April 2, 2018

Dear JR Clark:

Please find attached a comment for the Council in connection with its consideration of proposed changes to Standards 501 and 503. Further, at the Council’s hearing on April 12, 2018 in Washington D.C., the following people request time for oral comments:

Kellye Testy, President and CEO, LSAC

Christina Whitman, Francis A. Allen Collegiate Professor of Law, University of Michigan Law School, Chair, LSAC Board

Susan Krinsky, Associate Dean for Student Affairs and Communications, University of Maryland Francis King Carey School of Law, Past Chair, LSAC Board

Jay Austin, Assistant Dean for Admissions and Student Financial Services, University of California, Irvine School of Law

R. Lawrence Dessem, Timothy J. Heinsz Professor of Law, University of Missouri School of Law

Gisele Joachim, Dean of Enrollment Management, Seton Hall University School of Law

In addition, LSAC will have two Senior Staff in attendance:

Camille deJorna, Senior Director for Strategic Initiatives and Global Services

Anmarie Levins, Senior Vice President and Chief Strategy Officer

Sincerely,

Kellye Testy
President and CEO

LSAC.org
April 2, 2018

Dean Maureen A. O’Rourke, Council Chair
Council of the ABA Section on Legal Education
and Admissions to the Bar
321 North Clark Street, 21st floor
Chicago, IL 60654-7598

Dear Dean O’Rourke:

I write to offer comments on the proposed changes to Standards 503 and 501. As explained fully below, I urge the Council\(^1\) to take a more measured and holistic approach to any changes to these long-standing guidelines meant to protect applicants, the public, and the quality and reputation of American legal education. The current proposal should be tabled pending further analysis of several key matters that have been overlooked or misunderstood in the process to date. An opportunity for a more thorough and inclusive process is particularly appropriate on this high-stakes matter, where viewpoints are so divergent and where there is no emergency requiring action with respect to a proposed change that was first conceived just a few months ago.\(^2\) Such a measured and holistic process can bridge multiple perspectives, balancing legal education’s need for innovation with its equally important need for quality and fairness.

My comments are largely informed by my 25 years’ experience as a professor of law, including serving nearly 15 years as dean of two different law schools, as a recent President of the Association of American Law Schools, and as an active participant in the work of the Section over many years. They are also informed by my experience over the past several months as the new President and CEO of the Law School Admission Council (LSAC), a nonprofit membership organization of 221 accredited law schools in the U.S., Canada and Australia. LSAC serves law school candidates and this wide array of law schools that often have divergent viewpoints on many issues before the Council. Through these multiple capacities, I have come to believe that legal education’s use of a valid and reliable admission test can be compared to our nation’s commitment to democracy: while it may not be perfect, it is by far our best alternative.

Moreover, as an educator who has always sought to put students first, I have also come to appreciate the value of a standardized test for applicants as well as for schools. Applicants deserve the fairness that comes from a standardized assessment of the skills necessary to succeed in law school. They deserve that information for their own career decision-making about how to invest

\(^{1}\) I refer to the Council generally to recognize that while this proposal was issued by the Standards Review Committee (SRC), the SRC (as well as the Accreditation Committee) is likely to be merged into the Council soon based on a proposed fundamental realignment of the governance structure of the Section.

\(^{2}\) The Council had first proposed a change to Standard 503 that would permit law schools to use any admission test that was valid and reliable for law school admission. LSAC supported this change. Rather than proceed with this revision, however, the Council opted several months ago to instead put out for comment the current proposal that takes a much larger step by eliminating Standard 503 and the requirement of any valid and reliable admission test.
their time and resources and for the comparisons schools make among applicants in admission and financial aid decisions. An admission process without a valid and reliable standardized test injects a far greater likelihood of bias and exploitation, which is unfair to applicants and detrimental to legal education.

Legal education’s standards should not fall to a least common denominator but should stand at the very apex of quality and fairness as part of our collective commitment to advancing justice and the rule of law. The role of the Council in advancing quality in legal education is its unique and essential duty: ABA accreditation should be a mark of distinction and a source of pride. I am troubled by the serious concerns many of my colleagues in legal education and the legal profession have shared that the changes currently proposed to Standards 501 and 503 fail to advance quality and are therefore incongruous with the Council’s duty to the public.

Accordingly, I respectfully ask that the Council decline to approve the changes currently proposed and that it establish a process for a fuller and more inclusive consideration of Standards 501 and 503—one that is more likely to bridge many diverse perspectives and reach a better balance of considerations. In the alternative, I ask that the Council not implement changes to Standards 501 and 503 without first clarifying how Standards 501 and 509 should work in the absence of Standard 503.

Below I provide some background information that I hope assists the Council in its review of the proposed changes and in charting a wise path forward. I have erred on the side of including more information rather than less to assist the Council and other stakeholders in legal education who are seeking greater information on these important matters. I, as well as LSAC, with its 70+ years of experience in law school admission, stand ready to be of help in any way.

**Standardized Tests Level the Playing Field**

Standardized admission tests like the LSAT provide law schools with a common measure by which to assess applicants from very different educational backgrounds. Whether students come from big public universities, the Ivy League, historically black colleges and universities, or small religious schools, Standard 503 requires each of them to take a valid and reliable admission test to apply to accredited law schools. By doing so, the Standard ensures that all applicants are evaluated on a common basis.

Without a standardized test, it is extremely difficult for admission officers to make fair comparisons of students from these very different kinds of schools and from very different undergraduate degree programs, especially when some schools and programs are well known to them and others are not. It is easy for admission officers—unconsciously or not—to devalue grades of “A” earned by students from schools they do not know well or whose graduates have never

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3 My comments primarily refer to the LSAT because it is currently the only valid and reliable test for law school admission. That is not to say that LSAC or another test provider could not establish another valid and reliable test in the future. A test must first be designed for the field in which it is being used (“construct” validity) and then tested for validity and reliability under accepted professional psychometric standards. For these reasons, it would not be complex nor expensive for the Council to evaluate whether a given test is “valid and reliable.”
applied to their institutions. A standardized test helps to level the playing field, ensuring that admission officers assess very different applicants against a common measure.

A standardized test also guards against other forms of bias. Indeed, it was the reluctance of law schools in the 1940s to admit women as well as racial and religious minorities that inspired the development of the LSAT and, later, the creation of LSAC. While many overt forms of discrimination have thankfully diminished, there is no question that implicit bias and other forms of structural subordination still plague any decision-making process. Standardized tests guard against these biases and bring fairness to the admission process.

This perspective is widely shared by individuals and organizations who prioritize access and diversity in legal education. The Comment of March 28, 2017 signed by 36 deans, admission directors, and law professors from the Minority Network argues strenuously in favor of retaining the requirement of the LSAT because it “increases the likelihood all applicants, especially applicants from underrepresented and historically disadvantaged backgrounds, are fairly evaluated in the admission process.” The Council on Legal Education Opportunity (CLEO) and the American Indian Law Center made similar arguments to the Council. Professor Kevin K. Washburn, Professor of Law at the University of New Mexico School of Law and incoming Dean of the University of Iowa School of Law, and Professor Christina Whitman, Professor of Law at the University of Michigan, offered compelling personal accounts of the doors the LSAT opened for their careers. In considering what approach the Standards should take to increase access and diversity in legal education, I urge the Council to give heavy weight to these voices, which come from deep expertise and experience.

The LSAT also evens the playing field in another critical way, because it is a test of aptitude rather than of content. Legal education encourages applicants from all majors, unlike medicine, for instance, that has a defined “pre-med” track. Because legal education opens its doors widely, it is even more critical to make sure that applicants from diverse disciplinary backgrounds have the aptitude to succeed in legal studies. The LSAT, regarded worldwide as the premier test of critical thinking skills, achieves this goal. LSAT scores correlate closely not only to success in law school but also on the bar exam. Moreover, there is no field for which critical thinking skills are not vital, which is why LSAC commonly gets many requests for use of the test in other disciplines.4

Diversity and Access: Test Score Gaps

The role of what is known as a “score gap” in standardized testing is often misunderstood. A score gap refers to group-based differences in test scores, including those based on race or gender. All standardized tests, including the LSAT, have a score gap between Caucasian test takers and some subgroups of racial minorities due to persistent structural inequality in society, including in educational systems. This does not mean, however, that the standardized test (including the LSAT) is a barrier to admission for historically disadvantaged minorities. This argument is belied by many years of research and data.

4 LSAC is committed to high standards in assessment and thus, despite these market opportunities, would not assert that the LSAT is “valid and reliable” for a discipline for which it was not designed; rather, we follow recognized quality standards and work to design a valid and reliable assessment instrument for the particular usage at issue.
First, score gaps are not limited to standardized tests. There is also “grade gap,” both for undergraduate grade point average (GPA) and law school first-year averages (FYAs). Thus, eliminating the test requirement does not address the issue of differential performance between these groups—it simply shifts the problem to the “grade gap.”

Second, we know from studies of undergraduate institutions with “test optional” policies that they do not advance diversity despite arguments to the contrary, as we have seen in the debates over Standard 503. We also know that acceptance by some business schools of an additional admission test as an alternative to the GMAT did not improve diversity for business schools as had been argued. As noted above, without a common standard, more, not less, bias creeps into admission processes. Subjective and less standardized assessments rarely, if ever, benefit historically disadvantaged groups.

Third, the score gap does not reflect bias in the LSAT. The research here is very clear: test scores do not under predict FYAs for African American or Hispanic matriculants. The test scores for these groups are no less predictive of law school performance than those for white matriculants. In short, the LSAT serves the same function for historically disadvantaged groups as it does for others: providing a measure of their likelihood of success in law school.

Fourth, law schools already have ample room under Standard 503 to decide for themselves what weight to give LSAT scores in the admission process. While Standard 503 requires a test for the benefit of the school and the applicant, it does not mandate how schools use the scores. LSAC itself recommends that the test score be one factor in a holistic admission process. The LSAT score should only limit a school’s admission decision if the school believes that an applicant’s score, together with the rest of the admission file, does not demonstrate a likelihood of success in law school. In such a case, that limitation is justified. Diversity of the profession is not advanced by mere admission to law school; it is advanced by attainment of a degree and entry into the profession.

While there is surely a long way to go before we can be satisfied with the diversity of the legal profession, law schools are admitting increasingly diverse classes. Indeed, for the 2016 entering class, the percentage of African American matriculants to law school matched the proportion of African Americans graduating with bachelor’s degrees (10.2%). These numbers represent an improvement over time—in 2010, only 7.3% of matriculants were African Americans despite their receiving 10.3% of the bachelor’s degrees.

The use of the LSAT as a means for leveling the playing field in the past has helped the Council and the Accreditation Committee determine compliance with Standard 206 on Diversity and Inclusion. By providing test scores of minority applicants, admits, and matriculants, the committee could evaluate whether a school was genuine in its recruitment efforts (e.g., not admitting minority

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6 https://www.lsac.org/lsacresources/data/additional-gender-ethnicity

7 https://nces.ed.gov/programs/digest/d16/tables/dt16_322.20.asp?current=yes
students unlikely to enroll), and whether a school was demonstrating “a commitment to having a student body that is diverse with respect to gender, race and ethnicity.”

There are proven avenues to improving diversity in legal education that do not risk unfairness in admission. For instance, pipeline building programs have and will make a difference in diversifying legal education. LSAC has long been and intends to remain at the forefront of building and sustaining outreach programs and initiatives to increase the number of lawyers from racial and ethnic groups, LGBTQ communities, and others underrepresented in the profession. Many other organizations and schools support enhancing diversity and access through these kinds of programs.

**Consumer Protection**

Standardized admission tests provide law schools and applicants with critical data for making informed decisions. The purpose of requiring the test, in the ABA’s own words, is to help “the school and the applicant” assess the prospective student’s “capability of satisfactorily completing the school’s program of legal education.” At a time when the market for legal jobs remains challenging and many law schools struggle to fill their classes, it is imperative that applicants have an objective way to assess their prospects and that law schools admit only those who have a fair chance of succeeding.

As noted below, the LSAT provides this consistent information for schools, applicants and the public. At present there is no consideration of how the disclosures required under Standard 509 will be amended to account for the changes proposed under Standards 501 and 503. This is a serious oversight and must be addressed prior to any changes to those Standards to fulfill the Council’s important consumer protection functions. Without addressing this issue, these changes threaten to undermine any progress that has been made in consumer trust from the advances in Standard 509 disclosures and the matriculant certification process on which the Section and LSAC effectively collaborate.

To take one example, the current proposals do not include a requirement that schools disclose how applicants with no test score or more than one test score are evaluated against one another. Applicants and the public deserve to know what schools are relying upon to make admission and scholarship decisions. Accepting a certain test score in admission is very different than relying upon that score to make offers of admission and financial aid. Those and other disclosures should be addressed prior to adopting or implementing the proposed wholesale change of eliminating Standard 503.

**Benefits for Schools**

Law schools’ reliance on LSAT scores is supported by a long history of correlation studies that LSAC carries out annually for an average of about 200 schools. This research compares the LSAT scores and first-year grades of matriculating students and consistently shows a strong correlation between LSAT scores and student success in law school. This work, performed by LSAC as a free service to law schools, gives schools important feedback that they can use to evaluate and improve their admission procedures. The integrity of this process and the valuable data that comes from it
is likely to suffer without further analysis and discussion of the proposed changes to Standards 501 and 503.

Beyond the application process, LSAT scores provide law schools with information critical in determining whether the admitted student would benefit from enhanced academic support or other interventions prior to the beginning of classes or during the academic year. Here again, a wealth of data tracking performance against LSAT scores is available to each law school, thereby enabling the schools to anticipate and intervene, helping to ensure that all admitted students flourish. The reliability and availability of this data, too, is at risk under the current proposals.

**Benefits for Applicants**

The interests of potential law students should weigh heavily in the decision whether to eliminate Standard 503. Without the trust of applicants, all legal education will suffer. From the students' point of view, the LSAT provides a realistic look not only at their chances for admission at particular institutions but, perhaps more importantly, at their likelihood of succeeding in law school.

Each year, over 100,000 or more students see how they score on the LSAT prior to deciding whether and where to apply. This is critically important information for them. If the LSAT were not required, potential applicants may skip the test, be admitted to a school needing to fill its class, and then enroll only to fail after spending time and significant money at an institution at which they cannot thrive or, perhaps, on a career path that was not meant to be. Schools would then be subject to a legitimate critique of setting such students up for failure. Consumer protection is one important reason for the requirement of a standardized admission test. Law students are already facing enormous financial pressures with student loans and grants and removing a crucial means to inform their decision that may involve spending hundreds of thousands of dollars to realize their professional aspirations is unfair to the student and harmful to the profession.

Applicants benefit from the LSAT in other ways. The LSAT can help students understand their skills, sometimes for the first time, often opening doors that the student may not have dreamed possible. Further, neurological research shows that studying for and taking the LSAT improves critical thinking skills. It is thus not just a test but part of the development of legal skills that serve students in positive ways. The LSAT is a head start on the development of skills that will help the student thrive once admitted to law school.

**Market Pressures**

Eliminating the test requirement will create new market pressure on law schools. I am confident that most law schools will continue to use a standardized admission test even if the Standards no longer require it. Thus, for those who do, having the requirement will work no inconvenience. But the very schools for which test data is most imperative are the ones most likely to eliminate the requirement. Schools struggling to fill their classes are already admitting marginally qualified or, in some cases, unqualified students. Faced with understandable enrollment and financial pressures, they may take a chance on students who may ultimately struggle and possibly fail in their law school career. With no test scores, or multiple test scores (some of which are not valid
and reliable), the Council’s interim monitoring standards have yet to be articulated. A valid and reliable admission test gives students vital information they need to make informed decisions before devoting three years and tens of thousands of dollars to law school.

Moreover, the impact of some schools’ eliminating the test requirement will be felt at other institutions. In the competition to fill first-year classes, market pressure would undoubtedly force schools that would otherwise continue to require a standardized admission test to abandon the requirement as well. In short, the proposed revision to Standard 503 risks a race to the bottom with only retention and bar passage as after-the-fact “outcomes” to measure. But those come too late to help the students who have already invested and are now saddled with debt and possibly, lost opportunities. With law school closures and schools on probation, it is difficult to see how a school-by-school admission process is in the best interests of the consumer.

As former Undersecretary of Education, now President of American Council on Education (ACE), Ted Mitchell reminded accreditors, “The unfortunate reality is that not all institutions have students’ best interests at heart or are investing their resources in ways that maximize student success. Accreditors should be the failsafe in these situations.” Mr. Mitchell urged accrediting agencies to be flexible in allowing for differential reviews based on differing conditions and recognized that differential review may be based on risk factors. As part of a more measured and holistic review of admission standards, the Council could explore the possibilities of differential reviews and make clear the indicators that it will need (and the source of requirements for their disclosure) to do that productively.

**Challenging Environment of Law School Accreditation**

Some supporters of the elimination of Standard 503 suggest that the ABA may be the only regulator requiring a test, pointing to the medical school context and the universal use of the MCAT in admission. The experience of accreditors in other fields is not particularly relevant, however, because those regulatory regimes are different in many ways. The proposed revisions to law school admission standards were not prompted by any concerns expressed by the Department of Education. Indeed, it has long recognized that “accreditors, accrediting agencies, and the institutions and programs they accredit are diverse…. [T]hey have varying practices on how they approach their reviews of their institutions and programs and how they apply their standards.” Indeed, medical schools and law schools today operate in radically different environments, making the experience in one field wholly inapplicable in judging the appropriate approach to accreditation in the other.

Admission to medical schools is far more competitive than admission to law schools. For 2017–2018, for example, there are 816,153 applications from 51,680 applicants for just over 20,000 seats in medical schools. Most significantly, the pass rate for the licensing exams by medical school graduates exceeds 98%. Finally, it is extremely difficult to open new medical schools, and as result, quality control of medical schools is easier to ensure even without an admission test requirement.

Contrast the situation facing law schools today. In the Fall of 2017, there were just over 56,000 applicants for nearly 38,000 seats. Many schools are struggling to fill their first-year class with qualified students. The Section faces opposition to imposing a 75% bar passage rate as the
minimum standard for law school performance. Accreditation requirements should differ because accreditors of law schools are not operating in the same environment as accreditors of medical schools. The strong competition for seats in medical school results in uniformly high standards for admission and close to universal passage of licensing exams. Law schools are simply not in this situation, and it is appropriate that the ABA’s accreditation standards mirror this difference.

**Accountability, Transparency, and Public Trust**

The ABA’s role in accrediting law schools is vital to building public trust in the legal profession, trust that we must all work hard together to build and retain. Lawyers serve in many roles in society, but they all have this in common: they involve relationships of trust on matters of importance to people and organizations. This is one of most important reasons the Department of Education regulates law schools, and why every state licensing authority requires applicants for admission to the bar to meet knowledge and character requirements. Yes, many law graduates choose careers outside of law practice; however, most serve as trusted members of a self-regulating profession.

The Standards by which the Council evaluates law schools should bolster the public’s confidence in the fiduciary role of lawyers. I am deeply concerned that the proposal to eliminate the requirement of an admission test—especially coming at the same time the Council proposes other drastic changes in its oversight—risks undermining public confidence in the profession. That failure of confidence in turn erodes demand for legal education and the quality of justice. Among the Council’s other proposed changes are extending the time for accreditation reviews from seven to ten years and shifting the focus of its standards for success from graduation rates to bar passage, employment, and other outcomes. In addition, the Council is significantly restructuring the way it does its work, merging the work of the formerly separate Standards Review and Accreditation Committees into the Council. In sum, the proposal to jettison the long-standing commitment to an objective admission test—upon which schools and applicants have relied for generations—comes at the same time the Council proposes to fundamentally change how, and how often, it assesses law schools, and how it manages its own accreditation processes. All of these changes are proposed at a time of profound challenge to the profession from technological innovation and global competition and at a time when a fair number of schools are closing, on probation, or otherwise subject to discipline for various matters.

With all of these factors considered, it is especially important that any changes to Standards 501 and 503 are aligned with the requirements of Standard 509 Disclosures that “all information that a law school reports, publicizes, or distributes shall be complete, accurate and not misleading to a reasonable law school student or applicant.” No provisions have yet to be made to align disclosure requirements of Standard 509 to proposed changes to Standards 501 and 503. This topic should be fully considered before finalizing any changes to Standards 501 and 503, or, in the alternative, certainly before any changes are made effective.

**Responsible Innovation**

Many members of the legal education community, especially admission deans and professionals who work most closely with the admission process, do not support the proposed changes to 501
and 503, and I understand their concerns for the reasons noted above. At the same time, having been a law school dean for many years, I also appreciate the arguments of some deans who assert that changes to Standards 501 and 503 are important to encourage "innovation" and "experimentation." While I am a strong proponent of innovative approaches to legal education, I do not believe that a change so radical as eliminating Standard 503 is a necessary "experiment."

First, as noted earlier, an evidence-based analysis of these issues clearly shows that the laudable goals of enhanced access and diversity are unrealistic outcomes to expect from this "experiment." With those goals in jeopardy, the risks of harming applicants and undermining the quality of and confidence in legal education are too great to press on with the current proposal. No one has yet to seriously argue that law schools should stop using any test. At a minimum, there should be more time for thoughtful discussion and consideration of alternatives before eliminating Section 503 entirely. A more measured and holistic approach to the Standards can balance the benefits of innovation with commitments to quality and fairness.

Second, for those who seek avenues for innovation in legal education, there are fruitful directions for change that portend significant benefits rather than risks to students. Already, many schools have significant innovations underway that can serve as inspirations and models, including innovations in courses and clinics; curricular requirements; program format, design, and delivery; and new degree programs to supplement JD education and expand access to education in law. Not every risk is one worth taking; not every change is a responsible "innovation."

Third, through more analysis, it should be possible to regain the flexibility in admission that schools previously enjoyed under the Variance process. There was no substantive reason for discontinuing that process. Rather, the Section discontinued it for reasons of preferred resource allocation. The Variance process balanced the need for a consistent admission test for most applicants with the flexibility for schools to offer well-designed (and well-disclosed) opportunities for alternative admission, whether to reach joint-degree students on their campus or elsewhere, to design bridge programs with undergraduate schools (e.g., 3/3 programs), or to offer expanded admission opportunities to under-represented populations.

The Council can adopt an approach that provides room for mission-based flexibility through the Standards if it prefers that over a perhaps more resource-intensive Variance process. Such an approach, which can be honed through additional dialogue and analysis, can find the sweet spot of responsible innovation that our profession needs and deserves. Included in Appendix I is an example of the reporting requirements that might inform such an approach, drawn from the Consultant's Memo 1 (REVISED) Standards 503 and 802, August 2012.

These same reporting requirements might also help inform the wide range of disclosure issues yet to be addressed in the current proposal under either 501 and its interplay with 509. With that in mind, should the Council decide to proceed with the current proposed changes to Standards 501 and 503, I respectfully suggest the following revisions (changes indicated in bold):

*Interpretation 501-2*

*Sound admissions policies and practices include consideration of valid and reliable admission test scores, undergraduate course of study and grade point average, extracurricular activities,*
work experience, performance in other graduate or professional programs, relevant demonstrated skills, and obstacles overcome.

**Interpretation 501-3**

If a law schools uses an admission test other than the LSAT, it shall publish information regarding which tests accepted, how test scores are evaluated and used, the number of students offered admission under each test, the number of students offered scholarships under each test, and the number of students matriculating under each test.

**Conclusion**

I urge the Council to undertake further diligence prior to adopting such far-reaching changes to Standards 501 and 503, and to develop a more measured and holistic approach to any changes. No one wins if this decision turns out poorly—not law school candidates, not law schools, and certainly not the consuming public. Relying on a yet-to-be-determined bar pass standard as the only outcome measure for advancing the quality of legal education, especially at a time of such challenge and change in legal education and in the Council’s own governance structure, ill serves legal education. We can and must do better. I am confident that with further consideration of all the factors, we can chart a course that advances access, quality, and fairness in law school admission and enhances the overall quality of legal education. I ask the Council to table these changes pending further review, or, in the alternative, to slow the adoption of these changes (as was done with the implementation of the recent bar passage and diversity standards) until this important work can be accomplished.

Thank you for your time and consideration of these important matters.

Best regards,

[Signature]

Kellye Y. Testy
President and CEO
Law School Admission Council
Appendix I: An Example of Reporting Requirements for Law Schools Using a ‘Test Optional’ Admissions Process from the Annual Reporting for Standard 503 Variances

Annual Reporting on Approved Standard 503 Variances
If a variance from Standard 503 is approved pursuant to Standard 802, the school will be required to report annually on the special admissions program. The Committee requires the following information to be reported annually by November 1:

For each entering class, provide the number of “Special Admission” students who applied for admission under the program, the number of those students granted interviews, the number of those students admitted, and the number who matriculated. Provide also the total size of the entering class (Special Admission plus Regular Admission) for each class year.

For each year of Special Admission students referred to in paragraph (a), provide, where applicable, the range, mean, median, and standard deviation of the following: ACT score, SAT score, LSAT score, GMAT score, and Undergraduate GPA. Provide the same information for enrolled students in the regular admissions program.

Provide for each year of the Special Admission Program a report on the performance (including means, medians, and standard deviations) of students admitted under the Special Admission program, with respect to first semester Law School GPA, first year Law School GPA, cumulative GPA, attrition, and when available, graduation rate, bar passage, and employment; and a comparison of such data with corresponding data for students admitted under the Law School’s regular admission program.

Provide a report on the impact of the Special Admission Program on the Law School’s obligation to comply with Standard 212(a), and a description of the actions undertaken by the Law School to assure compliance with Standard 212(a) in light of the implementation of the Special Admission Program.

Show the information provided to applicants to the Law School under the Special Admission Program regarding the experimental character of the admissions aspects of the Program and regarding the need for such students to take the LSAT should they wish to apply to another law school as an incoming or transfer student. Identify also all places where this information may be found by applying students.

Describe the means by which the Law School complies with Standard 509 concerning the publishing of basic consumer information regarding admissions, for students admitted to the Law School under the Special Admission Program. Indicate all places where such information can be found by applying students.

Describe the benefits of each specific component or requirement of the Special Admissions Program to the Law School and to the students who are admitted and enroll in the Program. Describe any potential risks associated with the experimental character of the Program for the Law School or for the students who enroll.