

ESTABLISHING GRADUATE CERTIFICATES ARIZONA STATE UNIVERSITY GRADUATE COLLEGE

This form should be used by programs seeking to establish a new graduate certificate. All sections should be completed.

The graduate certificate is a programmatic or linked series of courses in a single field or in one that crosses disciplinary boundaries. The graduate certificate facilitates professional growth for people who already hold the baccalaureate degree, and it may be freestanding or linked to a degree program. The graduate certificate enables the university to respond to societal needs while promoting university cooperation with corporate, industrial, and professional communities.

Submit the completed and signed (chairs, unit deans) proposal to the **Office of Graduate Academic Programs** in Graduate College. Mail code: 1003 and electronic copies to eric.wertheimer@asu.edu or amanda.morales-calderon@asu.edu.

Please type.

Contact Name(s): Troy A. Rule	Contact Phone(s): (480) 965-7553	
College: Sandra Day O'Connor College of Law		
Department/School: Sandra Day O'Connor College of Law, Dean's Office		
Name of proposed Certificate: Law and Sustainability		
Requested Effective Term and Year: Spring 2018 (e.g. Fall 2014)		
Is a program fee required? ☐ Yes ☒ No		
Is the unit willing and able to implement the program if the fee is denied? Yes No N/A		
Note: for more information about program fee requests, visit https://provost.asu.edu/curriculum-development/changemaker/form-instructions#fees		
Do Not Fill in this information: Office Use Only		
CIP Code:		

1. OVERVIEW. Below, please provide a brief overview of the certificate, including the rationale and need for the program, potential size and nature of the target audience, information on comparable programs (at ASU and/or peer institutions), how this program would relate to existing programs at ASU, and any additional appropriate information.

The proposed Law and Sustainability certificate within ASU's Sandra Day O'Connor College of Law will be instrumental in propelling ASU law students into environmental sustainability-related legal careers. Environmental sustainability is a primary emphasis at ASU, and this certificate leverages that emphasis by recognizing those law students who have successively immersed themselves in the study of sustainability-related law courses during their time at the law school. The requirements for the certificate are tailored to ensure that recipients receive a significant breadth and depth of training in such burgeoning legal fields as water law, energy law, environmental law, and land use law. The hope is that the certificate ultimately gains a reputation as a powerful signifier to legal employers of specialized knowledge and competence in these fields.

The law school's Center for Law, Science and Innovation currently offers the Law, Science and Technology graduate certificate with a specialization in environmental and sustainability law. Students interested in environmental sustainability typically pursued that certificate and specialization. There is sufficient course work and student interest in the area of the sustainability and the environment for the College of Law to establish a certificate in Law and Sustainability for JD and LLM students. It is anticipated that at least 10-15 JD/LLM students will seek and receive the Law and Sustainability certificate on an annual basis.

2. ADMINISTRATION AND RESOURCES

A. How will the proposed certificate be administered (including recommendations for admissions, student advisement, retention etc.)? Describe the administering body in detail, especially if the proposed certificate is part of a larger interdisciplinary agenda. How will the graduate support staffing needs for this proposed certificate program be met?

The Program/ Certificate Director (at the law school) will be primarily responsible for administration of the Law and Sustainability Certificate. Each student who registers as a candidate for the certificate will be assigned a faculty advisor. Because this certificate will take the place of the former Environmental and Sustainability Law specialization under the Law, Science and Technology graduate certificate, this new certificate will generate relatively few new staffing needs.

B. What are the resource implications for the proposed certificate, including projected budget needs? Will new books, library holdings, equipment, laboratory space and/or personnel be required now or in the future? If multiple units/programs will collaborate in offering this certificate, please discuss the resource contribution of each participating program. Letters of support must be included from all academic units that will commit resources to this certificate program.

Implementation of the Law & Sustainability Certificate will not require any new law school or university resources. It will require the creation of one new course, Energy Law and Policy, but no new positions at the law school or elsewhere within ASU will be needed. [Note: After the teaching of Energy Law and Policy as an omnibus course for a number of semesters, a new course proposal for LAW 619 – Energy Law and Policy was submitted to Changemaker in June 2017 and was on the tentative Senate consent agenda for 8/23/17.] The Program/Certificate Director is primarily responsible for the administration of the Law & Sustainability Certificate and will confer with the Dean and other faculty as needed to serve enrolled students.

3. ADMISSIONS PROCEDURES AND CRITERIA

A. Admission criteria – Applicants must meet the admissions criteria for Graduate College. Please also include any other additional admission requirements, e.g. type of undergraduate degree, minimum GPA, tests and/or entry-level skills that are required for this certificate program.

(http://graduate.asu.edu/sites/default/files/GraduatePolicies 1.pdf)

Applicants must fulfill the requirements of both the Graduate College and the Sandra Day O'Connor College of Law.

Applicants must have a minimum of a 3.00 cumulative GPA (scale is 4.00 = "A") in the last 60 hours of a student's first bachelor's degree program, or applicants must have a minimum of a 3.00 cumulative GPA (scale is 4.00 = "A") in an applicable master's degree program.

Applicants are eligible to apply to the program if they have earned a bachelor's or master's degree, in any field, from a regionally accredited institution. Applicants must be existing J.D. or LLM students who are currently enrolled in coursework and in good academic standing with the ASU College of Law.

All applicants must submit:

- 1. admission application for the certificate program through Law Interactive. Please see the Law website.
- 2. proof of English proficiency

Additional Application Information

An applicant whose native language is not English (regardless of current residency) must provide proof of English proficiency.

B. Application Review Terms

Indicate all terms for which applications for admissions are accepted:

<u>To select desired box</u>, place cursor on the left side of the box, right click mouse, select *Properties*, under *Default Value* select *Checked*, press *OK* and the desired box will be checked

☐ Fall (year): 2018☐ Spring (year): 2018☐ Summer (year):

C. Projected annual admission/enrollment - How many students will be admitted immediately following final approval of the certificate? What are enrollment projections for the next three years?

All enrolled students that meet the requirements and apply to the certificate program will be reviewed for admission. Based upon past enrollment in the Law, Science and Technology graduate certificate with a specialization in environmental and sustainability law through the Center for Law, Science, and Innovation, enrollment of at least 10-15 new students per year is projected. However, given the significant increase in the law school's class size and the growing prominence of the focus on Law and Sustainability, higher numbers of enrollees are expected in the future.

Year 1	Year 2	Year 3
10	12	15

4. ACADEMIC REQUIREMENTS

A. Minimum credit hours required for certificate (15 credit hour minimum)

15 credit hours

B. Please describe the primary course delivery mode, (e.g., online, face-to-face, off-site etc.). Please note: If this proposed initiative will be offered <u>completely</u> online, clearly state that in this section.

All courses will be offered on-site and in person, subject to modification for new or revised courses.

C. As applicable, please describe culminating experience required (e.g., internship, project, research paper, capstone course, etc.)

To obtain a Law and Sustainability Graduate Certificate, students must complete two culminating experiences: (1) active participation in sustainability law, and (2) a writing requirement. This will be tracked internally by the College of Law.

Active Participation in the Law and Sustainability Program

Each student must participate in at least two different activities from the following list:

- Sustainability Law Research Seminar
- The Mentorship Initiative in Sustainability Law
- Extramural Environmental or sustainability moot court competitions (upon approval from Program/Certificate Director)
- Law and Sustainability-based externships (upon approval from Program/Certificate Director)
- Active participation on the board of the College of Law's Environmental Law Society (ELS) student chapter
 Writing Requirement

Each student must write a substantial paper on a topic related to Law and Sustainability. The paper must be at least 15 pages in length and written under the guidance of a member of the College of Law faculty. A paper written to satisfy the College of Law's graduate writing requirement or flexible writing requirement can fulfill this writing requirement, including a paper written as part of a seminar course included on the list of Elective Courses above. A paper that satisfies a law journal writing requirement may also be used to satisfy this writing requirement.

D. What knowledge, competencies, and skills (learning outcomes) should graduates have when they complete this proposed certificate program? Examples of program learning outcomes can be found at (https://uoeee.asu.edu/program-outcomes).

Outcome 1: Graduates will be able to identify and analyze legal issues relating to environmental sustainability law and policy.

Outcome 2: Graduates will be able to effectively write on a topic related to sustainability law and policy issues.

E. How will students be assessed and evaluated in achieving the knowledge, competencies, and skills outlined in 4.D. above? Examples of assessment methods can be found at (http://www.asu.edu/oue/assessment.html).

Outcome 1: Graduates will be able to identify and analyze legal issues relating to environmental sustainability law and policy.

Measure 1: Final exam or final paper required in a core course required for the certificate. 80% will achieve a grade of B- or better. Law school exams use multiple choice, short answer, and/or essay questions to test students' capacity to identify legal issues, analyze them under the appropriate legal rules, and articulate conclusions or arguments based upon that analysis. Any of the four courses designated as core courses for the certificate are applicable to Measure 1.

Measure 2: Graduate/Law Student Report Card (which is a University administered student survey) item about the development of the student's critical thinking skills. (Alternatively, a student focus group survey may be used). 70% will respond "very strong" or "strong". In the event that such a student focus group survey is used, student participants (who have completed the certificate requirements) will be asked in the survey to self-assess the development of their critical thinking skills in law and sustainability-related areas. Student self-assessment, as found in the Graduate/Law Student Report Card and the student focus group survey, is an indirect measure.

Outcome 2: Graduates will be able to effectively write on a topic related to sustainability law and policy issues.

Measure 1: Paper in a Graduation Writing Requirement (GWR) for the Law and Sustainability Certificate. Examples of GWR courses include LAW 770 – Law Journal, LAW 771 – Jurimetrics Journal. Additionally many of the LAW 691/791 –Special Topics courses offer the GWR. 80% will achieve a grade of B- or better.

Measure 2: Graduate/Law Student Report Card (which is a University administered student survey) item about the development of the student's writing skills. (Alternatively, a student focus group survey may be used). 70% will respond "very strong" or "strong". In the event that such a student focus group survey is used, student participants (who have completed the certificate requirements) will be asked in the survey to self-assess the development of their critical thinking skills in law and sustainability-related areas. Student self-assessment, as found in the Graduate/Law Student Report Card and the student focus group survey, is an indirect measure.

F. Please state the Satisfactory student academic progress standards and guidelines (including any time limits for completion).

Students must complete the coursework, writing requirement and participation requirement prior to graduation to earn the Certificate. Each student must earn a cumulative average grade point average of at least 3.0 for the courses taken to satisfy the substantive course work requirement of the Law and Sustainability Certificate Program. A student also must earn a minimum grade of "B" for any course taken outside of ASU Law if permitted.

G. Will this proposed certificate program allow sharing of credit hours from another ASU degree program to be used as part of this certificate program? (Please note that a maximum of 12 graduate-level credit hours taken as a non-degree student at ASU, including as a part of a certificate program, may be used towards a future graduate degree at ASU).

No, only courses offered at ASU Law apply.

H. Below, please list all required and elective courses in the appropriate boxes (you may attach additional pages if necessary).

Please ensure that all <u>new</u> core course proposals have been submitted to the Provost's office through the Curriculum ChangeMaker online course proposal submission system before this initiative is put on the University Graduate Council and CAPC agendas. Please note: a minimum of 2/3 of the courses required for a graduate certificate must be at the 500-level or above.

Required Courses			Credit Hours
(Students select two of the following four core courses)			
(Prefix & Number)	(Course Title)	(New Course?) Yes or No?	(Insert Section Sub-total)
LAW 631	Environmental Law	No.	6
LAW 619		Yes	3
	Energy Law & Policy		_
LAW 639	Natural Resource Law	No	3
LAW 643	Water Law	No	3
Elective	es: Choose from the courses listed below.		Credit Hours (Insert Section
(Prefix & Number)	(Course Title)	(New Course?) Yes or No?	Sub-total)
LAW 609	Administrative Law	No	2-4
LAW 691*	Seminar: Energy Law & Policy	No	2-4
LAW 631	Environmental Law	No	3
LAW 704	Federal Indian Law II	No	2-3
LAW 636	Land Use Regulation	No	2-3
LAW 647	Mass Tort Litigation	No	2-3
LAW 639	Natural Resource Law	No	3
LAW 643	Water Law	No	3
LAW 770	Law Journal	No	1 - 3
LAW 771	Jurimetrics Journal	No	1 - 3
LAW 691/791	Seminar (Special Topics course as approved by the Program/Certificate Director)	No	1-3
Culminating Experience (if applicable)			Credit Hours 0
Writing Requirement and Active Participation in Sustainability Law			0
	Total required credit hours		15

^{*}The list of eligible elective courses are subject to modification by Certificate/Program Director

5. PRIMARY FACULTY PARTICIPANTS - Please list all primary faculty participants for the proposed certificate, including home unit and title. You may attach additional pages if necessary.			
Name	Home Unit	Title	
Troy Rule	Sandra Day O'Connor College of Law	Professor of Law	
Karen Bradshaw	Sandra Day O'Connor College of Law	Associate Professor of Law	
Rhett Larson	Sandra Day O'Connor College of Law	Professor of Law	

Grady Gammage	Sandra Day O'Connor College of Law	Adjunct Professor of Law
Daniel Bodansky	Sandra Day O'Connor College of Law	Professor of Law
Robert Miller	Sandra Day O'Connor College of Law	Professor of Law
Betsy Grey	Sandra Day O'Connor College of Law	Professor of Law
Miles Lynk	Sandra Day O'Connor College of Law	Professor of Law
Ken Abbott	Sandra Day O'Connor College of Law	Professor of Law

6. REQUIRED SUPPORTING DOCUMENTS

(Please label accordingly, i.e., Appendix or Attachment A, B, etc.)

Please include the following with your proposal:

- A. Sample plans of study for students in the proposed program (see attached)
- B. Statements of support from all deans and heads of impacted academic units (see attached)

7. APPROVALS - If the proposal submission involves multiple units, please include letters of support from those units.

	1
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SIGNATURE	DATE;
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DEAN (PRINT/TYPE)	
TRUCK A TO THE STEP	
DOUGLAS SYLVESTER	
SIGNATURE	DATE /21/2017
i v v v v v v v v v v v v v v v v v v v	6/21/2017

<u>Please note:</u> Proposals for new certificates also require the review and recommendation of approval from the University Graduate Council, Curriculum and Academic Programs Committee (CAPC), the Academic Senate, and the Office of the Provost before they can be put into operation.

The final approval notification will come from the Office of the Provost.

GF1112G-89

SIGNATURE

DATE

DEAN, GRADUATE COLLEGE

APPENDIX A

OPERATIONAL INFORMATION FOR GRADUATE CERTIFICATES

(This information is used to populate the Graduate Programs Search website.)

1. Provide a brief (catalog type - no more than 150 words) program description.

The proposed Law and Sustainability Graduate Certificate within ASU's Sandra Day O'Connor College of Law will be instrumental in propelling ASU law students into environmental sustainability-related legal careers. Environmental sustainability is a primary emphasis at ASU, and this certificate leverages that emphasis by recognizing those law students who have successively immersed themselves in the study of sustainability-related law courses during their time at the law school.

Breakdown of requirements for the academic catalog:

15 credit hours

Required Core (6 credit hours)

LAW 619 Energy Law & Policy (3)

LAW 631 Environmental Law (3)

LAW 639 Natural Resource Law (3)

LAW 643 Water Law (3)

Electives (9 credit hours)

Culminating Experience

Writing Requirement and Active Participation in Sustainability Law

Additional Curriculum Information

Students must select two of the required core courses from the above list.

Each student must earn a cumulative average grade point average of at least 3.0 for the courses taken to satisfy the substantive course work requirement of the Law and Sustainability Certificate Program. A student also must earn a minimum grade of "B" for any course taken outside of ASU Law if permitted.

Each student must participate in at least two different activities from the following list:

- Sustainability Law Research Seminar
- The Mentorship Initiative in Sustainability Law
- Extramural Environmental or sustainability moot court competitions (upon approval from Program Director or Faculty Director)
- Law and Sustainability-based externships (upon approval from Program Faculty Director or Director)
- Active participation on the board of the law school's Environmental Law Society (ELS) student chapter

Each student must write a substantial paper on a topic related to Law and Sustainability. The paper must be at least 15 pages in length and written under the guidance of a member of the College of Law faculty. A paper written to satisfy the College of Law's graduate writing requirement or flexible writing requirement can fulfill this writing requirement, including a paper written as part of a seminar course included on the list of Elective Courses above.

2. Contact and Support Information:

Office Location (Building & Room): 478	Campus mail code: 9520
Campus Telephone Number: 5-7553	Program Director (Name and *ASU ID):
	Troy Rule
Program email address:	Program Support Staff (Name and *ASU ID):
LawandSustainability@asu.edu	Lauren Burkhart

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8/23/16

	Program website address:		Admissions Contact (Name and *ASU ID):		
	https://www.law.asu.edu/degree- programs/programs/sustainability	Laurer	n Burkhart		
	* ASU ID (e.,	g. SHJONI	ES)		
3.	Campus(es) where program will be offered: *	\boxtimes	Downtown		Tempe
			Online (only) Polytechnic		West
	* To select desired box, place cursor on the left side of the select <i>Checked</i> , press <i>OK</i> and the desired box will be	_	click mouse, select P	roperties,	, under <i>Default Value</i>
4.	Keywords: (List all keywords that could be used to specific to the proposed program.)	o search	n for this program	. Keywor	rds should be
	law and sustainability, environmental law, environmental	nental s	ustainability, law,	sustaina	ability
5.	Area(s) of Interest:				
	* <u>To select desired box</u> , place cursor on the left side of the select <i>Checked</i> , press <i>OK</i> and the desired box will be	_	click mouse, select P	roperties,	, under <i>Default Value</i>
	55.050 5.150.052 , p .000 5. 151.15 110 000.152 501 1111 50	01.001.00			
	Architecture & Construction Arts Business Communications & Media Education & Teaching Engineering & Technology Entrepreneurship Health & Wellness Humanities Interdisciplinary Studies Law & Justice Mathematics Psychology STEM Science Social and Behavioral Sciences Sustainability				
	B. Select one (1) secondary area of interest from Architecture & Construction Arts Business Communications & Media Education & Teaching Engineering & Technology Entrepreneurship Health & Wellness Humanities Interdisciplinary Studies	the list	below that applies	s to this	program.

Law & Justice

Ш	<u>Mathematics</u>
	Psychology
	STEM
	Science
	Social and Behavioral Sciences
\boxtimes	<u>Sustainability</u>

(NEW GRADUATE INITIATIVES)

PROPOSAL PROCEDURES CHECKLIST

Academic units should adhere to the following procedures when requesting new curricular initiatives (degrees, concentrations or certificates). Obtain the required approval from the Office of the Provost to move the initiative forward for internal ASU governance reviews/approvals. Establishment of new curricular initiative requests; degrees, concentrations, or certificates Rename requests; existing degrees, concentrations or certificates Disestablishment requests; existing degrees, concentrations or certificates ☐ Submit any new courses that will be required for the new curricular program to the Curriculum ChangeMaker online course approval system for review and approval. Additional information can be found at the Provost's Office Curriculum Development website: Courses link For questions regarding proposing new courses, send an email to: courses@asu.edu Prepare the applicable proposal template and operational appendix for the proposed initiative. New degree, concentration and certificate templates (contain proposal template and operational appendix) can be found at the Provost's Office Curriculum Development website: Academic Programs link ☐ Obtain letters or memos of support or collaboration. (if applicable) When resources (faculty or courses) from another academic unit will be utilized When other academic units may be impacted by the proposed program request ☐ Obtain the internal reviews/approvals of the academic unit. Internal faculty governance review committee(s) Academic unit head (e.g. Department Chair or School Director) Academic unit Dean (will submit approved proposal to the curriculumplanning@asu.edu email account for further ASU internal governance reviews (as applicable, University Graduate Council, CAPC and Senate) Additional Recommendations - All new graduate programs require specific processes and procedures to maintain a successful degree program. Below are items that Graduate Education strongly recommends that academic units establish after the program is approved for implementation. Set-up a Graduate Faculty Roster for new PhD Programs – This roster will include the faculty eligible to mentor, co-chair or chair dissertations. For more information, please go to http://graduate.asu.edu/graduate faculty initiative. **Establish Satisfactory Academic Progress Policies, Processes and Guidelines** – Check within the proposing academic unit and/or college to see if there are existing academic progress policies and processes in place. If none have been established, please go to http://graduate.asu.edu/faculty_staff/policies and scroll down to the academic progress review and remediation processes (for faculty and staff) section to locate the reference tool and samples for establishing these procedures. **Establish a Graduate Student Handbook for the New Degree Program** - Students need to know the specific requirements and milestones they must meet throughout their degree program. A Graduate Student Handbook provided to students when they are admitted to the degree program and published on the website for the new degree gives students this information. Include in the handbook the unit/college satisfactory academic progress policies, current degree program requirements (outlined in the approved proposal) and provide a link to the Graduate Policies and Procedures website. Please go to http://graduate.asu.edu/faculty_staff/policies to access Graduate Policies and Procedures.

Appendix B - Example Curriculum

Example One

First semester in certificate program:

LAW 631 - Environmental Law (3)

Second semester in certificate program:

LAW 619 - Energy Law & Policy (3)

One Qualifying Elective, e.g., LAW 609 – Administrative Law (3)

Third semester in certificate program:

One Qualifying Elective, e.g., LAW 639 – Natural Resources Law (3)

Fourth semester in certificate program:

One Qualifying Elective, e.g., LAW 704 - Federal Indian Law II (3)

Total: 15 credits

Example Two

First semester in certificate program:

LAW 639 - Natural Resource Law (3)

Second semester in certificate program:

LAW 643 – Water Law (3)

LAW 636 - Land Use Regulation (2)

Third semester in certificate program:

LAW 647 - Mass Tort Litigation (2)

Fourth semester in certificate program:

LAW 691 – Utility Law and Regulation (3)

LAW 791 – Sustainability Law Research Seminar (2)

Total: 15 credits

Appendix C – Statements of Support Official Submission - Sandra Day O'Connor College of Law

From: Leslie Mamaghani
Sent: Thursday, June 22, 2017 1:44 PM
To: Amanda Morales-Calderon <AMANDA.MORALES-CALDERON@asu.edu>
Cc: curriculumplanning@asu.edu
Subject: Law and Sustainability certificate proposal

Hi Amanda.

Attached is the Law and Sustainability certificate proposal from the College of Law. Also attached is a PDF of the signature page.

If you have questions about the proposal please let me know.

Thanks.

Leslie

School of Sustainability - Chris Boone, Dean

Troy,

The School of Sustainability supports your proposal for the Law & Sustainability Certificate. In addition to the courses you list we would be happy to provide students in the certificate program with access to the list of sustainability courses suggested below. I look forward to continued collaboration in building the Law & Sustainability efforts at ASU.

Here are some suggested SOS courses:

SOS 545	Organizations, Sustainability & Public Policy
SOS 514	Human Dimensions of Sustainability
SOS 513	Science for Sustainability
SOS 525	Social-Ecological-Technical Systems (SETS): Domains and interfaces
SOS 527	Environmental Ethics and Policy Goals
SOS 532	Sustainable Urban Dynamics
SOS 533	Sustainable Water
SOS 534	Sustainable Energy and Material Use
SOS 535	Sustainable Ecosystems
SOS 536	Food System Sustainability
SOS 517	Sustainability and Enterprise
SOS 545	Organizations, Sustainability & Public Policy

Christopher Boone Dean and Professor School of Sustainability, Arizona State University

College of Public Service and Community Solutions – Kathleen Andereck, Director of Curricular Initiatives

From: Kathleen Andereck

Sent: Monday, July 24, 2017 1:10 PM

To: Troy Rule

Subject: RE: Request for Support Memo -- Law & Sustainability Certificate Proposal

Thanks Trov.

The CPSCS is supportive of the certificate and see no conflicts with our programs.

Kathy

Kathleen Andereck, Ph.D.
Director and Professor
School of Community Resources and Development
Arizona State University
411 N. Central Avenue, Ste. 550
Phoenix, AZ 85004
kandereck@asu.edu
scrd.asu.edu

From: Troy Rule

Sent: Monday, July 24, 2017 11:31 AM

To: Kathleen Andereck < kandereck@asu.edu >
Cc: Leslie Mamaghani < leslie.mamaghani@asu.edu >

Subject: Request for Support Memo -- Law & Sustainability Certificate Proposal

Dear Kathleen,

I'm writing because ASU's Law & Sustainability Program is developing a new graduate certificate focused on environmental sustainability and the University recently informed us that, to move the certificate approval process forward, we need a "support memo" from the College of Public Programs and Community Solutions. This is a very brief memo or e-mailed statement simply verifying that the proposed certificate program will have no significant adverse impact on the course offerings in your college. I have attached the certificate application for your review. The proposed certificate merely requires students to complete 15 credits of law school courses that are already in existence.

We would greatly appreciate your submitting this support memo directly by to me by **August 15**. If you have any questions, please let me know. Thank you in advance for your help.

Troy

Troy A. Rule

Professor of Law Joseph Feller Memorial Chair in Law & Sustainability Faculty Director, Program on Law & Sustainability Sandra Day O'Connor College of Law Arizona State University