

EXHIBIT C



ACCREDITATION COMMITTEE

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April 18, 2018

AMERICAN BAR ASSOCIATION

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Attached please find the decision of the Accreditation Committee at its meeting on March 15-17, 2018, with respect to Western Michigan University Thomas M. Cooley Law School.

The Committee's Findings and Conclusions do not reflect a comprehensive checklist evaluation of each Standard and each facet of the institution.

In accordance with the U.S. Department of Education regulations applicable to recognized accrediting agencies, the Council of the Section of Legal Education and Admissions to the Bar is required to conduct interim monitoring of each ABA-approved law school to determine whether each school remains in compliance with the ABA Standards for Approval of Law Schools. This monitoring and review is in addition to the regular site evaluation process and is being conducted on an annual basis. The Law School may receive in any year a request for information as a result of the interim monitoring.

A law school that is approved by the American Bar Association continues in that status pending final action by the Accreditation Committee and Council of the Section of Legal Education and Admissions to the Bar.

Please feel free to call me, Deputy Managing Director William E. Adams, Jr., or Director of Accreditation Administration JR Clark, if you have any questions. As mentioned in the Decision Letter, please send any necessary updates to the Law School's application for acquiescence in its major change electronically, in .pdf format, no later than May 15, 2018, to the School Response email inbox at APSchoolResponses@americanbar.org. A hard copy is not required.

Sincerely yours,

Barry A. Currier
Managing Director of Accreditation and Legal Education

BAC/jrc
Attachment

DECISION OF THE ACCREDITATION COMMITTEE

March 2018

At its March 15-17, 2018 meeting, the Accreditation Committee (the "Committee") considered the status of Western Michigan University Thomas M. Cooley Law School (the "Law School"). The Committee had before it a response dated February 1, 2018, submitted by President and Dean Don LeDuc (the "Dean's Response"), as well as two other submissions from the Law School dated March 7, 2018, and March 8, 2018, in response to the Committee's September 2017 Decision Letter, which had been transmitted to the Law School in a letter from the Managing Director dated October 4, 2017. The Committee also had before it the history of decisions made by the Committee with respect to the Law School since its last regular site evaluation visit; the history is attached to this document as an appendix.

FINDINGS OF FACT:

(1) At its September 2017 meeting, the Committee concluded that the Law School was not in compliance with Standard 501(b) and Interpretation 501-1.

(2) The Committee requested that the Law School submit a report with all relevant information necessary to demonstrate compliance with Standard 501(b) and Interpretation 501-1 to be considered at its March 2018 meeting. If the written report did not demonstrate compliance with the Standard, then, pursuant to Rule 14(a)(2), the Committee requested that the President and Dean of the Law School appear at a hearing before the Committee at its June 2018 meeting to determine whether to impose sanctions in connection with the Law School's non-compliance with the Standard.

(3) The Dean's Response, together with supplemental responses filed on March 7 and March 8, 2018, provided additional information about the outcome-based admissions formula that the Law School had developed. That process uses a regression analysis of the actual academic performance of 3,410 of the Law School's matriculants. The Law School reports that the correlation study and regression techniques used were the same as those used by the Law School Admissions Council (LSAC) in its validity studies. However, the Law School states that its study goes a step further by including in the study the eventual Law School performance of the students studied, not just their first-year performance. Further, the study includes all of the Law School's students, not just full-time students who matriculated in the fall, which the Law School states is the universe of students used in LSAC correlation studies.

(4) The Law School bases its admission decisions on the applicant's predicted law school GPA that results from applying the regression study formula to the applicant's LSAT and UGPA. Prior to the Committee's finding of noncompliance with Standard 501(b) and Interpretation 501-1, the Law School was admitting applicants whose predicted law school GPA was 2.20 or higher and inviting applicants with predicted law school GPAs between 2.0 and 2.19 to attend a one-week, intensive admissions qualifying program, called the "Professional Exploration Program" (PEP). Some students would be offered admission based on their performance in this program.

(5) In January 2018, following the Committee's September 2017 conclusion that the Law School was operating out of compliance with Standard 501(b) and Interpretation 501-1, the Law School changed its admissions policy and practices. It raised the minimum predicted law school GPA for regular admission, increased the predicted law school GPA needed for invitation

Page 2 of 4

Western Michigan University Thomas M. Cooley Law School

to its Professional Exploration Program, and imposed caps on the course loads that certain groups of applicants could take. The chart below explains the changes that were made in the wake of the Committee's decision.

Admission Year 2017		Beginning January 2018	
Predicted Law School GPA	Admission Action	Predicted Law School GPA	Admission Action
3.50 or Higher	Unrestricted Acceptance	3.50 or Higher	Unrestricted Acceptance
3.00 to 3.49	Unrestricted Acceptance	3.00 to 3.49	Unrestricted Acceptance
2.50 to 2.99	Unrestricted Acceptance	2.50 to 2.99	Unrestricted Acceptance
2.35-2.49	Presumptive Regular Admission, Individual Review	2.24 to 2.49	9-12 Credit Hour Limit
2.20-2.34	Presumptive 12-Credit Limit, Individual Review		
2.00-2.19	Professional Exploration Program	2.10 to 2.23	Professional Exploration Program
Less Than 2.0	Admission Denied	Less Than 2.10	Admission Denied

(6) The following chart includes actual academic success rates for 2009 through 2016 matriculants in each predicted GPA band under the revised admissions policy and process:

Academic Success of All Matriculants, Jan-09 through Sep-16, by Predicted GPA Band (January 2018)

Predicted GPA Band	# in Group	# Academic Success	% Academic Success	Admission Action, January 2018
3.50-4.00	91	91	100.0%	Unrestricted Acceptance
3.00-3.49	902	878	97.3%	Unrestricted Acceptance
2.50-2.99	4,181	3,694	88.4%	Unrestricted Acceptance
2.24-2.49	1,329	1,075	80.9%	9-12 Credit Hour Limit
2.10-2.23	177	118	66.7%	Professional Exploration Program
Less than 2.10	100	57	57.0%	Admission Denied
Total	6,780	5,913	87.2%	

(7) This and other data provided by the Law School shows substantially diminished chances of academic success and bar passage as the predicted law school GPA decreases, which would likely lead to unacceptable outcomes for students with predictors below the minimum level that the Law School has now established for admission. The academic success and bar pass rate of the student population that is admitted under the Law School's admission policy and practices as of January 2018 will be determined as those admitted under the higher standards progress through their education.

(8) Because Standard 501(b) concerns, among other things, whether matriculants appear capable of being admitted to the bar, the Law School was asked to provide information about its graduates' recent bar exam outcomes. The Law School submitted considerable data on the bar passage outcomes of its recent graduates based upon LSAT, UGPA, and the Law School's predictive law performance index. Further the Managing Director's Office has recently

Page 3 of 4

Western Michigan University Thomas M. Cooley Law School

released bar passage data for all law schools, including Western Michigan University Thomas M. Cooley Law School.

Most law schools establish compliance with Standard 316, concerning actual bar passage by graduates, by using the test for first-time bar passage provided in Standard 316(a)(2). The Law School was and remains unable to meet Standard 316 using this test as shown in the following table:

	WMU Cooley pass %	Weighted state pass %	Differential (in percentage points)	Percent grads reported
2017	45.95%	73.84%	-27.89	58.81%
2016	48.13%	72.60%	-24.47	68.37%
2015	51.86%	71.58%	-19.72	70.40%
2014	52.73%	72.35%	-19.62	71.05%
2013	51.45%	74.14%	-22.69	71.19%

Instead, the Law School was able to establish compliance with Standard 316 using the test for ultimate bar passage provided in Standard 316(a)(1) with data provided by the Law School showing an ultimate bar pass rate of 83 percent for exam years 2009 through 2016.

However, more recently, the ultimate bar pass rate of the Law School's calendar year 2015 graduates two years after graduation was reported by the Law School to be 69.75 percent, based on data from 629 of the Law School's 680 graduates for that year. Even if all 2015 graduates who were reported as not yet having sat for a bar exam (one graduate, 0.15 percent of the graduates) plus all graduates for whom the Law School had no information (51 graduates, 7.50 percent of the graduates) eventually took and passed the bar exam, the ultimate pass rate would rise to only 72.06 percent. That percentage would go up if some of the non-passers continued to retake the exam and passed, but it would go down if any of the "no information" or non-takers did not pass. Graduates who began their studies in 2015 were admitted under the Law School's prior admission standards and it will be important to determine what impact the January 2018 change in admission standards has on bar pass rates for students going forward.

Standards 316 and 501 are different standards, but there is a well-understood relationship between admissions practices and bar passage. The more recent bar passage data suggests the need for an ongoing review of the Law School's admissions practices and its academic and bar passage outcomes.

CONCLUSIONS:

(1) Pursuant to Rule 12(a)(1), and on the basis of the information provided by the Law School and the changes made to its admissions practices, the Committee concludes that the Law School has now demonstrated compliance with Standard 501(b) and Interpretation 501-1. [See Findings of Fact (3)-(6)].

(2) Notwithstanding Conclusion (1), the Committee has ongoing concerns about the Law School's continuing compliance with the Standards. [See Findings of Fact (7)-(8)].

Page 4 of 4

Western Michigan University Thomas M. Cooley Law School

(3) Pursuant to Rule 7, based upon the Committee's concerns about the Law School's continuing compliance with the Standards, the Committee requires further assessment of the impact of the Law School's January 2018 changes in the minimum predicted Law School GPA now required for admission.

(4) The Committee directs the President and Dean of the Western Michigan University Thomas M. Cooley Law School to submit a report by November 1, 2018, that provides the following information:

- (a) Information on the overall class size and the 75th/50th/25th percentile LSAT and UGPA for the entering classes of 2018; and with names redacted, provide the individual LSAT, UGPA, and predicted law school GPA under its index for those in the 25th percentile;
- (b) The cumulative non-transfer attrition rates as calculated for Interpretation 501-3 for the 1L classes of 2014, 2015, 2016, and 2017;
- (c) Updated bar pass data for first-time and repeat takers for the February 2016, July 2016, February 2017, and July 2017 bar exams;
- (d) For the entering 2017 class for which the prior Law School admissions policy was in force, provide updates to the following:
 - The number of students admitted with a predicted law school GPA below 2.2, and the academic attrition/success rate of those students.
 - The number of students admitted with a predicted law school GPA between 2.2-2.49, the academic attrition/success rate of those students.

(5) Pursuant to Rules 7 and 9, the Committee directs that a fact finder be appointed to visit the Law School during the 2018-2019 academic year to gather facts to allow the Committee to evaluate the impact that the changes in admissions policy have had on the Law School's ability to remain in compliance with Standard 501(a) and (b) and Interpretations 501-1, 501-2, and 501-3, and to evaluate the potential impact of these changes on the Law School's attrition and bar passage outcomes going forward.

(6) The Law School's pending major change application will be considered by the Committee at its June 28-30, 2018 meeting. The Law School is invited to submit by May 15, 2018, any necessary updates to its application for acquiescence in this major change.