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Texas Higher Education Coordinating Board

The Feasibility of Accreditation for the University of North Texas at Dallas College of Law

A Report to the Texas Legislature

DRAFT

June 2010

Texas Higher Education Coordinating Board

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Table of Contents

Executive Summary 1

Overview 1

Purpose of Accreditation 2

Components of Accreditation 3

- **Organization and Administration** 3
- **Curriculum** 4
- **Assessment and Outcomes** 5
- **Admissions and Retention** 7
- **Financial Aid and Recruitment** 8
- **Faculty** 11
- **Library and Classroom Facilities** 13
- **Financial Resources** 16
- **Transfer of the College of Law to the University of North Texas at Dallas** 18

Coordinating Board Recommendations 20

Data Sources 22

Appendix A: Tuition and Fees of Texas Institutions for First Year Law Students 23

Appendix B: UNT-Dallas College of Law Estimated Revenue Based on $8M Special Item Funding 24

Appendix C: UNT-Dallas College of Law Estimated Expenditures Based on $8M Special Item Funding 25

Appendix B: UNT-Dallas College of Law Estimated Revenue Based on $5M Special Item Funding 26

Appendix C: UNT-Dallas College of Law Estimated Expenditures Based on $5M Special Item Funding 27

Appendix D: UNT-Dallas College of Law Estimated Revenue vs. Expenditures 28

Appendix E: UNT-Dallas College of Law Estimated Budget Comparison 29

I. Executive Summary

This study, mandated by Senate Bill 956 of the 81st Texas Legislature, is to assist the University of North Texas at Dallas College of Law in its bid to acquire accreditation from the American Bar Association (ABA). When the College of Law officially merges with the University of North Texas at Dallas in 2015, accreditation from the Southern Association of Colleges and Schools Commission on Colleges (SACS) comes into play as well. The scope of this report is to provide an objective analysis of the feasibility of accreditation, based upon the information provided to the Coordinating Board by the ABA, SACS, the University of North Texas System, and other independent sources.

The College of Law will face many challenges during the first few years: using limited start-up funds to the maximum advantage, anticipating the important issues related to both the short- and long-term housing of the law school, and being attentive to the critical timing of the merger with the University of North Texas at Dallas in Fall 2015. Financial and facility limitations may require reassessing immediate needs and alternate options for housing. If the University of North Texas at Dallas is still in SACS Candidacy status at the time of the merger, it could be in jeopardy of losing this status and may need to begin the entire accreditation process again to include the College of Law.

The stated mission of the College of Law is important for many reasons, including ABA accreditation. The ABA will evaluate faculty and library resources according to the academic emphasis and nature of the student population. If the College of Law concludes that its mission includes providing opportunities to urban or financially underprivileged applicants, then there may be problems to overcome with the inability to offer federal financial aid and night courses to its first two cohorts of students.

So long as the University of North Texas System and the Texas Legislature retain their financial commitment to the College of Law and it stays on track with its current timeline projections, it is our conclusion that full ABA accreditation is feasible for the College of Law, and SACS accreditation for the University of North Texas at Dallas should not be threatened by the merger.

II. Overview

On June 19, 2009, Governor Rick Perry signed into law Senate Bill 956 (companion House Bill 59), amending Section 105.502 of the Texas Statutes to establish a new College of Law in Dallas as part of the University of North Texas System. Dallas is currently the largest metropolitan area in the country without a public law school. While the Metroplex already has law programs at Southern Methodist University and Texas Wesleyan University, it was felt that these private institutions are financially prohibitive for many urban students, some of whom may already have careers and would need to take classes part-time or in the evenings.

Section A105.502(d) of the legislation directs the Texas Higher Education Coordinating Board to prepare a feasibility study to determine the actions the system must take to obtain accreditation of the law school. After working with the University of North Texas System to determine the steps that they are already taking toward accreditation, it was decided by Coordinating Board

staff that this report should not be intended to serve as a check-list for accreditation. That information is readily available from the American Bar Association (ABA) and the Southern Association of Colleges and Schools Commission on Colleges (SACS) in their own publications, in a more complete and authoritative form than we could produce here. Additionally, the University of North Texas System has hired its own outside consultant with extensive experience conducting site visits for the ABA. Professor Kenneth Randall, Dean of the University of Alabama School of Law, will be generating their agenda and timetable for ABA accreditation, and we see no need to duplicate that effort in this report.

What the Coordinating Board can do, and is directed to do by the legislative mandate, is assess the *feasibility* of accreditation. As a result, this report primarily addresses those aspects of ABA and SACS accreditation for which feasibility is a question because of time or available resources. It is important to note that just because some aspect of the accreditation process is not in this study does not mean that it is unimportant; it simply means that its feasibility is not in doubt. For example, SACS will require a "substantive change review fee" of $300 when the University of North Texas at Dallas College of Law merges with the University of North Texas at Dallas. While it is essential for full accreditation, this step is not covered in this report since it is easily feasible for the University of North Texas System to fill out the requisite paperwork, meet the deadline, and pay the fee.

This report addresses ABA accreditation and the corresponding SACS accreditation components. ABA accreditation is required for the University of North Texas at Dallas College of Law in order for its graduates to sit for the Texas bar exam. SACS accreditation, however, is not required for the College of Law to grant degrees. Once the College of Law merges with the University of North Texas at Dallas, the University projects to have attained full SACS accreditation. This report therefore addresses SACS accreditation only where the merger of the College of Law with the University of North Texas at Dallas presents accreditation feasibility issues for either institution.

For each subsection of this report, there will be three elements: a definition of the ABA standard, a definition of the SACS standard where applicable, and an evaluation of feasibility.

III. Purpose of Accreditation

Accreditation represents a primary means for recognition of educational quality, for development of a common core of standards, and to ensure improvement of institutional effectiveness. With accreditation, certain advantages are available to the institution, faculty and students. For the institution and its faculty, accreditation conveys a sense of trust and public confidence with the establishment and improvement of a common set of academic standards.

More specific to this case, ABA accreditation is necessary for law school students to sit for the required bar exam. The Texas Board of Law Examiners stipulates that candidates must have satisfied the requirements of graduation for a J.D. or equivalent degree from an approved law school. The Texas Supreme Court rules (TGC 82.024 Law Study Requirements, Eligibility for Examination), Rule I (3), define an approved law school as "a law school approved by the American Bar Association."

Accreditation is also required for an institution's students to be eligible for Title IV federal funding. The institution must be accredited (or pre-accredited) by an agency recognized by the U.S. Department of Education. The American Bar Association, a specialized accrediting agency, has been recognized as a "reliable authority as to the quality of postsecondary education" according to the Higher Education Act of 1965.

For the ABA to maintain this recognition by the U.S. Department of Education, an important stipulation is included: Only free-standing law schools may use accreditation by this agency to establish eligibility to participate in Title IV programs. The University of North Texas at Dallas College of Law meets the definition of a free-standing institution as it is not part of a larger college recognized by another accrediting agency. Therefore, from the time of provisional accreditation until the transition to the University of North Texas at Dallas in Fall 2015, the College of Law may use the ABA recognition as a specialized accrediting agency to qualify its students for federal financial aid. After the merger, the College of Law will be considered a professional school within the then SACS-accredited University of North Texas at Dallas, so its ABA designation will no longer be needed for Title IV funding.

IV. Components of Accreditation

A. Organization and Administration

1. ABA Standard

According to the ABA, if a College of Law is not part of a larger university, it should have a governing board. The ABA also stipulates that the dean is the chief executive of the College of Law. The dean may or may not be on the governing board, but if so, the dean cannot be the chair of the board. The dean and the faculty, not the governing board, are to create the College of Law's policies on promotion, tenure, hiring, and curriculum.

2. SACS Standard

The University of North Texas at Dallas should continue to meet SACS Core Requirement 2.2 (Governing Board) and Comprehensive Standard 3.2 (Governance and Administration). The Core Requirement calls for the institution to convene a governing board of at least five members with legal authority over the institution. Both components outline the board's academic and financial responsibilities, its policy-making and financial planning powers, and its final authority over all matters regarding the institution.

3. Feasibility

The University of North Texas at Dallas College of Law, as a stand-alone institution within the University of North Texas System, will use the existing nine-member University of North Texas Board of Regents as its governing board. After the transfer to the University of North Texas at Dallas, the College of Law will continue to operate under the authority of the University of North Texas Board of Regents. This consistency of administrative structure should be sufficient for ABA requirements.

Since the College of Law is not pursuing SACS accreditation as a stand-alone institution, the SACS requirements for a governing board will not apply until the time of the merger with the University of North Texas at Dallas. After the merger, no action will be necessary on this SACS standard since the College of Law will be a part of the by-then-SACS-accredited University of North Texas at Dallas.

B. Curriculum

1. ABA Standard

The ABA lists many details for the exact content of the curriculum and the required opportunities for writing and argumentation. Most importantly, the curriculum is to include substantial instruction in the history, structure, values, rules, and responsibilities of the legal profession and its members. Model Rules of Professional Conduct approved by the ABA should serve as the guide. To ensure that the curriculum continues to prepare students for a changing profession, the College of Law should engage in a periodic review.

The ABA allows for non-traditional aspects of a curriculum. The program should include student opportunities for pro bono work. It may also include other non-law related volunteer programs. These opportunities may or may not count for academic credit. If the College of Law offers evening or weekend programs, as it plans to do when access to facilities permits, the ABA requires that the benefits and opportunities for students enrolled in one option "shall be deemed reasonably comparable to the opportunities of students enrolled under other options." Distance education offerings are allowed so long as the courses are approved as part of the school's regular curriculum approval process, there is ample interaction with the instructor and other students both inside and outside the structure of the course, and there is sufficient monitoring of student effort and accomplishment. Students cannot take more than four credit hours of distance education in any one term and not more than 12 credit hours toward the full J.D. degree, and students cannot begin to take any distance education courses until they have completed 28 credit hours of classroom instruction.

No degree higher than the J.D. degree can be offered until the school is fully accredited, and then only after ABA grants additional review and approval. The minimum time for a J.D. degree is defined as 58,000 minutes (by Texas standards, 64 SCH or approximately 21 courses), 45,000 of which (by Texas standards, 50 SCH or approximately 17 courses) must be in attendance in scheduled classes at the College of Law. Additional requirements for minimum/maximum credit hours, the academic calendar, and credit for different types of assignments and clinical experiences are defined in the ABA *Standards and Rules of Procedure*.

2. SACS Standard

The SACS Commission does not outline specific course content requirements, only a general structure for graduate and professional programs. SACS Comprehensive Standards 3.6.2 (Graduate Curriculum) summarizes the structure of the graduate curriculum to include knowledge of the literature of the discipline, ongoing student engagement in research, and appropriate professional practice and training experiences. The minimum requirement for a professional-level degree is 30 semester credit hours, according to Core Requirement 2.7.1

(Program Length). Additionally, Core Requirements 2.7.2 (Program Content) and 2.7.4 (Coursework for Degrees) outline general curricular requirements for course and program content and method of instruction for all coursework. These requirements focus on administrative issues rather than content issues. Federal Requirements 4.2 (Program Curriculum) and 4.4 (Program Length) comprise the general standards of programs that are deemed appropriate and directly related to the purpose and goals of the institution.

For the merger, the prospectus should assure the SACS Commission that courses offered through the College of Law detail learning objectives and specific outcomes. The main focus of the SACS Commission, in regards to curriculum, is to maintain the quality and rigor of the accredited institution through evaluation and oversight.

3. Feasibility

Presuming the institution complies with both the ABA and SACS Commission deadlines and outlined curricular requirements, the Coordinating Board does not foresee any problems with this component of the accreditation process. So long as the College of Law provides SACS with the requested program descriptions and other necessary components, then the ABA curricular standards should suffice for SACS purposes.

C. Assessment and Outcomes

1. ABA Standard

The ABA evaluates the rigor of the program by assessing the first-time bar pass rates of graduates. There are three ways to document compliance: 1) The total number of first-time bar passers over the last five years is at least 75 percent; 2) for at least two of the years between provisional and full accreditation, 75 percent of the graduates pass the bar on the first try; or 3) for at least three of the last five years, the first-time bar pass rate is not more than 15 percentage points below the average rate of graduates from ABA-approved law schools in the same jurisdictions. (These figures assume that at least 70 percent of the University of North Texas at Dallas College of Law graduates will take the bar exam in Texas; otherwise, weighted averages apply that include the pass rates for other states.)

2. SACS Standard

The specific requirements for program outcomes and learning objectives—Core Requirement 2.5 (Institutional Effectiveness) and Comprehensive Standard 3.3 (Institutional Effectiveness) —are outlined in the *Principles of Accreditation* and clarified in the SACS substantive change prospectus. The SACS Commission regards outcome assessment as a systematic process within the strategic plan of the institution, not just a venture for reaccreditation.

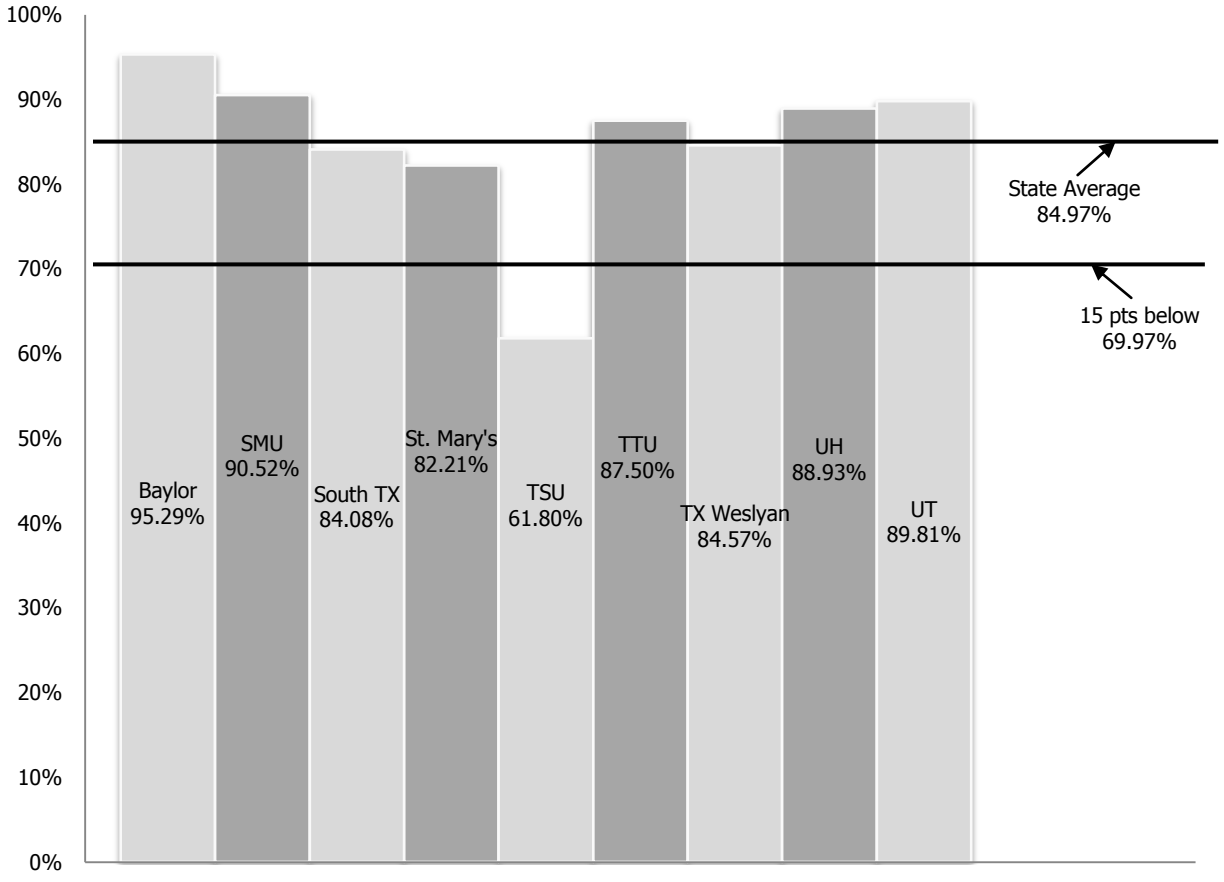
To that end, the College of Law should develop and determine its planning and evaluation processes, educational goals and outcomes, the procedure and timeline for attainment of these educational goals, and a method for program evaluation. The substantive change prospectus indicates that the University of North Texas at Dallas will need to "describe how the institution

assesses overall institutional effectiveness as well as the means used to monitor and ensure the quality of the degree program."

3. Feasibility

The ABA standard for academic outcomes is generous, so it is not likely that this will be a problem for the College of Law. The overall pass rate for all ABA-approved Texas institutions from 2005 to 2009 is 87 percent, meaning that the minimum threshold for the University of North Texas at Dallas College of Law would be only 72 percent for three of its first five years. Nevertheless, as a provisionally accredited law school without an established reputation, the University of North Texas at Dallas College of Law may have difficulty attracting highly qualified student applicants during its first five years. Based upon the performance of the first two graduating cohorts, the College of Law may need to stay flexible about redirecting resources toward student academic support, retention, and recruitment efforts in order to meet the minimum first-time bar passage rates required by the ABA.

Average First-Time Examinee Pass Rate in Texas, July 2005-July 2009



Source: Texas Board of Law Examiners

SACS may require additional methods of assessment measurement beyond bar exam pass rates. The College of Law should align its process for monitoring and evaluating programs (both academic and financial) with the assessment plans of the University of North Texas at Dallas. Additionally, before the merger, the University of North Texas at Dallas should determine how the College of Law can be integrated into the university's strategic plan and mission statement along with the other units of the institution.

For SACS, as long as the College of Law aligns the assessment process in accordance with those of the University of North Texas at Dallas, Coordinating Board staff do not foresee any problems with this component of the accreditation process.

D. Admissions and Retention

1. ABA Standard

The ABA recognizes that law school, particularly the first year, is especially demanding on students. A law school seeking accreditation should therefore provide sufficient academic support necessary to assure each student a satisfactory opportunity to complete the program. The ABA considers a first-time bar exam pass rate of 75 percent to be acceptable.

Accredited schools cannot deny candidates on the basis of race, color, religion, national origin, gender, sexual orientation, age, or disability. Furthermore, the ABA requires that accredited institutions demonstrate "concrete action" toward having a faculty, staff, and student body that are representative of diverse gender, race, and ethnic groups.

2. SACS Standard

The SACS Commission does not outline specific admission requirements. However, the College of Law should outline specific admission requirements for entrance into its program.

To assist in achieving retention goals, the University of North Texas at Dallas should continue to meet Core Requirement 2.10 (Student Support Services). A list and description of the readily available services should be provided to the SACS Commission.

3. Feasibility

Since the ABA requires "sufficient academic support," a formal support program with faculty advisors and perhaps additional personnel. The involvement of faculty will create a culture of student-centered support that reaches out and assists the underrepresented population targeted for admission. This goal for academic support may be strongly advisable for a new school, especially one like the University of North Texas at Dallas College of Law that explicitly targets an urban or financially underprivileged applicant pool. For the purposes of both ABA and SACS accreditation, attention should be paid to the accessibility and convenience of the operating hours and locations of academic support in order to promote retention, particularly for the underrepresented groups that may be targeted by the institution. The prospectus on the merger between the two institutions will need to indicate the impact on student services at both locations.

The mission of the University of North Texas at Dallas College of Law—combined with the ABA stipulation that accredited schools cannot deny candidates on the basis of race, national origin, etc.—will mean that the College of Law will have to set up a clear and careful policy on admissions. According to the ABA, a law school may use race and ethnicity in admissions to promote equal opportunity and diversity: "The commitment to providing full educational opportunities for members of underrepresented groups typically includes a special concern for determining the potential of these applicants through the admission process, special recruitment efforts, and programs that assist in meeting the academic and financial needs of many of these students and that create a more favorable environment for students from underrepresented groups." The admission policies of the College of Law will need to be compared to the admission policies of the University of North Texas at Dallas prior to the merger, and if there are differences, these should be justified to SACS.

E. Financial Aid and Recruitment

1. ABA Standards

The ABA considers student loan default rates as part of the accreditation process. To address the problem, the ABA recommends that schools should include debt counseling at the inception of a student's loan obligations and prior to graduation.

2. SACS Standards

SACS guidelines promote integrity and responsibility in advertising, student recruitment, and representation of accreditation status. As with ABA accreditation, schools should provide evidence of efforts to encourage diversity in such areas as race, ethnicity, region, denomination, or gender. Student loan default rates also are a factor in the accreditation process.

3. Feasibility

While it may not be directly related to the ABA provisional accreditation, the College of Law may face special recruitment challenges in its first two years of operation. The U.S. Department of Education Title IV financial aid guidelines prohibit students from taking out federal loans to attend unaccredited schools. Provisional accreditation from the ABA or Candidacy status from SACS meets the Title IV requirements, but neither of these would be available until two years after the College of Law admits students (classes are projected to begin in August 2012; provisional accreditation is expected in Summer 2015). In the absence of federal loans, ABA-required debt counseling will be particularly important as students are likely to be seeking out higher-interest private sector loans.

Loans are of vital importance to law students. According to 2008 data from the Association of American Law Schools, the nationwide median debt incurred for a public law school education was $54,509, and it has no doubt gone up considerably since then. The average cost of tuition and fees at public law schools in Texas in 2009-2010 is $19,479 per year.[1] Estimated living expenses in the Dallas area are approaching another $13,000. To use The University of Texas

[1] See Appendix A for further details.

at Austin as an example, 77 percent of the students in the School of Law in 2008-09 had loans. Students with grants or scholarships made up 54 percent, so many of the students with grants took out loans as well. Only 1 percent of students took out loans with private lenders, and the rest acquired federally sponsored loans.

A large majority of students choose to take out federal loans rather than private loans due to the lower long-term expense, fixed interest rates, and flexibility with pay-back options. The exact cost of loans depends upon many factors, but below is a sample comparison of federal and private loans based upon interest rates researched on January 4, 2010:

	Stafford/ Direct Loan	**Private Loan**
Maximum loan amount	$20,500	None
Interest rate	6.8%	8.25%*
Average TX public law school tuition and fees per year	$19,479	$19,479
Loan Amount	$20,500	$20,500
Typical repayment period	15 years	15 years
Monthly payment	$ 181.89	$ 198.88
Total cost of loan**	**$ 32,754.91**	**$ 35,797.97**

*On 1/4/2010 this varied from 6.25% to 10.5%, but an average of a representative sample of lenders appeared to be 8.25%. Many of the interest rates are flexible and increase once students leave the deferment period, so initial rates lower than the 6.8% of Stafford loans will most likely average out to be around 8.25% across the life of the loan.

**Totals are calculated by multiplying the loan amount by the interest rate and incorporating the interest payments into a constant monthly payment with a standard amortization calculator.

The difference between the Stafford/Direct loan and the private loan is therefore estimated to be $3,043. If, like at UT-Austin, 77 percent of the 75 first-year students at the University of North Texas at Dallas College of Law take out private loans (58 students),[2] this would be a total cost burden of $176,494 to the first cohort ($3,043 x 58) in the first year. During the second year, the first cohort would probably incur an additional $20,500 loan. During this same year, the second cohort of the same class size would acquire their first loan of $20,500. Therefore, three years' worth of $20,500 loans would be incurred by approximately 116 students. The table below compares the total costs incurred by the first cohort for two years, and the second cohort for one year, with and without federally funded loans.

[2] It is likely that the percentage of students requiring loans to attend the University of North Texas at Dallas College of Law will be higher than 77 percent, given the urban and underrepresented population that may be targeted by the institution.

FIRST COHORT	**Stafford/Direct Loan**	**Private Loan**
Maximum loan amount	$20,500 x 2 years	None
Interest rate	6.8%	8.25%*
Average TX public law school tuition and fees per year	$19,479 x 2 years	$19,479 x 2 years
Loan Amount	$20,500 x 2 years	$20,500 x 2 years
Typical repayment period	15 years	15 years
Monthly payment	$363.95	$397.76
Total cost of loan**	**$65,511.13**	**$71,595.93**

SECOND COHORT	**Stafford/Direct Loan**	**Private Loan**
Maximum loan amount	$20,500	None
Interest rate	6.8%	8.25%*
Average TX public law school tuition and fees per year	$19,479	$19,479
Loan Amount	$20,500	$20,500
Typical repayment period	15 years	15 years
Monthly payment	$181.89	$198.88
Total cost of loan**	**$32,754.91**	**$35,797.97**

Combined Loan Costs	**$98,266.04**	**$107,393.90**

*On 1/4/2010 this varied from 6.25% to 10.5%, but an average of a representative sample of lenders appeared to be 8.25%. Many of the interest rates are flexible and increase once students leave the deferment period, so initial rates lower than the 6.8% of Stafford loans will most likely average out to be around 8.25% across the life of the loan.

**Totals are calculated by multiplying the loan amount by the interest rate and incorporating the interest payments into a constant monthly payment with a standard amortization calculator.

During the first two years of classes at the University of North Texas at Dallas College of Law, students may not have access to either federal or private loans. Many private banks use the same loan qualification standards as the federal government and will not grant loans to students who are attending unaccredited institutions.

There are therefore several options that the University of North Texas System might consider in order to make recruitment of highly qualified candidates more feasible in the absence of access to federal loans. One option would be to establish a relationship with one or more local lenders, guaranteeing funding to qualified students to attend the University of North Texas at Dallas College of Law while it is still without provisional accreditation, with similar terms to that of the federal loans (fixed rates, deferment periods, etc.). A second option would be for the University of North Texas System to fund students directly with loans comparable to the Stafford/Direct loan fixed interest rate of 6.8%. A third option would be for the University of North Texas

System to offer financing or grants to students for the difference between private loans and federal loans for at least 116 students (77 percent of the 150 students), which is estimated to be approximately $1,058,835. If all 150 students were to take out loans of $20,500 during the three years, the cost difference would be $1,369,183.

While it would be possible to have students eligible for federal financial aid if the College of Law had SACS Candidacy status, this is not a reasonably feasible option. Many factors would make this option ill-advised as the SACS application process is lengthy, complex, and costly. According to SACS personnel and the *Accreditation Procedures for Applicant Institutions*, an applicant should receive Candidacy status within twelve to eighteen months after submission of the application. The timeline to receive Candidacy status is quite tight and unlikely to be complete before Fall 2012 for the first cohort of students needing federal aid. The financial responsibilities for the College of Law would begin with the SACS $12,500 application and Candidacy fees, annual dues (based on enrollment and general expenditures), and the acquisition of specialized personnel to guide the application process. An institution processing two major accreditation applications simultaneously would put an undue burden on both the personnel and financial resources of the newly emerging institution. Finally, a similar process (and just as costly and complex) would be required only a couple of years later upon the merger with the University of North Texas at Dallas. At this time, the University of North Texas System is not planning to begin the full SACS application process for the College of Law, and the Coordinating Board agrees that this is the best approach.

F. Faculty

1. ABA Standards

The ratio of full-time faculty to full-time students should be less than 30:1.[3] The ratio of 20:1 is ideal. Accreditors will take into consideration a variety of factors relating to teaching resources when approving ratios between 20:1 and 30:1.

Full-time faculty should teach a majority of the coursework, including substantially all of the first one-third of each student's courses. It is expected that the College of Law will employ adjunct faculty, and the College should provide them with orientation, guidance, monitoring, and evaluation. The College of Law should periodically evaluate the extent to which faculty provide effective teaching and perform their other duties.[4]

The College of Law should set standards for tenure. It should also provide job benefits for full-time adjuncts that resemble the benefits of tenure-track faculty.

2. SACS Standard

Comprehensive Standard 3.7 (Faculty) recommendations include faculty competence, development opportunities, role in governance, and the safeguarding of academic freedom. Core Requirement 2.8 (Faculty) assures the quality and integrity of the academic programs

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[3] "Full-time student" is defined in the American Bar Association, *Standards and Rules of Procedure for Approval of Law Schools 2008-2009*, 32-33.

[4] See Interpretation 403-2 for a list of ABA-recommended methods of professional development in teaching effectiveness.

upon selecting faculty for the institution. Also, the number of full-time faculty members should be adequate to support the mission of the College of Law and UNT at Dallas. Similar to the ABA, the SACS Commission encourages an institution to employ academically qualified and experienced faculty. Primary consideration should be given to those with terminal degrees in the discipline. In the case of the law program, the Juris Doctorate is appropriate.

In consideration of the merger, the prospectus should provide a narrative with supporting evidence that the number of full-time faculty members is adequate to support the program. The prospectus should include the faculty roster, which itemizes each faculty member's academic qualifications, applicable experiences, and courses taught. Additionally, the prospectus should describe the impact on current University of North Texas at Dallas faculty. If the College of Law intends to offer distance education courses during the first year, the prospectus should describe the processes for ensuring that students have structured access to faculty. Finally, the prospectus should document faculty experience in directing student research for this professional-level degree program.

3. Feasibility

As the College of Law builds the faculty roster to meet the demands of the potential student enrollment, officials should not only keep within ABA accreditation standards, but also compare ratios with those of comparable emerging law schools across the state and nation. With a four-year average ratio of 17.29 students to one full-time equivalent (FTE) faculty member, the University of North Texas at Dallas College of Law will exceed the national average of 14.71:1. In Texas, the average is somewhat higher with a student/faculty ratio of 16.44:1. Sixteen institutions that have achieved ABA accreditation in the last 20 years have an average student/faculty ratio of 16.56:1. Using these ratios as guidelines for estimating faculty needs, the Coordinating Board suggests that the College of Law re-examine the faculty needs to increase the number of faculty in year three and four to be closer to national and state student/faculty ratios. The following chart compares the College of Law's faculty projections and the Coordinating Board's suggestion based approximately on the average of the state and new institution ratios (16.5:1). As the first three years will require faculty to advise, fundraise, and develop the curriculum, the proposed student/faculty ratio does not have to be achieved until reaching the projected student enrollment capacity in Fall 2013.

The table below identifies the projected student/faculty ratios from the University of North Texas College of Law, contrasted with the Coordinating Board recommendations for bringing the ratio in line with state averages.

	Year 1 (FY12)	**Year 2 (FY13)**	**Year 3 (FY 14)**	**Year 4 (FY15)**	**Year 5 (FY16)**
Student FTE	0	75	150	225	300
UNT - Faculty	5	5	9	12	16
Student/Faculty Ratio	NA	15.00	16.67	18.75	18.75
THECB Recommendations- Faculty	5	5	9	14	18
Student/Faculty Ratio	NA	15.00	16.67	16.07	16.67

G. Library and Classroom Facilities

1. ABA Standards

The ABA states that when a law school is not part of a university, it should "seek to provide its students and faculty with the benefits that usually result from a university connection" by including general works in the library collection and developing working relationships with other institutions of higher education. If a stand-alone law school is in a shared or leased space, it needs to be under the total control and exclusive use of the law school.

The ABA has the obvious requirements that the facility should provide enough classroom space for reasonable scheduling of all classes, space for professional skills programs and moot courts, office space for all full-time faculty and adequate space for adjuncts to have student conferences, storage for records and equipment, space for staff, areas for co-curricular activities, and space for group study.

There should be sufficient technology for the current program into the immediate future, including technology support staff and their space, plus funds for technology upgrades.

The library takes particular prominence in ABA requirements. The law library should have sufficient financial resources to support the school's teaching, scholarship, research, and service. The library collection should have core and essential materials, plus enough materials to satisfy the demands of the curriculum and the teaching/research/service interests of the faculty. The materials should be in a variety of formats.[5]

The library administration should be autonomous enough to direct the development of the library and control use of the resources. The director of the library and the dean are responsible for personnel, services, and collection development. One of the library director's duties is to create a written plan, periodically updated, for the development of the collection.

2. SACS Standards

With the incorporation of the College of Law and its library, the University of North Texas at Dallas should continue to meet Core Requirement 2.9 (Learning Resources and Services), Core Requirement 2.11.2 (Physical Resources) and Comprehensive Standard 3.8 (Library and Other Learning Resources). These standards outline the requirements for providing a sufficient number of qualified staff and available physical and learning resources to support all its educational, research, and public service programs.

The substantive change prospectus should include a description of the library and information resources, including staffing and services specific to the law program. The prospectus should include descriptions of how students and faculty will access information from the College of Law's electronic resources, how faculty and students will train for online resources, and what staffing and services will be available to students and faculty.

[5] See Interpretation 606-5 for the ABA's list of what is considered to be core collection materials.

The prospectus should also include a description of the physical facilities and equipment that will be used by the College of Law. The prospectus should document the facility's adequacy, including general sufficiency, size, fireproof quality, and present state of repair or construction. SACS also considers the impact that the merger will have on existing programs and services for both locations.

3. Feasibility

Prior to the transition to the University of North Texas at Dallas, the College of Law students and staff may not have access to all of the "benefits that usually result from a university connection," as the ABA requires. A memoradum of understanding may need to be drawn up between the College of Law and the University of North Texas at Dallas (and perhaps also the University of North Texas at Denton) about access to various university resources. The city bus service between the College of Law site and the main University of North Texas at Dallas campus, as well as the shuttle service between downtown Dallas and the flagship campus at Denton, may be of interest to ABA accreditors.

Location

The University of North Texas at Dallas College of Law has complex plans for its physical location. For at least the first four years, it will be located on the fourth through sixth floors of the existing University of North Texas System Building. Pending the passage of a tuition revenue bond of around $50 million during the 2011 legislative session, the College of Law plans to move as early as 2016 into the nearby Dallas Municipal Building as its permanent site. The Municipal Building will offer many advantages, but it will require extensive renovations.

The feasibility of ABA accreditation while the College of Law is operating from the University of North Texas System Building is fairly certain. The law school will eventually have exclusive use of the spacious fourth through sixth floors. The fourth floor is ready for immediate occupancy, except for the evenings when night classes are offered by other institutions. This will prevent the law school from offering evening classes until construction on the sixth floor is complete, unless alternative space is found. There are 12,000 square feet of classroom and moot court space ready on the fourth floor, but the fifth and sixth floors are bare and will need to be fully renovated. The fifth floor is intended for the library and the sixth floor for faculty offices, administration, and meeting space. Once the sixth floor is completed, there will be 24,000 square feet available for faculty and instruction. The ABA does not specify exact space requirements other than "reasonable" or "sufficient," but 24,000 square feet exceeds Coordinating Board recommendations of 16,219 square feet for the projected number of students (225), faculty and Dean (13), staff (11), and support services space (9 percent).

The construction costs of remodeling the University of North Texas System Building are estimated to be $20 million, with the costs borne by the University of North Texas System. (The system will continue to use the site for other purposes when and if the College of Law moves to the Municipal Building location.) If the University of North Texas System Building site is renovated as planned, there will be adequate space for classrooms, offices, conference rooms, storage, and all the other purposes specified by the ABA.

The Dallas Municipal Building offers unique challenges and opportunities for the College of Law. It is the site of Lee Harvey Oswald's assassination, and it contains the prison cells and interrogation rooms where both Oswald and Jack Ruby were held. The building is a Recorded Texas Historical Landmark, and the Texas Historical Commission requires that these rooms, and other parts of the building of historical interest from the building's founding in 1914, be preserved. There will therefore be restrictions for the College of Law on the useable square feet of the building and special concerns for public access and security. It should be noted, however, that the imposing façade and the historical significance of the building, in addition to its location at the top of a new downtown park, will make the College of Law a very prominent part of Dallas life and culture. It may be a sound investment in the long-term prestige of the College of Law and of the University of North Texas at Dallas in general.

The move to the Dallas Municipal Building will have an effect on the curriculum, student enrollments, faculty hiring, and many other aspects of the College. As sole occupants of the building, the College of Law will be able to offer weekend and night classes to part-time and/or financially underprivileged applicants. This should allow for an enrollment increase from 225 to 300 projected full-time enrolled students. Faculty, staff, and support services would increase accordingly.

The viability of moving into the Dallas Municipal Building as a permanent site for the College of Law is difficult to estimate. It depends upon many variables that cannot be quantitatively measured: the likelihood of the Texas Legislature approving a $50 million tuition revenue bond taking effect in 2016, the City of Dallas following through with its promise to donate $16 million for renovations to the exterior, the schedule and skills of architects and contractors, the Texas Historical Commission placing restrictions on the useable space for the College of Law, unforeseen delays in construction, the amount of donations and private funding, and the possibility that the City of Dallas may find another occupant for the building if the College of Law has to wait for the 2013 legislative session in order to get sufficient funding granted.

What is known for certain, however, is that the State is projecting a significant budget shortfall for the 2011-12 biennium, the building is in very poor condition requiring major infrastructure repairs, the historical interest of the building will dictate unusual and expensive challenges for the designers, and the projected timeline for a 2016 move-in date seems ambitious if the projected TRB funding does not arrive until that same year.

Library

The library, occupying all of the fifth floor of the University of North Texas System Building, would have 12,000 square feet and is projected to have 50,000 volumes as well as full technology support. In comparison, the number of volumes in law libraries of institutions accredited in the last decade range from 26,267 at Charleston School of Law (provisional accreditation in 2008) to 354,300 volumes at Florida A&M University College of Law (accredited in 2004). The average number of volumes for this group of most recent ABA accredited and provisionally accredited institutions is almost 225,000 volumes. The University of North Texas at Dallas College of Law's projected number of volumes, by comparison, seems low. However, with the rapid changes in access to and presentation of information, such comparisons can be misleading.

Since 2006, ABA has given provisional approval to both the Charleston School of Law and the Charlotte School of Law. Charleston's Sol Blatt Jr. Law Library's primary goal is to allow access to resources 24 hours a day, 7 days a week. To accomplish this, most of its resources are in electronic formats. Their library contains only 26,267 volumes/volume equivalents. The Charlotte School of Law's library boasts the "largest, most comprehensive law collection in western North Carolina" with 110,000 volumes. Both institutions, with different goals and accessibility to information, have achieved ABA provisional accreditation within two years of one another. Therefore, the number of volumes projected for the University of North Texas at Dallas College of Law's library appears to be within the acceptable range for the ABA.

For estimated start-up costs of a law library, staff contacted law librarians at newly established programs around the nation. The Phoenix School of Law, a private institution in Arizona, opened its doors in January 2005 and received provisional accreditation status from the ABA in 2007. Christy Ryan, interim director of the Information Resources Center, provided staff with expenditures for establishing their new law library. During the first three years of operation, available funds for the library increased exponentially: $217,733 in FY 2005; $603,545 in FY 2006; and $2,429,569 in FY2007 (not including facilities and networking). With these resources, the library boasts an (almost) complete core collection of 107,142 volumes and a fully staffed program.

The American Association of Law Libraries and several peers recommended Gordon Russell for his perspective on building a primarily electronic law library. According to Dean Russell, Director of the Law Library at the Duncan School of Law at Lincoln Memorial University in Knoxville, Tennessee, the mission statement of the law school is the primary determining factor in building a law library. He strongly recommends that the law librarian review the mission of the law school to determine the research needs and hour availability for both the students and the faculty before building the library's collection.

University of North Texas College of Law
Library Budget (Excluding Personnel)

	Year 0 (FY11)	**Year 1 (FY12)**	**Year 2 (FY13)**	**Year 3 (FY 14)**	**Year 4 (FY15)**	**Year 5 (FY16)**
Library Acquisitions	$1,500,009	$0	$500,000	$1,100,000	$1,400,000	$1,600,000
Library Equipment	$499,991	$2,000,000	$0	$0	$0	$0
TOTAL	**$2,000,000**	**$2,000,000**	**$500,000**	**$1,100,000**	**$1,400,000**	**$1,600,000**

H. Financial Resources

1. ABA Standards

The resources generated by the College of Law (including tuition and fees, gifts, research grants, endowment funds) should stay within the College of Law to maintain and enhance its program. After the merger with the University of North Texas at Dallas, the university should provide the College of Law with a satisfactory explanation for the use of any College of Law funds for central university services or other non-College of Law activities.

2. SACS Standards

Understandably, the SACS Commission takes great interest in the continued financial stability of the accredited institution upon merging with an unaccredited institution. As part of the University of North Texas at Dallas Candidacy request, the institution will need to provide the Commission with a financial history demonstrating financial stability, profile information of financial health, audits of financial aid appropriations, and proof of appropriate control over all its financial resources (including research and externally funded programs).

For the substantive change merger prospectus, the University of North Texas at Dallas and the College of Law should provide a business plan outlining the merger's effect on maintaining the financial stability of the University of North Texas at Dallas. The plan should include a description of financial resources to support the merger, including a budget for the first year of transition. Supporting information should outline the operational, management, and physical resources available for the merger. Additional documentation for confirming continued financial support and stability should include projected revenues and expenditures and the amount of resources going to other entities for contractual or support services.

3. Feasibility

The financial stability of the College of Law is likely to meet ABA and SACS accreditation standards so long as the University of North Texas System and the Texas Legislature follow through with continued commitments of support. Sufficient special-item funding from the Texas Legislature will be necessary for the school to reach accreditation on schedule. The University of North Texas System submitted two budgets to the Coordinating Board: one with a $5 million special item funding request for each of the next two biennia, and one with an $8.2 million special item funding request for each of the next two biennia. The difference of $3,200,000 between the two proposed budgets is taken out of equipment costs, so unless the equipment is taken from crucial student or faculty support, either budget will be sufficient to support ABA accreditation.

If enrollments fall far behind projections for the first five years, the shortfall in tuition and formula funding revenues may also affect the financial feasibility of accreditation. In this unlikely circumstance, however, proportional cuts would presumably be made to student services and faculty hiring.

Tuition and donations generated by the College of Law are designated to stay in the College, not going to the University of North Texas System or the University of North Texas at Dallas, as recommended by the ABA. Upon the merger, the University of North Texas at Dallas should provide the ABA and SACS with evidence of its financial stability, and that the long-term financial strength of either institution will not be adversely affected by the incorporation of the College of Law.

I. Transfer of the College of Law to the University of North Texas at Dallas

Senate Bill 956 of the 81st Legislature established the University of North Texas at Dallas College of Law to operate as a professional school within the University of North Texas System, and it shall become a professional school of the University of North Texas at Dallas once the university has operated as an academic teaching institution for five years. Beginning in Fall 2010, the University of North Texas at Dallas will be recognized as a stand-alone institution, independent of the University of North Texas at Denton. Following the requirements of Senate Bill 956, therefore, the College of Law will become a professional school within the University of North Texas at Dallas in Fall 2015.

Due to this significant change in status, both the ABA and SACS require notification. The SACS Commission will require the University of North Texas at Dallas to submit a prospectus for substantive change.

1. ABA Standards

The transfer of the College of Law to the University of North Texas at Dallas would meet the ABA's definition of a "major change" ("merging or affiliating with one or more universities"), and the College of Law will need to notify the ABA in advance of the merger.[6] A change of this scale could potentially trigger a new accreditation review on the basis of the College of Law now being an entirely new law school. This is determined by whether the major change would significantly affect the finances, governance, faculty, curriculum, or physical facilities of the law school.

2. SACS Standards

At the time of the merger in Fall 2015, the University of North Texas at Dallas is projected to be fully accredited by SACS. As SACS accredits an entire institution and its programs and services, wherever they are located or however they are delivered, any "significant modification or expansion to [an accredited institution's] nature or scope" requires evaluation. Additionally, SACS follows federal regulations outlined by the Department of Education by defining the scope of the substantive change. Any substantive change made to an institution between decennial reviews requires the SACS Commission to determine whether or not the quality of the institution still meets the defined standards of an accredited institution. To continue compliance with the accrediting agency, officials at the University of North Texas at Dallas should anticipate and complete the prospectus for a substantive change with SACS informing the organization of its intent to incorporate the College of Law.

The responsibility for SACS compliance belongs to the University of North Texas at Dallas. At least six months before the designated date of merger, the liaison should write to the President of SACS informing the accrediting agency of the merger and anticipated merger date. With the assistance of faculty and administration of the College of Law, the University of North Texas at Dallas will need to submit their substantive change prospectus six weeks before the biannual meeting of the Board of Trustees. The prospectus and accompanying documents should

[6] The ABA *Standards of Rules of Procedure for Approval of Law Schools 2008-2009* does not specify a particular time frame for advance notification of a major change, so the College of Law will need to clarify this with their ABA accreditors at the time of the site visit.

describe how the University of North Texas at Dallas plans to continue meeting the *Principles of Accreditation*: *Foundation for Quality Enhancement* while implementing the merger.

The entire accreditation and reaccreditation process of an institution is considered a method of self-assessment. Through the substantive change prospectus, both the University of North Texas at Dallas and the College of Law will assess components regarding faculty, library and learning resources, physical resources, and financial support. Primary evaluation will be in regards to the institution's assessment of overall institutional effectiveness and the development of an improvement plan.

3. Feasibility

It is not likely that the ABA will consider the College of Law to be a substantially new law school after the merger with the University of North Texas at Dallas, thereby starting the accreditation process over from the beginning. The governing structure under the University of North Texas Board of Regents will remain unchanged, the finances of the school are unlikely to suffer, there are no projected changes in the curriculum, and the faculty will remain consistent. Even the name will not have to change: the institution will continue to be referred to as "The University of North Texas at Dallas College of Law." Nevertheless, the documentation for this important change will need to be handled carefully, and clear communication with the ABA will be essential from the time of the provisional accreditation.

The only point of concern regarding the accreditation documentation component is regarding the SACS application timeline. The University of North Texas System should take into consideration the SACS accreditation status of the University of North Texas at Dallas well in advance of the transfer of power. According to the estimated timeline presented to staff by the University of North Texas at Dallas, the SACS accreditation process should be complete by December 2013. Additional information supplied by the University of North Texas at Dallas explains any variance from this date:

> If all elements of the process were to fall into place more quickly than is usual, separate accreditation could possibly be achieved in June 2012. Conversely, delays at any point in the process could extend separate accreditation to as late as June 2013. Potential reasons for delay include the logistics of scheduling the on-site visit (selection of members, coordination of travel); the number and kind of partially compliant or non-compliant findings cited by the on-site committee, to which the institution would have to respond; and other procedural factors over which the institution has little control.

All dates presented are well in advance of the College of Law's transfer of power; therefore, the University of North Texas at Dallas will not be risking its accreditation status.

If, for some unforeseen reason, full accreditation is delayed beyond the June 2013 estimate, the University of North Texas at Dallas still needs to have full SACS accreditation in advance of the merger with the College of Law. The *SACS Commission Accreditation Procedures* clearly states that "if an institution implements a substantive change during its Candidacy period, the status of Candidacy may be revoked at the discretion of the Commission." The ABA accreditation for the College of Law could be affected in this circumstance as well, although the

ABA *Standards and Rules of Procedure for Approval of Law Schools 2008-2009* does not specifically address the question of merging with an unaccredited institution.

V. Coordinating Board Recommendations

Coordinating Board staff have found that full accreditation from both the ABA and SACS is realistic within the projected timeframe and budget provided by the University of North Texas System. We suggest, however, that the system keep these recommendations in mind to assure a trouble-free accreditation process:

- The College of Law may find it necessary to assist its first and second cohort of students with financing since federal financial aid is unavailable for students attending schools without at least provisional accreditation. One option would be to establish a relationship with one or more local lenders, guaranteeing funding with similar terms to that of the federal loans. A second option would be for the University of North Texas System to fund students directly with loans comparable to the Stafford loan fixed interest rate of 6.8%. A third option would be for the University of North Texas System to offer financing or grants to students for the difference between private loans and federal loans.

- The recruitment and admissions policies, library planning, and faculty hiring need to be aligned carefully with the mission of the College of Law. Several aspects of ABA and SACS accreditation take into consideration the attainment of goals and the allocation of resources as they are appropriate to the institution's mission. If the College of Law sees itself as primarily a teaching institution with an emphasis on professional training, it will be evaluated differently than if it sees itself as a research institution with an emphasis on a broader application of law to multiple disciplines and professions. The mission of the College of Law will need to be consistent with the mission of the University of North Texas at Dallas at the time of the merger.

- If the College of Law concludes that its mission includes providing opportunities to urban or financially underprivileged applicants, it should evaluate the impact of its initial inability to offer night courses. Options for distance learning in appropriate courses may help reach the target student population.

- Before and throughout the planning phase for the renovations of the Dallas Municipal Building, the College of Law will need to consult with the ABA in advance of the construction to ensure that the available square feet and the allocation of space is sufficient for the long-term projections of students and faculty. The College of Law will also need to make sure that the library space, educational resources, and facilities will meet ABA standards before moving it from the University of North Texas System Building.

- The University of North Texas System will need to have a backup plan for the permanent site in case the $50 million tuition revenue bond (TRB) is not approved during the 2015 legislative session (or in case it is approved for substantially less than $50 million). If there are significant delays in the TRB funding, it is possible that the City

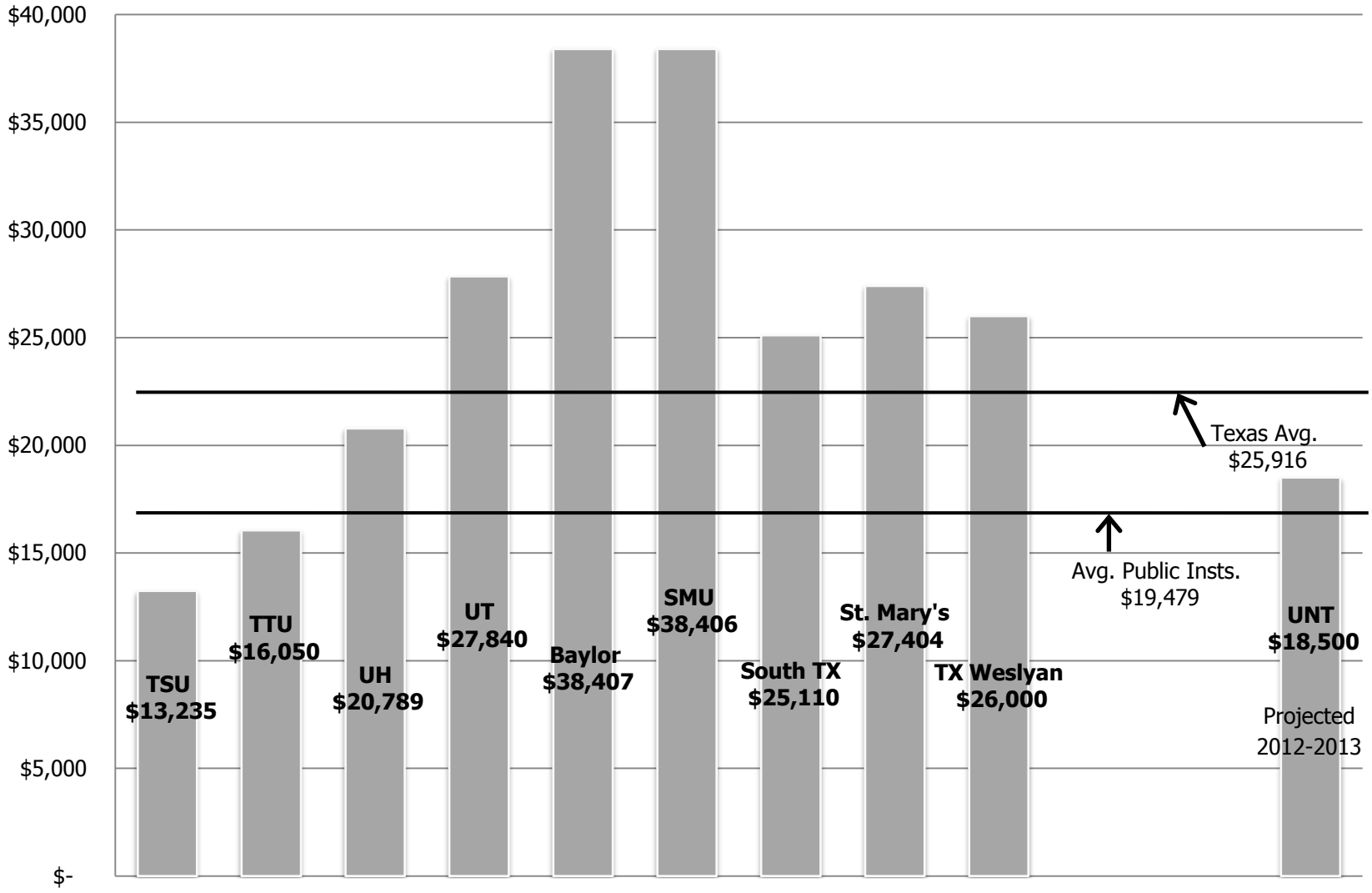
of Dallas could allow another bidder to move into the Municipal Building site. Long-range planning by the University of North Texas System should include the possibility that the College of Law will remain in its initial site inside the University of North Texas System Building.

Data Sources

Data and information included in this report came from the following sources:

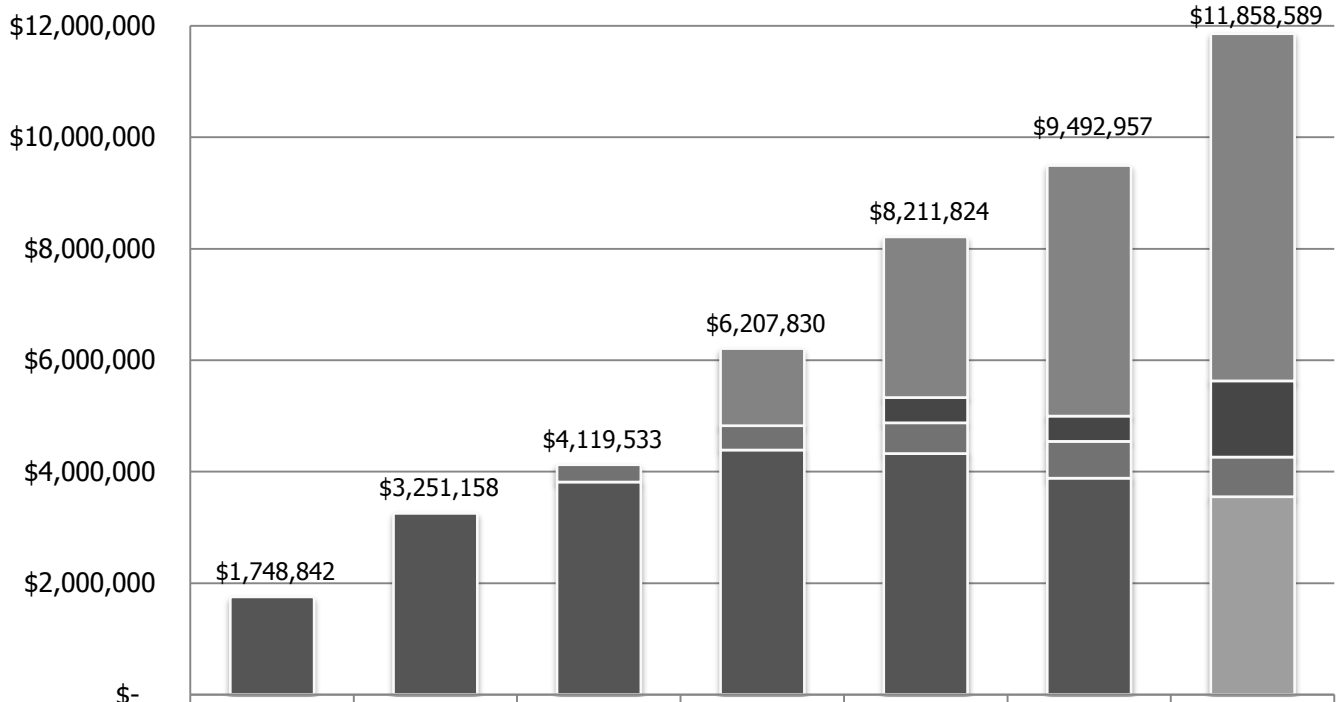
American Bar Association
Standards and Rules of Procedure for Approval of Law Schools, 2008-2009.
Baylor University
Charleston School of Law
Charlotte School of Law
Law School Admission Council
Official Guide to ABA-Approved Law Schools, 2010.
St. Mary's University
South Texas College of Law
Southern Association of Colleges and Schools Commission on Colleges
Substantive Change for Accredited Institutions of the Commission of Colleges, 2009.
The Principles of Accreditation: Foundations for Quality Enhancement, 2009.
Southern Methodist University
The University of Texas at Austin
Texas Board of Law Examiners
Texas Southern University
Texas Tech University
Texas Wesleyan University
Texas Higher Education Coordinating Board
U.S. Department of Education
Database of Accredited Postsecondary Institutions and Programs
Financial Aid for Postsecondary Students – Accreditations & Participation
University of Houston
University of North Texas
University of North Texas at Dallas
University of North Texas System
Wells-Fargo Bank, N.A.

Appendix A: Tuition and Fees of Texas Institutions for First-Year Law Students



Source: Institutional websites approximation of tuition and fees for 2009-2010. UNT data provided by the UNT System for 2012-2013.

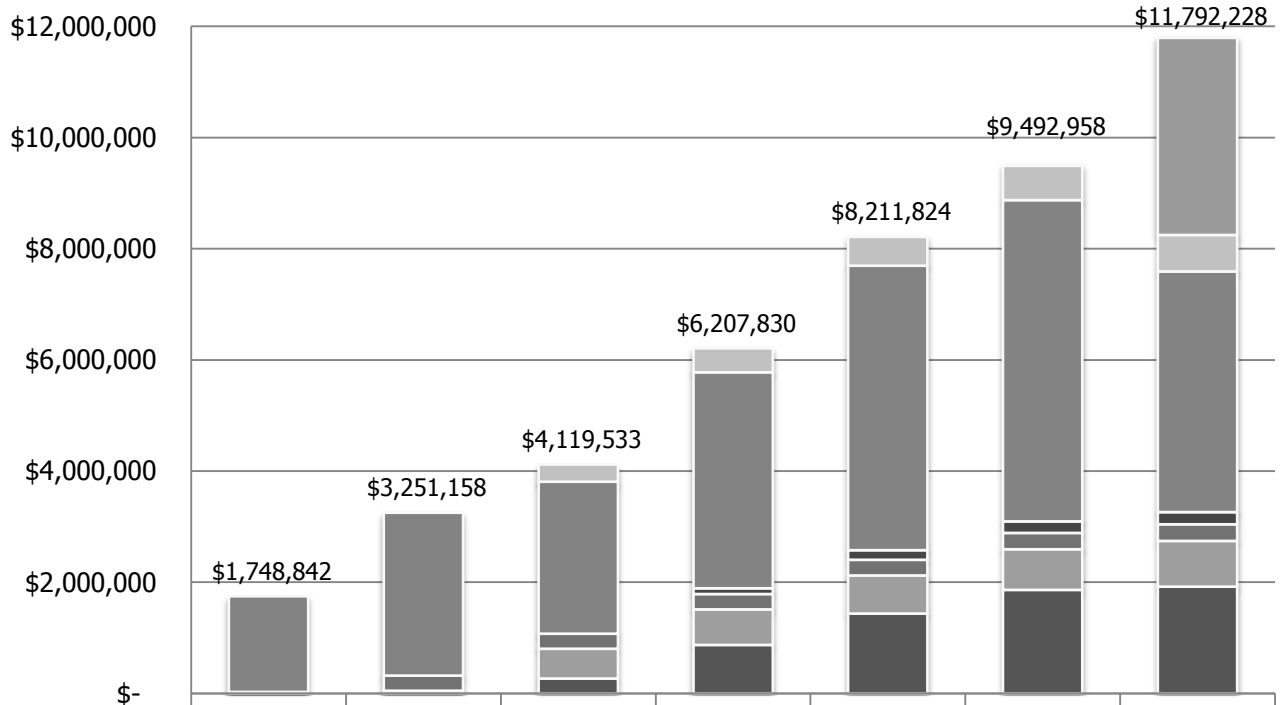
Appendix B: UNT-Dallas College of Law Estimated Revenue Based on $8.2M Special Item Funding



	FY10	FY11	FY12	FY13	FY14	FY15	FY16
TOTAL REVENUE	$1,748,842	$3,251,158	$4,119,533	$6,207,830	$8,211,824	$9,492,957	$11,858,589
Tuition & Fees	$-	$-	$-	$1,387,463	$2,883,510	$4,496,513	$6,234,930
Infrastructure/Operations	$-	$-	$-	$-	$454,501	$454,501	$1,363,504
State Portion of Proportional Benefits	$-	$-	$307,223	$432,677	$552,439	$663,317	$712,377
TRB Funding*	$-	$-	$-	$-	$-	$-	$3,547,778
Special Item Funding*	$1,748,842	$3,251,158	$3,812,310	$4,387,690	$4,321,374	$3,878,626	$-

* TRB Funding and Special Item Funding dependant on Legislative appropriations in FY 2012-13 and FY 2014-15.
Source: University of North Texas System

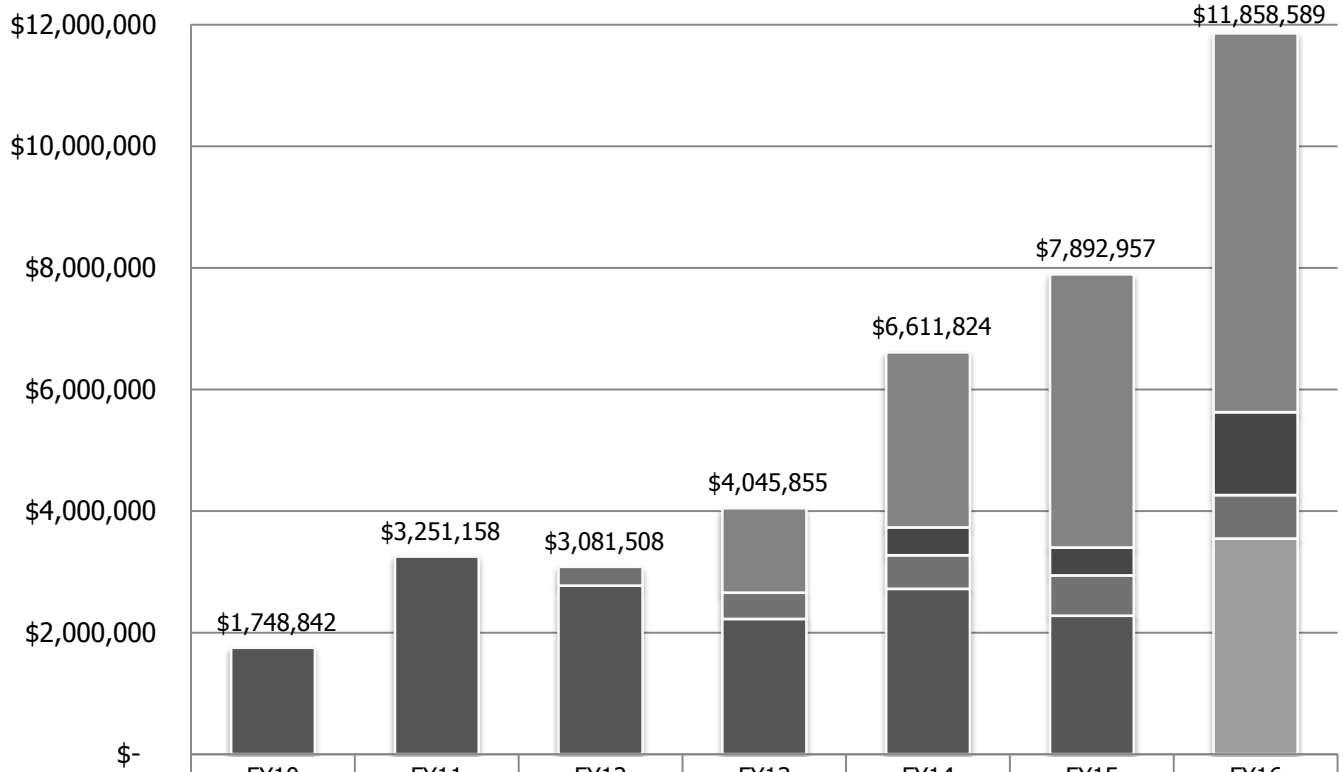
Appendix C: UNT-Dallas College of Law Estimated Expenditures Based on $8.2M Special Item Funding



	FY10	FY11	FY12	FY13	FY14	FY15	FY16
TOTAL EXPENDITURES	$1,748,842	$3,251,158	$4,119,533	$6,207,830	$8,211,824	$9,492,958	$11,792,228
TRB Debt Service	$-	$-	$-	$-	$-	$-	$3,547,778
State Funded Direct Benefits	$-	$-	$307,223	$432,677	$515,611	$619,098	$652,248
Operating Costs†	$1,718,009	$2,931,158	$2,736,976	$3,882,094	$5,118,038	$5,778,226	$4,330,812
Institutional Portion of Proportional Benefits	$-	$-	$-	$102,323	$171,870	$206,366	$217,416
Dean	$22,500	$270,000	$270,000	$275,400	$283,662	$292,172	$300,937
Admin/Staff/Library Salaries	$8,333	$50,000	$537,000	$642,000	$686,840	$732,577	$821,228
Faculty Salaries	$-	$-	$268,334	$873,336	$1,435,803	$1,864,519	$1,921,809

† Operating Costs include need-based aid, building expenses, library acquisitions, equipments & construction, and general operation and maintenance.
Source: University of North Texas System.

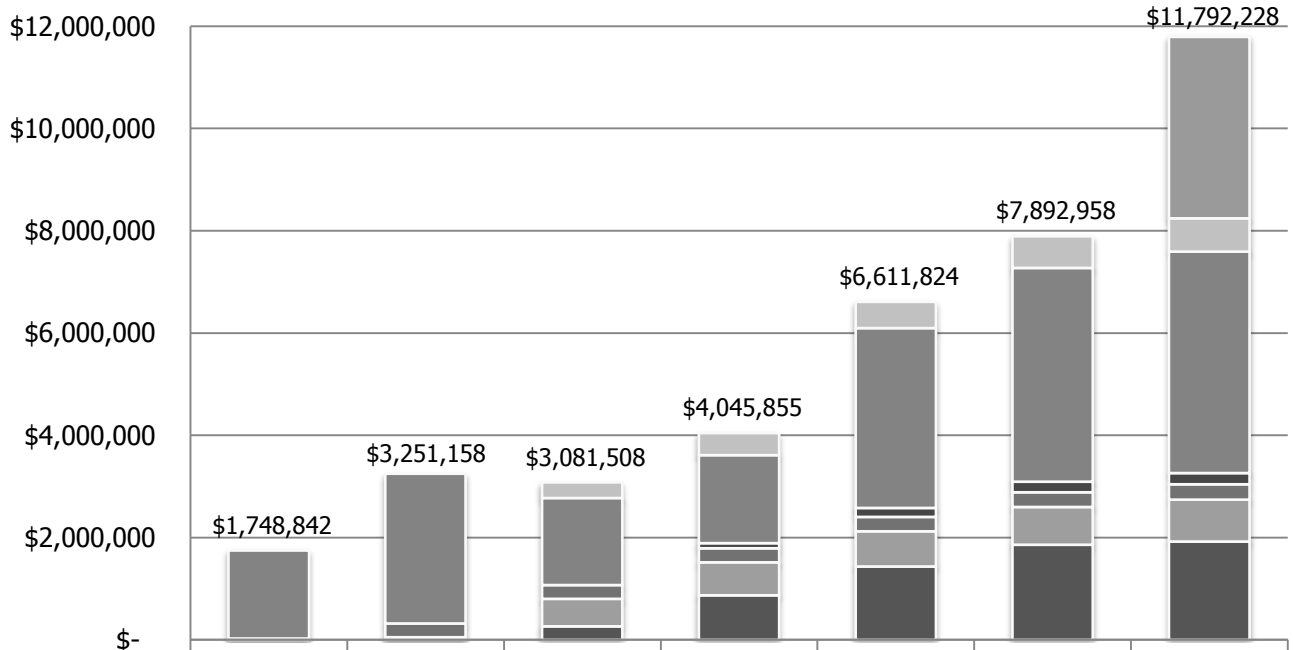
Appendix D: UNT-Dallas College of Law Estimated Revenue Based on $5M Special Item Funding



	FY10	FY11	FY12	FY13	FY14	FY15	FY16
TOTAL REVENUE	$1,748,842	$3,251,158	$3,081,508	$4,045,855	$6,611,824	$7,892,957	$11,858,589
Tuition & Fees	$-	$-	$-	$1,387,463	$2,883,510	$4,496,513	$6,234,930
Infrastructure/Operations	$-	$-	$-	$-	$454,501	$454,501	$1,363,504
State Portion of Proportional Benefits	$-	$-	$307,223	$432,677	$552,439	$663,317	$712,377
TRB Funding*	$-	$-	$-	$-	$-	$-	$3,547,778
Special Item Funding*	$1,748,842	$3,251,158	$2,774,285	$2,225,715	$2,721,374	$2,278,626	$-

* TRB Funding and Special Item Funding dependant on Legislative appropriations in FY 2012-13 and FY 2014-15.
Source: University of North Texas System

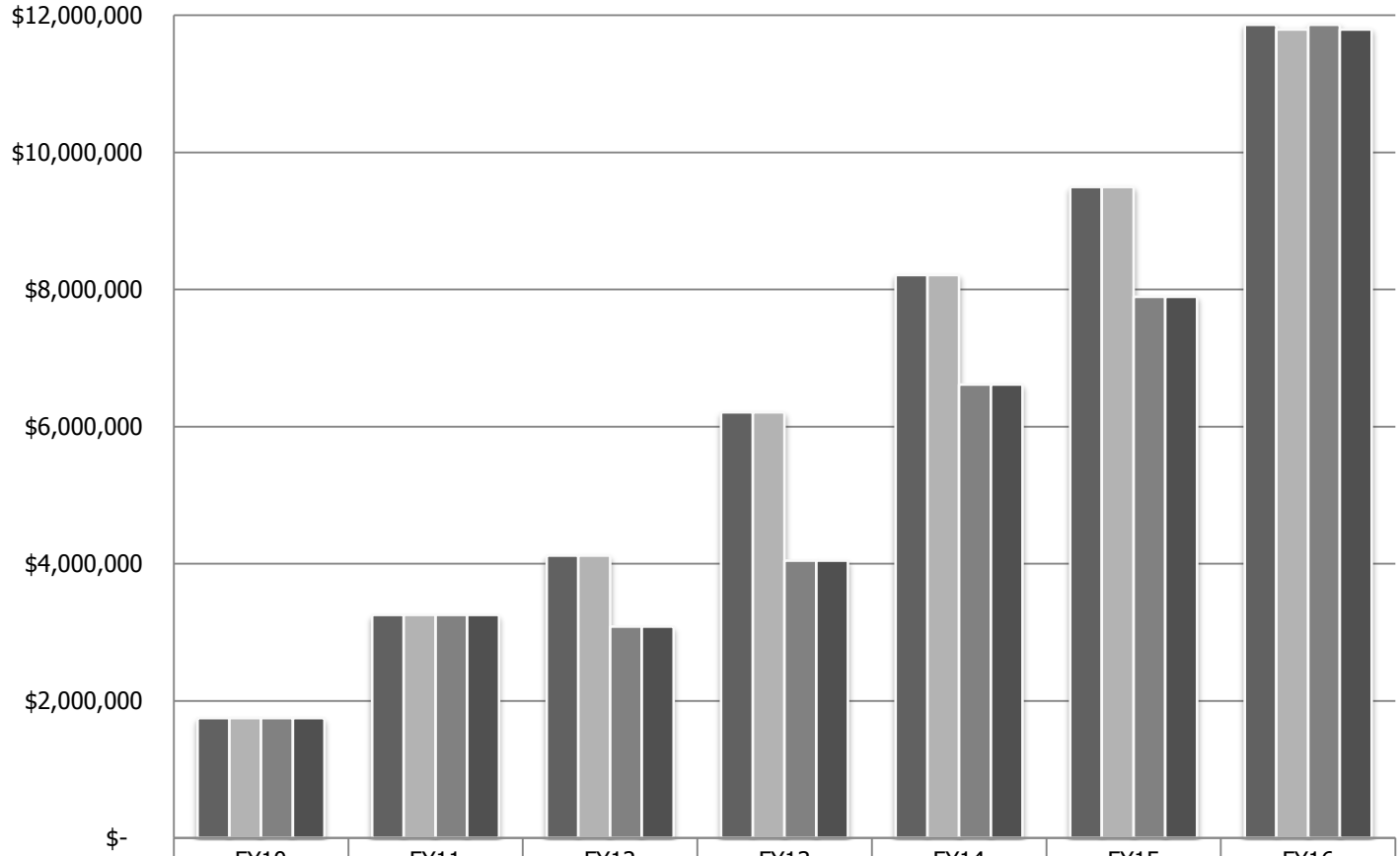
Appendix E: UNT-Dallas College of Law Estimated Expenditures Based on $5M Special Item Funding



	FY10	FY11	FY12	FY13	FY14	FY15	FY16
TOTAL EXPENDITURES	$1,748,842	$3,251,158	$3,081,508	$4,045,855	$6,611,824	$7,892,958	$11,792,228
TRB Debt Service	$-	$-	$-	$-	$-	$-	$3,547,778
State Funded Direct Benefits	$-	$-	$307,223	$432,677	$515,611	$619,098	$652,248
Operating Costs†	$1,718,009	$2,931,158	$1,698,951	$1,720,119	$3,518,038	$4,178,226	$4,330,812
Institutional Portion of Proportional Benefits	$-	$-	$-	$102,323	$171,870	$206,366	$217,416
Dean	$22,500	$270,000	$270,000	$275,400	$283,662	$292,172	$300,937
Admin/Staff/Library Salaries	$8,333	$50,000	$537,000	$642,000	$686,840	$732,577	$821,228
Faculty Salaries	$-	$-	$268,334	$873,336	$1,435,803	$1,864,519	$1,921,809

† Operating Costs include need-based aid, building expenses, library acquisitions, equipments & construction, and general operation and maintenance.
Source: University of North Texas System.

Appendix D: UNT-Dallas College of Law Estimated Revenue vs. Expenditures



	FY10	FY11	FY12	FY13	FY14	FY15	FY16
Total Revenue ($8.2M SIF)	$1,748,842	$3,251,158	$4,119,533	$6,207,830	$8,211,824	$9,492,957	$11,858,589
Total Expenditures ($8.2M SIF)	$1,748,842	$3,251,158	$4,119,533	$6,207,830	$8,211,824	$9,492,958	$11,792,228
Total Revenue ($5M SIF)	$1,748,842	$3,251,158	$3,081,508	$4,045,855	$6,611,824	$7,892,957	$11,858,589
Total Expenditures ($5M SIF)	$1,748,842	$3,251,158	$3,081,508	$4,045,855	$6,611,824	$7,892,958	$11,792,228

Source: University of North Texas System

Appendix E: UNT-Dallas College of Law Budget Comparison

($8.2M vs. $5M with differences highlighted)

	Budget Items	FY10	FY11	FY12	FY13	FY14	FY15	FY16
$8.2 Million Special Item Funding Budget	Special Item Funding*	$1,748,842	$3,251,158	$3,812,310	$4,387,690	$4,321,374	$3,878,626	$ -
	TRB Funding*	$ -	$ -	$ -	$ -	$ -	$ -	$3,547,778
	State Portion of Proportional Benefits	$ -	$ -	$307,223	$432,677	$552,439	$663,317	$712,377
	Infrastructure/Operations	$ -	$ -	$ -	$ -	$454,501	$454,501	$1,363,504
	Tuition & Fees	$ -	$ -	$ -	$1,387,463	$2,883,510	$4,496,513	$6,234,930
	TOTAL REVENUE	$1,748,842	$3,251,158	$4,119,533	$6,207,830	$8,211,824	$9,492,957	$11,858,589
	Faculty Salaries	$ -	$ -	$268,334	$873,336	$1,435,803	$1,864,519	$1,921,809
	Admin/Staff/Library Salaries	$8,333	$50,000	$537,000	$642,000	$686,840	$732,577	$821,228
	Dean	$22,500	$270,000	$270,000	$275,400	$283,662	$292,172	$300,937
	Institutional Portion of Proportional Benefits	$ -	$ -	$ -	$102,323	$171,870	$206,366	$217,416
	Operating Costs†	$1,718,009	$2,931,158	$2,736,976	$3,882,094	$5,118,038	$5,778,226	$4,330,812
	State Funded Direct Benefits	$ -	$ -	$307,223	$432,677	$515,611	$619,098	$652,248
	TRB Debt Service	$ -	$ -	$ -	$ -	$ -	$ -	$3,547,778
	TOTAL EXPENDITURES	$1,748,842	$3,251,158	$4,119,533	$6,207,830	$8,211,824	$9,492,958	$11,792,228
$5 Million Special Item Funding Budget	Special Item Funding*	$1,748,842	$3,251,158	$3,812,310	$4,387,690	$4,321,374	$3,878,626	$ -
	TRB Funding*	$ -	$ -	$ -	$ -	$ -	$ -	$3,547,778
	State Portion of Proportional Benefits	$ -	$ -	$307,223	$432,677	$552,439	$663,317	$712,377
	Infrastructure/Operations	$ -	$ -	$ -	$ -	$454,501	$454,501	$1,363,504
	Tuition & Fees	$ -	$ -	$ -	$1,387,463	$2,883,510	$4,496,513	$6,234,930
	TOTAL REVENUE	$1,748,842	$3,251,158	$4,119,533	$6,207,830	$8,211,824	$9,492,957	$11,858,589
	Faculty Salaries	$ -	$ -	$268,334	$873,336	$1,435,803	$1,864,519	$1,921,809
	Admin/Staff/Library Salaries	$8,333	$50,000	$537,000	$642,000	$686,840	$732,577	$821,228
	Dean	$22,500	$270,000	$270,000	$275,400	$283,662	$292,172	$300,937
	Institutional Portion of Proportional Benefits	$ -	$ -	$ -	$102,323	$171,870	$206,366	$217,416
	Operating Costs†	$1,718,009	$2,931,158	$1,698,951	$1,720,119	$3,518,038	$4,178,226	$4,333,972
	State Funded Direct Benefits	$ -	$ -	$307,223	$432,677	$515,611	$619,098	$652,248
	TRB Debt Service	$ -	$ -	$ -	$ -	$ -	$ -	$3,547,778
	TOTAL EXPENDITURES	$1,748,842	$3,251,158	$3,081,508	$4,045,855	$6,611,824	$7,892,958	$11,792,228

* TRB Funding and Special Item Funding dependant on Legislative appropriations in FY 2012-13 and FY 2014-15.

† Operating Costs include need-based aid, building expenses, library acquisitions, equipments & construction, and general operation and maintenance.