



The State Bar of California

OPEN SESSION AGENDA ITEM 701 SEPTEMBER 2023

DATE: September 21, 2023

TO: Members, Board of Trustees

FROM: Donna S. Hershkowitz, Chief of Programs/Legislative Director
Aracely Montoya-Chico, Chief Financial Officer

SUBJECT: Approval of 2024 Admissions Fee Increases and Fee Setting Policy; Update on February 2024 Bar Exam Locations; Discussion of July 2024 Bar Exam Administration

EXECUTIVE SUMMARY

The Admissions Fund currently has a structural deficit and is not sufficiently solvent to support operations in 2024 and beyond. Staff proposes a combination of fee increases and cost reductions to balance out revenue and expenditures going forward and begin to build back a reserve. On August 10, 2023, the Board Executive Committee approved cost reductions by reducing sites for the February 2024 Bar Exam. This agenda item requests Board approval of the proposed fee increases related to exams and the study of law, special admissions programs, and fees charged to law schools which are estimated to produce an additional \$7.9 million in revenue annually. This agenda item also recommends that the Board adopt a policy that would result in more frequent review of Admissions fees and increases based on the Consumer Price Index in intervening years. Staff is currently evaluating the feasibility of further changes to the bar exam administration, and related cost savings, beginning with the July 2024 exam; staff anticipates returning to the Board in November 2023, or January 2024, to seek Board direction following completion of that exploration.

BACKGROUND

The cost of all expenses for Admissions' operations is paid from the Admissions Fund. The money in the Admissions Fund comes from the fees charged by the Office of Admissions to applicants for its programs and services. The Admissions Fund is not supported by the State Bar General Fund or the State General Fund. Over the last five years Admissions revenue has generally been decreasing; at the same time, expenditures have been increasing.

The Admissions Fund currently operates at a structural deficit. Current projections are that 2023 revenue will be approximately \$19.5 million (up \$2 million from budgeted projections) and expenditures approximately \$25.5 million, on target with budgeted expenditures. If the revenue and expenditure figures hold, at the end of 2023 the projected fund balance is estimated to be approximately \$6 million. Projected 2024 revenue totals \$17.5 million and expenditures \$25.9 million. The result in 2024, absent action to increase revenue and decrease expenditures, is a deficit of \$8.4 million—more than the funds available in the reserve. Drivers for the current budget deficit include the following: escalating facility, proctor, and software costs; increases in costs related to approved requests for testing accommodations; reductions in the overall number of applicants for various admissions programs; cost-of-living adjustments and merit increases for Admissions staff; and the failure to increase fees since 2016 or earlier for many admissions programs and services. The Admissions Fund had a healthy fund balance for several years, which it used for one-time costs such as the development and deployment of the Admissions Information Management System (AIMS) in 2018 and 2019 and a liberal refund policy for the bar exam during the pandemic. Ongoing costs have been covered by the fund balance for 2022 and 2023.

In May 2022, staff presented (for discussion only) a comprehensive proposal to increase admissions service fees. In January 2023, [staff highlighted](#) the condition of the Admissions Fund to both the Finance Committee and the Board. The expenses for each program were reevaluated, using the 2023 adopted budget and actual program activity recorded for 2022, to determine new break-even points. An updated analysis was presented to the Committee of Bar Examiners (CBE) at their January and March 2023 meetings in addition to the Committee of State Bar Accredited and Registered Schools in April 2023. In mid-April staff circulated a proposal for public comment, incorporating the feedback received from these subentities and the earlier input from the Finance Committee and the Board. On May 9, 2023, staff presented an [analysis](#) to the Finance Committee, followed by a [Board agenda item](#) 10 days later, describing each Admissions fee in detail and outlining the two options for increasing the fees: Option 1, referred to as the “break-even” option, proposed fee increases designed to cover the cost of expected expenditures; and Option 2 proposed more modest increases for fees affecting students and nonattorneys. Option 2 resulted in a continued projected operating deficit of \$4.5 million. Staff presented key themes from the public comments that were analyzed in advance of the Board meeting.¹ After discussion of the fund condition and the fee increases proposed, the Board directed staff to develop a third option to get closer to break-even than Option 2, but to make some reductions to the Option 1 proposals where the Option 1 increase would be especially significant.

In July 2023, staff circulated a revised proposal for public comment based on the direction from the Board. That is the proposal being presented today in this agenda item. Themes from both public comment opportunities are highlighted in the discussion section below.

¹ The public comment period closed the week of the Board meeting, so the last 200 comments or so were not reviewed in advance of the meeting.

DISCUSSION

Following the direction of the Board at the May Board meeting, staff revised the Admissions fee increase proposal to carry out the direction of adhering to the “break-even” proposal except where the increase proposed was particularly steep. The revised proposal, also reflecting the original options for comparison, is included as Attachment A.

At the July Board meeting, staff presented a discussion item related to bar exam administration cost reduction measures and pending Admissions fee increases. Trustees posed several questions regarding fee increases, and directed staff to provide responses to those questions when the fee increase proposal was brought forward for Board action. The questions and answers are provided below:

- Why does the fee proposal include reductions in the fee for Registered Military Spouse Attorneys (RMSAs) and Registered Legal Aid Attorneys (RLAAs)?
 - Goal 2 of the State Bar Strategic Plan is to “increase access to the legal system though improved access to legal advice and legal services.” One of the implementation steps to move the needle on that goal is to increase the number of attorneys admitted through special admissions programs. Operational plan activities to accomplish that include identifying factors contributing to the low number of RLAAs, conducting an outreach and education campaign to increase awareness of the RLAA and RMSA programs, and revising rules to eliminate unnecessary hurdles for all special admissions programs. Lowering fees for the RLAA and RMSA programs is consistent with those goals/steps. Furthermore, the number of RMSAs and RLAAs is quite small. With 7 and 46 participants respectively, increasing the fees to the same level as other special admissions fees will do little to help the Admissions budget.
- Explore “tiered pricing” for the fee increases for the annual reports for the California accredited law schools.
 - See Attachment B, setting forth three options for how to structure a tiered approach to annual report fees. Having considered several ways to create tiered costs based on the school’s enrollment numbers, staff is recommending that the Board select one of these options in lieu of the fee set forth in Attachment A.
- Compare the proposed fee amounts with the amounts assessed in other states.
 - See [Attachment C](#).
- To what extent did law school tuition increase from 2016 to 2022 (for ABA, California accredited (CALs), and unaccredited law schools); to what extent did tuition at the UCs and CSUs increase for the same period?
 - See Attachment D.
- Can we provide a reduced cost by “bundling” several of the fees for those who are subject to multiple fees?

- The vast majority of applicants for admission are subject to multiple fees. As such, it is not clear how a bundling approach would work. Further, the fee increase model was not developed with such a structure in mind, and if discounts were provided to some types of bundles, additional increases would be required for others, benefiting neither applicants nor the State Bar.
- Compare the cost of fees paid by law students up through and including sitting for the bar exam versus fees paid to the State Bar after becoming licensed.
 - The only regular fee paid to the State Bar by licensed California attorneys individually is the annual licensing fee, set for 2023 at \$510 for active licensees and \$97.40 for inactive licensees. From that amount, active or inactive licensees may opt out of up to \$47. Additionally, there are late fees and noncompliance fees for not timely paying the annual licensing fee or complying with the triennial Minimum Continuing Legal Education requirements or the new Client Trust Account reporting requirements.
 - Fees paid to the State Bar by law students include registering with the State Bar (\$119), an Application for the Determination of Moral Character (\$551), an application to sit for a bar exam (\$677, plus a laptop fee of \$153).
 - Law students who do not attend a traditional law school but participate in the Law Office Study Program pay a fee of \$158 at the commencement of their studies and \$105 with every semiannual report (8 reports required for completion of the program).
 - Students who are required to take the First-Year Law Students' Exam have an additional fee of \$624 plus a laptop fee of \$153)
 - Students may participate in the Practical Training of Law Students Program for which they are assessed a \$55 application fee.

PUBLIC COMMENT ON TWO ROUNDS OF FEE INCREASE PROPOSALS

First Public Comment

In mid-April to mid-May, the State Bar circulated for public comment the proposal that contained Option 1, the break-even approach, and Option 2, with more modest fee increases. The public comment opportunity was circulated to nearly 17,000 individuals including those who were scheduled to take the July 2023 bar exam or had taken a previous exam but had not passed. An email was also sent to all California law school deans and was included in the weekly emails sent to applicants for the July 2023 bar exam in the weeks leading up to the exam. At the end of the 30-day comment period, 493 comments were received, with one-quarter of the comments (126 individuals) expressing a preference for Option 2, 13 percent expressing a preference for Option 1, and the majority (61 percent) preferring neither option.

As noted in the May Board agenda item, key themes from the first round of public comment included:

- Concerns about the financial burden of fee increases on law students, recent graduates, marginalized, and low-income groups.
- Disagreement with passing the cost of the State Bar deficit onto prospective bar takers.

- Concerns about the impact of fee increases on diversity and inclusion in the legal profession.
- Calls for alternative measures to generate funds for the State Bar deficit.
- Suggestions for major changes to the design and administration of the bar exam and moral character determination process to eliminate the need for high fees.
- Concerns about lack of reciprocity with other states.
- Calls for more information about the cost breakdown of the State Bar admissions services and functions.

Round one public comments have been organized into a dashboard that can be viewed [here](#).

Second Public Comment

In July, the Bar circulated the revised proposal, which hewed more closely to Option 1, the break-even approach, than to Option 2. The revised proposal, as noted in the fiscal impact section, results in a continued projected operational deficit of \$500,000 if no offsetting cost reduction measures are taken and/or if the recent bump in revenue realized represents a one-time anomaly and not a trend. The public comment opportunity was again circulated to roughly 17,000 stakeholders; 266 individuals submitted comments, many commenting on more than one category of fee increase. As would be expected, and in light of the response to the first public comment, the public comment largely disagreed with the State Bar's proposal to increase fees. The themes identified in these comments, largely consistent with the first set of public comments, include:

- Existing fees are already too high and/or the increases are too substantial.
- The State Bar should find other ways to increase revenue or decrease expenditures. Suggestions included assessing fees on licensed attorneys, and changing how the bar exam is administered.
- Fees increases should be phased in over time.
- The State Bar should create fee waivers or a sliding scale so that the fees don't serve as a barrier to the profession for those on the lower end of the socioeconomic spectrum.
- Increases to fees should have an obvious benefit for students/applicant.
- Fees charged to the California-accredited law schools should be tied to enrollment so that if the fee is passed on to students, students at smaller schools are not disproportionately impacted.

Round two public comments have been organized into a dashboard that can be viewed [here](#).

Despite the negative public comment received during both rounds of public comment, the State Bar is faced with a significant structural deficit in the Admissions Fund which must be addressed to remain solvent. Additionally, in light of the condition of the State Bar's General Fund, there is no opportunity to staunch the bleeding with a loan from the General Fund. The costs of doing business have increased; fees have not. Under these conditions significant fee increases are not optional but reasonable and necessary to defray the State Bar's expenses relating to admission to practice law and the future viability of the State Bar's Admissions function.

REVISION TO CALIFORNIA RULES OF COURT

Two of the fees included in Attachment A—the fee to appear as counsel pro hac vice and the fee to appear as out-of-state attorney arbitration counsel—are set forth in California Rules of Court rules 9.41 and 9.43, respectively. As such, no increase may go into effect until the Supreme Court adopts changes to those rules. If the Board approves the proposed increases for these programs at this meeting, staff will bring an agenda item forward to the Board in November with a recommendation to transmit the rule changes for those two fees to the Supreme Court to implement the increases.

POLICY TO ADJUST FEES IN THE FUTURE

On May 9, 2023, the Finance Committee recommended, and staff adopted, an updated policy regarding the frequency of review for all General Fund program fees. Under the policy, all General Fund program fees the State Bar charges for services will be reviewed every three years and, in the intervening years, the fees will be adjusted by the Consumer Price Index (CPI), if legally permissible.

Staff proposes to extend this policy to all fee-for-service programs in the Admissions Fund, to ensure more timely review and necessary adjustments are made such that the fees charged cover the costs to administer the programs. In light of the continuing effort to increase efficiencies and decrease program costs, however, staff believes that annual adjustment of some fees by the CPI might be inappropriate. Staff therefore recommends that the policy permit the Board to decline to apply the annual CPI adjustment to specific fees upon a showing by staff that such an increase is unnecessary.

COST REDUCTION MEASURES AND EFFICIENCIES

February Bar Exam

At its meeting on August 10, 2023, the Board Executive Committee considered the staff proposal to reduce the number of test locations for the February 2024 bar exam as a cost reduction measure. The committee directed staff to further explore whether a San Diego test site could be identified to replace the Ontario Convention Center, and delegated to the Board chair and State Bar executive director the authority to make the final decision on whether to maintain the Ontario site or go with a San Diego site. The committee approved the remainder of the test sites proposed by staff. Following the committee meeting, staff revisited a variety of venues in the San Diego area to try and identify space that could accommodate 1500–1700 applicants in place of the Ontario location (which can seat 2,300).

To augment its own known list of San Diego venues, staff solicited feedback from former Trustee Knoll as well as several San Diego law school deans. After exploration of all identified sites, staff determined that there was no available San Diego location large enough to administer the bar exam and meet the State Bar’s security needs. The venues available could seat at most 500–700 test takers, which is not sufficient.

After reviewing this information the Board chair and executive director directed staff to proceed with contracting for the Ontario location. This reduction in the number of test locations for February represents a savings of nearly \$550,000 as compared to the amount budgeted.

Staff is also attempting to identify efficiencies in how the exam is administered which could result in additional savings related to the cost of proctors, shipping materials to and from bar exam locations, printing of materials, and similar administrative costs.

July Bar Exam

For the July 2024 exam, staff is exploring several options including transitioning the California portion of the exam to a remote modality, using professional testing centers, and further modifying the geographic locations and venues for physical test administration. The State Bar has explored developing its own multiple-choice exam to replace the multiple-choice Multistate Bar Exam (MBE) in the short-term (while an entirely new bar exam is being developed), but found that such an endeavor is cost prohibitive at this time. In the meantime, the State Bar is exploring its options in light of the requirement that the MBE be delivered in person and be administered by State Bar staff.

Staff is currently in the process of gathering information about each of these options, with a particular focus on cost and the experience for those applicants who are granted testing accommodations. Staff will provide the Board with an update on the July exam administration at its November meeting, to include an articulation of the issues identified to date with respect to each of these options as well as initial cost/benefit analyses. The Board will be asked to make a decision regarding July 2024 exam modality/configuration at its January 2024 meeting. Staff will place holds on a number of potential in-person exam sites until that time so as not to circumvent the Board's deliberative process.

First-Year Law Students' Exam (FYLSX)

In addition to efforts to reduce costs in the administration of the bar exam, staff is also looking for cost saving measures and efficiencies throughout the Office of Admissions. One of the more promising ideas, and one which could be implemented quickly, comes from a report the Committee of Bar Examiners discussed in August that suggested streamlining and simplification of the First-Year Law Students' Exam (FYLSX) would be feasible without impacting the exam's overall reliability and predictive validity. Such changes could simultaneously reduce the testing burden on students, speed up grading, allow the State Bar to offer the FYLSX more than twice per year, and help maintain our pool of graders for the bar exam. The committee will discuss this in more detail at an upcoming meeting and develop a recommendation for how to proceed.

FISCAL/PERSONNEL IMPACT

The total impact of the proposed increases would result in additional Admissions Fund revenue of \$7.9 million. Absent the reduction in testing venues for the February 2024 exam, these

proposed fee increases would not fully cover the cost of provision of the specified services; a shortfall of \$0.5 million would remain for 2024. The reduction in testing venues for the February 2024 exam is projected to save \$550,000. If the only change to the July administration were a similar reduction in testing locations, staff projects additional savings of \$700,000. Additionally, revenue projections for 2023 were based on observed trends over the last several years. As noted above, revenue is now expected to exceed projections for 2023 by \$2 million. Staff will monitor 2024 receipts closely to determine if the 2023 revenue bump represents a one-time occurrence or a change in the trend line. In the meantime, the additional revenue for 2023 will assist the office in maintaining/rebuilding its reserves.

AMENDMENTS TO RULES

None

AMENDMENTS TO BOARD OF TRUSTEES POLICY MANUAL

None

STRATEGIC PLAN GOALS & IMPLEMENTATION STEPS

Goal 2. Protect the Public by Enhancing Access to and Inclusion in the Legal System

- a. 1. Increase the number of attorneys admitted through special admissions programs.

Goal 2. Protect the Public by Enhancing Access to and Inclusion in the Legal System

- c. 5. Continue the Mindsets in Legal Education Initiative and evaluate the merits of expanding the program.

Goal 2. Protect the Public by Enhancing Access to and Inclusion in the Legal System

- c. 6. Conduct an equity and cost focused analysis of the impact of various options for administration of the bar exam on exam pass rates, including remote and open-book formats.

Goal 2. Protect the Public by Enhancing Access to and Inclusion in the Legal System

- c. 7. Provide implicit bias trainings for bar exam proctors and graders to reduce any potential bias.

Goal 2. Protect the Public by Enhancing Access to and Inclusion in the Legal System

- c. 8. Continue to diversify the exam development and grading pool.

RECOMMENDATIONS

Should the Board of Trustees concur in the proposed action, passage of the following resolution is recommended:

RESOLVED, that the Board of Trustees adopts the staff recommendation for increases to fees relating to law study and exams, special admissions and law school fees, as provided in Attachment A, except as set forth below and it is

FURTHER RESOLVED, that the Board of Trustees adopts Option ____, set forth in Attachment B, related to the fee increases for annual reporting for the California-accredited Law Schools; and it is

FURTHER RESOLVED, that the Board of Trustees, directs that the Admissions fees be reviewed every three years and, in the intervening years, the fees be adjusted by the Consumer Price Index (CPI), if legally permissible, unless staff demonstrates that application of the CPI adjustment to specific fees is unnecessary.

ATTACHMENTS LIST

- A. Revised Fee Increase Proposal
- B. Tiered Structure for Annual Report Fees Charged to CALS
- C. [State-by-State Comparison of Admissions Fees](#)
- D. Tuition and Fee Increases from 2016 to 2022

REVISED FEE PROPOSAL

ATTACHMENT A

Law Study and Exams

Program	Category	Current Fee	Last Increase	Proposed New Fee	% Increase	For Reference: Prior Option 1	For Reference: Prior Option 2
Registration	Student Registration	\$119	2016	\$150	26%	\$150	\$150
	Attorney Registration	\$214	2016	\$300	40%	\$300	\$250
Bar Exam	Student Application	\$677	2016	\$850	26%	\$878	\$745
	Attorney Application	\$983	2016	\$1,500	53%	\$1,500	\$1,200
	Test Center Change	\$15		\$60	300%	\$100	\$25
First-Year Law Students' Exam	Application	\$624	2016	\$850	36%	\$1,850	\$685
	FYLSX writer/laptop change	\$15	2016	\$50	233%	\$50	\$50
Moral Character Determination	Application (student/nonattorney)	\$551	2016	\$725	32%	\$795	\$575
	Application (attorney)	\$551	2016	\$850	54%	\$1,000	\$675
	Extension (student/nonattorney)	\$265	2016	\$290	9%	\$375	\$275
	Extension (attorney)	\$265	2016	\$400	51%	\$500	\$375
Practical Training of Law Students	Application	\$55	2015	\$60	9%	\$60	\$60
	Request to Change	\$25	2015	\$30	20%	\$30	\$30
Law Office Study	Notice of Intent	\$158	2016	\$880	457%	\$880	\$880
	Semiannual reports	\$ 105	2016	\$ 525	400%	\$ 525	\$ 525

REVISED FEE PROPOSAL

Attorney Special Admissions

Program	Category	Current Fee	Last Increase	Proposed New Fee	% Increase	For Reference: Prior Option 1	For Reference: Prior Option 2
Multijurisdictional Practice	Application for Registered In-House Counsel	\$635	2016	\$1,075	69%	\$1,075	\$1,075
	Application for Legal Aid Attorney	\$635	2016	\$500	-21%	\$500	\$500
	Application for Military Spouse Attorney	\$635	2019	\$500	-21%	\$500	\$500
Out of State Attorney Arbitration Counsel	Application	\$50	pre-2014	\$500	900%	\$500	\$500
Pro Hac Vice	Application	\$50	pre-2014	\$500	900%	\$500	\$500
Foreign Legal Consultants	Application	\$370	pre-2014	\$1,000	170%	\$1,000	\$1,000
	Renewal	\$497	pre-2014	\$600	21%	\$600	\$600
	Late Renewal	\$100	pre-2014	\$150	50%	\$150	\$150

REVISED FEE PROPOSAL

Fees Charged to Law Schools

Program	Category	Current Fee	Last Increase	Proposed New Fee	Average Per Student Impact of Increase*	For Reference: Prior Option 1	For Reference: Prior Option 2
California Accredited Law Schools	CALS Annual Report	\$2,170	2018	\$22,900	\$224	\$22,900	\$2,800
	CALS Inspection* (1/5 of 5 yr base)	\$4,400		\$8,000	\$39	\$8,000	\$6,000
Registered Unaccredited Law Schools	Annual A (max 19 students)	\$725	2018	\$5,000		\$6,000	\$1,000
	Annual B (max 199 students)	\$1,090		\$7,500	\$176	\$9,000	\$1,500
	Annual C (> 200 students)	\$1,445		\$10,000		\$12,000	\$2,000
	Inspection A (1/5 of 5 yr flat)	\$1,385		\$4,500		\$6,000	\$1,600
	Inspection B (1/5 of 5 yr flat)	\$1,800		\$6,000	\$117	\$7,000	\$2,200
	Inspection C (1/5 of 5 yr flat)	\$2,200		\$7,250		\$8,000	\$2,800
	* Professional Services (hourly)	\$275		\$350		\$350	\$350

* Based on data report by law schools in the 2022 Annual Report, submitted December 2022. Note: San Francisco Law School lost its accreditation in August 2023; it has since begun operating as an unaccredited school. Analysis of per student costs and anticipated revenue were calculated prior to SFLS's switch from CALS to unaccredited.

Tiered Structure for Annual Report Fees Charged to CALS

Tiered Fee Structure for CALS Annual Report

ATTACHMENT B

	School Enrollment	# of Schools	Current Fee	Proposed New Fee	Average Per Student Impact of Increase*	Projected Revenue**
Current Proposal	All	18	\$2,170	\$22,900	\$ 224	\$412,000
Tiered Structure Option 1						
Tier A	0–99	6		\$15,250	238*	
Tier B	100–299	6		\$22,875	135	
Tier C	300 or more	6		\$30,500	70	
Total Revenue						\$412,000
Tiered Structure Option 2						
Tier A	0–99	6		10,875	170*	
Tier B	100–299	6		21,750	128	
Tier C	300–499	4		32,625	93	
Tier D	500 or more	2		43,500	53	
Total Revenue						\$413,000

Tiered Structure for Annual Report Fees Charged to CALS

Tiered Structure Option 3

**All Schools Pay
\$90 per enrolled
student**

Total Revenue

\$413,000

*The per student calculation for Tier A schools excludes San Francisco Law School, which had significantly reduced its enrollment while on probation, and recently lost its accreditation.

** Projected revenues were calculated prior to SFLS' transition from a California accredited Law School to an unaccredited law school.

Tuition And Fee Increases from 2016 To 2022

ATTACHMENT D

School Type	2016 Avg Annual Tuition	2016 Avg Annual Fees	2022 Avg Annual Tuition	2022 Avg Annual Fees	Increase in Avg Annual Tuition	Increase in Avg Annual Fees	Increase in Avg Annual Tuition + Fees
ABA-approved Law Schools – Typically Requiring 3 Years							
ABA Schools	37,072	857*	41,461	1,653	12%	93%	16%
ABA Schools – CA Only	49,677	438*	56,916	1,084**	15%	106%	17%
CALS and Unaccredited Schools – Typically Requiring 4 Years***							
CALS	16,379	523****	18,686	1,017	14%	95%	17%
Unaccredited	6981	365****	8,005	515	15%	42%	16%
UCs and CSUs							
CSUs	5,472	1,409	5,742	1,748	5%	24%	9%
CSU professional schools	6,738	1,409	7,175	1,748	7%	24%	10%
UCs	11,160	12,294	11,928	13104	7%	7%	7%
US professional schools	11,160	12,294	11,700	12,852	5%	5%	5%

* Annual fees for ABA law schools not reported until 2019. 2019 numbers used in this column.

** Average is determined based on the number of schools reporting assessment of fees, not average of total number of ABA schools in California.

***CALs and Unaccredited Schools report the total cost to complete a JD. Whereas ABA law schools are three-year programs, CALs and unaccredited schools are typically four year programs. Total reported costs for CALs and unaccredited law schools were divided by 4 to arrive at the annual number. Excludes Northwestern California University School of Law, which with 2022 tuition and fees of approximately \$4,000 is an outlier among all the other CALs; excludes from the % change overtime schools that had a significant decrease in tuition due to reclassification from ABA to CALs or CALs to Unaccredited. Excludes 2018 fees for schools reporting incorrectly.

**** The State Bar did not maintain data about fees for 2016. The data reported on fees is for 2018.