

REPORT OF THE WSCUC SPECIAL VISIT TEAM

To Alliant International University San Francisco Law School

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The team evaluated the institution under the 2013 Standards of Accreditation and prepared this report containing its collective evaluation for consideration and action by the institution and by the WASC Senior College and University Commission (WSCUC). 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. This report and the Commission letter are made available to the public by publication on the WSCUC website.

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SECTION I. OVERVIEW AND CONTEXT

A. Description of the Institution, Accreditation History, and Visit

San Francisco Law School (SFLS), located in downtown San Francisco, California, was founded in 1909, became a non-profit in 1941, and was acquired by then non-profit Alliant International University in July 2010. In February 2015, Alliant became a for-profit benefit corporation with the corporate name of Alliant International University, Inc., held by the Arist Education System located in Littleton, Colorado.

In August 2014, the San Francisco Law School expanded its JD degree to the Alliant campus in San Diego, California, calling the branch campus program, the San Diego Law School (SDLS). SFLS has been continuously accredited by the Committee of Bar Examiners of the State Bar of California since 1937. SDLS was approved as a fully accredited branch campus of SFLS by the California Bar Examiners in January 2015. While SFLS is not accredited by the American Bar Association (ABA), the state of California allows non-ABA-accredited graduates to sit for the state bar exam.

SFLS and SDLS offer one degree, the Juris Doctor (JD), in a four-year part-time 87-unit evening program, which includes summer courses in the first three years. One course (Professional Responsibility) is offered online. SFLS added a three-year full-time program in 2012. Some students are currently enrolled full-time, but no new students were admitted to the full time program in fall 2015.

The mission of the law school is to provide accessible and affordable legal education to traditionally underserved, racially diverse working populations. The institution is small, with 38 total students at SFLS in fall 2015, and 22 total students (1st and 2nd year) at SDLS. It is diverse, with 40% entering students of color in 2012-14, and almost balanced by gender with 43%

entering women in the same time period. Sixty percent of students have received financial aid since 2011. An average of 58% of entering students have graduated in the years 2011-2015.

The law school's 31 part-time faculty members (eight of whom are at SDLS) include practicing attorneys and judges. SFLS has one full-time administrative member at the dean level and one full-time faculty member. SDLS's full-time faculty member takes release time to serve as the associate dean.

Alliant International University offers bachelor's, master's and doctoral degrees through its five professional schools: California School of Professional Psychology, California School of Forensic Studies, Hufstedler School of Education, Alliant School of Management, and the San Francisco Law School. Alliant's main campus is located in San Diego, California, with campuses in Irvine, Fresno, Los Angeles, Sacramento, and San Francisco, California, and international locations in Mexico City, Tokyo, and Hong Kong.

Alliant had its Educational Effectiveness Review (EER) for reaffirmation of accreditation in spring 2011, after its 2010 acquisition of SFLS. Part of the EER specifically addressed the law school. In its July 5, 2011 action letter, the Commission found that the law school was "not yet fully integrated with Alliant and lacks several of the expected characteristics of an academic culture at the graduate level." SFLS was asked to hire at least one full-time faculty member, develop a system of faculty governance, support faculty scholarship and creative activity, build capacity for assessment of student learning and demonstrate that students are meeting those outcomes, and conduct a program review utilizing Alliant's Intensive Review process. A Special Visit was scheduled for February 2013.

While the Special Visit in February 2013 found "significant progress in operational integration of the law school with Alliant," the team concluded that progress in many areas was

lacking. In its action letter dated July 10, 2013, the Commission focused on three areas of development for the law school: (1) to improve student success, “including demonstrated results in graduation rates and bar pass rates,” by analyzing and interpreting data disaggregated by gender and race, and developing learning strategies that address graduation and bar pass rate disparities; (CFR 1.5) (2) to enhance a culture of evidence and academic quality assurance, to “make significant progress and be able to clearly demonstrate results in gathering, analyzing, interpreting and using data to make improvements in programs and in student learning;” (CFRs 2.3 – 2.7, 2.13) and (3) to develop the role of faculty in governance, to insure that faculty “set admissions standards, create academic policies and practices, and review the curriculum,” to “provide programs in faculty development,” and to hire “additional full-time faculty who can be readily available to advise and mentor students, conduct research..., serve on governance committees, and undertake other efforts to assure a strong academic culture within SFLS.” (CFRs 2.3, 2.8, 2.9, 4.7)

A Special Visit was scheduled for fall 2015 to assess these issues. Alliant International University will undergo a comprehensive review for reaffirmation of accreditation with its Offsite Review in fall 2019 and its Accreditation Visit in spring 2020.

B. Description of the Team’s Review Process

Alliant submitted its Special Visit institutional report in July 2015 that focused on the three areas highlighted by the July 2013 Commission letter. The team analyzed the report and identified areas of good practice, areas for improvement, and specific areas of further inquiry. The team requested further documents and materials before the start of the visit and during the visit. The law school provided all the information that the team requested that it had available. Prior to the visit, the team reviewed Alliant’s Legal Structural Change Update Report and the

Report on the Follow-up Site Visit on Structural Change of Legal Status and Ownership to identify issues that might impact the three foci of the fall 2015 Special Visit.

During the visit, the team conducted individual and group interviews with SFLS, SDLS, Alliant, and Arist personnel. These meetings included faculty, students, staff, and administrators. In addition, the team had access to the confidential email account.

Through its review of the institutional report, additional materials, and the interviews conducted during the visit, the team gained a good understanding of the law school.

C. Institution's Special Visit Report: Quality and Rigor of the Report and Supporting Evidence

The institutional report was organized into five sections: (1) the nature of the institutional context and major changes since the last WSCUC visit; (2) a brief description of how the report was prepared; (3) responses to the three issues identified by the Commission and the last visiting team; (4) other changes and issues the institution is facing; and (5) a concluding statement. The report was prepared by the dean of the law school, in sustained dialogue over a number of years with the head of institutional research and with the faculty, and is consonant with what the team learned of the institution during the visit.

The report's review of Alliant's organizational structure, its new status as a California benefit corporation that is part of Arist, and its opening of its San Diego Law School, provided relevant information to the team. The team did not see Alliant's structural changes as hindering or interfering with the law school's functioning. Indeed, Alliant's relationship with Arist has already brought needed capital infusion, information technology, online education, marketing, internet media, and personnel expertise into the law school. While the team initially had questions about SFLS's financial sustainability due to an anticipated 75% five-year decline in

enrollment, information regarding higher-than-expected fall 2015 enrollments, in addition to Arist's infusion of capital resources into Alliant—with attendant resource benefits to the law school—alleviated these concerns. Financial sustainability was not the purview of the Special Visit team, and this issue will be explored in the fall 2019 Offsite Review.

Although, in general the report showed a good use of data and evidence to support the law school's analyses and action steps, the team noticed some important gaps. For example, while the institution collects retention, graduation and bar pass rate data by gender, race and ethnicity, it is apparently not using the data to explore interventions that could address disparities in the rates (CFR 2.10). Further, the institution apparently has not taken steps to identify high-risk students and the academic support these students might need (CFR 2.13). Similarly, the law school has not reviewed its academic support services, transactional services, and co-curricular programs to determine the improvements that might be made to strengthen student success (CFR 2.11).

Overall, the team found that the law school's report was well organized and clearly written. Each issue was systematically discussed and the actions the institution has taken to address the Commission's concerns were described in detail.

SECTION II. TEAM'S EVALUATION OF ISSUES UNDER THE STANDARDS

This section is arranged according to the three issues identified by the commission: (A) student success, including retention, graduation, and bar pass rates disaggregated by gender, race and ethnicity, and the learning strategies designed to improve these disparities; (B) the progress in gathering, analyzing, interpreting and using data to make improvements in programs and in student learning, which are characteristic of an institution that uses evidence-based decision-

making and focuses on academic quality assurance; and (C) the development of faculty governance. Each section provides a description of the evidence presented by the law school, an evaluation of the effectiveness of the law school's actions, and suggestions, observations or recommendations by the team.

A. Student Success

This section discusses (1) retention and graduation rates, (2) admissions selection criteria, (3) bar pass rates, and (4) learning strategies to address disparities among gender, racial and ethnic groups. (CFRs 1.2, 2.10)

Much of the discussion on student success relates to the second issue under review by the Special Visit team: the establishment of a culture of evidence-based decision-making designed to improve the law school. This issue is discussed in Section B.

1) Retention and Graduation Rates. The 2013 report of the WSCUC Special Visit team expressed concern over disparities in the retention and graduation of students based on gender, race and ethnicity. The team was challenged to easily identify the law school's disaggregated retention rates from the data provided by the law school. Based on the team's calculations, it appears as if women sometimes showed higher attrition rates than men. For example, looking at data from the 2013-2015 cohort, 23 women withdrew or were academically disqualified compared to 12 men. In terms of race and ethnicity, looking at data from the 2013-2015 cohort for groups with 10 or more students, the attrition rates are as follows: 33% of white students (n=13) and 63% of African American students (n=10) left the law school (withdrew or were academically disqualified. The numbers are too small to report for Asian American or Hispanic/Latino students.

In terms of graduation rates, for the 2013-2015 cohorts, 59% (50 of 85) of all students graduated. Nearly three-quarters of all men graduated (29 of 41, or 71%) while nearly half of all women graduated (21 of 44, or 48%).

Analyzing 2013-2015 graduation rates by racial and ethnic groups revealed the following, for those groups with 10 or more students: 68% of all white students (n=27) graduated and 61% of all Asian American students (n=11) graduated. The percentages appeared lower for Hispanic / Latino students and African American students, but the numbers are too small (less than 10) to report.

Evaluation and Conclusion. While the law school reported gender, racial and ethnic disparities in its data tables, the law school did not explore the meaning of these disparities or ways the disparities could be minimized. Experimenting with admissions selection criteria such as LSAT scores, examining pedagogy and course assessment, monitoring first year midterm academic progress, instituting systemic academic and other student support services, and leveraging national student support organization resources might be ways to address some of these disparities and improve retention and graduation.

2) Admissions Selection Criteria. Variations in admission selection criteria might be one explanation for the gender, race and ethnicity disparities in retention, graduation and bar pass rates. LSAT scores, used by law schools as a primary selection criterion, can be a significant predictor of first year GPA in law schools and can correlate with bar pass rates.

In reviewing LSAT scores by cohort year from 2011 to 2015 disaggregated by gender, race and ethnicity, the team noted that the median LSAT for women declined in this time period.

Evaluation and Conclusion. The law school has not yet systematically addressed the disparities suggested by differences in admissions selection criteria. The institution has the data

to begin thinking about retention, graduation, and bar pass rates relative to admissions selection criteria, and to analyze these data by gender, race and ethnicity. Such analyses could help the law school identify and develop effective interventions to improve student success and bar pass rates for high risk groups and could inform future admissions selection criteria.

3) Bar Pass Rates. Bar pass rates are based only on those students who graduated from SFLS. The 2013 Special Visit report noted that the law school's bar pass rates historically lagged below the California Accredited Law Schools (CALs) average, but exceeded them in the three administrations of the bar immediately preceding the 2013 report. The first beneficiaries of the full set of multiple-year interventions implemented in 2007 began to graduate in 2012. The Commission's 2013 letter recommended that the law school improve the disparities in bar pass rates across gender, race and ethnicity.

Overall rates. California Bar data show that the law school's first time takers since the 2013 Special Visit passed at rates exceeding the statewide CALs pass rate of 40% in three of the five bar administrations between February 2013 to February 2015. Twelve of the 27 first time takers from San Francisco Law School in these five administrations passed, for a 44% pass rate for each of the five administrations. The law school also showed significant improvements in cumulative bar pass rates. Cumulative bar pass averages for the three-year cohort of 2012 to 2014 were, at 69%, 14 points higher than that of the three-year cohort of graduates from 2009 to 2011. Repeat taker pass rates, in contrast, exceeded CALs rates in only one of the five administrations.

The law school's institutional report provided "cumulative minimum bar pass rates" for all bar takers who graduated in each year from 2010 to 2014. The cumulative measure is based on a CALs rule introduced in 2014 that requires a minimum 40% pass rate of all bar passers over

all takers during a five-year period. The report calculates the law school's pass rates for each of the five graduating cohorts from 2010 to 2014 at 47%, 67%, 73%, 55%, and 80%, respectively. The cumulative minimum pass rate for the period was 63%, significantly higher than the comparable 48% cumulative minimum pass rate for 2008-2012.

Cumulative pass rates capture ultimate success, but require multiple years of internal record-keeping under consistent conventions; for example, almost a quarter of the law school's graduates delay taking their initial bar, so are not measured with their graduating cohort, and those who fail on their first attempt, pass on their second attempt at about a 15% rate. "First time taker" pass rates for each bar administration are extensively reported by the California Bar Examiners and are easily compared.

Disparities in bar pass rates across gender, race and ethnicity. As in retention and graduation, the gaps in cumulative bar pass rates between demographic groups observed in the 2013 report have persisted. One hundred ten students who graduated from 2008 to 2014 took the California Bar; 49 of these were women and 61 were men. The cumulative pass rate of the 49 women was 51%, ten points lower than the men's 61% pass rate. The 57 graduates of color passed at a 49% rate, while the 53 white graduates passed at a 64% rate. The team notes that gender and race disparities characterize bar pass rates for other CALS graduates.

In the 2012-2014 cohort, 62% of the women and 74% of the men, and 65% of the graduates of color and 73% of the white graduates, passed the bar. The numbers are too small to report bar pass rates by Asian American, African American, or Hispanic/Latino students.

Evaluation and Conclusion. While the overall bar pass rates have increased, the gender, race and ethnicity disparities, while reported in data tables, remain unexplored and uninterpreted.

Bar passage rates are the cumulative result of an effective curriculum, pedagogy, and learning assessment sequence, as well as effective student support services, and as such are tied to retention and graduation success, as well as assessment of student learning.

The team recommends that the law school continue to diagnose and address persistent, predictable challenges for female and underrepresented minority graduates in passing the bar, particularly given pressures on the applicant pool from regional competition, and Alliant's long-term strategic plan to increase law school enrollment.

4) Learning Strategies Addressing Gender, Race and Ethnic Disparities. The team observed that virtually every part of the law school curriculum directly serves the priority of improving and sustaining acceptable overall bar pass rates. The law school instituted key academic changes pursuant to improving bar pass rates prior to the 2013 Special Visit, and is planning several new initiatives in the fall of 2015. While these initiatives are not specifically tied to improving gender, race and ethnic disparities, faculty and students expect these initiatives to strengthen student success.

The older initiatives to improve bar pass rates were: (1) the addition of three required course units for review of Multistate Bar Examination (MBE) subjects (required in two summers) and Performance Examinations; (2) enhanced writing standards in all courses, particularly bar and practical skills courses, such as legal writing and moot court; (3) partnering with a commercial bar review provider for outlines and practice materials for student use from their first year forward, and (4) a comprehensive two month BarBri Bar Review course post-graduation from the same commercial provider.

During the visit, faculty members observed that graduates' average MBE scores rose to their highest level on the July 2012 bar, an outcome of the new requirement to take the identical

MBE course twice prior to graduation. From 2012 to the present, students received funding from the Blum Trust to take a full post-graduation bar review course. During the visit, students and alumni consistently stated that they valued having commercial outlines throughout their four years, as well as the post-graduation bar review course. While some students questioned whether repetition of the *same* summer MBE course was worth the tuition and opportunity cost—that is, it interferes with summer employment—the faculty’s rationale is the improved bar MBE scores in 2012. Although the data set is still small, the relative success of the 2012-2014 graduates with LSAT scores below the 20th percentile in passing the bar is particularly noteworthy.

The law school recognizes that a substantial number of its graduates will only pass on their second or third attempt at the bar exam. The institutional report included a thoughtful analysis of why its past program of allowing graduates to retake bar skills or writing courses and offering small group tutoring has been less than effective.

New initiatives to improve overall bar pass rates. The law school is launching four new programs in fall of 2015 in order to enhance and increase student learning tied to bar pass rates. These had not begun at the time of the team’s Special Visit. They include the following: (1) administer a Kaplan diagnostic test of legal skills to first semester students, (2) provide individual feedback and skills assessment following the test, (3) include a midterm examination with individualized feedback in all courses in the first year, and (4) intensify writing feedback in the legal writing course.

The law school has contracted with the Kaplan Bar Review to administer legal skills diagnostic tests in multiple years to diagnose students’ doctrinal knowledge and skills. Individual results may allow adaptive learning for students, and aggregated results may help faculty assess and adjust instruction of specific subjects and skills. Faculty are discussing how these assessment

results will be communicated to students, as well as how the curriculum will adjust to respond to learning needs pinpointed by the tests.

The faculty voted to require that each of the first year faculty hold individual student conferences to review each student's midterm performance. These conferences will supplement existing optional, weekly academic support sessions, which are not tied to particular courses. The faculty voted for this substantial commitment after concluding that student performance warranted more individualized assistance with writing and analysis.

Learning strategies that address disparities in student success across gender, race and ethnicity. The team did not find evidence that the law school has discussed student learning specifically in terms of demographic disparities or at-risk student groups, nor instituted programs or initiatives targeted specifically to address disparities. The team did learn, however, that the law school is adding a slate of new initiatives and focusing on individualized feedback to students, which presumably will help student learning for students at risk.

Evaluation and Conclusion. The team applauds the law school's strategic, sustained efforts to adapt the curriculum to improve overall bar pass rates, its increased attention to writing skills, and its commitment to a culture of individualized care and feedback. The school's newly required mandatory first year conferences, and Kaplan diagnostics, serve multiple retention, graduation, and bar passage goals. The law school will want to continue to explore how to address disparities in key academic indicators—retention, graduation, and bar pass rates—across known high-risk groups.

The team notes that the current small enrollment of the law school gives it the luxury of directing attention to each student's "individual strengths, challenges, and needs for academic

support” with tools like the new upcoming mandatory conferences. While this intensive support is no doubt beneficial, will it be sustainable when enrollments increase?

As more data on student performance in specific subjects are collected and analyzed, the faculty may revisit the most effective use of testing and individualized feedback, as well as additional required credits for bar preparation, practice skills, or employment-enhancing electives.

In addition, repeat bar exam takers may benefit from the Kaplan diagnostic and tools that include a substantially discounted commercial bar review course. Providing a full bar review course, at least for those graduates who were not beneficiaries of the recent Bar Review Scholarship Program, is a remediation for the law school to consider. Improving the success of repeaters could also help close the gap of female and underrepresented minority graduate pass rates.

B. Creation of an Evidence-Based Culture of Decision-Making

In 2013 the Commission found that the law school was in an emergent phase of “creating a culture of evidence-based decision making and assessment of student outcomes” and expected the law school “to make significant progress and be able to clearly demonstrate results in gathering, analyzing, interpreting and using data to make improvements in programs and in student learning. (CFRs 2.4, 2.7, 2.10, 4.4, 4.6, 4.8) The assessment of primary services, the efficacy of services, and the satisfaction of primary stakeholders are integral to an evidence-based institutional culture.

This section discusses (1) assessment of student learning, (2) program review, (3) assessment of student services and co-curricular resources, and (4) assessment of students and

alumni. (CFRs 2.3, 2.4, 2.6, 2.7, 2.11, 4.5) Discussions of student success are also central to a culture of evidence, and these are discussed in Section A.

1) Assessment of Student Learning. The law school has adopted four learning objectives, which are (1) doctrinal knowledge, (2) professional analytics, (3) communication skills, and (4) professional responsibility. Assessment is sequenced over the first three years. Assessment of doctrinal knowledge occurs in the analysis of a random sample of first year Torts final exams; professional analytics occurs in the analysis of four dimensions of analytical thinking of second year moot court appellate briefs; written communication occurs in the use of four objective measures of clear writing in the second year final project in Legal Research; oral communication occurs in a rating of five dimensions in third year moot court oral arguments; and professional responsibility occurs in analyses of proficiency exams in the Professional Responsibility course in the third year.

Additionally, the law school evaluated two of its learning objectives by assessing alumni performance on the bar exam. First-time takers' MBE scores on the CBE provided assessment of doctrinal knowledge; written and total exam CBE scores provided assessment of professional analytics. The law school was unable to obtain MPRE professional responsibility exam results from the CBE or the National Conference of Bar Examiners.

The faculty compared their assessment data across prior years, and when results indicated student learning weaknesses, they provided thoughtful discussion for how to intervene to improve student learning. For example, after determining that issue spotting was a relative weakness in doctrinal learning, the faculty voted to require 10 hours of academic support for first year students as a "learning skills accelerator," "especially beneficial for students with lower admission credentials." The faculty expect that the Kaplan legal skills diagnostic test assessment

beginning in fall 2015 will offer additional focused feedback on skills development, and are planning one-to-one conferences to discuss the feedback. Second, faculty are emphasizing critical case analogy skills in the second year Legal Research course given immediately prior to moot court, in expectations that students will sharpen their legal analysis skills. Third, after identifying weaknesses in communication, preparation, and questions / comments skills in oral communication, faculty set a minimum achievement benchmark for each category, and will include more questioning and presentation skills in their courses prior to moot court.

In order to give faculty a clearer picture of student learning progress, faculty decided to implement a student portfolio consisting not only of legal writing, but motion writing associated with Trial Practice, clinical fieldwork writing, and elective papers. Assessing student work from multiple courses over time in a portfolio will provide more focused information in designing learning interventions to improve student learning.

Lastly, faculty continue to discuss core academic issues such as standards for grading, use of rubrics in evaluating student skills, and calibration of feedback. Faculty use performance-based grading rather than grading curves, which is appropriate given the small enrollments. Faculty have developed a workable method of speaker phones to implement cross-campus faculty discussion and decision-making. They plan to continue to coordinate academic curriculum design and learning and skills assessment across the San Francisco and San Diego campuses.

Evaluation and Conclusion. The law school has made good progress in assessing student learning. Strategic gathering of data in core first, second and third year courses for the first few rounds of assessment has given faculty good comparative data and a window into their students' strengths and weaknesses in targeted areas. Faculty discussion of these findings has been

thoughtful, and has resulted in practical changes in curriculum, course assessment practices, and academic advising. The team praised the use of MBE results on the CBE to evaluate the efficacy of prior changes in curriculum. The team encourages the faculty to continue their thoughtful analyses of student learning data and lively discussions regarding next steps in improving student learning. During the visit the team found that the law school was beginning to pinpoint the first year courses, learning experiences, and assessments as foundational in student learning, and thus deserving of focused future strategic assessments and interventions. The team encourages these efforts to continue.

2) Program Review. The cyclical systemic self-reflection characteristic of program review is a core aspect of an institutional culture concerned with evidence-based decision-making. The law school participates in Alliant's program review process, which includes the filing of annual reports as well as an Intensive Review every five to seven years. The law school's first Alliant Intensive Review occurred in 2012. The 2013 Special Visit team determined that the Intensive Review was not sufficiently evidence-based.

In response to the Intensive Review, the faculty discussed ways to improve student learning and have undertaken these actions: required academic advising for first year students, and mandatory post-midterm individualized feedback meetings between first year students and course instructors; and hired three females out of five new faculty at SDLS to help diversify the faculty. Additionally, they are interested in developing more internship opportunities for students.

Evaluation and Conclusion. The team expects that with the law school's integration of Alliant and Arist institutional research, information technology and data management services, that the next Intensive Review of the law school will demonstrate more evidence-based

evaluation and decision-making. It was apparent to the team that Alliant and Arist are committed to data and metric informed decision-making and to carefully tracking student learning outcomes to enhance student success. Alliant has plans to build the infrastructure, particularly data warehousing and data access, necessary for this process. The team learned that Alliant plans to integrate student learning records from courses and assessments with admissions criteria such as LSAT scores, Kaplan legal skills diagnostic scores, MBE scores, and bar scores, to provide a developmental picture of each student's learning. The law school can analyze this information to develop interventions for more effective learning. In addition, Alliant is developing institutional level key performance indicators that will inform and assist the law school in collecting, analyzing, interpreting and applying data to enhance student learning.

3. Student Services and Co-Curricular Resources. The 2013 Special Visit team observed that the law school “did virtually nothing in terms of assessing student services and other co-curricular programs,” despite these being an essential part of student success. Assessing these vital services, analyzing and interpreting the findings, discussing how to use the information to improve student services, and designing improvements, are essential aspects of an institution committed to a culture of evidence-based decision-making. This section discusses the assessment of (1) academic support services, (2) admissions services, (3) financial aid services, (4) disabilities services, and (5) co-curricular resources.

Academic support services. The law school lacks units or offices that provide formal academic support services to students. However, the law school has integrated some support into the curriculum (for example, providing intensive feedback on students' writing) and also offers a voluntary, faculty-led weekly Saturday session for intensive work for first year students. The law

school has not assessed the impact of its existing support activities nor has it explored ways that institutionalized academic support structures might strengthen student success.

The law school faculty recognize that more institutionally supported academic advising is needed, particularly for first year students and high-risk students. Beginning fall 2015, all first year students will participate in mandatory midterm meetings with course instructors who will review student learning and skill development. In addition, faculty members are planning to meet with first year students to discuss feedback from the Kaplan legal skills testing. Lastly, faculty members will meet with students to discuss analytical writing skills essential to the legal profession.

The law school may want to survey students at the end of their first year to assess the efficacy of these new mandatory academic support services. .

Admissions services. The law school collects LSAT data, and Alliant plans to map these admissions data onto assessment data gained through MBE tests, Kaplan testing, course assessments, and bar pass rates, for a seamless picture of student learning over time. Alliant's robust institutional research capacity offers promising avenues of analyzing admissions data such as LSAT scores and GPAs to identify early interventions for individual students at risk of being unable to pass the bar. Because of the extremely small numbers of students, the law school may want to consistently measure, record, and analyze details of student demographics and achievement so that meaningful comparisons can be drawn across time.

Most notably for the law school's sustainability, Alliant is bringing its expertise in web-based marketing and internet-based technologies to the law school admissions process. This will provide the law school with captured data on web-based information relevant to the law school search process. Over time this will enable Alliant to target the most effective web-based

marketing strategies to increase the law school's enrollment. The team supports the law school's plans to collect data relative to the marketing and admissions process.

Financial aid services. The law school hypothesizes that financial aid, available to students since the merger with Alliant in 2010, has helped its students pass the bar. It is difficult to evaluate the impact of this factor given concurrent program changes. The law school may wish to further study the impact of financial obligations on student success, particularly given the law school's mission to serve a population unable to pay greater tuition.

Disabilities services. The law school registrar is the designated person to address ADA accommodation issues. Early documentation of disability accommodations can be essential to obtain accommodations on the bar examination, and as such is a critical ingredient of student success for higher-risk students. If not already doing so, the law school may want to include questions about disabilities in its first assessment of student use of law school services.

Co-curricular resources. Robust co-curricular resources and institutional support can enhance student learning and academic and bar success. Some underrepresented students may feel isolated, and lack faculty role models or a critical mass in the student community. In addition to the existing Black Law Students Association, SFSL may wish to explore the resources of and student interest in other professional identity organizations such as the local Asian Pacific American Bar Association, a Women in the Law chapter, or an active alumni association. These groups can provide understanding, mentors, and networking to help students navigate classes, the bar exam, and job market. Outside organizations can bring in speakers and present material to supplement limited elective courses.

4) Assessment of Students and Alumni. Administrators and students confirmed during the visit that there was no regular assessment of student satisfaction outside of course

evaluations, and no extant suggestion box. The team met with twenty SFLS and twelve SDLS students during the visit. Both campuses appear to have active and able Student Bar Association leaders who seem to function almost as Deans of Student Services, liaising with the administration over many matters, with varying degrees of success.

First and foremost, the team observed in all of the student conversations a striking respect and affection for the faculty. Students appreciated the faculty's time and availability, and praised the real world experiences that lawyers who are engaged in legal practices bring into the classroom. The team heard from individual students who were unanimous in their appreciation of faculty's knowledge, commitment, and personal investment in students; the words "family" and "relationships" repeatedly arose. Students appreciated the welcoming environment created by the administration and faculty. The team concluded that individualized attention and personal relationships are critical to the success of the educational mission of the law school, and encourages the institution to preserve and safeguard the unique asset of these faculty-student bonds as enrollments grow.

At the same time, many of the SFLS students voiced frustration with a perceived lack of student services, and with unclear and abrupt communications with the law school. One student stated simply, "there are no student services," while another summed up the discussion by stating that the law school needs "consistency in addressing student issues." Students brought up examples of lack of reasonable notice in issues requiring planning and financial budgeting, such as course scheduling, class cancellation, increase in tuition, health requirements, book purchases, course credits, and course fees. Some students reported that "things get dropped," or that administration policies are inconsistent or ambiguous, such as responses to questions about disability accommodations, course fees, and student organization activities.

The law school may want to undertake a survey of students regarding their satisfaction with student services, including academic support and co-curricular resources. Similarly, the law school may want to assess its alumni on measures it finds significant in its mission and learning objectives. A survey of alumni who have passed versus failed the bar on their first attempt, second attempt, and other attempts, for example, categorized by gender, race and ethnicity, might provide information for developing early learning interventions to support higher bar passage for high risk groups. Alternatively, correlating measures such as entering LSAT scores, first year GPA, MBE exam results, writing proficiency, and CBE scores might also offer information that can be assessed and used for future learning interventions.

The law school may want to examine its communications with students, particularly information affecting curriculum and student finances. Early and clear notifications about matters affecting money, such as tuition increases, class cancellations that affect book purchases, and obligations to pay for bar review services or materials, are essential for student planning.

C. Faculty Governance

In 2011 the Commission found that the law school was “not yet fully integrated with Alliant and lacks several of the expected characteristics of an academic culture at the graduate level.” SFLS was asked to hire at least one full-time faculty member, develop a system of faculty governance, and support faculty scholarship and creative activity. The 2013 Special Visit observed that, while the law school had hired their first full-time faculty member, established a Faculty Council, and designated faculty committees, a faculty governance model was not yet present.

In 2013 the Commission asked the law school faculty to set admissions standards, create academic policies and practices, and review the curriculum, and for the law school to provide programs in faculty development and promote faculty scholarship. In addition, the Commission noted the need for additional full-time faculty to be available to advise and mentor students, bring scholarship into the classroom, serve on governance committees, and assure a strong academic culture within SFLS.

This section discusses the progress the law school has made in addressing the Commission's concerns. (CFRs 2.2, 2.8, 2.9, 3.1, 3.10)

A formalized structure has been established and routinized for the engagement of full-time and part-time faculty from both campuses in the law school's governing body, the Faculty Council. The Faculty Council holds regular, frequent meetings, as do the Academic Standards and Admissions Committees. Topics discussed at the Faculty Council meetings include credit hour policy, curriculum, grading standards, use of grading rubrics, student learning objectives and student learning assessment, expansion of the law school to San Diego, examination policy, and admissions. This faculty governance infrastructure has resulted in formalized input, recommendations and decisions.

The long-standing faculty admissions committee, one that has engaged part-time faculty in critical decisions and now includes the core faculty members, continues to make decisions regarding admissions, readmissions, and the status of applicants who had been academically disqualified at institutions.

The law school's two core full-time faculty members are engaged in the Alliant faculty governance structures at several different levels. One faculty member serves on the Alliant Faculty Senate and the university's technology committee, participates in the Faculty Assembly

for the San Francisco campus, and is active on one-off committees. The other full-time faculty member is active on the university-wide program director meetings.

The part time and full time faculty are very engaged in assessing learning and reviewing and improving the curriculum. Since the 2013 Special Visit, one core faculty member has led the focus on improving legal writing skills. One part-time faculty member is leading the effort to utilize the results of the Kaplan exams to assess both individual and collective student learning.

The team observed that all faculty members present during the visit were deeply committed to their student's academic success, and they were collaborating to establish structures through shared governance to systematize methods to do so. For example, the school offers regular Saturday morning drop-in academic tutoring run by a part-time faculty member, and the Faculty Council agreed to require instructors to hold mandatory midterm meetings with students to review performance on exams—after a robust debate on adopting that practice.

A culture of continuous faculty development has been established that benefits both the core faculty and the adjuncts. For example, a core faculty member attended a national conference on assessment across the curriculum and has taken the lead role in bringing research, papers, and assessment data to each Faculty Council meeting. One faculty member recently participated in a WSCUC annual conference special interest group to learn from colleagues at other law schools about successful strategies in legal education assessment; and an adjunct faculty member participated in an Alliant sponsored faculty colloquium on student learning outcomes. The adjunct faculty not only bring their long experience and professionalism to benefit the program, but their professional legal networks and continuing legal education enhance student learning.

Evaluation and Conclusion. The team concluded that the law school has made substantial progress in faculty governance. With two full-time faculty members and 31 part-time

faculty, the Faculty Council provides leadership as well as oversight in decisions and policies regarding admissions, academic standards, student learning, assessment, and curricular review. The team particularly commended the meaningful engagement and leadership of the part-time faculty in faculty governance. The team also commended the full-time faculty's participation in Alliant's governance structures, bringing the law school's goals and perspectives to Alliant.

SECTION III. FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

Findings

1. The law school has improved its overall bar pass rates.
2. Gender, race and ethnic disparities continue to exist in retention, graduation, and bar pass rates and have not been systematically explored or addressed by the law school.
3. The law school is making good progress in assessing its student learning objectives and in designing thoughtful interventions aimed at improving areas of student weakness.
4. The law school's merger with Alliant and Alliant's acquisition by Arist have brought an infusion of resources and expertise to the law school, which are expected to positively impact the gathering and use of data designed to improve student learning and enhance student success.
5. The law school has not yet begun to assess student services and co-curricular resources; academic support and student services can contribute to student success.
6. The law school has made substantial progress in ensuring faculty oversight of essential academic functions and learning assessment, and in promoting faculty development.

Commendations

1. The team was moved by the commitment, dedication, and passion for teaching of the faculty at the law school. The team found a rare degree of faculty engagement with the students and dedication to the values and social justice goals of the law school. Students were unanimous in their accolades of faculty investment in student learning and shared numerous stories of class teachers taking time to answer questions and support their learning.
2. The team commends the law school for strategically responding to the challenge of low bar pass rates. Through early introduction and reinforcement through doctrinal, writing, and bar skills courses, the curriculum effectively sequences student learning across all four years of study. The investment in the Bar Review Scholarship Program for all students serves the institution's goal of serving diverse populations by helping *all* of its law graduates be competitive for professional licensure.
3. The law school has made substantial progress in faculty governance. With two full-time faculty members, the law school has implemented an effective practice of faculty governance, with faculty oversight in admissions, academic standards, assessment, and curricular review. The team particularly commends the meaningful engagement and leadership of the part-time faculty in faculty governance. The team also commends the full-time faculty's participation in Alliant's governance structures, bringing the law school's goals and perspectives to Alliant.
4. The team commends the institution's investment in professional development for the full-time faculty, and their encouragement to all faculty to pursue development opportunities that enhance their professional competencies. The full-time faculty benefits from attending conferences and institutional development programs. The team praises the adjunct faculty who bring their long experience, professionalism, and continuing legal education to enhance

student learning. The team commends the Faculty Council that tackles key academic issues such as pedagogy and assessment learning opportunities.

5. The team recognizes that times of institutional transition present numerous challenges, and the team commends the law school for the adaptive flexibility shown by its staff and faculty. The collaborative spirit of discussion between the law school, Alliant and Arist personnel was evident in the meetings with the team. The team commends the law school's willingness to learn new perspectives, cultures, and communication styles brought about by the law school's two new institutional cultures, Alliant and Arist.

Recommendations

The team recommends that the law school:

1. Continue its actions to enhance a culture of evidence-informed decision-making and curricular improvements. This includes: putting in place systematic structures and procedures to routinely gather relevant information about the educational effectiveness of the law school; collecting, analyzing and interpreting information; and using the results for improvement of teaching and learning. (CFRs 2.10, 2.11, 2.13, 4.1, 4.3, 4.5)
2. Continue monitoring retention, graduation rates, and bar passage rates; disaggregate data on student success; and benchmark the results against similar institutions. Continue to identify and address those factors leading to low graduation and bar passage rates, especially relative to disparities among student groups, and identify and implement strategies for high-risk students. (CFRs 1.2, 2.10, 2.13)