Dear Chief Judge Oliver and Mr. Currier,

The following comments are provided by The George Washington University Law School (GW Law) in response to proposed changes to Standard 205 [Non-Discrimination and Equality of Opportunity], Standard 206 [Diversity and Inclusion], Standard 207 [Reasonable Accommodation for Qualified Individuals with Disabilities], Standard 303(a)(3) [Curriculum], and Standard 603(a-c) [Director of the Law Library] of the ABA Standards and Rules of Procedure for Approval of Law Schools.

GW Law supports Standards 205 and 206, and has no additional comments to submit.

GW Law supports the inclusion of Standard 213’s (now 207) proposed requirement that a school "adopt, publish, and adhere to written policies and procedures for assessing and handling requests for reasonable accommodations made by qualified individuals with disabilities." We support the inclusion of this measure to ensure transparency in the accommodations offered to qualified individuals with disabilities.

GW Law is concerned about the proposed alternative to Standard 303(a)(3). While we fully support the goal stated in Standard 301 of maintaining an educational program that prepares its students for admission to the bar and effective and responsible participation in the legal profession, we oppose a requirement that students complete 15 credits in experiential courses because it creates several problems. It requires that all law schools structure their programs so that almost 20% of the curriculum focuses on one form of instruction. This is a major intrusion on the freedom of an institution to structure its program in a form that the faculty feel best prepare its students for participation in the legal profession. In addition, given the high cost of most forms of experiential education, it is likely that it will require an institution to incur a major new expense at a time when many are struggling simply to maintain their current levels of excellence.
The proposed changes for Standard 603 are supported. We support these changes because they ensure that the individual responsible for providing information services to faculty and students would be qualified to do so either through a background traditionally required for a director (law degree and degree in information science) or by having other qualifications that make him/her particularly suited to meet the needs of the institution.

Thank you for this opportunity to comment.

Sincerely,

Gregory E. Maggs
Interim Dean & Professor of Law
The George Washington University Law School