal resolution of complaints as a first step and throughout the dispute resolution process. The student also has the option of filing a formal grievance, as described in the Student Handbook.</p>
	<p>If so, does the institution adhere to this procedure? X YES <input type="checkbox"/> NO</p>
	<p>Comments:</p>

Records	<p>Does the institution maintain records of student complaints? X YES <input type="checkbox"/> NO</p> <p>If so, where? The Vice Dean's Office and the Vice President of Student Life's Office maintain records of student complaints for five years.</p>
	<p>Does the institution have an effective way of tracking and monitoring student complaints over time? X YES <input type="checkbox"/> NO</p> <p>If so, please describe briefly: Since 2016 they have used Advocate, a conduct/grievance/care compute program that allows them to track various student support issues including grievances. However, there have been only 3 student grievances since 2013 so it would be challenging to find meaningful trends in such a small number.</p>
	<p>Comments:</p>

*§602-16(1)(1)(ix)

See also WASC Senior College and University Commission's Complaints and Third Party Comment Policy.

Review Completed By: *Jenni Parrish*
Date: September 13, 2018

4– TRANSFER CREDIT POLICY REVIEW FORM

Under federal regulations*, WSCUC is required to demonstrate that it monitors the institution’s recruiting and admissions practices accordingly.

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Transfer Credit Policy(s)	Does the institution have a policy or formal procedure for receiving transfer credit? X YES <input type="checkbox"/> NO
	If so, is the policy publically available? X YES <input type="checkbox"/> NO If so, where? CWSL provides information about the transfer process. The school has a policy governing how the number of transfer credits is determined, and it provides information about the policy to prospective transfer students.: https://www.cwsl.edu/admissions-and-financial-aid/jd-admissions/transfer-and-visiting-students
	Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education? X YES <input type="checkbox"/> NO
	Comments:

*§602.24(e): Transfer of credit policies. The accrediting agency must confirm, as part of its review for renewal of accreditation, that the institution has transfer of credit policies that--

- (1) Are publicly disclosed in accordance with 668.43(a)(11); and
- (2) Include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education.

See also WASC Senior College and University Commission’s Transfer of Credit Policy.

Review Completed By: *Jenni Parrish*
 Date: September 13, 2018

Report Appendix

Institution: CWSL School of Law
Name of reviewer/s: Carlos González
Date/s of review: July 2018

1. Programs and courses reviewed - Maestría en Litigación Oral (Spanish Language LL.M. in Trial Advocacy)
2. Background Information - 1st fully on-line program, aside from select courses taught on-line

Other academic offer is (all face to face): [(iv) related to review]

- i. Doctoral Professional - Juris Doctor (JD)
- ii. Master's - Master of Laws in US Law, Master of Comparative Law for Foreign Lawyers
- iii. Dual Programs - JD/MBA and JD/Master in Social Work (MSW)
- iv. Short term programs (abbreviated list) - ACCESO Capacitación (Trial Skills Academy):
 1. Short term courses (3~5 days), in Spanish.
 2. Has been operating since 1998.
 3. Its courses are taught in situ across Latin America and in San Diego, CA.

The experience learned via this academy shaped the "Maestría en Litigación Oral"

3. Nature of the review (material examined and persons/committees interviewed)
 - a. From CWSL, telephone interview with:
 - i. Alex Simpson, Associate Director, Maestría CWSL
 - ii. Michael Semanchik, Staff Attorney CWSL
 - iii. Don Smythe, Vice-Dean Academic Affairs, CWSL
 - iv. Wendy Bashant, VP-Student Affairs, ALO, CWSL
 - b. Other interviews:
 - i. Alfredo Estrada, Dean, School of Law, CETYS University, Tijuana, México.
 - ii. Mario Ruiz, Practicing Attorney, Judge, State Court System of Baja California, 3rd District, Civil Cases, Baja California, México (2008-18)

Their opinions are:

- Even though law systems are similar, enough differences exist that make it dissimilar when studying a US Law based program, but
- Learning oral litigation skills, even under this dissimilar context does add value to students' skill set.
- Additionally, they perceive value to students from:
 1. International companies that establish operations in Latin American countries and are in need of law advice, (the companies bring in) their US attorneys and the (retained) domestic attorneys are able to speak a similar language.

(This based on experience from Mexican lawyers working with international companies based in Baja California).

2. And by expanding their networking experience, from interacting with their classmates from different Spanish speaking countries.

Observations and Findings

Lines of Inquiry (refer to relevant CFRs to assure comprehensive consideration)	Observations and Findings	Follow-up Required (identify the issues)
<p><i>Fit with Mission.</i> How does the institution conceive of distance learning relative to its mission, operations, and administrative structure? How are distance education offerings planned, funded, and operationalized?</p>	<p>The experience of 20 years from “ACCESO Capacitación” teaching in Latin America in Spanish for Law professionals has set the stage for maturing into a full master’s program today.</p> <p>It is their 1st fully on-line program, currently they provide some courses on-line.</p> <p>The online offering allows for broader access to different countries in the region, albeit with differing law systems, but which can all learn oral litigation skills to bring back to their own practice.</p>	<p>It is unclear how program sustainability ties in with budget planning, e.g., resources in Spanish will have to be continually added.</p>
<p><i>Connection to the Institution.</i> How are distance education students integrated into the life and culture of the institution?</p>	<p>The students for this program have 2-one week face-to-face seminars. The first one occurs at the start of the program, to get to know their professors, classmates, IT support (log into Canvas), and other student support that the institution offers (its offered all in Spanish).</p> <p>The second one is at the end of the program, similar to a capstone seminar, where oral litigation cases are presented by students.</p>	<p>The 2-one week face-to-face seminar allows integration on campus.</p> <p>Has a program been identified to assess how effective these seminars will be (challenges and good practices)?</p>
<p><i>Quality of the DE Infrastructure.</i> Are the learning platform and academic infrastructure of the site conducive to learning and interaction between faculty and students and among students? Is the technology adequately supported? Are there back-ups?</p>	<p>The LMS used is Canvas, the faculty are adept at teaching these courses in a condensed format abroad in Spanish, and manage their face-to-face courses using the platform.</p> <p>Spanish speaking TA’s will be assigned to each course to support faculty.</p>	<p>---</p>
<p><i>Student Support Services:</i> What is the institution’s capacity for providing advising, counseling, library, computing services, academic support and other services appropriate to distance modality? What do data show about the effectiveness of the services?</p>	<p>This is their 1st program fully on-line, at this time there is no data available about the effectiveness of student support services under this format.</p> <p>The electronic resources currently available from the Library are extensive and suit their current offer. These are all in English, which might pose challenges to prospective students.</p>	<p>A program to assess the effectiveness of electronic resources in Spanish and English from the Library would be helpful.</p>

<p><i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? Do they teach only online courses? In what ways does the institution ensure that distance learning faculty are oriented, supported, and integrated appropriately into the academic life of the institution? How are faculty involved in curriculum development and assessment of student learning? How are faculty trained and supported to teach in this modality?</p>	<p>Faculty are mostly adjunct Law Professionals practicing in the region, all bilingual speakers. They have experience using the LMS for their face-to-face courses, and will be the ones teaching the courses for the Maestría cohort, on a course-by-course basis schedule.</p> <p>Faculty are the ones who developed the curriculum for the Maestría.</p>	<p>Will they be the same faculty cohort that evaluates the effectiveness of the program as it goes for round 1?</p>
<p><i>Curriculum and Delivery.</i> Who designs the distance education programs and courses? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to on-ground offerings? (Submit credit hour report.)</p>	<p>Courses are designed by faculty, based on the on-the-ground programs, and the experience from ACCESO Capacitación.</p> <p>Hence the Maestría courses are on par to others not on-line.</p>	<p>Will the design be kept in-house or a third party be brought in as this program grows.</p>
<p><i>Retention and Graduation.</i> What data on retention and graduation are collected on students taking online courses and programs? What do these data show? What disparities are evident? Are rates comparable to on-ground programs and to other institutions' online offerings? If any concerns exist, how are these being addressed?</p>	<p>There is data for their face-to-face from 2013~2015, where attrition for 1L students has gone down (from mid-10's to mid-00's). No specific program was cited for this result.</p> <p>On their master's program, it was cited, of the latest generation, 117 began, and 100 graduated.</p>	<p>It was not evident that a more robust system of collecting retention data for on-line been considered, this may be a need.</p>
<p><i>Student Learning.</i> How does the institution assess student learning for online programs and courses? Is this process comparable to that used in on-ground courses? What are the results of student learning assessment? How do these compare with learning results of on-ground students, if applicable, or with other online offerings?</p>	<p>Faculty assess the work of the students based on the designed curricula and the expected outcomes for the course, additionally an exit survey is given at the end of the course.</p> <p>Faculty review the information on end-of-term meetings to make changes on courses.</p> <p>One external outcome is the ABA Bar-passage rates reported for graduates who hold jobs that require it, which has climbed for the past three years (2015~2017). From</p>	<p>Have other indicators been considered for this program, as most will not pursue the Bar exam nor work in the US?</p>

	<p>low 40's up to mid-50's</p> <p>As well as those students who hold jobs. A number that has also been on a positive trend in the same three years (2015~2017). From low 70's to mid-70's</p>	
<p><i>Contracts with Vendors.</i> Are there any arrangements with outside vendors concerning the infrastructure, delivery, development, or instruction of courses? If so, do these comport with the policy on <i>Contracts with Unaccredited Organizations</i>?</p>	<p>No such arrangements seem to fall under this at this time.</p>	---
<p><i>Quality Assurance Processes:</i> How are the institution's quality assurance processes designed or modified to cover distance education? What evidence is provided that distance education programs and courses are educationally effective?</p>	<p>Assessment occurs during each course, by professors and additionally indirectly by student surveys at the end of the course. This stage is solid, but it was unclear how these activities inform Program Review in a systematic way.</p> <p>This process will be carried over to the on-line program, which has been tested on selected courses from their current programs.</p> <p>Positive anecdotal evidence was offered at this stage for the effectiveness of this process on the on-line courses.</p>	<p>Will a separate process be need instituted for Program Review, given unforeseen challenges of teaching in another language with varying shades of meanings for the same words, e.g. in English U.S. flat vs. UK flat.</p>

Rev 3/2015