REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To San Joaquin College of Law

Date of Visit:
February 27 - March 2, 2017

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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 Institution and Reaccreditation Process

I. A.: DESCRIPTION OF INSTITUTION AND VISIT

San Joaquin College of Law (SJCL) is a private, non-profit, single-degree institution founded in 1969. SJCL is located in Clovis, California adjacent to Fresno. Fresno County, with a population of 974,861 (as of 2015), is one of the most ethnically diverse areas in the United States and this is reflected in the composition of SJCL’s student body.

SJCL offers a Juris Doctorate degree and as of fall 2015 had 24 full-time students and 160 part-time students which translates to 132 full-time equivalent students enrolled in its program. Most students work while attending school. SJCL’s 2016 graduating class was 52% male and 48% female, 56% white and 44% underrepresented minority, including individuals of Hispanic, Asian (Japanese, Chinese, and Hmong), black, East Indian and Middle Eastern race, heritage, or ethnicity. The entering class of 2015, now in the second year is 42% white, 42% Hispanic, 14% Asian, and 5% black. (CFR 1.4)

SJCL was created in response to the need for a local law school so that members of the community would be able to obtain a legal education without leaving the area. It is the only law school in the greater Fresno area, the closest law school being 135 miles away in Stockton. 19 of the region’s judges are graduates of SJCL, as are 8 court commissioners and 14 administrative law judges. SJCL has earned a strong reputation and the support of the local legal, educational and civic communities.

SJCL occupies a building that formerly housed a high school, which it leases from the City of Clovis for 55 years at $1 a year. The facilities are spacious, comfortable, and impressive, but more library and student study space is needed and to that end, SJCL plans to take over the local Senior Center, located next door, in 2020.

The team visited SJCL February 27 - March 2, 2017. In preparation for the visit, the team carefully reviewed SJCL’s 2016 institutional report. While on site, the team met with administrators, full-time and adjunct faculty, staff, the Board of Trustees, students, and alumni to solicit insights about every aspect of SJCL’s functioning to meet its educational mission and its
effectiveness in meeting that mission. The discussions were open, informative, and productive. A secure e-mail account was established so that members of SJCL community could share comments with the team.

SJCL does not have off-campus locations, nor does it engage in distance education programs. The team did not review any substantive changes in connection with this site visit.

The SJCL community was very engaged and responsive to the team. Their hospitality throughout the site visit was exemplary and greatly appreciated.

I. B.: DESCRIPTION OF TEAM’S REVIEW PROCESS

SJCL submitted its institutional report in July 2016. The team reviewed it and met for the Offsite Review (OSR) on September 22, 2016. The team developed Lines of Inquiry and submitted them to SJCL along with requests for additional documents. SJCL made its response to the Lines of Inquiry on December 19, 2016. The team drafted a preliminary version of this narrative report and held a conference call to discuss it on February 8, 2017. The accreditation site visit took place February 27 - March 2, 2017.

I.C.: INSTITUTION’S REACCREDITATION REPORT: QUALITY AND RIGOR OF THE REPORT AND SUPPORTING EVIDENCE

SJCL’s institutional report was clearly written and presented. However, because the institution exercised the option to “structure its report in the way it finds best suited to tell its story” (Handbook of Accreditation, pg. 27), the report only loosely adhered to the component format. As a result, it was challenging for the team to associate SJCL evidence to the eight components and to WSCUC Standards. The team determined that the institutional report accurately portrayed the condition of the institution. It was evident that the dean and academic dean were the leaders in the review and report preparation, as one would expect in a very small and specialized institution. The extent to which others were involved in the discussion of issues and recommendations was less clear.

In the seven years since the last reaffirmation visit, the college has made significant strides in a number of areas, not the least of which is in data collection and analysis. In the 2010 team report, there was discussion of data gathering by hand which was laborious and unsophisticated. Now, thanks to the creation of an Information Technology and Institutional Research (IT/IR) department at SJCL, the college has an abundance of data. The college takes IT/IR’s analysis very seriously and uses that analysis to substantially inform the institution’s policies and processes.
Of special note is that this review of SJCL is coming at a time of unprecedented upheaval in legal education. There has never been a time when relevant data and analysis are more crucial to the ongoing viability of law schools. While SJCL does not yet have the self-reflection process as institutionalized as it will have in future, the college has laid the foundation to collect, analyze, interpret and use data for decision-making and instructional improvement.

SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

II.A. Component 1: Response to previous Commission actions

The Commission Action Letter of July 8, 2010, emphasized these five areas for further attention and development: 1) Board and Administrative Policies, Practices and Plans; 2) Culture of Evidence/Institutional Research; 3) Assessment and Program Review; 4) Transparency; and 5) Diversity. In the 2016 institutional report, SJCL responded to each of these concerns.

In sections of the institutional report on Governance and Administration and Administration and Administrative Policies and Procedures, SJCL outlined the work it has done to: (a) develop realistic and achievable fund-raising goals and plans based on a formal assessment of feasibility; (b) create a succession plan for changes in administration, faculty, and the governing board, which were expected within the next five to ten years after that report and which have come to pass since then; (c) implement appropriate investment and endowment policies; (d) implement performance evaluation processes, including a more formal plan for the evaluation of the chief executive officer by the board; and create processes for the evaluation of board effectiveness and formalization of board functioning, terms and appointment. (CFRs 1.8, 3.5, 3.9, 3.10, 4.1-4.3)

With the exception of implementing the formal evaluation of the chief executive officer, and ongoing systematic evaluations of staff, SJCL has satisfactorily addressed this recommendation.

2) Culture of Evidence/Institutional Research.
SJCL installed SONISWEB in 2010. In 2014, the academic dean and student services director began a complete review of the data in SONISWEB how best to enhance SJCL’s data collection and analysis capabilities through the software. With time and greater depth of understanding of this system, the academic dean and the director of student services have worked with the expanded IT Department to generate the data that fill the institutional report. SJCL has now migrated significantly to SONISWEB. The growing technological capability of this system has enabled SJCL to track individual students from application to enrollment to graduation, including disaggregating the data by gender and race/ethnicity for the entering classes from 2007
to the present. The system can track students by entering cohort or graduating cohort. This is invaluable information both for evaluating the impact of student admissions, retention, and graduation and for working with assessment data. (CFRs 2.10, 4.1, 4.2)

3) Assessment and Program Review.
More than one-third of the 75-page 2016 institutional report is devoted to SJCL’s efforts with regard to assessment and program review. They begin with the history of the early efforts made under the previous academic dean starting in 2007 and continuing until her retirement in 2014. Now under the joint management of the dean and current academic dean, SJCL has implemented many of the recommendations in the 2010 WSCUC team report and is beginning to implement others. SJCL has examined its degree program, involving external reviewers, and is using assessment results to improve the program and make decisions. The faculty have worked to develop summative assessment mechanisms beyond bar examination results so that SJCL can demonstrate that “graduates consistently achieve...stated level of attainment” pursuant to CFR 2.6. (CFRs 2.3, 2.4, 2.6, 2.7, 4.4, 4.6, 4.7)

4) Transparency.
In response to the 2010 Commission’s concern that SJCL was not making public data on student achievement, SJCL has posted retention and graduation data as well as bar results, first-time and cumulative, on its website for many years. SJCL also posts the results of the Jury Assessment, the summative assessment of the graduating class. SJCL has posted employment data for the graduating classes of 2014 and 2015, verified by contact with each graduate. (CFRs 1.2, 2.6, 2.7, 4.2)

5) Diversity.
SJCL has worked to create diversity among students, staff, faculty, and trustees on its board. The percentage of minority students in the entering class has grown from a low of 32.5% in 2008 to 55.7% in 2015, though the diversity of students enrolling does not yet reflect the local population from which the student body is drawn. SJCL expects efforts such as the regional Pathway to Law School program created in 2016 to yield positive results in augmenting the underrepresented student population. Faculty and staff diversity has expanded as older members of those groups have retired or moved on to other work opportunities. “The Board of Trustees remains overwhelmingly white. With six vacancies on the board that will change quickly.” (2016 institutional report, page 59).

II.B. Component 2: Compliance with the Standards and federal requirements; Inventory of Educational Effectiveness Indicators

SJCL completed the review under WSCUC Standards in a reflective and analytical way, trying
to observe all policies and procedures related to the Criteria for Review (CFRs). SJCL was thorough and committed in providing plans to address areas needing improvement. More specifically, the team noted the following regarding each of the four Standards.

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

*Institutional Purposes*

SJCL has clear Mission and Vision Statements adopted by the Board of Trustees in 2009. Their vision is to be the premier provider of legal education, scholarship and service in the San Joaquin Valley. SJCL’s mission is to educate and develop individuals to become highly skilled attorneys and problem solvers who will benefit their communities through public and private service. In seeking this vision and attaining this mission, SJCL works to embody the values of civility, excellence, integrity, intellectual inquiry, and service. (CFR 1.1)

With respect to clear educational objectives and indicators of student achievement, the report reflects overall institutional buy-in on the educational objectives. (CFR 1.2) Student learning outcomes are included in each course syllabus, for example. The institutional outcomes are articulated by faculty as well as college leadership. SJCL strives to graduate students who 1) think like lawyers, 2) are prepared to pass the bar exam and 3) have a sense of law and justice and how they can better serve the community.

SJCL publishes data on student achievement on its website as well as course data, retention and graduation data. Criteria for success are spelled out for most courses. Curriculum maps specify 3, 4 and 5 year plans for completion of the JD degree. The three-year Strategic Plan also includes academic success as goal #1. Degree requirements can be found in the catalog as well as the student handbook.

*Integrity and Transparency*

SJCL has policies, practices and procedures for academic freedom, education, solid business practices, and timely student complaint resolution. Student complaint procedures are in the catalogue and student handbook. The policy of the Status, Hiring and Retention of Law faculty members at SJCL clearly states respect for academic freedom and freedom of expression. The same document sets forth the due process procedure for an adverse action against a faculty member (CFR 1.3)

SJCL has shown commitment to diversity in three areas: staff, board, and students. (CFR 1.4) SJCL has made some progress in increasing the diversity of the staff and the adjunct faculty. At
least three new hires have increased the diverse representation on the staff. The staff in the New American Legal Clinic also represent the population they serve. In terms of board diversity, one of the six vacancies on the board will be filled within the next month with a Latino businessman. In the team’s meeting with the board, several board members raised a concern about the challenges faced by SJCL in finding suitable diverse candidates to meet the expectations for board members. This is another area where SJCL needs to continue its efforts to reflect the community it serves.

To increase student diversity, SJCL created pathways with Fresno Community College and CSU Fresno. The report states that the student body is diverse, although still not reflective of the overall population of the region. This will require SJCL to continue its efforts to have a college community that reflects the diversity of the region. SJCL reports the following data showing an increase in the enrollment from underrepresented populations from the years 2007-2015. It also shows the percentages of ethnic groups in the overall population in the year 2014.

### Demographic data:

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<tbody>
<tr>
<td>Hispanic</td>
<td>51.9%</td>
<td>26.7%</td>
<td>38.2%</td>
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<tr>
<td>White</td>
<td>30.9%</td>
<td>57.8%</td>
<td>44.1%</td>
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<td>11.1%</td>
<td>16.2%</td>
</tr>
<tr>
<td>Black</td>
<td>5.9%</td>
<td>4.4%</td>
<td>0%</td>
</tr>
<tr>
<td>Other</td>
<td>3%</td>
<td>0%</td>
<td>1.5%</td>
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While the diversity of the student population is commendable, it is evident that there is still more work to be done. Particularly notable is the drop in the enrollment of African American students.

**Findings**

The team’s finding, which is subject to Commission review, is that the institution has provided sufficient evidence to demonstrate compliance with Standard 1. The team recommends that SJCL continue its efforts to increase representation of diverse communities, with particular emphasis on the board and the faculty.

**Standard 2: Achieving Educational Objectives Through Core Functions.**

**Teaching and Learning**

SJCL has a clear purposeful curriculum, numerous assessment tools, and conducts regular
evaluation of its program. The content, length and standards of the JD program conform to appropriate standards. Requirements for admission to the JD program and for graduation are clear. Students make timely progress towards the degree. Co-curricular programs align with academic goals. Academic advising and student support services are available. SJCL has instituted a data gathering/student tracking system which it disaggregates as appropriate. The college has engaged in an assessment, review and modification process since 2008 and where the assessment process has revealed weaknesses, for example writing, the college has taken corrective action. (CFR 2.1, 2.2)

SJCL’s JD program has created a culture that promotes the importance of professional practice. Students have multiple opportunities to do practical research and engage in practice opportunities in externships and the on-campus New Americans Legal Clinic (NALC). SJCL has qualified full-time faculty and a committed pool of adjunct faculty who are included in the faculty committee. (CFR 2.2b)

Externships are subject to review by the academic dean before and during placements. SJCL has developed learning outcomes at the course and program level. It is too early to tell how students are progressing after the college made changes to the writing curriculum. SJCL concedes that its learning outcomes need to be made more meaningful and assessable in order to yield more useful data for measuring student success and curricular planning. (CFRs 2.3, 2.4) While Jury Assessment is summative and a capstone course was implemented to supplement that assessment, the team recommends that SJCL strengthen its process of annual assessment that is summative for all learning outcomes. (CFR 2.6) SJCL’s process for program review is still in an early stage of development. The team recommends that SJCL make its current program review process more systematic and comprehensive, with clear guidelines, a full cycle of summative assessment, a review of program learning outcomes, and then use the results of program review to inform decisions about planning and resource allocation. SJCL has used external reviewers in its program review in the past, and the team recommends that this practice be continued. (CFR 2.7)

Scholarship and Creative Activity

Because of the college’s emphasis on professional practice, there does not appear to be a culture of scholarship or any significant scholarship and it is not clear to what extent scholarship is part of the institutional culture of SJCL. SJCL is in the process of exploring what additional resources would motivate more faculty to engage in scholarly research. (CFRs 2.8, 2.9)

Student Learning and Success

SJCL has collected and published substantial data on retention and graduation rates. It provided data on bar pass rates. It offers co-curricular programs that are aligned with its academic
program and goals. However, SJCL recognizes that it has not been assessing the effectiveness of its co-curricular programs in any formal way and is beginning to examine how it can achieve a more formal co-curricular assessment process. The team recommends that the college develop and implement annual assessment and periodic program review of co-curricular departments. (CFR 2.10, 2.11)

SJCL makes the requirements of its JD program clear in its publications and on its website. Academic advising is available, as is appropriate tutoring and career counseling. (CFRs 2.12, 2.13)

Findings

The team’s finding, which is subject to Commission review, is that the institution has provided sufficient evidence to demonstrate compliance with Standard 2. The team recommends that SJCL implement a more comprehensive program review process, continue to strengthen the process of summative annual assessment of one or more learning outcomes, and periodically assess the effectiveness of its co-curricular departments.

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

**Faculty and staff**

The team commends SJCL for the ongoing commitment to diversity. The faculty workload policy is clearly stated and the diversity plan submitted shows much planning and thoughtfulness. SJCL has clearly demonstrated the importance of diversity in all areas of the institution from the board to faculty to students. The detailed tasks and persons responsible for ensuring that SJCL meets its diversity commitments were clearly delineated. The roles and responsibilities of different academic administrators were also identified. SJCL acknowledges that there is much diversity work to be done in the areas of faculty and the board. SJCL has not had many opportunities to hire new faculty and to recruit new board members, but has made progress with staff diversity as the recent hires have indicated. The administration, faculty and board acknowledge the need for diversity, and have drawn up a plan with strategies and plans for attracting applicants from diverse backgrounds. (CFRs 3.1-3.3)

The benefits of having a diverse faculty and staff are critical at SJCL where the student body includes a high percentage of individuals from diverse backgrounds and the surrounding community is highly diverse. The administration and board members are very cognizant that having diversity in mentors, role models, viewpoints, life experiences, and approaches to problem solving would undoubtedly contribute to a more inclusive institutional culture and
climate for all students. (CFR 3.1)

The team strongly recommends that SJCL continue to develop and implement aggressively its strategies to search for and hire new faculty and board members from diverse backgrounds that would reflect the diversity of its student body. (CFRs 1.5, 3.2)

Interviews with the Board of Trustees indicate that they place a high priority on diversifying the board membership. Both the dean and the chairman are committed to working with board members to fulfill this need.

The team commends the board’s efforts to diversify its membership and recommends the Board of Trustees continue and expand its efforts to diversify its membership. (CFR 1.5)

In meetings with faculty and staff, the team saw a deep and continuing commitment to the institution. The college has a workload policy from 2002 that continues to be in use. A majority of the faculty committee and the dean approve this policy. There are currently no plans to update the policy. (CFR 2.1)

Faculty recruitment, orientation, workload, incentive, and evaluation practices are aligned, and appropriate policies are in place for faculty. SJCL recently completed a review of its JD program with some recommendations adopted by the faculty committee including curricular change and faculty training to better cultivate learning.

The two current challenges that SJCL faces are in the hiring of adjunct faculty and the lack of academic preparedness of incoming students (discussed below). SJCL has developed a preference for non-alumni adjunct faculty to broaden this faculty group’s perspective. New adjunct hiring is particularly challenging as SJCL seeks adjunct faculty to teach during the day, when many potential adjunct candidates have day jobs.

Faculty members are evaluated and counseled during the term, and the team saw evidence of faculty, especially adjunct faculty, using their feedback for continuous improvement of their courses. The team was impressed by the level of commitment to the institution from SJCL’s adjunct faculty. However, these adjuncts are not provided professional development funds by SJCL. The team encourages SJCL to consider making such funds available to all faculty members. (CFRs 2.8, 3.4)

Interviews with staff members indicated that performance evaluations have not been taking place, and staff expressed discontent regarding evaluation practices. Some do not see the value of the evaluation as there is no policy of merit pay increases and being a small institution, there is very little room for advancement. The team recommends that SJCL implement a consistent and uniform annual performance evaluation process and hold managers accountable for the timely
completion of evaluations. The college may wish to consider developing a clearly defined
broad-based incentive plan that can be utilized as a means to encourage both employee
performance and productivity. (CFR 1.7, 4.3-4.4)

Interviews with administrative staff indicate a broad-based desire for additional delegation
including budgeting and financial projections. The team encourages the dean to delegate
additional administrative responsibilities to members of her administrative team. (CFR 3.8)

It was also determined that there continues to be no formal review of the dean. The team
recommends that the board establish and implement a formal review process of the dean.
(CFRs 1.7, 3.9, 4.3-4.4)

Fiscal, physical and information resources

SJCL has developed a strategy for faculty to observe one another’s classes and provide feedback
on pedagogy. An evaluation of the way a particular course was taught revealed a need to reduce
dependency on power points during teaching. SJCL would benefit by expanding and making
more systematic colleague evaluations of teaching. (CFR 3.4)

The institution provides professional development opportunities for regular faculty and SJCL has
acknowledged that they are working on formalizing training. One of the challenges that SJCL
faces is the lack of academic preparedness of incoming students; this was discussed at various
meetings with administration and faculty. Providing academic support to the legal methods
course in grammar and basic writing, for example, could help meet incoming students’ lack of
academic preparedness.

The team commends SJCL for having a long history of unqualified audits and balanced
operating budgets. The college aligns resources with educational purposes and objectives.
Resource planning and development include realistic budgeting, enrollment management, and
diversification of revenue sources. (CFR 3.4)

Like many small private institutions, SJCL faces significant budget challenges, especially in
light of decreasing enrollment. Nonetheless, SJCL has shown adequate commitment to capital
construction given its budgetary restrictions. The purchase of the nearby senior center for use
of the library will enable SJCL to keep pace with the projected growth. The purchase is
expected to be completed in two years and SJCL already has several major donors who have
tentatively pledged $100,000 to $250,000 towards the $1.5 million projected cost of the center
and the $500,000 renovation costs. The dean also indicated that SJCL will have five to six
years’ worth of payments in reserve to pay for the senior center renovation when the time
comes. (CFR 3.5)
As SJCL strives to creatively address budget shortfalls, its shift to focus on fundraising is commendable, as is its continued growth of grant dollars. Such diversification of revenue sources is critical. Moreover, the institution appears to have taken appropriate steps to evaluate the capacity to sustain institutional objectives and strategic priorities and continues to make financially-conscious decisions about its programming and areas of growth. (CFR 3.4)

In reviewing the audited financial statements for 2016 and 2015, the institution has had operational surpluses before depreciation. The institution reduced its deficit from 2015 to 2016, and is looking at a surplus for FY2017. (CFR 3.4)

Organizational structures and decision-making processes

SJCL appears to provide sufficient technological access and support to its members. (CFR 3.6) SJCL has made recent changes to centralize information technology support for its classrooms. This was designed to improve response time and enable faculty to more effectively use technology. SJCL will want to determine the success of these efforts. (CFR 3.7)

The team commends SJCL for developing robust technology that has enhanced institutional research, enrollment management and student systems. SJCL uses technology to facilitate data analysis and more efficiently generate reports. SJCL also uses data to assist in recruitment efforts. The CIO is a partner and leader in enrollment management and provides relevant data to the recruitment committee to leverage marketing dollars. (CFRs 2.10, 3.7, 4.5)

SJCL also provides members of its campus community with free WI-FI access to the internet and will be able to provide internet access to the new library space when it becomes available. Computers are also available in the library to access a broad array of digital resources. The current technology team continues to support and grow the use of technology at SJCL and have the capacity to support additional users and distance learning. SJCL is moving towards more smart classrooms as resources become available. (CFRs 3.6, 3.7)

SJCL has a clear organizational structure, and its decision-making processes have been addressed in its current strategic plan. Its shared governance model ensures representation of faculty, staff, students, and administrators on committees making important decisions about academic quality or effectiveness and institutional improvements (CFR 3.8). SJCL has an effective governing board, though it could benefit from a formal self-review and training, as needed, to enhance board effectiveness. (CFR 3.9) SJCL has a full-time CEO and CFO and appears to be effectively staffed (CFR 3.10). SJCL’s faculty roles, rights, and responsibilities are clearly defined. (CFR 3.11)

Findings

The team’s finding, subject to Commission review, is that the institution has provided sufficient evidence to demonstrate compliance with Standard 3. The team recommends that SJCL
implement a consistent process of annual staff evaluations and that the Board of Trustees reviews the Chief Executive Officer and engages in periodic self-review to enhance board effectiveness.

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

SJCL has worked hard to meet the expectations and requirements of Standard 4. It engages in sustained, evidenced-based and participatory self-reflection about how effectively it is accomplishing its purposes and achieving its educational objectives. It considers the changing environment of legal education in envisioning its future, and its activities inform institutional planning and systemic evaluations of educational effectiveness. SJCL uses the results of its institutional inquiries, research and data collection to establish priorities, to plan and to improve quality and effectiveness.

*Quality Assurance Processes*

SJCL utilizes a deliberate quality assurance process in academic areas. The leadership of SJCL recognizes the need for a quality assurance process in the non-academic areas. For the past several years, the college has directed its major focus on quality assurance at the academic programs. As a result, the quality assurance process for the non-academic areas is in the very early stages. (CFR 4.1)

Since 2006, SJCL has regularly, but not annually, engaged in various reviews, evaluations, and adjustments of its academic program. It held a self-described “Conclave” to develop Student Learning Outcomes in 2006. It initiated a Writing Task Force in 2010 to review and assess its writing program; it developed, reviewed and evaluated the extant program to assess the progress of students during the first year of the program in 2008 and annually reviewed it through fall 2013. SJCL engaged in a two-year program review commencing March 2012, utilizing nine subcommittees consisting of full-time and adjunct faculty members, and members of the staff. That review did not result in a formal report, but did generate numerous recommendations from the subcommittees. In 2015, the faculty engaged in a deep evaluation of the SJCL program and that evaluation generated revised Student Learning Outcomes, and performance criteria, and a curriculum map. In all of these review and development of assessment activities, SJCL generated and used data that tracked student learning and performance results over time and across several measuring modules, e.g., performance on exams as reflected in grades, external reviews of performance measured through rubrics and performance of graduate first-time takers on the California Bar Examination. (CFR 4.1)

SJCL has limited research capacity as it is a small stand-alone college of law and not part of a
larger university that has an institutional research office or department. Despite this limitation, SJCL has engaged in data collection and evaluation, and made numerous data-driven decisions. SJCL has a robust IT department which has developed several databases that SJCL uses to collect and pull data for analysis of the quality and effectiveness of its programs. (CFR 4.2)

Institutional Learning and Improvement

SJCL is an institution committed to improving its governance, program of legal education, and administration through data collection, assessment, evaluation and adjustment. It has a more than 10-year history of engaging in assessment and evaluation of the educational program. It is in the very early stages of developing quality assurance processes in non-academic areas. In all of its endeavors, SJCL has engaged the appropriate stakeholders. The full-time and adjunct faculty members have been involved in the assessment and review of the academic program, e.g., the Writing Task Force and the development of the curriculum map. The board members engaged in the evaluation, review and recommendations of the efficiency and effectiveness of the board that led to the adoption of term limits, the commitment to increase the diversity of the board, and the creation of new committees focused on areas of board input and responsibility. The alumni and members of the legal community have served as external reviewers in the Jury Assessment and External Writing assessment programs. The faculty also engages in a peer review process to evaluate and provide feedback on the teaching at SJCL. (CFR 4.3)

Although, SJCL does not appear to have a formal reflection and self-assessment process, e.g., annual retreats by board, faculty and/or administrators, the commitment to improvement based on data collection and evaluation is an obvious part of the culture of SJCL. Additionally, SJCL clearly considers changes in the legal education environment as it plans for the future, e.g., its recognition of the reduction of applications to law schools and consideration of the needs of its region for a second career opportunity for individuals seeking to attend law school. (CFRs 4.4-4.7)

Findings

The team’s finding, which is subject to Commission review, is that the institution has demonstrated sufficient evidence of compliance with Standard 4.

Federal Requirements

Inventory of Educational Effectiveness Indicators (IEEI)

SJCL completed the Inventory of Educational Effectiveness Indicators. This document shows that its one degree program has learning outcomes. The college publishes these outcomes in
appropriate places. SJCL is doing annual assessment and it reports that the last program review was in 2014.

However, SJCL concedes it needs to give more definition to its SLOs to provide more specific information about student skill weaknesses, including setting milestones of achievement. It states that this, coupled with a more comprehensive curriculum map, would make curricular planning better. SJCL needs to implement a comprehensive program review process. This should involve more faculty, particularly adjunct faculty. It would help the institution to see the big picture of student performance and how SJCL could impact that performance. Currently, SJCL does not disseminate the results of assessment to adjunct faculty or students and the college may want to consider developing a process to do so. (CFR 2.7)

II.C. Component 3: Degree Programs: Meaning, quality and integrity of degrees.

The college discussed this component to some extent in Section 5 of SJCL’s institutional report and defined the meaning of the JD degree in terms of what a graduate will be able to do after attaining the JD degree, rather than in terms of the distinctive experiences a student will have. During the team’s visit, the academic dean expanded on the discussion in the report and described the three things SJCL wants all graduates to be able to do: 1) think like attorneys, 2) pass the bar exam and 3) act as leaders in the law. SJCL understands who it is and is well able to articulate what skills a graduate should possess on completion of the program. (CFR 2.2)

In terms of assurance of quality and integrity, SJCL has made significant progress over the past year in assessing whether students are achieving learning outcomes. (CFR 2.6) It adopted learning outcomes and performance criteria for each outcome. It created course maps, which indicated which learning outcomes are covered in each class, the level at which they were covered and how they are assessed (2016 institutional report, page 13). The college consolidated these course maps into a comprehensive curriculum map. SJCL states it has a “progressive assessment regimen” (2016 institutional report, page 14) and it assesses learning outcomes at several points in the program. During the visit, the Faculty Committee reported that much of the assessment that SJCL has been doing is formative in nature. (CFRs 2.3, 2.4, 2.6)

The team recommends that SJCL continue to strengthen its process of annual summative assessment. Learning outcomes are included in the appendix, but performance levels associated with the performance criteria were not included. There is no discussion as to how the JD degree is formally evaluated so as to ensure it consistently meets institutional standards of quality and consistency. Over the past year the college has developed a capstone course and, while it engages in further development, SJCL intends to ultimately use the capstone to assess all program learning outcomes. It has developed rubrics to assess assignments performed in the capstone. SJCL included substantial information as to bar pass rates and faculty and SJCL’s
The Dean discussed the potential for developing a new one-unit class that reviews information tested on the bar exam to improve pass rates.

The team would have liked to have seen further reflection as to the role that program review plays in assessing the meaning, quality and integrity of this degree. (CFRs 2.2, 2.7) SJCL should be able to articulate how the curriculum and co-curriculum are sequenced and delivered so that students achieve learning outcomes at expected levels of performance. The academic dean evaluates faculty and there is some peer review, but the institution does not address how these evaluations are used in assessing the quality and integrity of the degree.

II.D. Component 4: Educational Quality: Student learning, core competencies, and standards of performance at graduation.

“The Juris Doctor degree at SJCL is designed to both prepare students for the California bar exam and practice as competent and ethical lawyers.” (2016 institutional report, page 14) This one simple statement captures the two major educational goals of every law school: 1) to produce graduates who are prepared to pass the bar exam; and 2) to educate the novice attorney in the practical skills needed in the practice of law. These are very different goals. It appears that SJCL is meeting its first goal. In 2015, its cumulative five-year pass rate for state-accredited institutions was 82%, greatly exceeding the minimum acceptable level of 40% set by the State Bar. As SJCL itself notes, its biggest challenge is the success of black students on the bar exam. (2016 institutional report, page 27)

Core Competencies

Passing an exam that tests substantive knowledge is one thing; practicing law is a complex process of using skills some of which can be acquired in the law school classroom, some in a clinical setting, and some must be acquired on the job. Writing and critical thinking are two of those skills. SJCL has long used the Snear Problem to measure the development of these two skills from enrollment to graduation. The institutional report lays out the history of the use of Snear but concludes by saying that the Legal Methods I & II courses and the Introduction to Legal Studies (ILS) course have replaced it. SJCL highlights the importance of writing in the law curriculum by having a required writing course in every one of the four years.

The Jury Assessment is a summative assessment exercise for graduating students with both oral and written components. The oral part was meant to be “a learned discussion amongst scholars, a thesis-defense light.” (2016 institutional report, page 38) While performance on both the written and oral components were strong (see Attachment 52 of the 2016 institutional report, noted on page 40), “the Jury Assessment results do not reflect performance on the individual skills identified in the Student Learning Outcomes and Performance Criteria, so are of limited
help in making curricular improvements.” (CFRs 2.7, 2.10, 4.1, 4.2, 4.4)

For 2016, the Jury Assessment was replaced by converting Remedies II to a capstone course, SJCL’s first such attempt at this type of summative assessment. The course included writing an internal office memorandum, a complaint, a letter to a client, a motion for preliminary injunction and an opposition to that motion. The oral component was two arguments. Students argued in one session in support of the motion for preliminary injunction and in a second session against that motion. Full-time faculty and experienced adjuncts evaluated student performance. On the oral component 82.5% of graduates scored at an acceptable level. On the written component 81% scored at an acceptable level. (Attachment 53 of the 2016 institutional report– Capstone Course 2016 Oral & Written Scores (2 documents))

SJCL has utilized external reviewers for writing assessment (2016 institutional report, page 33) and for Moot Court Oral Arguments (page 41-42) as was recommended by the 2010 WSCUC team.

In 2015, SJCL revised student learning outcomes (what most people would call program learning outcomes) and devised performance criteria to give them more meaning and to generate more useful information. This in turn led to a survey of faculty and the creation of a curriculum map.

The use of surveys, including surveys of students and alumni, have produced useful results for assessment purposes. One example is that while 74.4% of alumni felt very well prepared or well prepared for the bar examination upon graduation, they felt less prepared for the practice of law. On a scale of 1 (very little prepared) to 4 (very much prepared), the overall rating was 2.62. “It does inspire SJCL to continue to imbue the curriculum with practical skills.” (2016 institutional report, page 49)

SJCL knows that it needs to undertake more systematic program review and states that they will begin in fall 2016 and do it every other year thereafter. A brief summary of this program review was given to the team during the visit. The Program Review Committee looked at three important skills: issue spotting, rule statements in essays, and critical analysis. Based on these reviews, the Committee closed the loop by making two recommendations: 1) the creation of two faculty training workshops to help professors assess students’ analytical skills; and 2) a new requirement that students take MBE-style exams at the end of their second year and right before graduation. Further, they generated relevant questions to be discussed by the Faculty Committee to enhance student performance.

In all these efforts at summative assessment and program review, some going back to 2007, it must be acknowledged that SJCL was creating the wheel when there were not a lot of role
models available in legal academia. Their techniques have evolved with experience and they do not as a group seem to be overly troubled by dropping one technique when it proves to be less than fully successful at generating the evidence needed to evaluate their program. Such flexibility of attitude has not been overly abundant in most law schools in the last decade. The faculty and staff here seem genuinely dedicated to not only individual student success but institutional success in doing the best job of training lawyers.

II.E. Component 5: Student Success: Student learning, retention, and graduation.

Student Success

Student success is highlighted in the SJCL Strategic Plan. The objectives include increasing the first-time bar passage rate to 55% and to improve student success in the Legal Methods course, which would contribute to student retention. SJCL strives to graduate students who 1) can think like a lawyer, 2) can pass the bar exam and 3) have a sense of law and justice in service to the community.

SJCL has engaged in extensive analysis of student success beginning with the admission process. SJCL is clear that it “seeks to admit any individual with a reasonable prospect of success in law school.” They understand that English as a second language has an impact on student success and have responded with the Legal Methods course. The faculty in Legal Methods work with students on their writing skills in particular. They also meet individually with students periodically to advise on particular issues they may be having with their classes. Success in the first year contributes positively to continuation to the second year and ultimately graduation.

Student Retention

Retention rates have improved overall since 2007, from 44.4% overall to 54.4% in 2015. Hispanic retention rates have improved significantly, even surpassing white student retention rates in some years. The group that has lagged behind most significantly is black students. (CFRs 1.2, 1.4, 2.10, 4.2)

Graduation Rates

Graduation rates have improved between 2007 and 2012. Overall graduation rates improved from 44.4% in 2007 to 50% in 2012. However, the graduation rates for students who advanced to the second year in 2015 went up to 96%. This highlights the recognition by SJCL that they should: 1) admit students with a reasonable chance of success, 2) implement the Legal Methods course in the first year to support student success, and 3) exclude students early if they are unable
to meet expected progress. It saves students from accumulating unnecessary debt. (CFRs 1.2, 1.4, 2.10, 4.2)

Bar Passage Rates

SJCL has spent the time to analyze bar passage rates by LSAT scores, undergraduate GPA and graduate GPA. The differences are mostly what one would expect with some exceptions. Students who enter SJCL with higher LSAT scores, and maintain higher GPAs tend to be more successful. Overall, students’ bar passage rate is 50% for first time test takers. Cumulatively over the past 20 years the bar pass rate is about 82% total. For the years 2007-15, 80% of SJCL graduates have passed the California bar examination. SJCL also disaggregates bar passage rates by gender and ethnicity. (CFR 1.2)

Disaggregated California Bar Passage Rates 2007-15
Males 81%  Females 79%
Hispanic 77%
Asian 87.5%
Black (number too small to calculate)
White 81%

It should be noted that SJCL has had a recent unanticipated dip in bar passage (31%). They are in the process of reflecting and analyzing these data and are prepared to address the issue going forward.

SJCL has well developed learning outcomes and performance criteria and a curriculum map. The curriculum map is critical to students making progress towards graduation and completion of learning outcomes at the appropriate level of competency. All syllabi include Student Learning Outcomes. A major effort since the last reaffirmation has been the creation and assessment of the capstone class. Faculty have worked to have the capstone course be a cumulative assessment of learning. As a result, there have been some changes made to the curriculum. It was clear that writing and critical reading needed to improve. Moot Court went from a short summer course to a full semester class. Faculty have resorted to a creative color-coding mechanism to track SLO’s and the critical steps involved in connecting legal analysis to critical facts.

SJCL also has multi-year and progressive assessment of learning to determine that students are making consistent and appropriate progress. The curriculum “road map” works for faculty to determine and decide what students need to learn, and how and where the faculty are teaching what.
Program review is currently a two-year process. SJCL has chosen to assess two or three learning outcomes over a two-year period. Since this college of law has only one program, the assessment is always focused on the one “major.” The process, which has just begun has revealed some weaknesses in the program and those weaknesses are being addressed. SJCL does not, however have a comprehensive program review process in place that includes guidelines, a review of all program learning outcomes, the use of external reviewers, assessment results, and the connection of the results or program review to planning and budgeting. (CFRs 2.7, 4.1, 4.3 4.4)

The issues that SJCL continues to address is a student population that is becoming younger and is less prepared with the reading and writing skills, as well as the academic discipline to be successful in law school. The data on student success and assessment of student learning have revealed and highlighted these challenges. Some changes have already been implemented, such as the first year Legal Methods course. The faculty and staff are in the process of reflecting on these challenges and focused on how they can maintain access to the younger student as well as the second career student and insure that they are all successful.

II.F. Component 6: Quality Assurance and Improvement: Program review, assessment, use of data and evidence

The college discussed this component in section 9 of institutional report. SJCL was very early in adopting learning outcomes, especially for a law school. The college uses multiple methods to assess student learning. It has articulated performance criteria that align with learning outcomes. It collects indirect evidence in the form of surveys to supplement direct evidence of student learning. As a result, the college collects abundant data on a regular basis.

Program Review

SJCL states in its report that its last program review began in 2012, but that no formal report was written (2016 institutional report, page 44). However, the 2016 institutional report shows, and discussion with faculty and administrators at the visit reveal, that this review was intended to evaluate SJCL’s compliance with American Bar Association (ABA) standards for potential ABA accreditation. During the 2012-2014 review, SJCL engaged in very little analysis of student achievement of the program’s learning outcomes. (CFR 2.7) Its plan to undertake formal program review every other year is ambitious, but the team recommends that SJCL first develop a set of guidelines, so that the program review it implements is integrated with assessment of learning. The “Program Review Summary of Findings and Suggestions” produced during the visit further established that what SJCL considers to be program review is, in fact, assessment of
learning outcomes. Program review includes, but is broader than, assessment of learning outcomes.

SJCL regularly submits student work to local legal professionals to assess whether student work is in line with professional expectations. The team commends SJCL for this practice and encourages the college to expand on it and include this in program review. For example, during the visit, the full-time faculty group stated that the form the external evaluators complete ties to the performance criteria, which align with the program learning outcomes. The results of this review have been used to improve the first year Legal Methods class. It appears that SJCL could incorporate what it learns from local employers and professionals into program review.

While the academic program has been reviewed in some fashion, co-curricular services and units have not. The team recommends that SJCL develop and implement periodic program review of co-curricular departments. (CFR 2.11)

Assessment of Student Learning

SJCL’s multi-year assessment processes include Snear, External Writing Evaluations, Jury Assessment and the newly developed capstone course. It refers to its process as a “progressive assessment regimen.” It has developed a comprehensive curriculum map.

However, while SJCL addressed the Snear assessment extensively in its 2016 institutional report, the college did not address that assessment at the visit and the institution appears to have moved on to other forms of assessment. The sample sizes in writing assessment are very small. The SJCL program is small enough that it should consider assessing all students at or near graduation, rather than sampling. The rubric for external review of writing does not include performance levels. A 2010 Writing Task Force was formed in response to some early assessment of writing skills, and while the Task Force made some recommendations, it did not address fundamental structural problems in the teaching of writing about which some faculty expressed concerns due to significant faculty resistance to changes to the writing curriculum (2016 institutional report, page 35). Assessment is not clearly tied to or aligned with learning outcomes and performance criteria. It is not clear whether all outcomes are being assessed on a regular cycle. Some results of assessment show students achieving at unusually high rates (e.g. Jury Assessment History 2011 through 2015). It is not clear that the results of surveys are being disseminated.

Over the past year SJCL has developed a capstone course and, while it is undergoing further development, SJCL intends to ultimately use the capstone to assess all program learning outcomes. It has developed rubrics to assess assignments performed in the capstone.

While SJCL has improved its assessment practices, it has not shown evidence of a formal process to develop and monitor plans as a result of the assessment activities. (CFR 2.10) The team recommends that SJCL develop a system to ensure that assessment findings are used to
improve student learning, retention, completion rates and bar pass rates.

Use of Institutional Data

The team commends SJCL for developing robust technology that has enhanced institutional research, enrollment management and student systems. (CFRs 4.1, 4.2)

II.G. Component 7: Sustainability: Financial viability, preparing for the changing higher education environment

As the higher education environment continues to change, universities will have to be flexible, responsive, creative, and data-driven. On the academic and student sides, though SJCL has made significant strides in developing a culture of assessment, there is always more work to do.

Financially, SJCL shows evidence of stability. The team commends SJCL for creating a financial reserve of $2.3 million. In reviewing the enrollment projections for FY2018 and FY2019, the institution shows moderate increases in enrollment with surpluses. Calculation of financial ratios shows robust key performance indicators that surpass the industry benchmarks. One such ratio is the Primary Reserve ratio. This ratio is a measure of the level of financial flexibility of an institution. The standard for this ratio is 0.40; however, SJCL’s primary reserve ratio is at 0.62. This means that, if all of SJCL’s revenues immediately ceased, SJCL could operate for approximately 7.5 months on existing expendable resources. Though this scenario is highly unlikely, SJCL ratio exhibits a healthy level of expendable net assets relative to operations and provides the institution the flexibility to take advantage of opportunities that may arise or deal with unforeseen adversities. Overall, SJCL is financially viable given current indicators. (CFRs 1.1, 1.2, 2.10, 3.4, 4.6, 4.7)

Though these accomplishments are commendable, and SJCL has taken strides to tie these efforts to its strategic planning, more needs to be done to ensure long-term planning takes place, especially in light of possible budget shortfalls if SJCL does not meet enrollment goals. For instance, it does not appear as if SJCL has fully explored alternate revenue sources like online and continuing education or executive education. While SJCL has sought a closer relationship with Fresno State University with little significant results, it is not clear to what extent it has engaged other academic institutions in expanding its course offerings or in recruitment of students.

II.I. Component 9: Reflection and plans for improvement.

SJCL has demonstrated its compliance with WSCUC standards, a commitment to assessment, program development and diversity, and a vision for a sustainable future in the ever-changing landscape of legal education. Although a small institution, SJCL gets the most out of its financial and human resources and has a clear understanding of its opportunities and limitations. It continues to meet the needs of its region for well-educated and trained graduates and serve the
region and educate its students through internships and programs like the New American Legal Clinic. The culture of SJCL – mission, commitment to assessment, diversity and excellence, service orientation, and planning for the future – provide a strong foundation for institutional and student success.

SECTION III – COMMENDATIONS, AND RECOMMENDATIONS FROM THE TEAM REVIEW

As reported in the public meeting at SJCL on March 2, 2017, at the end of the site visit, the team found the following:

Commendations:

The team commends the institution for the following accomplishments and practices:

1. Having a faculty, staff, and board that is committed to the success of SJCL;
2. Establishing a regional pathway to promote diversity of students;
3. Being an access school with a diverse student population and maintaining rigor as reflected by the academic attrition rate;
4. Making progress in increasing the diversity of the staff and the adjunct faculty;
5. Establishing the grant-funded New American Legal Clinic benefiting both the participating students and the community;
6. Being a very early adopter of student learning outcomes; SJCL was there before many other law schools;
7. Providing helpful information on SJCL’s website regarding Academic Standards & Achievements;
8. Developing robust technology that has enhanced Institutional Research, enrollment management and student systems;
9. Creating a financial reserve of at least $2.3 million.

Recommendations:

The team makes the following six recommendations:

1. Program Review. Implement a formal comprehensive program review. While SJCL has engaged in various types of reviews and evaluations of its academic program (including external review), the college lacks a formal comprehensive program review process. A program review process includes the development of guidelines for the review, analysis of results of a full cycle
of summative assessment, a review of program learning outcomes, the use of external reviewers, and connecting assessment results and other important data with planning and budgeting in a systematic way. (CFR 2.7, 4.1, 4.3, 4.4)

2. **Assessment.** Continue to strengthen the process of summative annual assessment of one or more program learning outcomes. SJCL has periodically assessed students’ competencies in oral and written communication, and now needs to systematically assess their other program learning outcomes. (CFR 1.2, 2.4, 2.5, 2.6, 2.10)

3. **Assessment of Effectiveness of Co-curricular Programs.** Develop assessment and implement periodic program review of co-curricular departments such as the library, career services, and advising. (CFR 2.11).

4. **Diversity.** Continue efforts to increase representation of diverse communities at SJCL, with particular emphasis on the board and faculty. (CFR 1.4)

5. **Evaluation of Staff.** Implement a consistent process of annual staff evaluation. (CFR 2.7, 3.2)

6. **Board of Trustees.** Implement a process for annual review of the Chief Executive Officer at SJCL and ensure that the board regularly engages in self-review and training to enhance its effectiveness. (CFR 3.9)

**APPENDICES**

A. Federal Compliance Forms
   1. Credit Hour Review
   2. Marketing and Recruitment Review
   3. Student Complaints Review
   4. Transfer Policy Review

Appendix 1. Credit Hour Review

<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>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)?</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Does the institution adhere to this procedure?</td>
<td>YES</td>
</tr>
<tr>
<td>Comments: A faculty member is appointed every two years to review each syllabus to make sure there is enough in-class and out-of-class work appropriate to meet the policy. The Academic Dean reviews all new courses for compliance. The last two-year review was in 2015-16.</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Schedule of on-ground courses showing when they meet</th>
<th>Does this schedule show that on-ground courses meet for the prescribed number of hours?</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sample syllabi or equivalent for online and hybrid courses</th>
<th>How many syllabi were reviewed?</th>
<th>What kind of courses (online or hybrid or both)?</th>
<th>What degree level(s)?</th>
</tr>
</thead>
<tbody>
<tr>
<td>What discipline(s)?</td>
<td>Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>Comments: No online or hybrid courses</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>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)</th>
<th>How many syllabi were reviewed?</th>
<th>What kinds of courses? New American Legal Clinic; Experiential Learning Program</th>
<th>What degree level(s)? JD</th>
</tr>
</thead>
<tbody>
<tr>
<td>What discipline(s)? Law</td>
<td>Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sample program</th>
<th>How many programs were reviewed?</th>
</tr>
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<tbody>
<tr>
<td>one</td>
<td></td>
</tr>
<tr>
<td>Material Reviewed</td>
<td>Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.</td>
</tr>
<tr>
<td>-------------------</td>
<td>--------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| **Federal regulations** | Does the institution follow federal regulations on recruiting students?  
|                    | x YES ☐ NO  
| | Comments:  
| | The team confirmed that SJCL does not provide any incentive compensation for anyone for success in securing student enrollment. |
| Degree completion and cost | Does the institution provide information about the typical length of time to degree?  
| | x YES ☐ NO  
| | Does the institution provide information about the overall cost of the degree?  
| | x YES ☐ NO  
Comments:

| Careers and employment                                                                 | Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? | x YES □ NO |
|                                                                                       | Does the institution provide information about the employment of its graduates, as applicable? | x YES □ NO | http://www.sjcl.edu/index.php/academics/student-achievement |
|                                                                                       | Comments:                                                                                           |

*§602.16(a)(1)(vii)

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

Review Completed By: Jenni Parrish
Date: 3-2-2017

Appendix 3. Student Complaints Review.

STUDENT COMPLAINTS REVIEW FORM
Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution’s student complaints policies, procedures, and records.

| Material Reviewed | Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.) |
### Policy on student complaints

<table>
<thead>
<tr>
<th>Does the institution have a policy or formal procedure for student complaints?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ YES ☐ NO</td>
</tr>
</tbody>
</table>


**Comments:**

### Process(es)/procedure

<table>
<thead>
<tr>
<th>Does the institution have a procedure for addressing student complaints?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ YES ☐ NO</td>
</tr>
</tbody>
</table>

If so, please describe briefly: Students are encouraged to resolve complaint informally with Academic Dean. If unsatisfied, he directs them to follow the policy for formal complaints. If it’s an academic matter, the student may wish to petition the Faculty Committee for a change in academic policy or standards.

If so, does the institution adhere to this procedure?  ☒ YES ☐ NO

**Comments:**

### Records

<table>
<thead>
<tr>
<th>Does the institution maintain records of student complaints?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ YES ☐ NO</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Does the institution have an effective way of tracking and monitoring student complaints over time?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ YES ☐ NO</td>
</tr>
</tbody>
</table>

If so, please describe briefly: There have been only 2 complaints in the last four years. One was an academic petition; the other was a conduct issue. The complaint comes to the Academic Dean who copies the file to the HR Director. She maintains the file in her office and calendars any action to be taken. Both complaints have been resolved.
Comments:

*§602-16(1)(1)(ix)
See also WSCUC Senior College and University Commission’s Complaints and Third Party Comment Policy.

Review Completed By: Jenni Parrish
Date: 3-2-2017

Appendix 4. Transfer Policy Review.

TRANSFER CREDIT POLICY REVIEW FORM
Under federal regulations*, WSCUC is required to demonstrate that it monitors the institution's recruiting and admissions practices accordingly.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transfer Credit Policy(s)</td>
<td>Does the institution have a policy or formal procedure for receiving transfer credit? x YES ☐ NO</td>
</tr>
</tbody>
</table>
Is the policy publically available? x YES ☐ NO  
If so, where?  
http://www.sjcl.edu/index.php/prospective-students/transfer-students; also see SJCL Student Handbook, page 52.  
Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education? x YES ☐ NO |
*§602.24(e): Transfer of credit policies. The accrediting agency must confirm, as part of its review for renewal of accreditation, that the institution has transfer of credit policies that--

(1) Are publicly disclosed in accordance with 668.43(a)(11); and

(2) Include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education.

See also WSCUC Senior College and University Commission's Transfer of Credit Policy.

Review Completed By: Jenni Parrish
Date: 3-2-2017