

REPORT OF THE WSCUC VISITING TEAM
SEEKING ACCREDITATION VISIT 2

To Lincoln Law School

September 24-27, 2019

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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 WSCUC 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 Lincoln Law School – Sacramento

Lincoln Law School of Sacramento (LLS) is a private, four-year, evening law school founded in 1969 by Andrew Smolich and Victor Bertolani, practicing attorneys in the Sacramento area. In 1985, Mr. Smolich and Mr. Bertolani concluded their partnership and Mr. and Mrs. Smolich became sole owners. LLS is a single facility campus located at 3140 J Street, Sacramento, California, approximately two miles from the State Capitol, the Third District Court of Appeal, and the United States District Court for the Eastern District of California.

The school is incorporated in the State of California as a private, for-profit corporation with the following mission: “Lincoln Law School provides an excellent legal education to a qualified and diverse student body through an accessible and supportive four-year evening program.” Through its four-year program, students who attend LLS are eligible for the degree of Juris Doctor (JD) when they have completed a minimum of 86-semester units in accordance with the Law School’s prescribed curriculum. Students who graduate with the JD degree awarded by the Law School are eligible to sit for the Bar Exam. More than 1,200 LLS graduates have been admitted to the California Bar. The great majority of them practice law in the Sacramento area, and include more than 10 California Superior Court judges.

First-year classes at LLS currently range from 75 to 90 students. Second-, third-, and fourth-year classes have ranged between 35 and 60 students. Enrollment numbers, one month into the Fall 2018 semester, were first-year 88, second-year 46, third-year 41, and fourth year 46. Total enrollment stands at 221. Approximately half the students are Caucasian and half comprise historically underrepresented groups.

The School's administrative support staff includes a chief executive officer, chief financial officer, dean, director of admissions and accreditation, registrar, career services and

alumni outreach coordinator, librarian, and assistant librarians. The combined experience and education of key staff provides substantial support consistent with the school's purpose and mission creating an atmosphere of openness and stability. The faculty includes 26 adjunct professors and one full-time professor. The school also has 11 legal writing readers all of whom are licensed attorneys.

Accreditation History

LLS received provisional accreditation in 1978 through the Committee of Bar Examiners of the State Bar of California and full accreditation since 1981. Seeking accreditation through WSCUC was a goal set through the strategic planning process by the school's Board of Directors to ensure the continual strive for excellence. LLS submitted its application for eligibility in January 2013. In March 2013, the Eligibility Review Committee acted to defer eligibility for the institution to have more time to meet the eligibility criteria. During the deferral, WSCUC initiated a new process for becoming accredited including a revision of eligibility criteria under which LLS' original eligibility application was reviewed. Originally 23 Eligibility Criteria were used for the LLS review, and six criteria were found to require more work: Criteria 4, 5, 6, 10, 20, and 21. With the reorganization of the Eligibility Criteria, the areas that were found to need more attention were:

Criterion 7: Governance and Administration (Old Criteria 4, 5, and 6)

Criterion 9: Institutional Planning (Old Criterion 20)

Criterion 11: Educational Objectives and Assessment of Student Learning (Old Criteria 10 and 2).

On September 1, 2015, a panel of the Eligibility Review Committee (ERC) of the WASC Senior College and University Commission (WSCUC) deliberated on a supplemental application presented by LLS. The panel determined that LLS had met all the Eligibility Criteria at a level

sufficient to grant Eligibility for five years through September 1, 2020.

LLS' first Seeking Accreditation Visit (SAV 1) took place in March 2017. Here the SAV 1 team evaluated LLS' progress with Criterion 7, 9, and 11 and overall alignment with the WSCUC Standards. On the latter, the team made the following recommendations to the Commission regarding candidacy and initial accreditation:

- For Standard 1 (Defining Institutional Purposes and Ensuring Educational Objectives), the team found that LLS presented sufficient evidence to demonstrate compliance with the Standard that is required for Candidacy.
- For Standard 2 (Achieving Educational Objectives Through Core Functions), the team determined that LLS presented sufficient evidence to demonstrate compliance with the Standard that is required for Candidacy.
- For Standard 3 (Developing and Applying Resources and Organizational Structure to Ensure Quality and Sustainability), the team determined that LLS had not presented sufficient evidence to demonstrate compliance with the Standard that is required for Candidacy.
- For Standard 4 (Creating an Organization Committee to Quality Assurance, Institutional Learning, and Improvement), the team determined that LLS had not presented sufficient evidence to demonstrate compliance with the Standard that is required for Candidacy.

LLS initially scheduled an SAV 2 visit for fall 2018, which was subsequently postponed to the fall of 2019 to allow the school more time to align with the Standards. LLS filed its SAV 2 report in July 2019 with the site visit occurring September 24–27, 2019.

B. Quality and Rigor of the Review and Report

LLS submitted its second seeking accreditation report on July 17, 2019, meeting a deadline set by the Commission for a fall 2019 site visit. The SAV 2 team held a conference call

on August 14 to share individual reflections on the report. There was consensus among the team that the report met minimal expectations for a self-study. LLS reported on progress against each CFR identified in the SAV 1 report as an area of focus. Thus, the report was organized more as a CFR checklist than a narrative of an institution living into the Standards and learning from the WSCUC process. To illustrate, the report includes what appears to be WSCUC prompts for content—see page 6, “Here: Provide a general statement a paragraph or two long presenting a case for how LLS meets Standard 1 at a sufficient level for Initial Accreditation ...” Like language can be found throughout the document. Onward, the site team recommends that such prompts be deleted from future LLS WSCUC reporting.

The report then left the site visit team unconvinced that LLS was aligned with Initial Accreditation, largely due to format and a check-the-box-oriented presentation. Thus, the report made the final list of one of the team’s recommendations—see Section III.

Further discussion with LLS leadership on the last day of the visit deepened the team’s understanding of how the report was drafted. According to the CEO, LLS received consultation with WSCUC to keep the report brief and focused on the CFRs. The team raises this issue to offer general feedback to the Commission on how it approaches training and consultation for report writing. Members of the team, citing past WSCUC workshops and institutional consultation, approached the SAV 2 assignment with high expectations for the final report. The team expected more of a narrative of an institution that knows its strengths, developmental areas, and how it is using data collection and analysis toward continuous improvement. The team acknowledges that the gap between expectations and the final deliverable might be attributable to differences in guidance offered by WSCUC staff to LLS and past guidance relayed to team members as part of WSCUC for their home institutions.

C. Response to Issues Raised in Past Commission Letters

In a letter dated June 30, 2017, the Commission formally communicated with LLS CEO Linda Smolich that it had accepted the recommendations from the SAV 1 team on the school's standing with the four Standards of Accreditation. For Standards 1 and 2, LLS would be recognized as meeting conditions for Candidacy with Standards 3 and 4 staying at Eligibility. All told, 22 CFRs were identified for continued focus: three in Standard 1, five in Standard 2, seven in Standard 3, and seven in Standard 4.

LLS in turn spent the next two years further aligning with the best practices outlined in each CFR. Their efforts were documented in the SAV 2 report submitted to WSCUC in July 2019. The past two years also saw notable change to LLS personnel, starting with the CEO. Linda Smolich was the CEO and ALO for the institution for the SAV 1 visit. She has since stepped away from the role. Today it is occupied by her husband, Jim Smolich, the son of Andy Smolich who co-founded the school and remains on its board. Other changes include the hiring of a new staff member, Brittney Adkins-Neumann, to oversee admission, accreditation, and institutional research functions, and the promotion of Melissa Fuller-Haskin to oversee the registrar and student services functions.

Section III of this report provides a detailed overview of what the SAV 2 team observed and documented during their September 2019 visit. The inquiry began with each team member conducting an independent review of LLS' report and supporting appendices. From there, team members contributed to a worksheet provided by WSCUC to capture reflections, questions, and areas of continued inquiry. The team participated in a conference call on August 14 to share notes and formulate an action plan for the site visit. To follow is a high-level review of the team's analysis.

Standard 1:

The Commission recommended LLS focus on diversity programs, policies, and practices (CFR 1.4), autonomy from external entities (CFR 1.5), and operational integrity (CFR 1.7).

The team found progress on each CFR identified, especially in its efforts to strengthen board governance and a focus on policy development and practice. For instance, the LLS Board of Directors is larger than it was during the SAV 1 visit, a development that provides greater assurances that the Board operates autonomously and can provide oversight without requiring acquiescence from the school's founding family. The site visit confirmed what was relayed in the SAV 2 report.

Standard 2:

The Commission recommended that LLS continue working on its assessment plan for teaching and learning (CFR 2.6), disaggregating data for program reviews (CFR 2.7), competency with collecting, analyzing, and acting on student achievement and satisfaction data (CFR 2.10), further connecting co-curricular programs to the academic experience (CFR 2.11), and being able to analyze student data toward improving retention efforts (CFR 2.13).

Again, the team found progress across all the identified CFRs, especially with LLS' efforts to nurture a culture of data collection and analysis toward continuous improvement. An example that surfaced throughout the report and visit was the creation of "Friday Night Review," a program to help students, especially those in their first year, access more academic support from faculty and high-performing peers. All told, LLS provided ample evidence that it was aligned with the Standard 2 criteria for Initial Accreditation.

Standard 3:

Here LLS' needed to make greater strides with the CFRs given that the Commission maintained its Eligibility standing after the SAV 1 visit. Areas of focus identified in the June 2017 letter include embracing best practices for conducting performance reviews for faculty and staff (CFR 3.2); creating standing training and professional development programs for faculty and staff (CFR 3.3); practicing long-range financial planning (CFR 3.4); performance reviews of the CEO by the Board along with trustee self-assessment (CFR 3.6); further clarity around the role of the Board in decision making (CFR 3.7); further clarity around the roles and responsibilities of full-time staff (CFR 3.8); and a more independent governing board (CFR 3.9).

Once more the SAV 2 team saw significant progress against all that was identified in the Commission's 2017 letter. In particular, the school made substantive advancements with governance, including increasing the number of trustees, creating a new, independent process to evaluate the CEO, and implementing new practices for staff performance evaluations. LLS made so much progress across Standard 3 that the team moved beyond Candidacy and recommended Initial Accreditation.

Standard 4:

Finally, the Commission recommended that LLS focus on the following in order to advance to advance to Candidacy and Initial Accreditation: conducting longitudinal reviews of student data to show progress with student learning outcomes (CFR 4.1); improving the school's institutional research competency and capacity (CFR 4.2); developing an institutional effectiveness plan backed by data collection and analysis (CFR 4.3); completing an assessment cycle and showing results of the inquiry (CFR 4.4); expanding engagement and input from key stakeholders beyond students to include alumni and employers (CFR 4.5); advancing its work with strategic planning with engagement from stakeholders and incorporating academic,

enrollment, and financial planning (CFR 4.6); and being more intentional with looking external and aligning LLS with new trends in higher education.

The team found that LLS made significant progress across all six areas of focus identified by the Commission. In particular, the school's institutional research function made strides due to a new staff hire and a renewed focus on that area. As a result, LLS added more capacity to such key practices as program assessment, data collection from new constituencies, and focusing on measured institutional effectiveness. The team also observed a management team recognizing that LLS' future will look different than its past along with a realization that it will need to be open to new academic practices, e.g., online and hybrid modality, to compete in an evolving marketplace and advance its mission. As was the case with the other Standards, the SAV 2 team saw sufficient evidence that LLS had made great strides with each CFR, insomuch that it evolved beyond Candidacy to be recommended for Initial Accreditation. Section II offers a deeper review of the team's review and analysis that went into its recommendations to the Commission.

SECTION II – EVALUATION OF INSTITUTIONAL COMPLIANCE WITH THE STANDARDS

Standard 1. Defining Institutional Purposes and Ensuring Educational Objectives

Among the Commission's and SAV1 team's recommendations for Standard 1 was for LLS to further its diversity agenda, create a more autonomous board structure, and practice operational integrity through its policies and procedures.

Starting with diversity (CFR 1.4), the SAV 2 team observed that LLS has made considerable progress with its inclusion and diversity agenda, including concerted efforts to foster diversity among faculty and staff. This is evidenced by the hiring of four new faculty members, the hiring of a new career service and alumni coordinator, and the addition of a new trustee, all of which are from historically underrepresented groups. (CFR 1.4)

While LLS' Employee Hiring Policy and Procedure remains silent on the intentionality of ensuring a diverse applicant pool, the Chief Executive Officer (CEO) and senior leadership displayed a strong commitment to ensure diversity and inclusiveness inside and outside the classroom and workplace. Meanwhile, the board communicated deliberate efforts to recruit trustees that are diverse in race, gender, and expertise.

LLS also made gains with its admission practices, including the development of policies to aid the enrollment of a diverse group of students. Whereas the SAV 1 team observed an admission process largely centered on LLS' dean, the school today turns to a committee and a holistic approach, with consideration supported by personal statements, a resume, and recommendation letters, as well as information concerning achievements and accomplishments, past work experience, community service, college activities, political activities, and other life experience. This approach seeks to facilitate enrollment of students who can contribute to the enrichment of LLS' mission and educational program. Additionally, there is current discussion among senior leadership to broaden its demographics by targeting students with diverse ages and experiences to bring a different perspective into the classroom. (CFR 1.4)

Turning to governance, the SAV 1 team concluded that LLS' efforts to consolidate governance into one board and policies related to evaluation of the CEO/director met the standard of Candidacy for autonomy under Standard 1, with further development needed to recommend Initial Accreditation. Since then, LLS has made significant progress on building an independent, autonomous board. Board bylaws were amended to increase from five to seven trustees with family members of LLS founders being limited to two of that seven—thus non-family trustees now constitute a super majority. (CFR 1.5) New trustees bring expertise in specialized fields of importance to LLS leadership, strengthen alumni engagement, and increased the diversity of membership. Board committees have been further formalized, each with three

members, with a limit of a single family member serving on the Nominating, Finance, and Audit committees. The team found that while progress is being made, given the small size of the board, challenges remain to reach suitable quorums, achieve desirable diversity, and bring the range of experience and skills that would make this an even higher functioning board. (CFR 1.5)

Finally, the SAV 1 team saw opportunities for improvement with how LLS documents policies and structures related to core business practices. (CFR 1.7) LLS has since diligently addressed these concerns. The SAV 2 team found clear delineation of responsibility between members of the administration, including the CEO, CFO, Chief Academic Officer (CAO), and other key role players from the director of admissions and institutional research to the registrar and student services lead.

Clarity and consistency on financial planning and budget review was another area of focus. Here the SAV 2 team observed a CFO planning, managing, and reporting on LLS finances, with the Board Finance Committee reviewing and approving the annual budget and LLS's financial position at its quarterly meetings. The board also has responsibility to approve new unbudgeted expenses requested over \$25,000. An appropriately constituted Board Audit Committee commissions and reviews an independent annual financial audit, an admissions policy explains criteria, and the process for application and admission. (CFR 1.7)

Onward, the Team suggests LLS consider devising a "policy on policies" to establish authority to identify needed policies and processes for their formation and continuous review.

Standard 2. Achieving Educational Objectives through Core Functions

For Standard 2, the team focused on CFRs related to student learning outcomes (CFR 2.6), program review (CFR 2.7), analysis of student outcomes data (CFR 2.10), co-curricular programming (CFR 2.11), and student services (CFR 2.13).

The SAV 1 team observed LLS as measuring its student achievement primarily through end-of-term grades, overall GPA, and California bar exam passage rates. LLS was still in a developmental stage toward disaggregating the data by student population, either for tracking progress towards graduation or bar exam passage. The SAV 2 team subsequently observed that LLS has expanded and enhanced student learning objectives to align better with WSCUC expectations in addition to addressing the bar exam. Faculty cited developments in curriculum design and teaching methods that monitor and support student learning during courses, as well as via final exams, course grading, and bar exam achievement. To illustrate, the LLS' new "Friday Review Program" provides a venue for student input into teaching approaches and learning effectiveness and has prompted several changes in teaching and curriculum. (CFR 2.10) LLS also has enhanced bar exam preparation resources for students, in part by offering new programs for students through a third-party service. (CFR 2.6)

LLS witnessed an unusually low bar exam pass rate in 2018, which resulted in further assessment of student learning outcomes (SLOs) and their impact on preparation for licensure—an improvement strategy strongly influenced by the WSCUC accreditation process. The team observed that monitoring and constantly improving SLOs remains a priority for LLS. (CFRs 2.6, 2.7)

Overall, the team saw evidence of LLS developing a culture emphasizing program assessment to make data driven decisions. (CFR 2.7) For instance, data collected from LLS student surveys helped identify more resources through the library offerings. (CFR 2.13) LLS also implemented a program review cycle tied to an Institutional Effectiveness Plan (IEP) and the school's strategic plan. (CFRs 2.10, 4.1, 4.6)

Student Learning and Success (CFRs 2.10, 2.11, 2.13)

The primary recommendation from SAV1 regarding student learning and success was to continue to show progress in implementing a formal structure of assessment, grounded in SLOs, and supported by regular evaluation of student outcomes data.

Since SAV 1, LLS developed and implemented an IEP, Student Satisfaction Survey (SSS), and a post-bar survey. The IEP features needs assessments and identified key performance indicators (KPIs) such as bar pass rates, overall GPA, student satisfaction and progress, and achievement of graduation. The school's strategic plan also includes KPIs for student achievement. (CFR 4.1) In addition, LLS published a student achievement document on its website, which included information on student satisfaction, enrollment, retention and graduation rates. Onward, LLS would benefit by having more student achievement data disaggregated to ensure that they are able to address the needs of certain student populations.

During the SAV 2 site visit, the team observed faculty involvement in assessing SLOs for courses taught, including the use of a rubric designed to measure outcomes, provide feedback to students, and inform strategic planning for teaching and learning. For instance, faculty used the assessment process to determine that practice exams and final exams may not sufficiently measure student success. Instead, guided by data analysis, faculty seek more direct interaction with students. They also incorporated more actual bar questions into midterm and final exams and embrace consistency with their use of measurable rubrics to score exam answers. (CFR 2.6) Lastly, course evaluations and student satisfaction surveys helped inform changes to enhance the student educational experience, the hiring of a new career services and alumni outreach role, and the investment of technology in the classrooms. (CFRs 2.10, 2.13)

One area of concern was a recent decline in LLS' first-time bar passage rate (13 percent for 2018 compared to 58 percent for 2017). The SAV 2 team observed full transparency from LLS administration that the results fell well short of expectations and that the school would not

take a passive approach; instead, additional data are being collected with more direct support being provided for exam takers, i.e., offering a discounted rate for Themis Bar Review.

Regarding student support and co-curricular activities (CFRs 2.11, 2.13), the SAV 1 team reported that while LLS had access to such programs, LLS could benefit from more data collection and analysis, disaggregated by student population, regarding attrition, overall student support needs, and counseling—including financial, academic, and sociocultural factors. These data in turn might be useful in pairing students with academic support, along with resources to support student internships and mentoring.

Guided by analysis of data collected through student surveys, LLS has made several changes since SAV 1. Enhancements include re-evaluating the Legal Writing program and directing attention to matching student needs with individual tutors for 2019-2020 academic year. Influenced in part by the SAV 1 report, LLS expanded its student academic support program in the fall of 2017 by creating a Friday Review Program, which offers students, especially those in their first year, more academic support. LLS also hired a new career services and alumni outreach coordinator to further support student internship and employment opportunities and strengthen the alumni network. In order to better support students, especially those at-risk of falling beyond, each student organization can request funds for additional academic support items that would benefit members. Other co-curricular activities include moot court competitions, or publish articles in *Voir Dire*, it was denoted that such opportunities are not mapped to SLOs or the IEP. Among the SAV 2 team's formal recommendations is for LLS to align co-curricular activities with KPIs and SLOs. (CFR 2.11)

Keeping with data analysis, the SAV 1 team recommended that LLS continue developing its competency to disaggregate student outcomes data to better understand factors contributing to retention, graduation, and bar passage and the resources needed to improve KPIs. Subsequently,

during the 2017–2018 and 2018–2019 academic years, the school’s withdrawal and academic disqualification statistics were gathered and reviewed to assist in identifying students or student groups who could benefit from additional support services.

In addition, beginning in the 2017-2018 academic year, the CAO held academic advising meetings with all students who had two grades below “C” at midterms. Besides the Friday Review Program, students report being supported by the faculty and support staff. One-on-one tutoring is available, ADA accommodations are provided, and career and financial counseling is offered. While attrition analysis is a good starting point, the SAV 2 team observed that LLS could do more to align student services to better serve all students, including those who are persisting. (CFR 2.13)

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

The SAV 2 team focused on seven CFRs subordinate to Standard 3: faculty and staff policies and evaluations (CFR 3.2), faculty and staff development (CFR 3.3), evidence of enrollment management planning and clean audits (CFR 3.4), leadership operating with high transparency and clarity over responsibility (CFR 3.7), clear and consistent decision-making structures, including with the board (CFR 3.7), full-time and qualified senior administrators (CFR 3.8), a fully functioning and independent governing board (CFR 3.9).

Faculty and Staff (CFRs 3.2, 3.3)

Regarding faculty and staff policies, procedures, and evaluations, the SAV 2 team observed progress since SAV 1. For example, LLS has implemented more formal and structured annual staff performance reviews (CFR 3.2), including a board program for reviewing the CEO. (CFR 3.9) The peer-review program for faculty appears robust and was reported as effective and constructive by the faculty themselves. It is clear that LLS has formalized its performance review

program, although the team observed that administration and staff reviews and goal setting would benefit from further development. The team recommends continuing attention to aligning performance expectations with KPIs and annual and long-range plan priorities. (CFR 3.2)

Regarding faculty and staff development (CFR 3.3), LLS has introduced some additional professional development programs for faculty, mostly focused on new techniques in teaching and provided by fellow faculty and outside specialists. The SAV 2 team observed that the LLS senior administration—namely the CEO and CFO—are newer to their positions while LLS has undertaken steep learning curves in recent years related to WSCUC best-practice areas. Because staff members are asked to cover a broad range of functions, the team sees it as critical that there be appropriate and regular attention to development and feedback, as well as training in new delivery service systems and technology. (CFR 3.3)

The team recommends that the LLS staff should take advantage of outside expertise and peer/mentoring opportunities to continue to build institutional competencies. Examples include joining the Association of Governing Boards (open to institutions accredited or seeking accreditation from a recognized regional agency) and involving the CEO, board chair, CAO/dean and other members in their professional development conference programs. The National Association of College and University Business Officers (NACUBO) provides professional development and peer group support for higher education business officers. Offerings for accreditation officers, institutional research specialists, and other executives will continue to build staff skills aligned with WSCUC accrediting standards (e.g., WSCUC's Assessment Leadership Academy). (CFR 3.3) Finally, the team recommends that LLS review its strategic plan and identify key competencies needed to advance its agenda, a practice that could inform professional development planning.

Fiscal, Physical, and Information Resources (CFR 3.4)

As of the SAV 1 visit, annual financial audits, with board oversight, was not the common practice at LLS. Instead, the school hired a Certified Public Accountant (CPA) to provide an opinion on the three fiscal years preceding its initial eligibility application with WSCUC. The SAV 2 report attachments included an external auditor's annual report, a current year line item budget, and a top-line version of the strategic plan, including five-year financial projections. (CFR 3.4)

As for areas of opportunity, the team concluded that LLS would benefit from strengthening its short-and long-term planning processes and documenting performance against those plans. (CFR 3.4) To illustrate, continued refreshment of the annual and strategic plans, including assessment of whether and how outcomes align with goals—with resulting action plans—would benefit institutional progress. The strategic plan could then be recast annually and the five-year goals examined and recalibrated in response to changes in the market and other environmental influences alongside findings from the various ongoing internal assessment activities. Since tuition is the most important revenue source, and enrollment marketing and management are keys to tuition revenue outcomes, the team recommends running long-range plan scenarios that map alternative courses of action (and objectives and strategies) that anticipate potential significant changes in external conditions or changes in internal resources or assets. (CFRs 3.4, 4.6)

Organizational Structures and Decision-Making Processes (CFRs 3.6, 3.7, 3.9)

According to the SAV 1 report, the previous site visit team saw opportunities for improvement with board governance, especially decision-making, planning, and assessment practices documented through meeting agendas, minutes, and active board subcommittees.

Formally evaluating the school's CEO was another developmental area. LLS documented numerous advancements in their 2019 report to WSCUC, including expanding from five trustees to seven, engaging in trustee self-evaluations, and formalizing a new process to evaluate the CEO. (CFRs 3.6, 3.9)

The SAV 2 team validated this progress during its site visit. Trustees reflected on learnings from their self-evaluations and an altogether more formalized, documented approach to governance. One notable anecdote was the CEO's most recent evaluation. After first conducting the evaluation in a group setting with input from LLS' co-founder, and father of the CEO, the board determined it best to transition to a new process where relatives of the CEO were recused from offering formal feedback. The remaining trustees then conducted individual evaluations to be compiled into a formal review. Overall the SAV 2 team found significant evidence of LLS practicing leadership and governance with transparency, integrity, and a high-level worthy of a WSCUC-accredited institution. (CFR 3.6)

The SAV 1 report portrayed LLS' approach to board governance as a work in progress, i.e., functioning more like an advisory group than a fully autonomous board with clear authority over the institution and CEO. Since then, LLS has made observable gains, including expanding the number of trustees, creating standing committees, and conducting quarterly meetings with clearly defined agendas and desired outcomes. The SAV 2 team observed a more advanced governance process than what was documented in 2017. The team also went deeper than just looking at the board. It observed the inner workings of an administration that embraced collaboration and transparent decision making, a faculty contributing to the conversation about continuous improvement, and a functioning Student Bar Association that is at the table with administration on issues that directly affect students. To summarize, LLS took the SAV 1 team's

recommendations to heart and, guided by its own processes for improvement, made observable gains to how it approaches decision making. (CFR 3.7)

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

For Standard 4, the SAV 2 team focused on seven CFRs with specific attention on quality-assurance processes (CFR 4.1), institutional research capacity (CFR 4.2), continuous assessment cycles of teaching and learning (CFRs 4.3, 4.4), stakeholder engagement in organizational assessment and planning (CFR 4.5), strategic planning (CFR 4.6), and adaptability to the changing higher education landscape (CFR 4.7).

Quality Assurance Processes (CFRs 4.1, 4.2)

Many of the structures in place to complete and maintain a comprehensive plan for quality assurance and continuous improvement were still new to LLS during SAV 1. The team identified academic curricular design and review as an area with high-level assessment. Based on guidelines and areas of the California bar exam, LLS regularly reviews its curriculum broadly and at a course-by-course level. As observed by the team, LLS faculty and dean share the responsibility for evaluating student performance and making changes to curricular content and/or delivery, as well as examination methods and timing. In addition to curriculum, the Senior Faculty Review Committee is responsible for the evaluation of faculty. In terms of curriculum and faculty review, LLS had a developed plan in place and engages in effective quality assurance measures. (CFR 4.1)

Since the SAV1, LLS implemented the IEP, which outlines the quality-assurance processes. After working to define SLOs and curriculum reviews, the faculty Assessment Committee approved the Learning Outcome Assessment Plan (LOAP) during the 2018–2019 academic year to formally define and document LLS’ assessment cycle. Comprising three

faculty members, the Assessment Committee meets bi-annually and developed writing and oral rubrics. As outlined in the strategic plan, LLS is at the beginning of a seven-year cycle and began with the assessment of SLO No. 6: *Possess communication skills including writing and oral advocacy in a legal context*. The SAV 2 team confirms that LLS is actively advancing its assessment plan. To illustrate, it selected courses for the SLO No. 6 assessment that ended in the spring and summer of 2019. Afterward, LLS conducted an assessment from the final exam for SLO No. 6 for four courses; the findings yielded that LLS would be better suited to assess students in non-pressurized environments (final exam) for the writing component and to use moot court for oral communication skills. With the partnership of the Legal Writing readers and 1L professors, LLS will use data for the evaluation for SLO No. 1. (CFR 4.1)

The SAV 1 team identified that LLS had substantial work to accomplish in order to implement and sustain its efforts for ongoing institutional effectiveness. LLS had developed a position of institutional research director. In its efforts of being data-driven, LLS collected some internal and external data, particularly information related to student passage rates on the Bar exam in comparison to other California schools; however, LLS did not have an identified set of benchmarks with which to compare itself in terms of goals or achievements. While LLS uses Populi for collection of data, tracking, and evaluation, the SAV 1 visit team did not find much evidence of reports that had been generated and noted this was an area for future growth. (CFR 4.2)

Although LLS noted many key data points and performance indicators, the team found that it continues to primarily use student GPA to determine continuation and success in its program. As of the SAV 2 visit, LLS had yet to develop a more comprehensive plan for identifying additional data to analyze and how they might develop benchmarks for success. Possible examples include how LLS identifies enrollment goals, sets tuition models, tracks

student financial aid needs, student success, and retention rates beyond GPA, or whether they disaggregate student admission, retention, graduation and bar passage rate by diverse student populations. Considering such data has future potential for the school and could be integrated more closely into their overall operations.

Since the SAV 1, LLS hired a director of admissions and accreditation who is responsible for institutional research. (CFR 4.2) This unique hybrid position has been touted as working well. LLS staff reported that with their duties ebb and flow with admissions advancing on a rolling-basis and strategically intertwined with the assessment calendar, thus, easing the burden of having separate positions. Additionally, LLS hired a marketing firm for recruitment to assist in targeting students.

The director of admissions and accreditation works directly with the Assessment Committee, senior faculty review committee, institutional effectiveness team, and staff in collecting relevant data and in generating reports for review. Primary data sources include application and student data maintained in Populi, Survey Monkey, and State Bar of California law school statistics. LLS identified peer institutions from law schools in California to obtain comparative data, which are used as a benchmark for LLS performance and to identify trends in legal education. Additionally, data were used in the development of the school's strategic plan and the identified KPIs. LLS developed its LOAP in 2018 with the first program SLOs were recently assessed. (CFR 4.1) The director of admissions and accreditation will continue to work with the appropriate committees and share reports at the school's Institutional Effectiveness meetings to identify potential improvements to institutional research. (CFR 4.2)

Institutional Learning and Improvement (CFRs 4.3, 4. 4, 4.5, 4.6, 4.7)

CFR 4.3 verifies leadership at all levels, including faculty, staff, and administration, are committed to improvement based on the results of inquiry, evidence, and evaluation. The SAV 1

site team found limited evidence of such reporting, including assessment of teaching, learning, and the campus environment used for improvement.

The SAV 2 team recorded improvements by LLS with gathering and analyzing data for continuous improvement. LLS is becoming more adept with gathering data where they see areas the institution can improve and assess. LLS identified through practice that students benefited from research papers rather than case briefs, as it was a better reflection of writing proficiency. Additionally, LLS utilizes KPIs in employee and faculty reviews toward accountability for student success, including a peer-to-peer faculty evaluation process. (CFR 4.3)

During the SAV 1, the team documented marginal improvement with designing and completing an assessment plan. (CFR 4.4) Since then, the SAV 2 team observed that LLS has nurtured a culture of continuous improvement through assessment practices. For instance, LLS has begun canvassing stakeholders through surveys to collect feedback on assessment practices toward continuous improvement. LLS also turns to an Assessment Committee charged with identifying data needs to inform improvements in program learning outcomes and other institutional improvements. Additionally, LLS developed the LOAP that set standards for LLS to have a cycle of continuous improvement through planning and assessment. (CFR 4.4)

During the SAV 1 it was less clear how other stakeholders—e.g., alumni, employers, practitioners, and students—were involved in institutional learning and improvement efforts. Since then, LLS developed the IEP focusing on six main areas: SLO assessment, bar examination pass rate, student satisfaction, alumni support, employer relations, and employee satisfaction. Seeing the value of external data, LLS developed and deployed a survey for alumni and employers, albeit with limited results for the latter constituency. (CFR 4.5) The board subsequently acknowledged that alumni, employer, and stakeholder engagement is something that could occur more regularly on a formal level, since LLS already has productive community

engagement activities, and many of the faculty are practitioners in the local area. In its institutional report, LLS noted that this remains a developmental area.

Looking within, the SAV 2 team found that LLS regularly involves stakeholders in the assessment of institutional effectiveness through various surveys, meetings with faculty committees, the board, and both formal and informal discussions with students and other stakeholders. (CFR 4.5)

The LLS report included a PowerPoint summarizing the long-range (five-year) strategic plan. (CFR 4.6) Reviewing the plan, the SAV 2 team observed opportunities for additional inputs, including a review of external opportunities and threats ahead for LLS that would suggest a more outward looking institutional strategy. The visit offered some, though limited, evidence that such a review supported the plan. Additional team recommendations include mapping individual performance KPIs to the objectives and tactics of the strategic plan and defining annual institutional goals to help advance the agenda. While LLS has made substantial progress in building a culture of assessment based on data gathering, the team sees opportunities for stronger analysis of data gathered followed by reflection and “re-planning” including preparation of more extensive annual and long-range plans. (CFR 4.6)

Finally, the SAV 1 team recommended that LLS not rest on its past successes, and instead continue to look externally to new trends in higher education and be open to exploring new modalities and programs. In general, it saw opportunities for LLS to practice strategic planning with a more outward looking worldview. LLS has since then formulated a strategic plan that acknowledges challenges facing legal education, e.g., declining bar results, and shifts in the marketplace, including emerging trends in online and hybrid pedagogy. The SAV 2 team observed a school that understood the case to evolve. The CEO stated, “Change is coming...it’s inevitable.” The administration cited the WSCUC accreditation process as instrumental in

preparing them for what lies ahead, including new ideas on how best to align their curriculum and delivery model for the future. (CFR 4.7)

SECTION III. FINDINGS, COMMENDATIONS AND RECOMMENDATIONS

Commendations

1. LLS has made substantive overall improvements since SAV 1. The team observed indisputable evidence of an earnest commitment to institutional improvement. Each CFR identified in the last report was addressed, yielding tangible results. Meanwhile, the school added new team members who brought distinct experiences and fresh perspectives to LLS' culture. LLS was at a defined stage of its development during SAV 1. It has made a significant leap forward since then.

2. LLS significantly elevated its competency for governance. The SAV 2 team saw evidence of a board practicing proper oversight of the school. (CFRs 1.5, 3.7, 3.9) Supporting anecdotes include adjustments to how the CEO is evaluated, trustees practicing self-evaluation, and the Board seeking greater engagement in the strategic planning process.

3. LLS appreciates and embraces the assessment process and the value of data-driven continuous improvement. (CFR 4.1, 4.4, 4.5) The team especially commends the faculty, comprised largely of adjunct professors, who embraced the use of SLOs to improve their teaching. Other examples include the creation of the Friday Night Review sessions, the outcome of learnings from the Student Satisfaction Survey, and curriculum adjustments emerging from Program Review. (CFR 2.6, 2.7)

4. LLS sees value in and is committed to the function of institutional research. (CFR 4.2) LLS moved beyond adding IR functions to a standing member of the team; instead, it hired to the competency, finding someone with experience in data collection and analysis. The result is added capacity to deploy new surveys to collect data toward continuous improvement.

5. Faculty, students, and trustees are engaged, committed, and appreciative of LLS' efforts to improve. (CFR 1.7, 4.5) Their comments during the open sessions illustrated the benefits of the WSCUC process. They could see the results of the project and how it positively impacted the institution.

Recommendations

1. LLS' written report to the site visit team could have been stronger. The team unanimously observed that the narrative did not fully account for the school's progress and achievements since SAV 1. LLS has a great story. Onward, the team suggests including more anecdotes of progress, more data, and more effort to engage the reader. Show how the institution is evolving and improving while being honest and reflective. Further discussion of the team response to the report can be found in Section I of this report.

2. Embrace external professional development for the board, CEO, and management. The SAV 1 team suggested that LLS get more involved with the Association of Governing Board (AGB). The recommendation stands. The SAV 2 team recommends that LLS find ways to further connect with the larger higher education community, not just the circle of California accredited law schools. Consider sending a team member, ideally the ALO, to the WASC Assessment Leadership Academy. Meanwhile, explore developing a competency model, whereas LLS identifies key skills and attributes to advance its strategic goals and a plan to make them better. (CFR 3.3)

3. The SAV 2 team recommends further efforts to align enrollment, financial, and strategic planning. One suggestion is to conduct a gap analysis in academics, operations, facilities, and other key areas, and identify what resources are needed to close the gap. Another is to go beyond KPI measurement and develop annual institutional goals that connect to the strategic plan. The goals feature specific projects to be resourced and accomplished throughout

the plan year. The projects then can be tied to individual goals; thus, all are involved in advancing the collective agenda. Finally, consider developing long-range financial plan models that go beyond stretch goals. Build a worst-case scenario model to help management see the effects of an enrollment dip and a status quo model that extends current revenue actuals into the near term. Lastly, incorporate new growth projects into the strategic plan, including program and modality diversification.

4. The team recommends more intentionality around incorporating diversity, equity, and inclusion as core values of LLS. (CFR 1.4) Suggestions include more training and professional development centered on diversity, further integration of these values into the strategic plan, and identifying a member of the LLS team to “own” diversity initiatives.

5. The team recommends continued efforts to develop data analysis competencies. Focus on evolving beyond data collection to more reflection on data. Identify research questions, i.e., what do you want to know, before collecting data and conducting analysis. Consider more training for the Assessment Committee of the faculty.

6. Finally, the team recommends more alignment between co-curricular programs and academic goals and SLOs. (CFR 2.11). Include them in the assessment plan and measure outcomes of the non-credit-bearing activities.

Team Recommendations Regarding Initial Accreditation

Standard 1 – Defining Institutional Purpose and Ensuring Educational Outcomes

As it relates to Standard 1, the team’s finding, which is subject to Commission review, is that Lincoln Law School of Sacramento has presented sufficient evidence to demonstrate compliance with the Standard that is required for Initial Accreditation.

Standard 2 – Achieving Educational Objectives through Core Functions

As it relates to Standard 2, the team's finding, which is subject to Commission review, is that Lincoln Law School of Sacramento has presented sufficient evidence to demonstrate compliance with the Standard that is required for Initial Accreditation.

Standard 3 – Developing and Applying Resources and Organizational Structure to Ensure Quality and Sustainability

As it relates to Standard 3, the team's finding, which is subject to Commission review, is that Lincoln Law School of Sacramento has presented sufficient evidence to demonstrate compliance with the Standard that is required for Initial Accreditation.

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

As it relates to Standard 4, the team's finding, which is subject to Commission review, is that Lincoln Law School of Sacramento has presented sufficient evidence to demonstrate compliance with the Standard that is required for Initial Accreditation.

The team congratulates LLS for its hard work and commitment to the cause of accreditation. The team enjoyed the opportunity to learn more about the institution and engage with the people who make such a meaningful and purposeful mission thrive for the next 50 years and beyond.

APPENDICES

1. Federal Compliance Forms
 - a. Credit Hour and Program Length Review
 - b. Marketing and Recruitment Review
 - c. Student Complaints Review
 - d. Transfer Credit Review

Federal Compliance Forms

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? CATALOGUE
	Comments:
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 type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	If so, does the institution adhere to this procedure? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	Comments: LLS REPORTS THIS IS 'N/A'
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:
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? ZERO
	What kind of courses (online or hybrid or both)?
	What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)?
	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"/> YES <input type="checkbox"/> NO
	Comments: LLS DOES NOT OFFER ON LINE OR HYBRID COURSES
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? 3
	What kinds of courses? EVIDENCE, PROFESSIONAL RESPONSIBILTY, TORTS
	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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Sample program information (catalog,	How many programs were reviewed? LAW CURRICULUM
	What kinds of programs were reviewed?

website, or other program materials)	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 the programs offered at the institution are of a generally acceptable length? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:

Review Completed By:

Date:

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	Does the institution follow federal regulations on recruiting students? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Degree completion and cost	Does the institution provide information about the typical length of time to degree? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Does the institution provide information about the overall cost of the degree? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Careers and employment	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
	Does the institution provide information about the employment of its graduates, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:

*§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: MARIANNE BRISCOE
Date: OCTOBER 1 2019

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? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, is the policy or procedure easily accessible? Is so, where? WEBSITE</p> <p>Comments:</p>
Process(es)/ procedure	<p>Does the institution have a procedure for addressing student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, please describe briefly: FORMS AND PROCESS DESCRIBED ON WEBSITE. E MAIL OR OTHERWISE CONVEY FORM TO ADMINISTRATIVE OFFICE; DEAN REVIEWS; REFERS TO DISCIPLINE COMMITTEE; ON TO DIRECTOR; DIRECTOR DECISION IS FINAL</p> <p>If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments:</p>
Records	<p>Does the institution maintain records of student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, where?</p> <p>Does the institution have an effective way of tracking and monitoring student complaints over time? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, please describe briefly: KEPT IN DEAN'S OFFICE FOR 6 YEARS AFTER RESOLUTION</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:

Date:

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? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, is the policy publically available? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where? CATALOGUE
	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? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: EXISTS, COULD BE MADE CLEARER FOR PROSPECTIVE STUDENTS AND OTHER READERS

*§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:

Date: