REPORT OF THE WSCUC VISITING TEAM

SEEKING ACCREDITATION VISIT 2

For Institutions Seeking Initial Accreditation

To Cal Northern School of Law

September 12-14, 2017

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

A. Description of Institution and Visit

Cal Northern School of Law (CNSL) is a small for-profit institution offering a Juris Doctor (JD) degree and a Masters of Legal Studies (MLS) degree. Established in 1983, CNSL has been accredited by the Committee of Bar Examiners of the State Bar of California (CBE) since 1992.

CNSL is owned by Cal Northern Educational Development Corporation (EDC), established in 1983 as a private, for-profit corporation (Subchapter S), to support the creation of a local law school. It is not affiliated with any governmental or religious organization. EDC leases 20,000 square feet of a larger building to Cal Northern. The building includes additional space that is leased to long-term tenants, the Internal Revenue Service and a law office. After electing to seek WSCUC accreditation in 2011, Cal Northern Educational Development Corporation’s Board of Directors amended its bylaws in 2015 to create CNSL’s Board of Trustees to govern CNSL.

As of spring 2017 there are 34 students enrolled in the JD program of which 20 are concurrently enrolled in the JD and MLS programs. Staff includes two full-time employees: the Chief Executive Officer, who has the titles Dean and President (referred to in this report as Dean); and the Assistant to the Dean. There are also four part-time administrators (the Dean of Students, the Director of Student Services, the Assessment and Institutional Research Coordinator, and Chief Financial Officer); three part-time office/library staff members; and 20 adjunct faculty members. CNSL offers a program of study designed to accommodate part-time students who are working professionals. Among CBE schools, CNSL has established a reputation for impressive results on the difficult California Bar Examination. Also, as part of its
educational program the school of law has established a Self-Help Legal Clinic that meets important needs in the local community.

CNSL was granted WSCUC Eligibility in May 2014. The first Seeking Accreditation Visit (SAV1) was conducted in November 2015. In its March 2016 action letter, the Commission scheduled a Seeking Accreditation Visit 2 (SAV2) to review compliance with those Standards and Criteria for Review (CFR) that the Commission determined were not sufficiently met for Candidacy or Initial Accreditation. While the underlying educational programs remain the same, the institution reports several changes in governance processes and hiring to address recommendations raised in the action letter. It also has continued to develop its efforts in assessment of learning outcomes.

Although CFR 1.8 was met in the SAV1 visit and is not the subject of this visit, the 2017 team also found CNSL’s transparency and candor during the SAV2 visit to be of note. Cal Northern has undertaken the accreditation review process with seriousness and openness (CFR 1.8). All constituencies the team encountered, administration, faculty, board members, students and alumni were aware of the requirements of accreditation, articulated a value of accreditation to the institution and were sincere and thoughtful in their interactions with the team. As noted in the commendations, one of the greatest strengths of the institution is the commitment of its component groups to its operational improvement and ability to serve the region.

B. The Institution’s Seeking Accreditation Visit Report: Quality and Rigor of the Review and Report

The institutional report addressed each of the recommendations from the previous action letter, organized by those recommendations and referencing the appropriate CFRs. The report was supported by electronic documentation that was clearly referenced to each CFR. Team requests for additional documentation were responded to quickly.
The report indicates that the school of law undertook a process of reflection following the action letter. This process included the Board of Trustees, staff, faculty through the Faculty Senate, and students through surveys and other input. The report itself was primarily drafted by the Dean. The team found that the report would have been more helpful if it had provided more detailed examples for each CFR with more analysis linking the examples to the relevant CFR.

C. Response to Issues Raised in Past Commission Letters

The team found that CNSL has made significant progress with respect to all of the recommendations set out in the action letter of March 2, 2016. The discussion in Section II below addresses each one of the Standards and accompanying CFRs that were the subject of the Commission’s recommendations in that letter. The most significant of those recommendations fall into the following general categories:

1. Governance structures. The team confirmed that revisions to the bylaws have appropriately separated the roles and duties of the Board of Directors and the Board of Trustees but additional work is necessary to address the WSCUC Independent Governing Board Policy.

2. Faculty engagement with assessment of learning outcomes and program review. The team found that progress has been made in each of these areas, with additional faculty training, revision and further development of program learning outcomes, the undertaking of initial assessment projects, and the completion of the first program review. In the discussion in Section II, the team provides a number of recommendations for how the institution can build on this progress to develop a more systematic approach to assessment and program review.
3. Improve the institutional research function. The acquisition of a student information management system has substantially improved CNSL’s ability to generate and evaluate data. More expertise is needed to appropriately process the data for meaningful analysis.

4. Sufficiency of staffing levels. While CNSL has added capacity by recruiting members of its part-time faculty to undertake additional roles, additional capacity and professional expertise will be needed as the institution grows and progresses through the WSCUC process.

After reviewing all of the evidence provided, the team found that the institution did not deliver sufficient evidence to support the finding that CNSL met the Standards at a level sufficient for Initial Accreditation. As a result, the finding is that the institution met the Standards at a level sufficient for Candidacy, which is noted within this report.

SECTION II. EVALUATION OF INSTITUTIONAL COMPLIANCE WITH WSCUC’S STANDARDS AND IDENTIFIED CFRs FROM PRIOR SEEKING ACCREDITATION VISITS

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

Since the SAV1, CNSL has amended its governance structures, adopted an appropriate Academic Freedom policy and further developed its capacity for tracking student achievement. Recommendations for Standard 1 are in CFR 1.5 and 1.7 to complete the changes needed in governance and business practices. By these measures, the team finds that CNSL meets Standard 1 at the level sufficient for Candidacy. Only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

CFR 1.2: Clear educational objectives; indicators of student achievement

CNSL has continued to make strides in implementing a culture of evidence-based decision-making, with data actively used to enhance student learning. The institution regularly
generates, evaluates, and makes public data about student achievement, including measures of retention and graduation, and evidence of student learning. The team found that the Assessment and Institutional Research Coordinator (AIRC) has worked over the last two years to improve the institutional research infrastructure. The adoption of Populi, a student information management system, allows CNSL to collect and create reports on retention, enrollment and graduation data. The new software aids in the development of reports that are provided to faculty as well as the Board of Trustees for discussion and application to decision making.

Additionally, the Registrar and Dean generate the necessary graduation, retention and student demographic data from the student information system to create a Student Achievement Report presented in a clear way on the CNSL website and available to the public. The Student Achievement Report includes bar passage rates for each graduating class, the number of students from each entering class who advance to the second year, and the number who advance who graduate. CNSL does not disclose directly the number of entering students who ultimately graduate. The team suggests that the institution moves towards the next level of data analysis, specifically calculating the graduation data for each entering student cohort in addition to the data presently published for students who advance to year two to compare the differences in the results. The team also suggests that CNSL disaggregate the data by gender, age and other criteria that are valuable to consider for entry into and completion of law school. This additional information will be particularly useful in more detailed program review efforts in the future (see further discussion under CFR 2.7 and 4.1).

CFR 1.3: Academic freedom policies and procedures

After the SAV1 visit, Cal Northern reviewed and revised its Academic Freedom policy to align the policy with the principles promoted by the American Association of University
Professors (AAUP). The revised policy affirms that the faculty are free to share their opinions and responsible conclusions with their colleagues and their students. The policy is readily available and published in the school’s faculty handbook. The team suggests that the institution continue to provide faculty with training on all policies, and specifically the Academic Freedom policy, to include training on the processes to be followed when there are alleged violations.

**CFR 1.5: Autonomy from external entities**

Newly amended bylaws, adopted by the Board of Directors in May 2016 have strengthened the Board of Trustees’ role and responsibilities and have clarified the relationship between the Board of Trustees and the Board of Directors. The amended bylaws now effectively outline the duties of each board: the Board of Trustees is accountable for the management of the institution and retains the fiduciary responsibilities of the schools’ financial health, selection and evaluation of the Dean and strategic vision of the institution. The Board of Directors’ responsibilities center on the management of corporate assets. These changes largely address the concerns of the SAV1 team that the relationship was unclear and that control of the budget rested with the Board of Directors.

In accordance with the bylaws, two individuals from the Board of Directors are elected to the Board of Trustees. The Board of Trustees can have 5-15 members (currently there are nine), ensuring that Board of Directors members are never in the majority. Actions of the Board of Trustees can be undertaken through an affirmative vote by a majority of the trustees and there are no actions which require a unanimous vote, so those trustees who also serve on the Board of Directors do not have an opportunity to control any vote. In the Second Amended and Restated Bylaws, the Board of Directors’ powers include the ability “to nominate and remove with cause members of the Board of Trustees and remove with cause employees of the school of law” (emphasis added). As explained in the WSCUC Independent Governing Board Policy, it is
acceptable to have certain extraordinary decisions be reserved to the related entity as long as the final decisions on matters of ordinary oversight and management remain with the Board of Trustees of the accredited institution. Under that directive, when a power is reserved it is essential that the subject of the reserved power is first raised and acted upon by the Board of Trustees before being subject to the related entity’s final approval. The team recommends that the powers of the respective boards should be reviewed in light of the WSCUC policy and amended accordingly.

As of 2016, CNSL has independent operating bank accounts and the Dean is provided quarterly accounting statements directly. The team’s review of the provided quarterly financial statements for each entity confirm that the assets and liabilities of the corporation and CNSL have been separated. Funds are no longer co-mingled and the Dean controls CNSL’s operating accounts. See discussion under CFR 3.8 regarding the role of the Chief Finance Officer (CFO).

During interviews, the members of the Board of Directors and the Board of Trustees demonstrated a strong understanding of their roles and articulated the appropriate processes for engagement with the institution. With the adoption of the amended bylaws, four new members were invited to join the Board of Trustees, each with relevant and valuable qualifications. The chair of the Board of Trustees has many years of higher education experience. As an alumnus with business background, the Finance Committee chair brings a high level of commitment to the role. He has embraced the responsibility for budget oversight and works directly with the Dean and the CFO in preparing the budget for review and approval by the Board of Trustees.

The Board of Directors’ members are all shareholders in the corporation and have contributed financially to the development of the school. Deeply committed to the institution’s mission, the Board of Directors have not paid dividends in over ten years and recently bought out some second generation shareholders who were not fully engaged in the corporation’s work in
legal education. Recognizing the important differentiation between their roles and that of the Board of Trustees, the directors interviewed described their role in reviewing the budget as one of information and awareness to assist their discussions regarding leasing costs for the facility that the school leases from the corporation.

CNSL is commended for the steps taken to strengthen the Board of Trustees’ role and responsibilities and to clarify the relationship between the Board of Trustees and the Board of Directors. The team suggests that the Board of Trustees undertake board education activities to further develop their understanding of their important role. The board should consider membership in the Association of Governing Boards of Universities and Colleges (AGB), which will provide them access to best practices in board governance, model policies and exposure to other college and university board members, as suggested in the WSCUC Independent Governing Board Policy. The team suggests the administration and trustees familiarize themselves with this policy.

Additionally, while Article Four, Section 17 of the Second Amended and Restated Bylaws has a well-developed process for the handling of transactions or contracts between the school and any entity in which a trustee may have an interest, the team suggests that the Board of Trustees draft and adopt a formal Conflict of Interest policy. Such a policy would provide a mechanism for the members to disclose and process any potential conflicts and bring them forward for review by the full Board of Trustees. The policy should be published and all trustees trained on when to invoke it.

**CFR 1.6: Truthful representation to students/public; fair and equitable policies; timely completion**

CNSL has increased the administration and faculty’s familiarity with its policies and procedures regarding the treatment of student issues. (CFR 1.7) The Faculty Senate, which
implements many of these policies, and the Dean of Students are conversant with them. With the addition of a Director of Student Services, whose role is to provide academic support for at-risk students, the Dean of Students now focuses primarily on the other areas of student life, including disability accommodations and grievances. The Dean has promoted faculty awareness and understanding of the policies in the student handbook. The team acknowledges this activity and suggests continued investment in faculty training regarding the application of the policies.

**CFR 1.7: Adoption and implementation of appropriate policies and procedures, sound business practices**

CNSL operates with integrity and sound business practices, and provides timely and fair responses to complaints. The Board of Trustees reported in interviews that the process of seeking accreditation has helped the institution and the board adopt better business processes. The school has an audit conducted annually by a qualified independent auditor which specializes in educational entities. The audit is reviewed and accepted by the Board of Trustees. The audit firm was selected during the prior governance structure and has been continuously engaged since that time. The team recommends that the Audit Committee of the Board of Trustees formally select and approve the auditor annually as is recommended by the Association of Governing Boards of Universities and Colleges (AGB). The audit of the institution is consolidated with the corporation and has been issued with no findings for the past two fiscal years. A more detailed discussion of the institution’s financial audits is provided under Standard 3.

In summary, the institution has made important progress since its last visit. The work in separating the two boards and the active engagement in the areas of policy and practice lay a solid foundation. The team has provided two related recommendations for the institution to address with the focus on policy and process of Board of Trustees operations:
1. The team recommends that the board amend the bylaws to ensure the removal of CNSL staff and administration, beyond the Dean, is not solely the purview of the Board of Directors. (CFR 1.5)

2. The team recommends that the auditor should be reviewed and appointed by the Board of Trustees annually. (CFR 1.7)

**Standard 2: Achieving Educational Objectives through Core Functions**

CNSL has taken steps to begin building a culture of assessment, which, when further developed and refined, will provide the appropriate mechanisms and processes for evaluating educational effectiveness and further promoting student success. The faculty have demonstrated a commitment to improving assessment efforts and to creating a culture focused on student learning and success, while the students have expressed satisfaction with the faculty’s responsiveness and level of engagement. Because of these efforts, the team finds that CNSL meets Standard 2 at the level sufficient for Candidacy. Only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

**CFR 2.1 and 2.2b: Programs appropriate in content, standards, degree level; sufficient qualified faculty**

Since the time of the SAV1, CNSL has taken important steps to separate the JD and MLS programs at a structural and conceptual level. New program learning outcomes have been developed for the MLS, separate from those of the JD program, and the Dean and faculty are in the process of creating a capstone course for the MLS program. While these steps help to show the uniqueness of each program, the team suggests that the institution engage in more work to fully differentiate the programs from one another. In particular, if future students choose to enroll in the MLS without concurrently enrolling in the JD (as the planning for the MLS envisions), it will be necessary for the Assessment Committee to determine how to separately
assess the learning of students under the MLS learning outcomes, when they are taking the same courses with the JD students, whose learning is assessed under a different set of outcomes. In addition, the team suggests that the faculty further refine the distinct learning outcomes for each program, ensuring that they are articulated in measurable language and that they establish expectations for standards of performance. The faculty will also need to develop appropriate summative assignments and tools within the capstone course for assessing the program learning outcomes for the MLS program.

CFR 2.3: Student learning outcomes (SLOs) and expectations for student learning

CNSL faculty have adopted student learning outcomes at the programmatic level (PLOs) and are creating course-level learning outcomes (CLOs) and assessment tools. Since the SAV1, the Assessment Committee has revised the JD PLOs and created new PLOs for the MLS degree. CLOs and PLOs are now published in all syllabi, and students indicate awareness of learning outcomes and assessment activities. The team suggests that, in refining initial practices, faculty create or adapt rubrics which define and clearly describe distinct performance levels for use in assessing student learning outcomes through the assessment of student artifacts.

CFR 2.4: Faculty’s collective responsibility for SLOs and standards, demonstrating achievement of standard, and assessment

The faculty have formed an Assessment Committee since the SAV1, and through the work of that committee, as well as in individual classroom activities, the faculty has demonstrated an approach to student learning that now includes a commitment to learning outcomes and assessment. During this past year, faculty have initiated various activities in the assessment of student learning. For example, the Assessment Committee worked to develop rubrics for three of the learning outcomes and applied those rubrics to final exams for first year students to assess those learning outcomes. The institution also held a faculty assessment
workshop in fall 2016, which provided faculty with training in the process of outcomes assessment. While the institution is in the early stages of developing formalized assessment processes, several of CNSL’s faculty have begun to engage in formative assessment, and a timeline for summative assessment of PLOs has been created. Faculty discussed their use of formative assessment methods to provide students with feedback on their performance with respect to various areas of learning, including the use of practice exams in traditional courses and the use of outside experts to provide feedback to students on their performance within the Self-Help Clinic. Further, faculty members described an interest in adjusting teaching methods and evaluation processes in light of earlier assessment activities. These efforts are appreciated by the students, who stated that obtaining more detailed and meaningful feedback on their performance and engaging in active learning have improved their learning.

CNSL appears to be basing its current assessment practices on recommendations in the book entitled *Student Learning Outcomes and Law School Assessment: A Practical Guide to Measuring Institutional Effectiveness*, by Lori E. Shaw, Victoria L. VanZandt. In addition to this resource, the team further suggests the creation and/or distribution of training materials to inform the faculty’s understanding of assessment practices.

**CFR 2.6:** Graduates achieve stated levels of attainment; SLOs embedded in faculty standards for assessing student work

The Assessment Committee has completed a major assessment project, in which rubrics for three PLOs were applied to student artifacts from first year students. The Assessment Committee has created an assessment schedule and has begun to map the courses in which specific outcomes are introduced, practiced, and mastered. At the current time, only first-year student work product has been assessed, and only through one cycle. This completed project provides an important baseline for future efforts. It will be valuable in subsequent stages both to
compare data from one year’s class to the next, and to assess students at more advanced stages of
mastery, including at or near graduation, in order to establish that graduates are meeting the
stated goals. The team endorses the goal set out in the SAV2 report that the faculty should
continue to align their teaching with the learning outcomes and cultivate good practices for
assessment. The institution should clearly articulate expected levels of student learning that are
required for graduation, continue to engage in direct assessment of student work to ensure that
students’ achievement of PLOs are at the expected performance levels, and ensure that faculty
are consistent in their rating of student work.

**CFR 2.7: Program Review**

CNSL has completed one program review under its Program Review Plan. The plan was
adopted in early 2015 and, with a five year cycle of review, is only in the initial stages of
implementation. As the institution develops its program review process it will be important to
include retention and graduation rates, bar pass data and other relevant student achievement data,
as well as progress on student learning outcomes (see discussion of program review under CFR
4.1)

**CFR 2.8: Faculty scholarship, creativity, curricular and instructional innovation**

Development efforts aimed at improving faculty expertise in pedagogy and assessment
seem appropriate for an institution of this type and size. As described above, the team suggests
that these efforts continue in a broad and sustained manner.

**CFR 2.10 and 2.13: Students’ timely progress/ Student support services**

Reported current attrition is consistent with the mission and approach of a law school
accredited by the California Committee of Bar Examiners (CBE). Data provided indicates that
attrition peaks during the first year of the program and those who remain at the end of the first
year are retained and graduate at high levels. This was noted in the SAV1 report and the position
of Director of Student Services (DSS) was developed in response in order to provide first year students with needed support for their academic success. The position focuses exclusively on academic tutoring for students who score less than 70% on the fall mid-term exams. Six students were referred for tutoring during the fall 2016 term. Evidence was provided that some student exam scores increased after such tutoring. While those are promising results, the team urges the institution to continue to identify students in need of academic support, carefully assess the value of the support provided by the DSS office, and adjust or expand its provision in light of those assessment results.

**CFR 2.11: Co-curricular programs aligned with academic goals and regularly assessed**

The size of the student body has allowed the institution to work with individual students through informal processes to support them outside of class. These efforts include the interventions by the Dean of Students regarding non-academic matters, and the academic tutoring provided by the Director of Student Services. The team suggests that the institution identify and assess co-curricular outcomes. Additional professional development for those providing student support services will also be of value. CNSL does not currently assess student satisfaction and campus climate. Disaggregation of such data would allow the institution to make data-informed decisions that identify any gaps in the provision of student support services, and promote student satisfaction and achievement.

In summary, the institution has made important progress since its last visit to develop its understanding of assessment and begin a process of systematic assessment of learning outcomes. In addition to the suggestions the team has provided throughout this section, there are three major recommendations relating to Standard 2 for the institution to address:

1. The team recommends that the institution conduct periodic program reviews that include student learning assessment results, retention and graduation rates, bar pass rates, and other relevant data that are then used to inform decision making. [CFR 2.6, 2.7]
2. The team recommends that the institution regularly collect and analyze aggregated and disaggregated data related to student satisfaction and student achievement. [CFR 2.10, 2.13]

3. The team recommends that the institution regularly assess the effectiveness of the efforts by the Dean of Students and the Director of Student Services to support the students’ academic, personal, and professional development, and use those results for improvement. [CFR 2.11]

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

Since the SAV1, CNSL has taken steps to improve its technological resources and address concerns about adequate staffing. The team finds that CNSL meets Standard 3 at a level sufficient for Candidacy. Only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

CFR 3.1: Sufficient, qualified and diverse faculty and staff

CNSL has added some capacity in leadership positions to address concerns raised in the SAV1 about the sufficiency of staffing levels. While these steps have offered some improvement, more capacity is needed. There are two full-time employees at CNSL: the Dean and the Assistant to the Dean, who also functions as the Registrar. CNSL’s other administrative functions are serviced by existing adjunct faculty with extremely limited part-time hours (Dean of Students, Director of Student Services, and Assessment/Institutional Research Coordinator). The Chief Financial Officer position is filled by a volunteer. (Please see the discussion at CFR 3.8 regarding that position.)

The Dean of Students (DOS) role is filled by an adjunct faculty member who has long served the institution, and receives a small stipend as compensation. The DOS stated that he devotes up to one hour per week meeting with students who seek him out, addressing those concerns about student life not related to academic support. Due to the limited hours available,
the approach is more reactive than proactive. The team found that the Dean of Students was not adequately familiar with important higher education regulations relating to student interaction such as Title IX, the Americans with Disabilities Act (ADA) and the Family Educational Rights and Privacy Act (FERPA). Because thorough knowledge of these provisions is important for the role of the DOS, the team suggests that the DOS pursue professional development through affiliation with the National Association of Student Personnel Administrators (NASPA) or a similar organization, to receive guidance and support that will enhance his effectiveness in this role and provide him access to peers in similar positions.

The role of the Director of Student Services (DSS) is a new position (see discussion under CFR 2.10 and 2.13 above). It is also filled part-time by an adjunct professor. The DSS reports regularly to the Dean, but has very limited interaction with other key student support personnel, such as the DOS. Interaction with the DOS is not formalized, nor frequent and is, instead done on an as needed basis. The team found that the lack of regular interaction between these key roles impeded more efficient and effective response to student needs. For that reason, the team suggests that regular interaction take place among all roles dealing with student support and success to create a stronger network.

The Assessment/Institutional Research Coordinator (AIRC) is another part-time faculty member receiving a small stipend. The team found the AIRC to be enthusiastic towards the work, passionate about the mission of the institution, and desiring to grow in her understanding of assessment. Due to the limited number of hours she can devote to the dual tasks of assessment and institutional research, development of these functions has been slow, although preliminary steps have been taken in each area. The institution’s plans to provide the AIRC with additional professional development opportunities are appropriate.
The faculty serving in part-time support capacities have deep affection for the institution and its students. However, the team is concerned that the lack of available time and resources, coupled with limited professional development hampers the development of academic and co-curricular programs. The team agrees with CNSL’s self-assessment as written in the SAV2 report: the institution must continue to “adjust its staffing, planning, and budgeting to take into account the fact that effective deployment of an evidence-based approach requires more administrative resources.” New positions will need to be created to accommodate the responsibilities that exist for an institution that is WSCUC accredited and/or receives Title IV funding from the United States Department of Education. The team suggests sufficient professional development regularly take place for all roles dealing with student support and success (see CFR 3.3) and that intentional cross-training of functional roles occur among staff to increase effectiveness, and to provide for succession when necessary.

CFR 3.2: Faculty and staff policies, practices and evaluation

CNSL has a wide array of policies that are typical of a higher education institution, including an appropriate faculty handbook, student handbook, and published financial policies. Interviews with the faculty indicated that they are familiar with these policies.

CFR 3.3: Faculty and staff development

CNSL’s budget limitations and model of using adjunct faculty who practice law full time pose challenges for continued and increased professional development. However, evidence was provided to show that members of the faculty, staff, and Board of Trustees have taken initial steps by attending conferences and workshops, and receiving specific training in the areas of assessment, accreditation, and teaching skills. The team believes exposures to peer institutions and functional areas through professional organizations will assist the institution in finding
scalable solutions to issues encountered in their limited staffing model. The team encourages the institution to build on the initial progress made in this area.

**CFR 3.4: Financial stability; integrated budgeting; enrollment management**

While noting progress in CNSL’s approach to budgeting and financial planning, the team found very limited strategic financial planning. In response to the concerns expressed in the SAV1 report about the co-mingling of funds between the corporation and the law school, CNSL now budgets and reports on the financial position of each entity separately. This disaggregation provides decision-makers more meaningful data with which to work. Bookkeeping and payroll functions are outsourced to a local Certified Public Accountant (CPA) firm, with appropriate expenditure and deposit transactions occurring weekly. However, financial reports are only provided to CNSL on a quarterly basis. This infrequency of receiving key financial information did not appear to hinder present operations, but this level of frequency is not typical of a higher education institution. CNSL should consider receiving financial reports more regularly, allowing a faster response to changes in the school’s financial reality.

The institution observes appropriate roles in the budget review process. An annual proposed budget is created in the fall by the Dean and is reviewed by the Chief Financial Officer and Finance Committee of the Board of Trustees (BOT) before going to the Board of Directors (BOD) for comment and observation, then approval by the BOT. Interviews conducted with the Board of Directors and Board of Trustees (BOT) affirmed that the BOT alone approves the annual budget (see CFR 3.9). The Audit Committee of the BOT receives the financial audits, although it is not involved in the selection of the auditor. No material weaknesses, significant deficiencies, reportable instances of noncompliance or other matters were identified. Review of the financial audits and internal financial statements confirm cash reserves of approximately 30% of operating expenses.
The team found an absence of long-term financial forecasting, effective enrollment management and integrated resource planning related to CNSL’s annual budgeting process, in addition to a lack of revenue diversification. While there have been no operational deficits within the preceding three years, there was no evidence presented of a systemized or strategic process in place to ensure this outcome. Each year’s proposed budget is primarily based on the current year’s actuals, with minimal review of multi-year trends, in-depth analysis or alignment with strategic goals or enrollment planning. Interviews with the Dean and Chief Financial Officer confirmed that when CNSL experiences either additional or declining revenues compared to the budget, no updated or pro-forma budget is developed, and instead operations continue based on the approved budget. Additional revenues are placed in savings for unidentified future uses. Budget shortfalls are addressed via spending reductions, along with potential financial assistance from the Board of Directors. CNSL did not identify a planned purpose for the cash reserves, nor an end reserve figure towards which they are moving.

The team encourages the institution to develop a more strategic approach to financial planning. Because CNSL’s operations are based upon its ability to maintain and grow student enrollment and return surplus revenue to the organization, the strategic plan should also focus on resource allocation, and other planning to ensure financial sustainability and the long-term viability of the institution. The Board of Trustees oversight should also include selection of the auditor as noted in CFR 1.7 of this report.

**CFR 3.5: Facilities, services, information and technology resources**

CNSL’s facilities are attractive and welcoming, providing appropriate capacity for current operations. The library is adequate in size and scope to support student learning, although multiple constituencies stated that the library was seldom used and that the space could be used for more strategic purposes.
Classrooms are neat, clean, quiet and spacious, providing a proper environment for student learning to occur. All are equipped with traditional chalkboards or whiteboards, and there is an available projector. While none of the stakeholders mentioned deficiencies with the current set up, the team suggests investigating ways in which the learning experience can be enhanced through the use of additional video and audio technology in the classroom. The institution’s Wi-Fi and internet capabilities appeared sufficient to handle user needs. Separate Wi-Fi channels are dedicated for student and staff purposes, providing adequate bandwidth for each group’s needs, along with enhancing security by preventing student access to staff computers.

The most notable technological improvement CNSL has made was to transition away from spreadsheet-based student recordkeeping, which was inefficient and unreliable, to that of a comprehensive and professional web-based student information system. During a demonstration of the software (Populi), the Registrar was able to show team members the mechanisms for registration, gathering student data and generating initial level reports on retention and graduation. Both students and staff reported high satisfaction with the features of Populi. Students reported to the team an immediate improvement in the overall student experience with its implementation, stating that they can now easily access their class schedule, financial billing statement, and student record at any time. Because of the newness of the program there remains additional untapped capacity for such important tasks as pulling data, running reports and increasing staff efficiency. The staff affirmed a desire to further develop their understanding of the system. The team commends CNSL for the implementation of a professional student information system and encourages continued training for the relevant staff to ensure that its full potential is exploited.

CFR 3.6: Leadership operates with integrity, high performance, responsibility and accountability
The team found the leadership, Board of Trustees and Board of Directors to be enthusiastic, operate with personal integrity, and take seriously their corresponding roles with a high sense of responsibility and accountability (see discussion under CFR 1.5, above).

**CFR 3.7: Clear, consistent decision-making structures and processes**

The limited size of CNSL’s staff, leadership and boards make decision making structures and processes straightforward. The Faculty Senate develops and recommends all academic and professional policies (CFR 3.10). The Board of Trustees is responsible for the governance of the institution, reviewing and approving all policies related to fiscal, operational, financial and academic matters (CFR 3.9). The Board of Directors manages all business operations of the parent corporation; it provides input and observation to the BOT regarding CNSL’s budget and operations but does not have authority over these matters. The team confirmed that these structures are in place and operating as designed.

**CFR 3.8: Full-time chief executive officer (CEO); chief financial officer (CFO); sufficient qualified administrators**

CNSL’s Dean operates as its Chief Executive Officer (CEO) and does so in a full-time capacity. However, having a Chief Financial Officer (CFO) who is meaningfully involved in financial planning and who is intimately aware of all financial details of the institution is of critical importance for CNSL as it pursues WSCUC accreditation.

In response to the concerns expressed in the SAV1 report, CNSL replaced its previous Chief Financial Officer in January 2016. A CNSL alumnus and adjunct professor, the new CFO has the appropriate credentials (CPA) with suitable experience. However, an interview of the CFO revealed that he is not engaged with the institution or its operations in a meaningful way. Both he and the Dean confirmed that he is a volunteer who typically serves one hour per month and “only when asked.” Because the payroll and bookkeeping functions are handled by an
outside firm, there is no interaction with the day to day operations of the institution. He also
does not perform the higher functions typical of the CFO role, such as budget management, long-
term strategic financial planning or regular advising to the Dean. He attends one Board of
Trustees meeting annually for the approval of the budget, but has no additional interaction with
the trustees, and none with the Board of Directors. He is aware of the National Association of
College and University Business Officers (NACUBO) but stated he is not a member of this or
any other industry-recognized group, nor has he utilized its resources.

During interviews both the Dean and the CFO stated that they believe that the CFO’s
level of engagement was sufficient for the college’s needs. However, the model of a volunteer
Chief Financial Officer whose primary responsibility is not to the institution is not common in
higher education, and the team has significant concerns regarding the feasibility and long-term
effectiveness of such an approach. Restructuring the CFO position so that its holder is more
fully engaged with financial oversight and planning will be crucial for the institution to access
Title IV funding through the Department of Education.

In summary, the institution has significantly improved its technological infrastructure
with the deployment of Populi and it has somewhat improved its staffing levels and expertise.
In addition to the suggestions the team has provided throughout this section, there are two
important recommendations relating to Standard 3 for the institution to address:

1. The team recommends that the Board of Trustees empower the Dean to charge the
   holders of the positions of CFO and Director of Student Services with the appropriate
   responsibility to allow them to provide effective leadership and management in their
   functional areas. [CFR 3.6 and 3.8]

2. The team recommends that the institution pursue strategic enrollment management that is
   integrated with other institutional planning and resource allocation to ensure its long term
   financial viability. [CFR 3.4]
Standard 4: Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement

Cal Northern School of Law (CNSL) continues to demonstrate its intent to develop and foster a culture of continuous improvement of student learning, and has followed through on several issues identified by the SAV1 Commission action letter, such as conducting its first program review cycle and engaging stakeholders in conversations about the use of assessment to improve teaching and learning. The institution will be able to build on this initial effort as it moves toward greater sophistication in the use of assessment and data to improve learning. The team finds as a result of this progress that CNSL meets Standard 4 at a level sufficient for Candidacy. Only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

CFR 4.1: Quality-assurance processes

Program review serves as a vital point of inquiry about effectiveness. As noted above (see discussion under CFR 2.7), CNSL has completed one program review cycle since SAV1, providing the institution a foundation from which to build its quality assurance methodologies and practices. Because CNSL is only in the beginning stages of developing a capacity to engage in inquiry about educational effectiveness, the utility and applicability of the data included in the inaugural program review report are limited. The team suggests that CNSL consider additional lines of evidence to determine whether program delivery aligns with stated educational and operational goals. For example, CNSL explained in its SAV2 report that they use “Course Evaluations to obtain student feedback about the effectiveness of all courses and instructors” (p. 41). Student evaluations yield limited evidence of teaching effectiveness (c.f., Boring, Ottoboni,
& Stark, 2016\(^1\)); furthermore, research shows that student evaluations of women are biased by statistically significant amounts. Likewise, evaluations of faculty from traditionally underrepresented groups reflect bias. The team learned that CNSL faculty regularly engage in peer evaluation of classroom teaching. Peer observation of teaching may likely provide more useful and actionable information about teaching effectiveness.\(^2\) Additionally, satisfaction surveys of employers, and other stakeholders are potentially limited in their ability to yield actionable results pertaining to effectiveness; expanding survey items beyond satisfaction is one way to increase the utility of surveys for gathering feedback. The team suggests that CNSL consider additional methodologies (e.g., interviews, focus groups, testimonials) for engaging its key stakeholders in on-going inquiry about the alignment of educational goals and outcomes.

**CFR 4.2: Sufficient institutional research (IR) capacity**

As noted previously, the Assessment and Institutional Research Coordinator (AIRC) demonstrates dedication and commitment to the institution and to developing a greater understanding of institutional research and assessment. The adoption and implementation of a new student information system also has provided the institution with new capacity to generate and analyze relevant data. However, the AIRC’s time restrictions and limited experience in institutional research may constrain the institution’s ability to take full advantage of the available data. The team suggests that CNSL consider external models or additional resources to help develop a sustainable system of policies and practices that will yield robust and actionable data to support on-going inquiry. In particular, the team suggests that CNSL increase its capacity to disaggregate institutional data by demographic characteristics (e.g., gender, race, ethnicity), as


well as by relevant student information (e.g., entrance credentials). A possible future area of inquiry for CNSL could include systematic evaluation of any correlations between these data and the results of learning outcomes assessment.

Based on the appendices in the SAV2 report, it appears that the institution may have conflated measures of institutional effectiveness (e.g., persistence data, graduation rates) with the assessment of student learning. While inherently related, the distinctions between the two approaches matter. With clarified understanding of the purposes of institutional research and learning outcomes assessment, CNSL will make important strides toward answering both internal and external questions about its effectiveness at achieving its stated goals.

CFR 4.3: Commitment to improvement based on data and evidence; systematic assessment; utilization of results
CFR 4.4: Ongoing inquiry into teaching and learning

While the commitment of the faculty and staff to evidence-based improvement is apparent, the data presented in the SAV2 report and during the visit are insufficient to support claims that there is a mature culture of evidence-based decision-making at CNSL. Rather, the presentation of data in the report and during the visit reveals little change from the findings of the SAV1 team, which were that CNSL is in the initial stages of understanding how to use data to chart its future. The team suggests that CNSL develop its capacity to effectively select, collect, analyze, present, and disseminate data in alignment with standard practices at institutions of higher education.

CFR 4.5: Appropriate stakeholders involved in regular assessment of institutional effectiveness
CFR 4.6: Strategic Planning

The faculty, staff, students, directors, trustees, and alumni whom the team met provided ample evidence of CNSL’s commitment to its mission to provide affordable quality legal education to the residents of northern California. The clarity of this mission lends itself to the
development of a strong strategic plan. The team found that, as in the SAV1 report, CNSL’s strategic plan does not adequately articulate the institution’s vision for its future. The team refers the institution to the 2013 Handbook of Accreditation, which describes effective strategic planning as including on-going, systemic reflection on and examination of the degree to which the institution’s purposes, core functions, and resources are aligned (p. 21). Specifically, the team suggests that CNSL develop a strategic plan which includes specific and actionable goals aligned to its educational mission; achievable performance targets; realistic timelines; and scheduled evaluation of progress towards achievement of the plan. The plan should also consider the allocation of resources to these targets.

In summary, CNSL has taken important and meaningful steps towards demonstrating an institutional commitment to quality assurance, institutional learning, and improvement. The team commends this progress, and encourages CNSL to focus on the design and implementation of systemic, sustainable, and meaningful evaluation processes and practices which will expand its capacity to fulfill its mission of providing high-quality and accessible legal education in northern California. To achieve this progress, the team has two important recommendations:

1. The team recommends that CNSL develop and implement systematic quality assurance processes that integrate the results of existing and emerging academic, fiscal, and co-curricular inquiries [CFR 4.1]

2. The team recommends that CNSL develop a comprehensive strategic plan that goes beyond assessment of student learning to include evaluating the alignment among purpose, core functions, and resources, in order to define the future direction of the institution. [CFR 4.6]

IDENTIFICATION OF OTHER CHANGES OR ISSUES THE INSTITUTION IS FACING

The institution has identified the anticipated turnover of some of the long-term faculty as a key issue that CNSL will be facing in or before 2019. In meetings with the team, faculty and
administrators noted that they receive fairly large numbers of inquiries regarding faculty positions, so they do not believe the issue will be finding faculty but, rather, finding faculty who will wish to be part of their newly developing culture that is focused on assessment, student learning outcomes, and a cycle of quality improvement. CNSL contends, and the team concurs, that it will be important for them to develop training and orientation materials for new faculty to help them learn about CNSL’s expectations and culture.

The other issue that the institution has identified is the elimination of “registered” law schools, which will open the door to distance education JD programs, which will also seek accreditation. While online programs are not currently being planned, CNSL has identified investigation of the viability of online programs as something to be considered by the institution. The team suggests, should the institution decide to offer online programs as a means for remaining competitive, that they seek training in good practices in online pedagogical approaches and curriculum development that provide for rigorous, active learning experiences; regular, effective formative assessment of student learning activities that allow students to build proficiency; and embedded summative assignments and assessments that allow for assessing student learning outcomes.

SECTION III. FINDINGS, COMMENDATIONS AND RECOMMENDATIONS

FINDINGS

Below is a consolidation of the team’s findings from the SAV2 review and visit. Only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.

Standard 1
Since the SAV1, CNSL has amended its governance structures, adopted an appropriate Academic Freedom policy and further developed its capacity for tracking student achievement. The team finds that CNSL meets this Standard at a level sufficient for Candidacy.

**Standard 2**

CNSL has taken steps to begin building a culture of assessment, which, when further developed and refined, will provide the appropriate mechanisms and processes for evaluating educational effectiveness and further promoting student success. The faculty have demonstrated a commitment to improving assessment efforts and to creating a culture focused on student learning and success, while the students have expressed satisfaction with the faculty’s responsiveness and level of engagement. The team finds that CNSL meets this Standard at a level sufficient for Candidacy.

**Standard 3**

CNSL has significantly improved its technological infrastructure and it has somewhat improved its staffing levels and expertise. The team finds that CNSL meets this Standard at a level sufficient for Candidacy.

**Standard 4**

CNSL has taken important and meaningful steps towards demonstrating an institutional commitment to quality assurance, institutional learning, and improvement. The team offers suggestions above for the development of greater expertise to improve the evaluation and analysis of quality assurance data. The team finds that CNSL meets this Standard at a level sufficient for Candidacy.
The team wishes to make clear that in addition to finding that all four Standards were met at a level sufficient for Candidacy, the team found that nearly all of the accompanying CFRs were only at a level sufficient for Candidacy.

**COMMENDATIONS**

1. Multiple constituencies throughout the institution fully embrace the stated goal of CNSL to serve the North State by providing an affordable and effective legal education for working students.

2. The institution fosters and promotes community at multiple levels; the students describe a strong sense of community among themselves as well as with the staff and faculty, while the institution is deeply connected with the local region and with attorneys in the area.

3. CNSL has taken important steps to clarify the roles of the two governing boards, with each board playing a distinct role in the governance of the institution, and in appropriate relationship with the faculty’s corresponding role.

4. CNSL has adopted and implemented a student information system that improves the student experience.

5. The faculty demonstrate dedication to the students and their learning. Students and alumni praised the faculty for their availability and responsiveness.
RECOMMENDATIONS

1. The team recommends that the board amend the bylaws to ensure that removal of CNSL staff and administration, beyond the Dean, is not solely the purview of the Board of Directors. (CFR 1.5)

2. The team recommends that auditor should be reviewed and appointed by the Board of Trustees annually. (CFR 1.7)

3. The team recommends that the institution conduct periodic program reviews that include student learning assessment results, retention and graduation rates, bar pass rates, and other relevant data that are then used to inform decision making. [CFR 2.6, 2.7]

4. The team recommends that the institution regularly collect and analyze aggregated and disaggregated data related to student satisfaction and student achievement. [CFR 2.10, 2.13]

5. The team recommends that the institution regularly assess the effectiveness of the efforts by the Dean of Students and the Director of Student Services to support the students’ academic, personal, and professional development, and use those results for improvement. [CFR 2.11]
6. The team recommends that the Board of Trustees empower the Dean to charge the holders of the positions of CFO and Director of Student Services with the appropriate responsibility to allow them to provide effective leadership and management in their functional areas. [CFR 3.6 and 3.8]

7. The team recommends that the institution pursue strategic enrollment management that is integrated with other institutional planning and resource allocation to ensure its long term financial viability. [CFR 3.4]

8. The team recommends that CNSL develop and implement systematic quality assurance processes that integrate the results of existing and emerging academic, fiscal, and co-curricular inquiries [CFR 4.1]

9. The team recommends that CNSL develop a comprehensive strategic plan that goes beyond assessment of student learning to include evaluating the alignment among purpose, core functions, and resources, in order to define the future direction of the institution. [CFR 4.6]
APPENDIX A

FEDERAL COMPLIANCE FORMS

OVERVIEW
There are four forms that WSCUC uses to address institutional compliance with some of the federal regulations affecting institutions and accrediting agencies:
1 – Credit Hour and Program Length Review Form
2 – Marketing and Recruitment Review Form
3 – Student Complaints Form
4 – Transfer Credit Policy Form

During the Accreditation Visit, teams complete these four forms and add them as an appendix to the team report. Teams are not required to include a narrative about any of the matters in the team report but may include recommendations, as appropriate, in the Findings, Commendations, and Recommendations section of the team report.

1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM
Under federal regulations, WSCUC is required to demonstrate that it monitors the institution’s credit hour policy and processes as well as the lengths of its programs.

Credit Hour - §602.24(f)
The accrediting agency, as part of its review of an institution for renewal of accreditation, must conduct an effective review and evaluation of the reliability and accuracy of the institution's assignment of credit hours.

(1) The accrediting agency meets this requirement if-
   (i) It reviews the institution's-
       (A) Policies and procedures for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for courses and programs; and
       (B) The application of the institution's policies and procedures to its programs and coursework; and
   (ii) Makes a reasonable determination of whether the institution's assignment of credit hours conforms to commonly accepted practice in higher education.

(2) In reviewing and evaluating an institution's policies and procedures for determining credit hour assignments, an accrediting agency may use sampling or other methods in the evaluation.

Credit hour is defined by the Department of Education as follows:
A credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than—

(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or
(2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

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

**Program Length - §602.16(a)(1)(viii)**

Program length may be seen as one of several measures of quality and as a proxy measure for scope of the objectives of degrees or credentials offered. Traditionally offered degree programs are generally approximately 120 semester credit hours for a bachelor’s degree, and 30 semester credit hours for a master’s degree; there is greater variation at the doctoral level depending on the type of program. For programs offered in non-traditional formats, for which program length is not a relevant and/or reliable quality measure, reviewers should ensure that available information clearly defines desired program outcomes and graduation requirements, that institutions are ensuring that program outcomes are achieved, and that there is a reasonable correlation between the scope of these outcomes and requirements and those typically found in traditionally offered degrees or programs tied to program length.
### CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy on credit hour</td>
<td>Is this policy easily accessible?  ☐ YES  ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Where is the policy located? Catalog and published in syllabi</td>
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<tr>
<td></td>
<td>Comments:</td>
</tr>
<tr>
<td>Process(es)/ periodic review of credit hour</td>
<td>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)?  ☐ YES  ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Does the institution adhere to this procedure?  ☐ YES  ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Comments:</td>
</tr>
<tr>
<td>Schedule of on-ground courses showing when they meet</td>
<td>Does this schedule show that on-ground courses meet for the prescribed number of hours?  ☐ YES  ☐ NO</td>
</tr>
<tr>
<td></td>
<td>Comments:</td>
</tr>
<tr>
<td>Sample syllabi or equivalent for online and hybrid courses</td>
<td>How many syllabi were reviewed?</td>
</tr>
<tr>
<td><em>Please review at least 1 - 2 from each degree level.</em></td>
<td>What kind of courses (online or hybrid or both)?</td>
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<td>What degree level(s)?</td>
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<td></td>
<td>What discipline(s)?</td>
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<td></td>
<td>Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?  ☐ YES  ☐ NO</td>
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<td></td>
<td>Comments:</td>
</tr>
<tr>
<td>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)</td>
<td>How many syllabi were reviewed?</td>
</tr>
<tr>
<td><em>Please review at least 1 - 2 from each degree level.</em></td>
<td>What kinds of courses?</td>
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<td>What discipline(s)?</td>
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<td>Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?  ☐ YES  ☐ NO</td>
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<td>Comments:</td>
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<tr>
<td>Sample program information (catalog, website, or other program materials)</td>
<td>How many programs were reviewed? Two</td>
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<td>What kinds of programs were reviewed? JD and MLS</td>
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<tr>
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<td>What degree level(s)? graduate</td>
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<td></td>
<td>What discipline(s)? Law</td>
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<tr>
<td></td>
<td>Does this material show that the programs offered at the institution are of a generally acceptable length?  ☐ YES  ☐ NO</td>
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<td>Comments:</td>
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</tbody>
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