

#### 4.6 Technical Correction of Approved Revisions to Appendix A Related to Fees for Unaccredited Law Schools



# The State Bar of California

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## **OPEN SESSION AGENDA ITEM 4.6 SEPTEMBER 2024 BOARD OF TRUSTEES**

**DATE:** September 19, 2024

**TO:** Members, Board of Trustees

**FROM:** Cody Hounanian, Program Director, Office of Admissions

**SUBJECT:** Technical Correction of Approved Revisions to Appendix A Related to Fees for Unaccredited Law Schools

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### **EXECUTIVE SUMMARY**

In September 2023, the Board of Trustees approved revisions to fees pertaining to unaccredited law school fees. In March 2024, the Board approved a minor change to the previously approved unaccredited law school fees, renaming the “Annual Compliance Report” fee to the “Registration Services fee” to better represent the fee’s purpose, and directed staff to bring the revisions to Appendix A of the State Bar’s Rules, the Schedule of Charges and Deadlines, reflecting this change at its July 2024 meeting. While updating the published version of Appendix A, following the Board’s approval in July 2024, staff discovered that an outdated version of Appendix A related to unaccredited law schools had been mistakenly attached to the July 2024 report. Staff now seek the Board’s approval to make a technical correction to Appendix A that reflects the change from “Annual Compliance Report” fee to “Registration Services fee” on an up-to-date copy of Appendix A as detailed in Attachments A and B.

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### **RECOMMENDED ACTION**

Approval of revisions to Rules of the State Bar of California Appendix A, [Schedule of Charges and Deadlines](#) related to unaccredited law schools.

### **DISCUSSION**

In September 2023, the Board approved a package of revisions to fees pertaining to the Office of Admissions, including those related to unaccredited law schools.

In [March 2024](#), in addition to approving a set of revisions to fees applicable to the California Accredited Law Schools (CALs), the Board also approved a minor change to the previously approved unaccredited law school rules, renaming the “Annual Compliance Report” fee to the “Registration Services fee” to better represent its purpose. No other changes to the unaccredited law school fees were discussed at that time.

In [July 2024](#), the Board approved revisions to Appendix A, including the change to “Registration Services fee.”

#### **TECHNICAL CORRECTION TO APPENDIX A**

After the July Board meeting, while updating the published version of Appendix A, staff discovered that the attachment used to reflect the title change to “Registration Services fee” was an outdated version of Appendix A. Although the title change was correctly presented, the document inadvertently used a version of Appendix A that pre-dated the September 2023 revisions. Only the title changes were meant to be updated pursuant to the resolution approved by the Board in March 2024.

Staff communicated the intended changes to the Board in both the July 2024 staff report and meeting presentation:

The July 2024 staff report stated: “In March 2024, the Board 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.”

During the July 2024 Board meeting, staff stated: “At the March 2024 meeting, the Board of Trustees approved renaming the ‘Periodic Compliance Report’ fee for CALs to the ‘Accreditation Services’ fee and similarly renaming the ‘Annual Compliance Report’ fee for unaccredited law schools to the ‘Registration Services’ fee to better reflect how that fee revenue is used.” A recording of that discussion is [available online](#).

Staff therefore seeks the Board’s approval to make a technical correction to Appendix A reflected as redlines in Attachment A and a clean version in Attachment B, to clarify the intended revisions.

#### **PREVIOUS ACTION**

[September 2023](#): The Board approved revisions to unaccredited law school rules and directed that the proposed increases on the fees assessed to the CALs be adjusted downward and circulated for additional public comment.

[March 2024](#): The Board approved changes to the CALs fees and the relevant title change to the unaccredited law school fees and directed staff to return in July with revisions to the Schedule of Charges and Deadlines.

[July 2024](#): The Board approved revisions to Appendix A reflecting changes approved by the Board at the March 2024 meeting.

## **FISCAL/PERSONNEL IMPACT**

None

## **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 the technical corrections to the Rules of the State Bar of California Appendix A, Schedule of Charges and Deadlines, related to unaccredited law school fees changing the title of the “Annual Compliance Report” fee to the “Registration Services fee,” as reflected in Attachments A and B.

## **ATTACHMENTS LIST**

- A. Appendix A, Schedule of Charges and Deadlines Related to Unaccredited Law Schools (Redline Version)
- B. Appendix A, Schedule of Charges and Deadlines Related to Unaccredited Law Schools (Clean Version)

## Appendix A, Schedule of Charges and Deadlines Related to Unaccredited Law Schools (Redline Version)

## TITLE 4, DIVISION 3

UNACCREDITED LAW SCHOOL FEES

*Fees previously adopted by the Board of Trustees or mandated by statute.  
Last amended effective **January 1, 2024.***

<i>Rule</i>	<i>Description</i>	<i>Amount</i>	<i>Deadline</i>
4.209(B)	Services of Senior Executive or consultant	\$350.00/hour	Not applicable
4.209(C)	Travel Expenses (per State Bar Travel Reimbursement policy)	Actual cost	Not applicable
4.221(A)	Application for Registration	\$2,310.00	Not applicable
4.221(B)	Inspection for Application for Registration	\$5,775.00	Not applicable
4.241(D)	Deadline for Disclosure Statement Certification and copy of Disclosure Statement	Not applicable	November 15
4.242	<del>Annual Compliance Report</del> <b>Registration Services fee</b> - Category A law school	\$5,000.00	November 15
4.242	<del>Annual Compliance Report</del> <b>Registration Services fee</b> - Category B law school	\$7,500.00	November 15
4.242	<del>Annual Compliance Report</del> <b>Registration Services fee</b> - Category C law school	\$10,000.00	November 15
4.242	Late Filing of Annual Compliance Report	\$350.00	Not applicable
4.243	Self-Study (if separate from inspection)	\$350/hour	Not applicable
4.244(B)	<b>Inspection</b> - Category A law school fee	\$22,500.00	Not applicable
4.244(B)	<b>Inspection</b> - Category B law school fee	\$30,000.00	Not applicable
4.244(B)	<b>Inspection</b> - Category C law school fee	\$36,500.00	Not applicable
4.245	Request for approval of Major Change	\$350/hour	Not applicable
4.261	Response to Notice of Noncompliance	\$924.00	Not applicable

\*Amendment of title of the "Annual Compliance Report" to "Registration Services fee" effective September 19, 2024.

## Appendix A, Schedule of Charges and Deadlines Related to Unaccredited Law Schools (Clean Version)

## TITLE 4, DIVISION 3

UNACCREDITED LAW SCHOOL FEES

*Fees previously adopted by the Board of Trustees or mandated by statute.  
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4.241(D)	Deadline for Disclosure Statement Certification and copy of Disclosure Statement	Not applicable	November 15
4.242	Registration Services fee - Category A law school	\$5,000.00	November 15
4.242	Registration Services fee - Category B law school	\$7,500.00	November 15
4.242	Registration Services fee - Category C law school	\$10,000.00	November 15
4.242	Late Filing of Annual Compliance Report	\$350.00	Not applicable
4.243	Self-Study (if separate from inspection)	\$350/hour	Not applicable
4.244(B)	<b>Inspection</b> - Category A law school fee	\$22,500.00	Not applicable
4.244(B)	<b>Inspection</b> - Category B law school fee	\$30,000.00	Not applicable
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\*Amendment of title of the "Annual Compliance Report" to "Registration Services fee" effective September 19, 2024.