September 25, 2013

The Honorable Solomon Oliver, Jr., Chairperson
Council of the Section of Legal Education and Admissions to the Bar
American Bar Association
321 N. Clark Street, 21st Floor
Chicago, IL 60654-7958

Mr. Barry A. Currier, Managing Director of Accreditation and Legal Education
Section of Legal Education and Admissions to the Bar
American Bar Association
321 N. Clark Street, 21st Floor
Chicago, IL 60654-7958

Dear Chief Judge Oliver and Mr. Currier,

The following comments are provided in response to proposed changes to Chapter 4 of the ABA Standards and Rules of Procedure for Approval of Law Schools.

The George Washington University Law School supports removal of a student faculty ratio from the standards (Interpretations 402-1 & 402-2). We concur with the stated Explanation of Changes, which asserts that calculation of a ratio is impractical and that the ratio is misleading because it does not provide a useful measure of the adequacy of the full-time faculty's size.

The current ratio is a formula that arbitrarily assigns weights of less than 1 to anyone who is not a tenured faculty member, tenure-track faculty member, or ABA Standards 405(c) legal writing instructor or clinician. It penalizes tenured deans who teach a full load and other deans, who though not tenured, have job security and teach as much as any faculty member. Additionally, we do not agree with the current method because it penalizes small schools and those schools who are able to attract many high-quality adjuncts with tremendous experience.

Thank you for this opportunity to comment.

Sincerely,

[Signature]

Gregory E. Maggs
Interim Dean and Professor of Law