



UNH School of Law
Office of the Dean
2 White Street
Concord, NH 03301
V: 603.513-5101
F: 603.513-5104
law.unh.edu

August 11, 2017

Barry A. Currier, Managing Director
Accreditation and Legal Education
ABA Section of Legal Education and
Admissions to the Bar
321 N. Clark St., 21st Floor
Chicago IL 60654

Re: Petition to suspend implementation of changes in graduate employment reporting

Dear Mr. Currier:

The University of New Hampshire School of Law urges the Council for the Section of Legal Education and Admission to the Bar to suspend implementation of the proposal it adopted at its June meeting to change the Employment Summary Report and questionnaire. This letter specifically addresses two changes that unfairly disadvantage smaller law schools: the reporting of law-school funded positions and the elimination of class size. Accompanying this letter is the petition I have executed on behalf of the law school urging the Council to suspend the changes and to reinstate the 2015 instructions and questionnaire.

The purpose of the reporting changes the ABA adopted in 2015 was to provide prospective students, employers and law schools with a more accurate understanding of the availability of jobs in the actual legal marketplace, especially after the economic downturn in the previous few years. The requirement that law schools must report all law school funded jobs, whether funded directly or indirectly, permits a reader to quickly determine how many graduates secured employment in the competitive legal marketplace rather than in school-subsidized and generated positions. The requirement that schools report the total number in the graduating class permits consumers to assess the strength of particular programs and outcomes based on percentages.

The Council's approval of a proposal to rewrite the Employment Questionnaire and to change the reporting requirements significantly undermines the public's ability to understand employment trends in the actual legal marketplace. For instance, a law school funded job paying \$41,000 for thirteen months of work would be reported with equal weight as a permanent law firm job paying \$160,000 in the competitive marketplace. This is misleading. Additionally, without knowing the size of the graduating class, prospective students and employers cannot readily determine how well a particular school prepares graduates for and places them in the legal profession. These changes substantially undermine the intent of the reporting process.

Moreover, the Council's action unfairly favors large, established, well-endowed law schools that can afford to subsidize relatively short-term, modestly-compensated, self-made jobs in an effort to bolster their employment outcomes. By contrast, smaller schools that cannot do this must compete only in the competitive marketplace. The 2015 changes leveled the playing field by allowing all schools to *count* law

school funded positions but at least to *identify* subsidized jobs. Similarly, the requirement that all schools report the number of graduates simply permits fair comparison among all schools.

We urge the Council to reverse its June decision and to reinstate the 2015 changes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan Carpenter'. The signature is stylized with a large 'M' and 'C'.

Megan Carpenter, Esq.
Dean