



Managing Director's Guidance Memo

Standard 509 (July 2014, Revised July 2016)

Standard 509. REQUIRED DISCLOSURES

- (a) 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. A law school shall use due diligence in obtaining and verifying such information. Violations of these obligations may result in sanctions under Rule 16 of the Rules of Procedure for Approval of Law Schools.
- (b) A law school shall publicly disclose on its website, in the form and manner and for the time frame designated by the Council, the following information:
- (1) admissions data;
 - (2) tuition and fees, living costs, and financial aid;
 - (3) conditional scholarships;
 - (4) enrollment data, including academic, transfer, and other attrition;
 - (5) numbers of full-time and part-time faculty, professional librarians, and administrators;
 - (6) class sizes for first-year and upper-class courses; number of seminar, clinical and co-curricular offerings;
 - (7) employment outcomes; and
 - (8) bar passage data.
- (c) A law school shall publicly disclose on its website, in a readable and comprehensive manner, the following information on a current basis:
- (1) refund policies;
 - (2) curricular offerings, academic calendar, and academic requirements; and
 - (3) policies regarding the transfer of credit earned at another institution of higher education. The law school's transfer of credit policies must include, at a minimum:
 - (i) A statement of the criteria established by the law school regarding the transfer of credit earned at another institution; and
 - (ii) A list of institutions, if any, with which the law school has established an articulation agreement.
- (d) A law school shall distribute the data required under Standard 509(b)(3) to all applicants being offered conditional scholarships at the time the scholarship offer is extended.

(e) If a law school makes a public disclosure of its status as a law school approved by the Council, it shall do so accurately and shall include the name and contact information of the Council.

Interpretation 509-1

Current curricular offerings, for the purposes of Standard 509(c), are only those courses offered in the current and past two academic years.

Interpretation 509-2

A law school may publicize or distribute information in addition to that required by this Standard, including, without limitation, the employment outcomes of its graduates, so long as such information complies with the requirements of subsection (a).

Interpretation 509-3

A conditional scholarship is any financial aid award, the retention of which is dependent upon the student maintaining a minimum grade point average or class standing, other than that ordinarily required to remain in good academic standing.

Interpretation 509-4

Articulation Agreement means a formal written agreement between a law school and another accredited university or institution providing for the transfer of defined academic credits between the parties to the agreement.

Background

This memorandum addresses the form, manner and time frame for publishing certain information as required by Standard 509, and provides other guidance regarding compliance with the Standard. Attached is a chart that summarizes the requirements of the Standard. It revises, updates and replaces the memorandum issued in July 2014.

Standard 509 divides the information that a law school must publish on its website into two categories: (1) that for which the Council prescribes a particular form, manner and time frame of publication [Standard 509(b)]; and (2) that which schools must disclose in a readable and comprehensive manner [Standard 509(c)]. Each of these categories is addressed below. Additionally and importantly, all information reported, publicized or distributed by a law school is subject to the overriding mandate of Standard 509(a) that it be “complete, accurate and not misleading to a reasonable law school student or applicant.”

Standard 509(b): Required Disclosures – Form, Manner, and Time Frame Prescribed by the Council

Standard 509(b) requires schools to publish certain information on their websites “in the form and manner and for the time frame designated by the Council.” The following paragraphs address in turn these three aspects – form, manner, and time frame – of 509(b).

1. Form of mandated disclosures

The Council has designated two forms for the disclosures required by Standard 509(b):

- (a) Employment Summary Report, pursuant to 509(b)(7); and
- (b) Standard 509 Information Report, pursuant to 509(b)(1), (2), (3), (4), (5), (6), and (8).

Employment Summary Report. Schools will generate the Employment Summary Report as a PDF in the “Admin” section of the ABA Employment Questionnaire (EQ). The report is derived from the data that schools submit in the EQ, and is also published in the online *Official Guide to ABA-Approved Law Schools*. A blank copy of the Employment Summary Report is attached.

Standard 509 Information Report. Schools will generate the Standard 509 Information Report as a PDF in the “Admin” section of the ABA Annual Questionnaire (AQ). This Report is derived from information submitted by each school in the AQ, and is also published in the online *Official Guide to ABA-Approved Law Schools*. A blank copy of the Standard 509 Information Report is attached.

Schools must publish this information in the prescribed format.

2. Manner of mandated disclosures

All information that must be published on a law school’s website in compliance with Standard 509 must be posted conspicuously and in a readily accessible location:

- At a minimum, a school website’s home page must prominently display a link labeled, “ABA Required Disclosures,” that connects the reader either to a place that provides all of the disclosures or a direct link to each of them. To be readily accessible and prominent, generally this link should be on the home page and require only one click to access the information.
- In addition, the information must be available by a link featured prominently on the main page for admissions/prospective students. Again, this link must be to a place that provides all of the disclosures or a direct link to each of them.
- The Employment Summary Reports must also be available by a link featured prominently on the main page for career services.
- It is not sufficient for schools to post the Employment Summary Report or the Standard 509 Information Report by providing a link to the page on the ABA’s website where schools’ Reports can be generated. The Reports themselves must be posted.

3. Time frame for mandated disclosures

Employment Summary Report. Law schools must post their current and past two years’ Employment Summary Reports by April 15, the date currently fixed by the Council, with results for the prior year’s graduating class.

Standard 509 Information Report. A report for the most recent year must be posted by December 15 of the year, the date currently fixed by the Council.

Standard 509(c): Required Disclosures – Readable and Comprehensive

Standard 509(c) requires schools to disclose current information on refund policies; curricular offerings, academic calendar, and academic requirements; and policies regarding transfer of credit earned at another institution, including a list of institutions with which the law school has established articulation agreements. These items are not susceptible to a uniform format, and so are governed by the “readable and comprehensible” requirement. Schools should post these items in a location or locations on their websites that are readily accessible to both current and prospective students.

Standard 509(d): Distribution of Conditional Scholarship Data

Law Schools that offer conditional scholarships must include the conditional scholarship information from the Standard 509 Information Report at the time that a conditional scholarship offer is extended. It is not sufficient to provide a link to the page on the ABA’s website where the law school’s 509 Information Report can be generated. The data itself must be posted.

Standard 509(a): All Disclosures Must Be Complete, Accurate, and Not Misleading

All information reported, publicized, or distributed by a law school is subject to the overriding mandate of Standard 509(a) that it be “complete, accurate and not misleading to a reasonable law school student or applicant.”

Schools typically publish supplementary, complementary, and/or explanatory information about their programs, including additional information about the mandated disclosures discussed above. Schools also frequently provide some analysis and elaboration of the topics covered by the mandated disclosures. Any such information, or analysis and elaboration of the mandated disclosures, must meet the “complete, accurate, and not misleading” requirements of Standard 509(a).

The following guidance is offered regarding how the Council and the Accreditation Committee view this overriding requirement of publishing information that is complete, accurate, and not misleading. Wherever a school offers any analysis or elaboration of the information covered by Standard 509, the required disclosures must be repeated or there must be a link to those required disclosures that is sufficiently proximate and prominent to draw the reader’s attention to the link. The disclosures or link to them must precede the analysis or explanation. Finally, the display of the analysis and elaboration of the data may not be more conspicuous or prominent than the display of the mandated disclosures or the link to them

On a different, but related, topic the Council does not require schools to post graduate salary data, and there is no prescribed form, for the publication of such information. However, pursuant to the direction in the preceding paragraph regarding the publication of information in addition to that mandated by Standard 509, schools may not alter the Employment Summary Reports to add graduate salary data.

This area is a special challenge for both schools and the accreditation process, particularly given the multiplicity of employment categories that schools must report. Because graduates’ salary data can so easily be misleading, schools that publish salary information must take special care to ensure that it complies with the “complete, accurate, and not misleading” requirements of Standard 509.

The Managing Director's Office will issue Guidance memoranda from time-to-time when new Standards or Interpretations have been adopted or when, in the course of the Office's dealings with schools about compliance with the Standards, a number of schools are asking for clarification or direction regarding a particular Standard, Interpretation or reporting requirement. The Office does its best to provide helpful guidance, but we remind schools that we do not have the authority to bind the Council or the Accreditation Committee. That said, the Council and the Accreditation Committee understand the necessity of providing guidance and will take that guidance into account in any determination about a school's operating in compliance with the Standards.

Standard 509 Summary Chart

Mandated Disclosure	Required Form	Manner	Time Frame
Employment data Standard 509(b)(7)	Employment Summary Report	Posting on law school web page must be: conspicuous; readily accessible; with prominent way to find information from law school home page. Posting of info also on admissions/prospective students main page and on career services main page.	At least 3 years of data; most recent year posted by April 15
All other 509(b) required disclosures Standard 509(b)(1), (2), (3), (4), (5), (6), (8)	Standard 509 Information Report	Posting on law school web page must be: conspicuous; readily accessible; with prominent way to find information from law school home page. Posting of info also on admissions/prospective students main page.	At least the current report posted by December 15
Refund policies; curricular offerings, academic calendar and academic requirements; transfer of credit policies Standard 509(c)	N/A	Posting on law school web page must be: readable and comprehensive; readily accessible.	Current
Distribution of Conditional Scholarship Information Standard 509(d)	NA	Conditional scholarship information from the Standard 509 Information Report at the time that a conditional scholarship offer is extended	ongoing

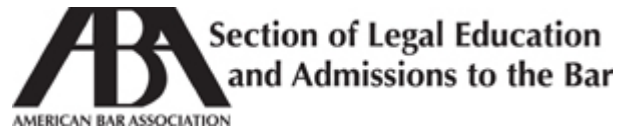
UNIVERSITY/SCHOOL NAME

Street Address

City, State Zip Code

Phone:

Website:



EMPLOYMENT SUMMARY FOR 2015 GRADUATES

EMPLOYMENT STATUS	FULL TIME LONG TERM	FULL TIME SHORT TERM	PART TIME LONG TERM	PART TIME SHORT TERM	NUMBER
Employed - Bar Passage Required					
Employed - J.D. Advantage					
Employed - Professional Position					
Employed - Non-Professional Position					
Employed - Law School/University Funded					
Employed - Undeterminable					
Pursuing Graduate Degree Full Time					
Unemployed - Start Date Deferred					
Unemployed - Not Seeking					
Unemployed - Seeking					
Employment Status Unknown					
Total Graduates					

EMPLOYMENT TYPE	FULL TIME LONG TERM	FULL TIME SHORT TERM	PART TIME LONG TERM	PART TIME SHORT TERM	NUMBER
Law Firms					
Solo					
2 - 10					
11 - 25					
26 - 50					
51 - 100					
101 - 250					
251 - 500					
501 +					
Unknown Size					
Business & Industry					
Government					
Pub. Int.					
Clerkships - Federal					
Clerkships - State & Local					
Clerkships - Other					
Education					
Employer Type Unknown					
Total					

LAW SCHOOL/UNIVERSITY FUNDED POSITIONS	FULL TIME LONG TERM	FULL TIME SHORT TERM	PART TIME LONG TERM	PART TIME SHORT TERM	NUMBER
Employed - Bar Passage Required					
Employed - J.D. Advantage					
Employed - Professional Position					
Employed - Non-Professional Position					
Total Employed by Law School/University					

EMPLOYMENT LOCATION	STATE	NUMBER
State - Largest Employment		
State - 2nd Largest Employment		
State - 3rd Largest Employment		

Employed in Foreign Countries	
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- **Employed – Bar Passage Required.**

A position in this category requires the graduate to pass a bar exam and to be licensed to practice law in one or more jurisdictions. The positions that have such a requirement are varied and include, for example, positions in law firms, business, or government. However, not all positions in law firms, business, or government require bar passage; for example, a paralegal position would not. Positions that require the graduate to pass a bar exam and be licensed after beginning employment in order to retain the position are included in this category. Judicial clerkships are also included in this category.
- **Employed – J.D. Advantage.**

A position in this category is one for which the employer sought an individual with a J.D., and perhaps even required a J.D., or for which the J.D. provided a demonstrable advantage in obtaining or performing the job, but which does not itself require bar passage or an active law license or involve practicing law. Examples of positions for which a J.D. is an advantage include a corporate contracts administrator, alternative dispute resolution specialist, government regulatory analyst, FBI agent, and accountant. Also included might be jobs in personnel or human resources, jobs with investment banks, jobs with consulting firms, jobs doing compliance work in business and industry, jobs in law firm professional development, and jobs in law school career services offices, admissions offices, or other law school administrative offices. Doctors or nurses who plan to work in a litigation, insurance, or risk management setting, or as expert witnesses, would fall into this category, as would journalists and teachers (in a higher education setting) of law and law related topics. It is an indicator that a position does not fall into this category if a J.D. is uncommon among persons holding such a position.
- **Employed – Professional Position.**

A position in this category is one that requires professional skills or training but for which a J.D. is neither required nor a demonstrable advantage. Examples of persons in this category include a math or science teacher, business manager, or performing arts specialist. Other examples include professions such as doctors, nurses, engineers, or architects, if a J.D. was not demonstrably advantageous in obtaining the position or in performing the duties of the position.
- **Employed – Non-Professional Position.**

A position in this category is one that does not require any special professional skills or training.
- **Short-term.**

A short-term position is one that has a definite term of less than one year. Thus, a clerkship that has a definite term of one year or more is not a short-term position. It also includes a position that is of an indefinite length if that position is not reasonably expected to last for one year or more.

A position that is envisioned by the graduate and the employer to extend for one year or more is not a short-term position even though it is conditioned on bar passage and licensure. Thus, a long-term position that is conditioned on passing the bar exam by a certain date does not become a short-term position because of the condition.
- **Long-term.**

A long-term position is one that the employer expects to last one year or more. A law school/university funded position that the law school expects to last one year or more may be considered long-term for purposes of this definition only if the graduate is paid at least \$40,000 per year. The possibility that a short-term position may evolve into a long-term position does not make the position a long-term position.
- **Full-time.**

A full-time position is one in which the graduate works a minimum of 35 hours per week. A full-time position may be either short-term or long-term.
- **Part-time.**

A part-time position is one in which the graduate works less than 35 hours per week. A part-time position may be either short-term or long-term.

Submitted On

Last Updated

2016 Standard 509 Information Report

Address
Phone:
Website:

ABA
Approved
Since



The Basics

Type of school	PUBLIC/PRIVATE
Term	
Application deadline	
Application fee	
Financial aid deadline	
Can first year start other than fall?	Yes/No

GPA and LSAT Scores (calendar year**)

	Total	Full-Time	Part-Time
# of apps	0	0	0
# of offers	0	0	0
# of matriculants	0	0	0
75th Percentile GPA	0.00	0.00	0.00
50th Percentile GPA	0.00	0.00	0.00
25th Percentile GPA	0.00	0.00	0.00
# not incl. in GPA percentile calc.	0.00	0.00	0.00
75th Percentile LSAT	0	0	0
50th Percentile LSAT	0	0	0
25 Percentile LSAT	0	0	0
# not incl. in LSAT percentile calc.	0	0	0

Tuition and Fees (academic year*)

	Resident	Non-Resident
Full-Time	\$ 0	\$ 0
Part-Time	\$ 0	\$ 0
Tuition Guarantee Program		

Living Expenses (academic year*)

Estimated Living Expenses for singles	
Living on Campus	\$ 0
Living Off Campus	\$ 0
Living at Home	\$ 0

Grants and Scholarships (prior academic year*)

	Total		Full-Time		Part-Time	
	#	%	#	%	#	%
Total # of students	0	0	0	0	0	0
Total # receiving grants	0	0	0	0	0	0
Less than 1/2 tuition	0	0	0	0	0	0
Half to full tuition	0	0	0	0	0	0
Full tuition	0	0	0	0	0	0
More than full tuition	0	0	0	0	0	0
75th Percentile grant amount			\$ 0		\$ 0	
50th Percentile grant amount			\$ 0		\$ 0	
25th Percentile grant amount			\$ 0		\$ 0	

Conditional Scholarships

Students Matriculating in	# Entering with	# Reduced or Eliminated
2015-2016 Academic Year		
2014-2015 Academic Year		
2013-2014 Academic Year		

J.D. Enrollment and Ethnicity (academic year*)

	Men		Women		Other		Full-Time		Part-Time		First - Year		Total		J.D. Deg Awd
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
Hispanics of any race	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
American Indian or Alaska Native	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Asian	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Black or African American	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Native Hawaiian or Other Pacific Islander	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Two or more races	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Minority	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
White	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Nonresident Alien	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Race and Ethnicity Unknown	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0



ABA
Approved
Since

Curriculum (prior academic year*)

Typical first-year section size	0
# of classroom course titles beyond first-year curriculum	0
# of upper division classroom course sections	
Under 25	0
25 - 49	0
50 - 74	0
75 - 99	0
100+	0
# of positions available in simulation courses	0
# of simulation positions filled	0
# of seminar positions filled	0
# of law clinics	
# of seats available in the law clinics identified in sub-part (i) above	0
# of seats filled in the law clinics identified in sub-part (i) above	0
# of field placement positions filled	0
# of students who enrolled in independent study	0
# of students who participated in law journals	0
# of students who participated in interschool skills competitions	0

Faculty and Administrators (calendar year**)

	Total		Men		Women		Other		Minorities	
	Spr	Fall	Spr	Fall	Spr	Fall	Spr	Fall	Spr	Fall
Full-Time										
Deans, librarians & others who teach										
Part-Time										

J.D. Attrition (prior academic year*)

	Academic	Transfer	Other	Total	
	#	#	#	#	%
1st year	0	0	0	0	0
2nd year	0	0	0	0	0
3rd year	0	0	0	0	0
4th year	0	0	0	0	0

Transfers (prior academic year*)

Transfers In	
#	
See Appendix for list of schools from which students transferred	
Transfers Out	
0	

Bar Passage Rates (February and July 2015)

First Time Takers:					
Jurisdiction	Takers	Passers	Pass %	State %	Diff. %
	Reporting %	Avg. School Pass %	Avg. State Pass %	Avg. Pass Diff. %	

Bar Passage Rates (February and July 2014)

First Time Takers:					
Jurisdiction	Takers	Passers	Pass %	State %	Diff. %
	Reporting %	Avg. School Pass %	Avg. State Pass %	Avg. Pass Diff. %	

Bar Passage Rates (February and July 2013)

First Time Takers:					
Jurisdiction	Takers	Passers	Pass %	State %	Diff. %
	Reporting %	Avg. School Pass %	Avg. State Pass %	Avg. Pass Diff. %	

* "Academic year" refers to the 2016 - 2017 academic year. ** "Calendar year" refers to the 2016 calendar year.