

January 4, 2017

The Infilaw System
8625 Tamiami Trail North, Suite 500
Naples, FL 34108

Dear Mr. Inatome, President Ogene, and Dean Conison,

Charlotte School of Law had made numerous assurances to students following ABA probation and the loss of federal student loan eligibility. After corresponding with students and graduates, as well as a review of communications between the school and students, we have concluded that CSL should immediately provide additional information to students and the public.

At this point, CSL students cannot make informed decisions because CSL has not been sufficiently transparent. As such, Law School Transparency makes this urgent request for transparency that will help CSL students make the choice that is best for their personal career ambitions.

1. Infilaw must be transparent about any pending or reasonably foreseeable ABA sanctions at Florida Coastal. As CSL develops its plan for CSL students to transfer to Coastal, Infilaw must ensure that CSL students are fully informed about Coastal's compliance with ABA standards. Students need and deserve to know about the potential for similar problems to emerge at Coastal.

Infilaw should disclose any communications from the ABA that in any way indicate potential sanctions against Coastal, including fact-finding inquiries that the ABA may use to evaluate whether the school has sound admissions and retention policies and practices.

2. Infilaw should be transparent about communication with the U.S. Department of Education regarding Florida Coastal School of Law's continued participation in the federal student loan program. If Coastal has received notice from the ABA about non-compliance, it has not disclosed it to date. That could provide a basis for the ED to take similar action against Coastal.

Coastal might be a reasonable alternative for some CSL students, but it is not fair or ethical or consistent with the school's fiduciary duty to withhold this information from CSL students considering a transfer (or, for that matter, current Coastal students).

3. Infilaw should be transparent about its plans to facilitate transfers within the Infilaw System, including moving expense reimbursement, alternative class schedules, tuition discounts, and whatever else students need to ease the transfer. It is essential that administrators promptly develop and communicate a fair, simple, and transparent approach for students to file for reimbursement.
4. Charlotte School of Law should clarify whether it will permit and facilitate students who seek to visit another law school this semester. The question is whether CSL will approve visits, accept the credits towards CSL degree requirements, and waive degree requirements that cannot be met at the visiting school, such as the course on North Carolina distinctions.

The school has sent mixed messages to students about the possibility of visiting at another school. CSL should publish clear guidance on visits as soon as possible, and should do everything possible to facilitate visits for students who request them.

5. Charlotte School of Law should devote more resources to student service and administrative offices. Students report to us that they are still waiting on one or more of these items from CSL. Dean Fleury indicated in an email to a student that a team of five people is working through transfer packets for students. But time is of the essence, thus the school needs to devote even more resources so that inattentiveness does not prevent students from making informed choices about their futures.
6. Charlotte School of Law should clarify why it indicated that the school will submit a “teach-out” plan to the ABA in March. We understand that ABA accreditation rules require a teach-out plan for any school that loses access to the federal student loan program. However, Rule 34 also requires a teach-out if the school intends to cease operations. CSL has already informed students who had been planning to start this month that the “spring start” for which they had been admitted has been cancelled. With deadlines for transfer and visits looming, and nearby schools preparing to begin classes as early as tomorrow, CSL should clarify whether the school plans to cease operations in the near future, or if it is even considering such a step.

While we understand that the situation is fluid, and that the school’s plans may be contingent on a variety of factors that are outside of the school’s control, CSL must not let uncertainty prevent timely release of information. If in doubt, CSL should err on the side of full disclosure and immediately release any information that could conceivably affect its students’ decisions.

Sincerely,



Kyle McEntee
Executive Director



David Frakt
Chair, National Advisory Council