



The State Bar of California

OPEN SESSION AGENDA ITEM 6.5 JULY 2024 BOARD OF TRUSTEES

DATE: July 18, 2024

TO: Members, Board of Trustees

FROM: Cody Hounanian, Program Director, Office of Admissions
Natalie Leonard, Principal Program Analyst, Office of Admissions

SUBJECT: Approval of Revisions to Appendix A, Schedule of Charges and Deadlines,
Related to Law School Fees

EXECUTIVE SUMMARY

At its March 2024 meeting, the Board of Trustees approved revisions to fees related to California Accredited Law Schools (CALS) which included the use of law school enrollment numbers to calculate a new accreditation services fee. The specific service fee amount was not adopted by the Board as additional time was needed to work with law schools to finalize the methodology for calculating enrollment. The methodology and associated accreditation services fee have now been finalized. The Board is asked to approve the accreditation services fee and related revisions to the Rules of the State Bar of California Appendix A, Schedule of Charges and Deadlines.

In March 2024 the Board also approved renaming the annual report fee for unaccredited law schools to the "registration services" fee, to better reflect that the fee covers regulatory services similar to those covered by the accreditation services fee for CALS; corresponding amendments to the Schedule of Charges and Deadlines were not presented to the Board at that time. The Board is asked to approve those amendments as part of the present item.

RECOMMENDED ACTION

Approval of revisions to Rules of the State Bar of California Appendix A, Schedule of Charges and Deadlines.

DISCUSSION

In [March 2024](#), the Board approved revisions to the fees assessed to law schools accredited by the Committee of Bar Examiners, referred to as California Accredited Law Schools or CALS.

The Board approved a new accreditation services fee in concept as well as a methodology for calculating that fee:

*(\$275,000/aggregate student enrollment) * the school's total enrollment*

For CALS recognized by the committee as jointly accredited by another accreditor¹:

*[((\$275,000/aggregate student enrollment) * 89%)] * the school's total enrollment*

Some schools expressed concern regarding the total enrollment element of the calculation; subsequent to the March meeting staff met with impacted law schools to address this and other concerns. Based on that feedback, staff finalized an approach whereby for purposes of the accreditation services fee calculation enrollment figures would be defined as the unduplicated count of all students who were enrolled at a law school in a JD program at any point in the designated 52-week period, except for those who received a full refund for the entire period. Nearly all CALS already use this approach for enrollment counts and others required only small adjustments to align.

Using the formula approved by the Board in March and the methodology described above, the 2024 accreditation services fee is \$60.44 per enrolled student and the fee for CALS recognized as jointly accredited is \$53.79 per enrolled student. These amounts will be adjusted annually based on updated enrollment data.

PREVIOUS ACTION

- [September 2023](#): The Board directed that the proposed increases on the fees assessed to the CALS be adjusted downward and circulated for additional public comment periods.
- [March 2024](#): The Board approved changes to the CALS fees described above and directed staff to return in July with revisions to the Schedule of Charges and Deadlines.

¹ The Committee of Bar Examiners accredits certain law schools in California that fully comply with the Accredited Law School Rules. Schools accredited by both the committee and a U.S. Department of Education-recognized accreditor can become "Jointly Accredited Law Schools." Jointly accredited law schools must comply with core requirements defined in Rule 4.147(C) but are subject to fewer accreditation requirements. The aim is to streamline regulation and reduce redundancies for both the committee and the law schools. Staff estimate an approximate 11 percent reduction in staff time dedicated to accreditation services for jointly accredited schools resulting in a reduced accreditation services fee for those schools as detailed in the staff report provided to the Board in March 2024 titled ["Adoption of Admissions Fee Increases Related to California Accredited Law Schools."](#)

FISCAL/PERSONNEL IMPACT

The 2024 budget projects \$26.4 million in revenue for the Admissions Fund, with \$30.7 million in expenditures. The 2024 revenue projection does not include the new revenue attributable to the revised CALS fees. The new accreditation service fee is expected to generate up to \$275,000 in revenue annually.

AMENDMENTS TO RULES

Appendix A: Schedule of Charges and Deadlines

AMENDMENTS TO BOARD OF TRUSTEES POLICY MANUAL

None

STRATEGIC PLAN GOALS & IMPLEMENTATION STEPS

None – core business operations

RESOLUTIONS

Should the Board of Trustees concur, it is:

RESOLVED, that the Board of Trustees approves revisions to the Rules of the State Bar of California Appendix A, Schedule of Charges and Deadlines, related to accredited law school fees reflecting the changes approved at the March 2024 board meeting and the accreditation services fee to be assessed in 2024 as shown in Attachment A; and it is

FURTHER RESOLVED, that the Board of Trustees approves revisions to the Rules of the State Bar of California Appendix A, Schedule of Charges and Deadlines, related to unaccredited law school fees reflecting the changes approved at the March 2024 board meeting as shown in Attachment B.

ATTACHMENTS LIST

- A.** Revised Schedule of Charges and Deadlines Related to CALS (Redline Version)
- B.** Revised Schedule of Charges and Deadlines Related to Unaccredited Law Schools (Redline Version)
- C.** Revised Schedule of Charges and Deadlines Related to CALS (Clean Version)
- D.** Revised Schedule of Charges and Deadlines Related to Unaccredited Law Schools (Clean Version)