REPORT OF THE WSCUC TEAM

For Reaffirmation of Accreditation

To Zaytuna College

Date of Visit

September 30, 2019 - October 3, 2019

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The team evaluated the institution under the 2013 Standards of Accreditation and prepared this report containing its collective evaluation for consideration and action by the institution and by the WASC Senior College and University Commission (WSCUC). The formal action concerning the institution’s status is taken by the Commission and is described in a letter from the Commission to the institution. This report and the Commission letter are made available to the public by publication on the WSCUC website.
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SECTION I: OVERVIEW AND CONTEXT

A. Description of Institution and its Accreditation History

Zaytuna College (also referred to as Zaytuna) is the first Muslim liberal arts college in the United States and is located in Berkeley, California. The Zaytuna College seal states, "The greatest, truest, and only permanent good bestowed upon humanity is that of true knowledge. From such knowledge, all other goods flow, even faith. And this is why, at Zaytuna College, we have adorned our seal with the prayer Qul Rabbi zidnī ‘ilman ("Say: O Lord, increase me in knowledge"). Zaytuna began as an institute that focused on educational programs, publications, and productions to advance Islam’s educational and intellectual legacy and to provide learning among Western Muslims. The institution currently offers a Bachelor of Arts degree in Islamic Law and Theology and a Master of Arts degree in Islamic Texts, approved by WSCUC in 2018. As noted on its website introducing the new MA, “the achievement represents a major milestone, not only for Zaytuna’s growth as a Muslim liberal arts college, but also, God willing, for a renewed meeting of Islamic and Western streams of scholarship, which have a long history of enriching one another.”

Zaytuna currently welcomes 15-20 new undergraduate students each year and its initial two cohorts of graduate students have been 5 and 6 students, respectively. Its total enrollment is approximately 80 students, and there are 60 alumni. Currently, the institution does not operate off-campus locations or distance education programs. It has two locations in Berkeley, one housing its administrative offices and some instruction and public events, and a recently acquired campus in the Berkeley Hills area, a few miles from the administrative offices.

In the fall of 2010, Zaytuna notified WSCUC of its intent to become accredited. In December 2013, the institution sought eligibility to apply for accreditation and had their first
Seeking Accreditation Visit (SAV) in October of 2014. The Commission granted Zaytuna Initial Accreditation on March 4, 2015, followed by a required Mid-Cycle Report in spring of 2017 and a Special Visit in the spring of 2018. The Special Visit focused on the three areas identified by the Commission: Board development and organizational structure [CFR 3.6, 3.7, 3.9]; institutional research structure, capacity, and use of data in decision making [CFR 4.1, 4.2]; and policy development, particularly with regard to faculty roles and human resources [CFR 3.2]. The Special Visit was completed on February 6-7, 2018. The Offsite Review for this Reaffirmation of Accreditation occurred February 27-28, 2019 and the campus visit occurred September 30-October 3, 2019. This report represents the outcomes of the WSCUC team findings and recommendations following the campus visit.

B. Description of the Team’s Review Process and Visit

The team received Zaytuna College’s self-study report, accreditation history, and prior WSCUC action letter in December 2018. Each team member completed the offsite worksheet, evaluating the institution against the standards and its response to prior WSCUC concerns. The team’s assistant chair compiled all initial responses on the team worksheet in preparation for the team’s two-hour conference call on February 8, 2018. During the call, the team discussed initial areas of commendation and lines of inquiry, compiled a list of additional documents to be requested from the institution, and agreed to a division of effort in preparing the report. The Offsite Review occurred on February 27-28, and the team identified five areas of commendation and seven lines of inquiry for the campus visit, as well as additional documents to be available on campus. A team call was held on September 13 prior to the campus visit to review lines of inquiry, the visit schedule, team members’ individual meeting schedules, and areas of focus for
each meeting. Each member served as first author for one section of the report and second author for other sections. The campus visit began on September 30, 2018 at 4pm with a meeting with the Zaytuna president, provost and two additional Zaytuna officers to provide the team an orientation to Islamic tradition and teaching and its relevance to the reaccreditation visit. The visit occurred on October 1-3, with meetings at both campus sites, and concluded with the exit report on October 3, 2019.

The WSCUC team found a welcome and cooperative Zaytuna community. Throughout the visit, the team met administrators, faculty, staff, and students who were very engaged by the process and who demonstrated a sincere love and commitment to the mission and goals, as well as high expectations for education at Zaytuna at both graduate and undergraduate levels. The team especially noted the high level of activity and progress made in the short time since accreditation and the Special Visit addressing earlier recommendations, and strongly affirms these efforts. The team commends the entire Zaytuna community for its commitment to engaging with critical themes such as building institutional research capacity and assessing educational effectiveness.

C. Quality and Rigor of Report and Supporting Evidence

Zaytuna College’s self-study report provided an orientation to its academic purpose mission and approach, its intention to demonstrate sufficient compliance with WSCUC standards, and its response to actions taken since the 2015 WSCUC Commission Action Letter (CAL), and the 2018 Special Visit. The team commends Zaytuna for producing a report that was compelling, clear, and well organized, and conceptually anchored in its mission. Although there was clear connection between institutional mission and the lived curricular and co-curricular experience for students, the team felt that the report lacked information in some areas, especially
in providing supporting evidence to demonstrate compliance with standards. Examples include the lack of samples of direct evidence of student learning, the lack of written documentation about changes made to administrative areas recommended in prior reviews, such as the board of trustees or institutional research, and the lack of written documentation for strategic planning, facilities planning, or finance planning. In many cases it was the individual campus conversations that clarified questions team members had in their investigation about compliance for particular criteria within a standard, respectively. Prior WSCUC teams mentioned similar inconsistencies from initial findings based on the written report to clarifications being made at the time of the campus visit. Throughout the campus visit the team was presented with additional documents, either following a team member comment or volunteered by a member of the Zaytuna staff without a prior prompt. The team appreciated the willing response by the Zaytuna community yet questioned why these documents had not been presented in the self-study or included in the evidence room. Zaytuna's rapid growth as an institution suggests a need for continued understanding of and attention to formalizing structures and processes for data collection, use, tracking and reporting, across operational areas. (CFR 1.3, 4.3)

SECTION II: EVALUATION OF INSTITUTIONAL ESSAYS

A. Component 1: Response to previous Commission actions

Zaytuna completed a Special Visit in February 2018. Following that visit, the Commission noted six areas for continued attention, including:

1. Establish clear board policies, procedures, and criteria for evaluation of the president, placing in writing clear performance standards for conducting formal annual evaluation. (CFR 3.9)

2. Engage both board and outside counsel regarding the appropriate roles of and potential conflicts with the three founders of Zaytuna as full voting board members while holding
other leadership positions at the College. (CFR 3.9)

3. Adopt best practices for the operation of college governing boards (e.g., standard formatting of, and more detailed, minutes; ongoing training of all Board members, and mentoring of new board members). Rewrite board bylaws to reflect current best practices. (CFR 3.7)

4. Formally incorporate the use of IR capacity to assist decision making and planning in its core quality assurance processes such as learning outcome assessment and program review. (CFR 4.1)

5. Continue to develop the IR capacity, especially in gathering direct evidence for student learning and to appropriately share data externally, including publishing data of student success on the college’s webpage. (CFR 1.2, 4.2)

6. Review the most current Faculty Handbook with faculty to reach agreement on the content of the Handbook and align the content of the Faculty Handbook with the Employee Handbook. Consult legal counsel before finalizing the Faculty Handbook. (CFR 3.2)

Between the Special Visit of 2018 and the Reaffirmation of Accreditation visit in October 2019, Zaytuna has made substantial progress in all six areas and is to be commended for its attention, action, and progress.

Its board of trustees has adopted clear bylaws conforming to California nonprofit code, separated board membership from administrative roles, and provided opportunities for board development, including those offered by the Association of Governing Boards (AGB). It has established policies and procedures for the annual review of the president, and is now recording and keeping its agendae and minutes.

Zaytuna continues to make great strides in the area of institutional research and use of data in decision making. There is now a position of Director of Institutional Effectiveness, and the position is a member of the president's leadership team. Much work has been done to create a system for gathering data, both institutional data and assessment of learning; the complete evaluation of this area occurs in the evaluation of Standards 2 and 3, below.
The team noted great concern in one area in which Zaytuna has not responded to prior Commission letter, and is out of compliance with a WSCUC standard. Standard 1 includes a criterion for review that institutions make data on student achievement public, and at the time of the team visit there was no published data of student achievement on the college website. (CFR 1.2)

Zaytuna completed and has published the Faculty Handbook, aligned it with the Employee Handbook and used legal counsel in its development. (CFR 3.2)

B. Component 2: Compliance: Review under WSCUC Standards and compliance with federal requirements; Inventory of Educational Effectiveness Indicators

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

Institutional Purposes

As the first Muslim liberal arts college accredited in the United States, Zaytuna holds a unique position of privilege and responsibility. Throughout the self-study and the campus visit, Zaytuna demonstrated a keen awareness of this reality in its institutional purposes. The team found ample evidence that Zaytuna operates with formally approved and appropriate statements of purpose through the Zaytuna website, the College Catalog, and course syllabi, as well as its annual academic journal, Renovatio. (CFR 1.1) This team concurs with prior teams in commending Zaytuna for its inspiring mission and purposeful commitment to cultivate spiritual and intellectual leaders grounded in the Islamic tradition. Zaytuna’s bold vision is impressive, as is the steadfast way in which it is developing itself as an institution, grounded in a highly defined sense of values and character. Led by a charismatic and committed president, the team found
strong evidence of performance, responsibility, and accountability across the leadership team. (CFR 1.3)

Zaytuna offers two programs, one undergraduate and one MA degree. Both programs have a very structured curricular design grounded in a classic liberal arts curriculum, including a "Zaytuna canon," of which the trivium (grammar, logic, and rhetoric), is a strong anchor. The programs have clearly articulated objectives and indicators of achievement at the institutional, program, and course level, published annually in the *College Catalog*; however, as noted above the institution has not yet made public data on student achievement, which is an area of concern for the team. (CFR 1.2) The undergraduate degree outcomes are identified by faculty, reviewed by the Provost/Dean of Faculty and his leadership team, and included in course syllabi. (CFR 1.3)

*Integrity*

As an institution, Zaytuna lives its mission and operates with much intention for truth and integrity. The team was impressed by the depth of commitment to institutional purpose as a Muslim liberal arts college functioning in the 21st century, and the intersection of classic and contemporary best practices such as academic freedom and autonomy, faith and truth. (CFR 1.4, 1.6, 1.7, 1.9)

In its original lines of inquiry, the team identified diversity and equity as an area for further evaluation. The team noted that in light of Zaytuna’s distinctive mission, it wanted to learn more about Zaytuna’s commitment to the principles enunciated in WSCUC’s Equity and Inclusion Policy. During the review of materials, questions arose regarding diversity policies and organizational practices with respect to hiring and retention of faculty and staff, support for students, and campus climate. The issue arose in different manners throughout the campus visit.
While it maintained that its own policies and practices be grounded in Muslim tradition, Zaytuna approached the conversations in an open and engaging manner. They have a published anti-discrimination policy for prospective students in the *College Catalog* and noted their student support efforts for students of all backgrounds. In meeting with the board of trustees about board composition, they articulated a desire for more diversity, especially gender diversity. In conversations with faculty, they spoke positively about having academic freedom and ability to present multiple perspectives. Zaytuna also expressed a desire to hire and retain a more diverse and equally qualified faculty and staff, especially in terms of gender. In the student life area, staff spoke of their efforts to support all students, including on issues of gender identity and orientation, educating them in Muslim tradition and helping them live in accord with that tradition; they acknowledged some students may have left due to climate, and they supported them in their transition.

One issue of concern noted by the team was gender equity in both curricular and co-curricular opportunities for students. Because Zaytuna has a highly relational, community approach to whole student learning, there are community dinners, events and speakers, and communal prayer. They also have curricular preceptorials that function like independent studies in which students work with alone with one faculty member. Given the lack of female faculty, the protocols about different-gender interactions, and the separation by gender at group events, the team questioned how female students are given equal opportunities for engaging with faculty in class in terms of ability to engage in discussions and outside of class: in preceptorials, in prayer services, in social events, and possible internships and/or apprenticeships. (CFR 1.5)

With respect to its operational practices and policies, Zaytuna has policies in place for complaints and evaluation of performance. (CFR 1.8) Zaytuna strives to have policies in place
for students, staff, and faculty that are consistent with the ideals and principles of Islam. There is a student honor code that all students sign, with six principles including personal accountability; timeliness; integrity, respect, and trust; cleanliness; modesty and propriety in dress and behavior; and sobriety and restraint. Faculty and staff also have handbooks for both privileges and responsibilities. Zaytuna also operates with integrity in its representation and communication with WSCUC and its intention to follow WSCUC policies. (CFR 1.9)

**Standard 2: Achieving Educational Objectives through Core Functions**

*Teaching and Learning*

Zaytuna clearly demonstrates its commitment to delivering rigorous, mission-driven academic programs, holistic student development, and ongoing institutional reflection. The curricula at the undergraduate and graduate levels are consonant with the school’s mission to educate students in the Islamic tradition and, simultaneously, with a foundation in Western thought and standards of scholarship. The team saw comprehensive evidence that undergraduate and graduate coursework are appropriate for the respective degree level, and that the academic programs are staffed by sufficient numbers of faculty qualified for the type and level of curriculum offered. Entry-level and graduation requirements are clearly defined and published in the catalog, website, and other materials. (CFR 2.1, 2.2) Team review furthermore ascertained that Zaytuna’s recruiting and public relations materials truthfully portray the institution. Students have ready access to accurate information about admissions, degree requirements, course offerings, and educational costs and receive advising about relevant academic requirements. (CFR 2.12)
Zaytuna’s undergraduate program offers in-depth study of Islamic and Western liberal arts and seeks to integrate the five GE core competencies across the curriculum. Written and oral communication as well as critical thinking skills, especially, are developed in terms of both breadth and depth of knowledge. The institution has set outcome standards and evaluation criteria for these competencies, e.g. by creating a unified assessment rubric for written communication, reasoning, and research used by all faculty for all written work (Document 51). Writing diagnostics are conducted at intake as well as during the ninth week of the first semester in order to match students with academic support early on. The senior thesis and experiential learning project are capstones in the BA program, and several of the GE core competencies are included in their assessment. On the other hand, the team was not able to ascertain how the core competencies of information literacy and quantitative reasoning are developed and assessed within the curriculum, areas that Zaytuna should address as it continues to develop its programmatic assessment. (CFR 2.2a)

The master’s program, only in its second year, has clearly stated objectives differentiated from the undergraduate program in terms of admissions, curricula, standards of performance, and student learning outcomes. Faculty are sufficient in number for the size of the program and hold the appropriate terminal degree in Islamic textual studies. As the program matures, a conscious effort should be made to further develop a graduate culture that promotes and fosters the importance of scholarship and active engagement with the literature in the field. (CFR 2.2b)

Zaytuna has a coherent mission-driven philosophy that guides the meaning of its degrees and is clearly articulated and published in its undergraduate and graduate catalogs, website, and syllabi. In the institution’s own words, “The Zaytuna curriculum emphasizes universal principles and themes. It fosters interdisciplinary thinking as well as the integration of theoretical and
experiential knowledge” (BA Catalog, p. 8). The team saw evidence that undergraduate experiential reflection provides the data to assess how well this integration is occurring (Document 38). (CFR 2.3)

The institutional self-study and onsite review provided evidence that learning expectations are articulated at the course and program levels, reflected in programs, curricula, and policies, and generally aligned with support services. Importantly, however, program outcomes for the undergraduate program (Document 41) are not expressed as measurable outcomes. Moreover, the institution has only begun to differentiate learning outcomes according to their level of development (introductory, developing, mastery) and to map course to program learning outcomes for some courses. (CFR 2.3, 2.7)

Zaytuna’s faculty determine the student learning outcomes for their courses and include them in their syllabi. Faculty are involved in learning outcome assessment and some programmatic review (Document 63: Senior Thesis Assessment Results, Document 64: Senior Thesis Reflection). The institution has committed resources to creating a culture of data-driven assessment, which is still emerging when it comes to comprehensive program review based on the assessment of direct and indirect evidence. (CFR 2.4, 2.6)

Zaytuna’s students are actively involved in a rigorous program of learning. Prior learning, especially in the area of grammar and expository skills as well as Arabic language (key for accessing the Zaytuna curriculum) are assessed by means of diagnostic testing, the Summer Arabic Institute, and developmental workshops. Small classes built on lecture and discussion and frequent writing assignments give students ample opportunity to practice and generalize what they are learning, culminating in the senior thesis and experiential learning project, where
students apply what they have learned to sophisticated research questions and current social and cultural realities. (CFR 2.5, 2.7)

Review of the self-study and supporting documentation as well as interviews of key personnel during the visit demonstrated that Zaytuna has laid the groundwork for continuous improvement aligned with both the internal norms of Islamic learning and the standards of external accreditation. Relevant evidence reviewed by the team included syllabi, assessment plans and reports, and samples of student work. Zaytuna has taken important steps towards establishing an assessment infrastructure (Documents 21—29), for example, through the expansion of the institutional research function in response to the July 2018 WSCUC Action Letter. However, the self-study provided less thorough documentation than desired with regard to direct evidence of student learning and assessment feedback loops. Assessment results largely entail indirect evidence of learning, such as surveys (e.g. Documents 29, 39), and are not often enough in the form of quantifiable data. Zaytuna needs to continue to develop data-driven methods to ensure the institution is systematically learning and implementing change at the program and institution level. (CFR 2.6, 2.7)

It should be noted that Zaytuna’s BA alumni appear well prepared to pursue graduate-level study beyond Zaytuna as evidenced by their impressive graduate school admission outcomes (Document 11: IR Undergraduate Alumni Profile). The currently small number of graduates allows for granular analysis of alumni, and the onsite interview conducted by team members with a group of alumni corroborates their satisfaction with the Zaytuna educational experience and their preparation for life after college although the team observed the need to develop career advisement. (CFR 2.6)
Scholarship and Creative Activity

Expectations for research and scholarship for students are apparent in both the undergraduate and graduate programs as delineated in the respective program catalogs (e.g. senior thesis, experiential learning project, preceptorials and special reading courses; Self-Study, p. 10). The institution’s expectations of scholarship for its graduate students are expressed in the MA thesis guidelines (MA Catalog, p. 17); however, developing a vibrant graduate culture characterized by scholarship and creative activity remains an area for future growth. Scholarship by faculty is mentioned in the Faculty Handbook, which includes in the periodic evaluation by the Professional Review Committee, faculty self-reporting “on the nature, quality, and quantity of their scholarly work” (p. 15). However, expectations for faculty scholarship output are not specified. (CFR 2.8)

Student Learning and Success

Zaytuna regularly identifies the characteristics of its students and assesses their preparation, needs, and experiences by means, for example, of diagnostic testing, advising, and surveys. Data garnered through these processes and through the assessment of student work (e.g. Documents 10, 36, 37, 39) are used to improve student achievement, although, as mentioned, more quantifiable assessment of direct evidence of student learning is needed. Analysis of retention and graduation data seems incomplete and was difficult for the team to assess as the institution has not published retention and graduation rates or provided disaggregated data in that regard. The institution has established benchmarking criteria of higher education institutions offering comparable Islamic studies (Document 27). The necessary further analysis of
disaggregated retention and graduation rates may also look to draw comparisons with the appropriate peer institutions. (CFR 2.10)

Zaytuna’s co-curricular programs reflect a strong student life approach consistent with the mission and purpose of the institution’s educational goals and philosophy and encompassing the development of students’ minds, bodies, and spirits. The small size moreover allows for whole-person education that is intentional and individualized. Of note is the Sunna sports program, a requirement for all undergraduates in the freshman through junior years and consisting of swimming (focus on overcoming fears), archery (focus on inner peace and temperance), and horseback riding (focus on relating with and caring for another being). Religious life and ritual are part of student development and woven into the daily routine of the college. Students’ spiritual development is of prominent importance. Onsite interview with a representative group of undergraduate and graduate students affirmed the centrality of this aspect for the students who choose Zaytuna. As one put it, “I don’t have to abandon any part of my identity to be here.” Student life programming also includes public lectures, an engaging residential life experience with workshops on money management, ethical and healthy eating, dinner and discussion with faculty and staff, and on-campus job opportunities. (CFR 2.11)

Zaytuna has developed a multi-faceted approach to ensuring student success that involves faculty, registrar, dean, academic support and student affairs staff, etc. The institution provides whole-person advising and other student services, notably academic support, residential life, and opportunities to work on campus. The team was impressed by faculty engagement with students. Each undergraduate is assigned a faculty advisor at admission, who accompanies the student throughout the four years in the program and tracks their academic, social, and spiritual development. However, given the preponderance of male professors (currently all full-time
professors and most adjuncts are male) and the particular mores of traditional Islamic social
etiquette, female students, who make up roughly half of undergraduate enrollment, are
disadvantaged when matched with male advisors as they do not enjoy the same access, openness
of communication, or ease of interaction with male faculty as male students do. This imbalance
is recognized by faculty and senior leadership, who have taken some measures to alleviate the
situation, for example, by ensuring that male faculty make it a point to sit with female students
during dinner and discussion. It is recommended that Zaytuna redouble its efforts to hire
additional female faculty in order to provide female students with opportunities to forge
meaningful mentoring relationships with appropriate role models. (CFR 2.9; 2.13)

Review of documents and interviews with key personnel and students revealed that
assessment and remediation are intertwined. Academic support is well developed, and individual
students are tracked to ensure that their academic needs are identified early and addressed
through skills workshops, individual tutoring, and advising (Document 37). Published material
and interviews with academic support staff and faculty advisors also established that Zaytuna
provides basic disability-related accommodations. The team recommends staff receive
professional development in the area of disability services to support a more robust system for
serving students with learning and physical disabilities in compliance with federal law (e.g.
American with Disabilities Act, Fair Housing Act). (CFR 2.13)

Finally, Zaytuna has recently begun to admit international students, which directly
supports its goal to shape Islamic education both in the U.S. and globally. The team recommends
that the school provide professional development for those staff serving in international student
services roles in order to develop comprehensive advising services for international students.
This will ensure that international students are able to integrate into the campus community and
receive crucial F-1 advising to protect their status and eligibility for practical training and other benefits. (CFR 2.13)

Standard 3: Developing and Applying Resources and Organizational Structures to Ensure Quality and Sustainability

Zaytuna benefits substantially from the generous support of thousands of individual donors who, in the Islamic tradition of zakat (similar in concept to tithing in certain Christian religions), consistently provide current use gifts to fund the school’s operations. The school also benefits from the generosity of major donors who have injected funds as required for extraordinary expenditures, such as in FY 2017-18 when the school successfully solicited donations to purchase its Marin Avenue campus. Its fund-raising capacity has provided Zaytuna with financial security and stability. (CFR 3.4)

The school’s leadership recognizes that its nearly exclusive reliance on fund-raising as a revenue stream may be insufficient to sustain the school over time. Leadership has concluded that the school must build a $50-$100 million endowment to fund faculty chairs, student scholarship, and capital improvements to withstand future risks and uncertainties.

Zaytuna’s FY 2017-18 financial statements – the most current available – were unqualified. The school’s balance sheet was healthy, reflecting $30 million in total assets, composed of $24 million (80% of total) of property and equipment and $1.5 million (5% of total) of endowment investments. It had an acceptable working capital ratio of 1.67, no long-term debt, and one short-term, no-interest loan from a friend of the school to purchase the upper campus property. (CFR 3.5)

Zaytuna’s operating budget is about $9.5 million or $119k per student (for contrast, the average for all 4-year private nonprofit colleges was $56k in FY 2015-16 according to the
National Center for Education Statistics). Nevertheless, Zaytuna’s costs of operation are comfortably in line with its revenue. Costs for institutional advancement represented a third of total costs in FY 2017-18, which is reasonable given the school’s reliance on the continual support from its network of private donors (see discussion about its advancement program below). (CFR 3.4)

Over the past three years, gift revenue composed 95% of Zaytuna’s total revenue. Only 2.7% of revenue was derived from net student tuition. For at least the past five fiscal years for which audited statements are available, Zaytuna has posted net revenues (surpluses). During the most recent three years, net revenues (surpluses). During the most recent three years, excluding an extraordinary gift related to the purchase of the Marin Avenue campus, were about $2 million. (CFR 3.4)

Faculty are sufficient in number and in qualifications to fulfill Zaytuna’s mission (CFR 3.1). As noted elsewhere in this report, diversity of faculty, although consonant with the school’s academic mission and religious precepts, could be greater. Female students would benefit if more women faculty were available to provide direction and support. The school’s leadership has recognized the need for better gender balance and is actively recruiting women faculty. (CFR 3.1) Zaytuna’s ratio of students to faculty is about 5:1 FTE for FY 2019-20, which is among the lowest of all private liberal arts colleges in the U.S. It should be noted that some listed as Zaytuna’s faculty may have administrative duties in addition to their teaching obligations. (CFR 3.1)

Zaytuna very recently reorganized its administrative organization as part of its president’s decision to conduct a thorough review of administrative policies, procedures, and lines of communication. The school created the position of provost responsible for faculty, student
affairs, admissions, operations, and institutional research. The president retains responsibility for advancement, marketing, accounting, and publications. This reorganization stemmed from an analysis of operational effectiveness commissioned by the president and from turnover in key positions in advancement, marketing, and operations. Three key positions in these areas remained vacant during the on-site review. (CFR 3.1)

The school’s outside auditor commented that turnover in the CFO position has occurred at a higher rate than is ideal. Zaytuna would be well served by placing a CFO who will instill stability and consistent oversight of internal controls. (CFR 3.1, 3.8)

The new organization chart is essentially flat, which doubtless promotes accountability and efficiency through direct and immediate bi-directional communication between Zaytuna’s senior leaders and its management team. Zaytuna will need to guard against the potential in such a flat structure for overburdening the school’s leaders with issues or problems that would be best resolved at a lower level. (CFR 3.1)

Since its Special Visit in 2018, Zaytuna has worked to ensure that policies affecting faculty are clear and consistent, particularly regarding recruitment, hiring, termination, grievance, and evaluation. (CFR 3.3)

Zaytuna’s facilities at both its lower campus and recently acquired upper campus are pleasant and appear to be sufficient for the school’s growth plans. Building grounds at both campuses are attractive and well maintained. As noted below, the age of many of its structures is advanced, and several buildings may not comply with current disability access codes. The school will need to plan for maintenance and improvement of its aging structures. The location of both campuses exposes Zaytuna to potential losses and disruption resulting from a major earthquake
or a devastating wildfire. The school should address in its risk management and capital improvement plans how it might mitigate those risks. (CFR 3.5)

The school’s enterprise software is state-of-the-art. It has outsourced its desktop and network maintenance to a well-regarded service provider. (CFR 3.5)

Zaytuna recently rewrote its bylaws, with assistance from a reputable law firm, and has engaged the services of AGB to help train the school’s board. Zaytuna’s founders no longer sit as voting members on its board. The review team noted that the number of board members falls one short of the nine required by its bylaws. The board’s president said the board is actively recruiting to reach a total of twelve members. (CFR 3.9)

**Standard Four: Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement**

In response to previous WSCUC recommendations, Zaytuna College has demonstrated a commitment to building capacity in the area of institutional effectiveness. Clearly, the office of institutional research is providing data to various offices across the campus in order to promote a culture of assessment and utilize data to inform decision making. However, the utilization of data for improving curricula, pedagogy, and learning results is not apparent in the current program review assessment. (CFR 4.1, 4.3, 4.4) While Zaytuna has developed a program review process, the assessment systems should be improved to make more meaningful use of the assessment activities referenced in the program review that are more clearly able to allow for course and pedagogical changes. Further, the system of assessment itself should be more carefully analyzed so that it might mature. The use of direct and indirect evidence is clearly needed in order to assess program learning outcomes. (CFR 2.3, 2.7, 4.3, 4.4)
Zaytuna has initiated a process of program review for the bachelor’s program. Examples of program assessment were provided in samples of specific student assignments. A BA Program Review for outcome #2 (Demonstrate grounding in the Islamic and Western scholarly traditions) was provided that demonstrated the initial process of reviewing the program. The process is currently ongoing, with examples of student and faculty responses to specific questions provided. Data were presented in narrative form, with the goal of faculty discussing interview responses. While faculty involvement is evident, the process clearly lacks specificity in assessing program learning outcomes. (CFR 4.1, 4.4) The program learning outcomes are not stated as specific learning outcomes but are stated as a holistic product outcome. Zaytuna is encouraged to develop specific learning outcomes that can be measured, analyzed, and interpreted to create a culture of evidence and improvement. (CFR 4.3)

Zaytuna clearly communicates a commitment to student success as evidenced by the processes found in the Academic Support Center. The college is encouraged to systematize the support system through the collection, analysis, interpretation, communication, and tracking of student support thereby creating a system for improving learning results. (CFR 4.1)

Zaytuna has developed an institutional research office that is able to provide and track data. Institutional data are being provided to various constituencies across campus, but the utilization of data is unclear. Zaytuna is encouraged to complete its strategic plan through formalizing institutional strategic priorities that are measured through the utilization and tracking of data informed benchmarks. (CFR 4.6)

Zaytuna is required by WSCUC to publish data of student achievement including retention and graduation rates on its institutional website and to disaggregate such data according to appropriate demographic categories. (CFR 1.2, 2.10, 4.2)
**Inventory of Educational Effectiveness Indicators (IEEI)**

Zaytuna submitted the Inventory of Educational Effectiveness Indicators. The IEEI addresses the two programs offered by Zaytuna. The learning outcomes for each program are listed as being published on the college’s website. The BA program learning outcomes are not listed as measurable outcomes and are stated in a narrative form. The MA learning outcomes are listed on the college website as referenced in the IEEI. Indirect assessment is used as evidence that students have achieved the outcomes and are reviewed by faculty. The team suggests that Zaytuna continue the critical work of assessing both direct and indirect evidence grounded in clear learning outcomes at the institution, program, and course levels. It is also critical that Zaytuna complete the development of its comprehensive program review process, using data-driven analysis in curricular decision making.

**Federal Requirements**

The team has reviewed and confirmed that Zaytuna is in compliance with the following reviews, as relevant: 1) Credit Hour and Program Length Review; 2) Marketing and Recruitment Review; 3) Student Complaints Review and 4) Transfer Policy Review. Note that while a substantive proportion of Zaytuna’s undergraduate students have completed prior coursework and, often, degrees at other institutions of higher learning, the uniqueness of the Zaytuna curriculum and its cohort model do not lend themselves to transferring in credit. Zaytuna has a transfer credit policy in its catalog that outlines approval parameters and process, although these are rare in occurrence.
C. Degree Programs: Meaning, Quality, and Integrity of Degrees

Zaytuna has defined the meaning, quality, and integrity of its degrees through its own framework, which also follows the same framework that students are introduced to in each of their classes (Self-Study Report, p. 16). The undergraduate and graduate curricula are fixed in the canon of great books of the Western and Islamic classical traditions, and the primary Islamic texts, respectively.

The program review example clearly articulates the questions that Zaytuna deems critical in assessing the integrity of their degrees. Moreover, as indicated in the institutional self-study, “students engage the shared traditions of Islam and the West…Zaytuna is a place for the renewal and reconciliation of ‘our’ common heritage, and for keeping God and revelation at the center of the conversation” (Self-Study Report, p. 24).

In meeting with faculty, the team discovered that despite the absence of measurable program learning outcomes, faculty did modify sequencing of student assignments in response to student and faculty surveys. This example reflects an emerging culture of assessment indicative of Zaytuna’s distinctive curriculum as related to the institutional mission.

Clearly, Zaytuna considers the value of the institutions’ commitment to its mission as complementary to the integrity of its degrees. Moreover, Zaytuna continuously affirmed throughout the team’s visit that excellence, reflection, and self-assessment are fundamental to the Islamic tradition. As such, Zaytuna is committed to developing students who are excellent, as well as proficient, and therefore, reflective of their quality of education. However, the curricular programs lack measurable outcomes that can assure the degrees awarded meet institutional standards of quality and consistency. (CFR 2.6,2.7, 4.1, 4.3,4.4, 4.6) A holistic assessment is utilized as students gain the ability to use the tools of learning as identified by Zaytuna.
D. Component 4: Educational Quality: Student Learning, Core Competencies, and Standards of Performance at Graduation

Zaytuna College has developed an initial program review for its undergraduate program. Policies and procedures are in place for assessing student learning in measurable outcomes. Student outcomes, including for the core competencies, are assessed primarily through written assignments. As indicated in the self-study and in interviews, rubrics may be introduced in the future. Zaytuna identifies three tools of learning that addressWSCUC’s five core competencies (Self-Study Report, p. 26). A chart is provided in the self-study to illustrate the relationship between Zaytuna’s tools of learning and WSCUC core competencies. The examples indicate assignments that demonstrate competency in the Zaytuna tools of learning. Clearly, oral communication is a priority for Zaytuna as students are initially assessed as freshmen and again in a senior thesis presentation.

The team notes a lack of clarity as to how quantitative reasoning skills are assessed upon admission or developed and assessed within the curriculum. The courses that are indicated as examples of where these core competencies are addressed provide no indication of their development or assessment. At best, a culture of assessment is nascent at Zaytuna.

The standards of performance are set by individual faculty based on discussion by faculty, alumni feedback, and external perspectives. It is unclear as to who constitutes the external perspective. The team did not find the existence of curricular maps that indicate where core competencies are introduced, developed or mastered. Zaytuna continuously asserts that a student’s full potential is not truly realized until the end of the degree program or after they have graduated (Self-Study Report, p. 27). It is unclear how core competencies intersect meaningfully
and consistently with courses and an assessment system. The evidence provided indicates a qualitative approach to assessment without regard to established patterns of assessment. The program review lacks documentation of modifications made as a result of discussion.

E. Component 5: Student Success: Student Learning, Retention and Graduation

Zaytuna prides itself in the academic rigor of its programs and the success of its graduates. The school’s multi-faceted approach to student success involves advisors, instructors, registrar, dean, student life staff, and peer tutors. Each student is assigned a faculty mentor for the duration of their studies, and student performance is tracked in order to match students who are falling below satisfactory academic performance with the appropriate academic support services, typically tutoring or skills workshops. Much focus is placed on written expression and grammar. For the undergraduates, proficiency and development of those skills is assessed at entry and during the first semester. Rubrics have been developed to measure writing and critical thinking, and corresponding data are collected in all courses on a regular basis.

Attention is also paid to students’ physical and spiritual development, supported by an integrated student life approach consistent with the mission and purpose of the Zaytuna education. In team interviews, representative numbers of current students as well as alumni indicated strong satisfaction with their education and preparedness for life after college, in terms of both their academic preparation as well as the values and moral compass cultivated through the Zaytuna experience. Although Zaytuna BA graduates have impressive graduate school admissions outcomes, administrators as well as current students identified a lack of resources, such as career development services, when it comes to preparing students for life post graduation.
Zaytuna continues to collect data on student success; however, the team found it difficult to examine retention and graduation data. As mentioned under Standard 1, although previousWSCUC reviews have emphasized the need for Zaytuna to publish student success data, the institution has not made retention and graduation rates public. Data provided in the self-study indicated a 72% retention rate and a 51% graduation rate for the undergraduate program (Document 10). Unfortunately, context for these data points was lacking, and reasons for noticeable attrition were not addressed. The institution should move to disaggregate and analyze relevant student success data, including retention and graduation rates, and make them available on the Zaytuna website. (CFR 1.2)

F. Component 6: Quality Assurance and Improvement: Program Review, Assessment, Use of Data and Evidence

Zaytuna has worked assiduously to develop its systems and structures for quality assurance and improvement. They expanded the office of institutional research to that of institutional effectiveness, and promoted the director to a leadership level position. This affords them the ability to integrate data design, collection and use in more areas of operation. With only two programs, one undergraduate and one graduate, they have been able to address program review design in a straightforward fashion. They have a map for program review in terms of the different institutional learning outcomes for general education and the major. Each learning outcome has articulated areas for review and assessment.

Faculty have always been engaged in student learning through discussion and informal processes; because of their small population, they take an individualized approach to advising, and faculty and staff advisors maintain close relationships and are able to identify student strengths and weaknesses and address areas for improvement. Zaytuna is now working to
formalize these processes without losing the high level of discussion and faculty participation. They are involved in faculty-wide conversations about a particular learning outcome, where it is mapped in the curriculum—in and across courses. They are also working on more scaffolding of instruction, and clearer integration between outcomes and types of pedagogy; because the practice has been heavy in lecture, they are now considering how increasing discussion, as well as pair work (e.g., project-based learning) might complement the solid foundation in lecture. Much of the data collected are grounded in student surveys and faculty evaluations of student performance. In the area of writing, however, they have begun to do more direct sampling of student output and create evaluation tools, such as rubrics. Thus, in terms of assessment and use of data, Zaytuna is at low-emerging stages of development. They clearly understand the importance of studying student performance to make curricular decisions, but there is work to do in terms of using more direct forms of evidence, and aggregating data across students for institutional purposes. At the institutional level, they are also emerging; there are new structures in place but they are in "wet cement," in terms of regular use and demonstrable effect.

G. Component 7: Sustainability: Financial viability, preparing for the changing higher education environment

Zaytuna College is commended for its accomplishment in graduating students from its programs free of debt. Zaytuna is exceptionally adept at fundraising and, as a result, has posted unqualified audited financial statements, annual operating surpluses for at least the past five years, and a balance sheet at the end of FY 2017-18 that is free of long-term debt, even after the recent acquisitions of substantial real estate.
Zaytuna relies heavily on the fund-raising skill of its president and on the productivity of its advancement team to maintain critical revenue flow. In recognition of the vital importance of its gift revenue pipeline, the school devotes considerable resources to maintaining a network of alumni and friends, planning and executing fund-raising events, and cultivating major donors. The school’s heavy reliance on gift revenue for survival could amplify the adverse financial effects of external and internal risks. Such risks include economic downturn, market volatility, changes in laws or regulations, turnover within the advancement department, adverse publicity, the president’s inability to continue his fund-raising efforts, natural disasters, or other events outside Zaytuna’s control. The school should compose detailed strategies to respond to the range of realistically possible threats to its essential gift revenue.

Zaytuna’s recent property acquisitions more than doubled its real property assets at the end of FY 2017-18 to about $24 million and substantially increased the school’s physical capacity for future growth. The acquisitions also imposed liabilities attendant to aged infrastructure including deferred maintenance costs and the risks of loss from a major earthquake or wildfire. The college’s strategic plan should prioritize plant maintenance and improvement to ensure the habitability of its structures. The plan should also allocate funds necessary to improve the school’s facilities to suit its growth plans (CFR 3.4).

SECTION III. FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

The team agreed that Zaytuna conducted a thorough, productive, and informative internal review. The team also recognized and affirmed the hard work put into the self-study, and in responding to requests for additional documents. As a result of the visit, the team came to understand better Zaytuna's mission and distinctive approach to teaching and learning, the
improvements resulting from the self-study process, and, what is perhaps most important, the profound sense of mission and commitment to excellence. Zaytuna continues to mature as a higher education institution even as it faces organizational challenges.

The team identified five (5) commendations and six (6) recommendations.

**Commendations.** The team commends Zaytuna College for the following five accomplishments and practices:

1. For developing a compelling vision and rigorous curricular programs aligned with its mission, values, and purpose, and for the impact the college is already having on American higher education and the global Muslim community. (CFR 1.1, 1.3)
2. For its substantial achievements in response to previous recommendations from WSCUC evaluations, including building capacity in the area of institutional effectiveness, and by completing and approving the Faculty Handbook. (CFR 4.4, 3.3)
3. For its substantial improvements in board governance. Responding to prior WSCUC recommendations and to the institution’s own desire to adopt best practices, it is gratifying to see how the board has adopted clear bylaws conforming to California nonprofit code, separated board membership from administrative roles, and provided opportunities for board development, including those offered by the Association of Governing Boards (AGB). (CFR 1.3, 1.8, 3.9)
4. For its ability to graduate students from its programs free of debt. Zaytuna College is exceptionally adept at fundraising and, as a result, has posted unqualified audited financial statements, annual operating surpluses for at least the past five years, and a balance sheet at the end of FY 2017-18 that is free of long-term debt, even after the acquisitions that year--and the year before--of substantial real estate. (CFR 3.5)
5. For attracting highly qualified and motivated students and providing them with a deeply reflective and holistic educational experience that they cannot find anywhere else, one that integrates Islamic and Western liberal arts traditions while incorporating academic rigor, co-curricular engagement, and experiential learning. (CFR 2.1, 2.5, 2.6)

**Recommendations.** The team has identified the following six (6) recommendations to focus Zaytuna College’s ongoing efforts:

1. In order for Zaytuna College to comply with WSCUC standards, the team recommends that the College without delay publish data of student achievement—including retention and graduation rates—on its institutional webpage. (CFR 1.2, 4.2)

2. The team recommends that Zaytuna College complete its strategic plan through formalizing institutional strategic priorities, aligning resources with those priorities, and establishing benchmarks for communicating progress to the entire Zaytuna community. (CFR 3.4, 4.6)

3. The team recommends that the institution’s strategic plan incorporate strategies to diversify its revenue streams and otherwise mitigate conceivable threats to financial viability including market volatility, adverse publicity, unplanned staff turnover, natural disaster, and the like. (CFR 3.4)

4. The team recommends that Zaytuna College’s strategic plan prioritize plant maintenance and improvement to ensure the habitability of its structures and allocate the funds necessary to improve them to suit the school’s growth plans. (CFR 3.4)

5. The team recommends that Zaytuna College build on its success of coordinating academic and co-curricular areas to develop robust policies and procedures to support all of its students equally—in courses, preceptorials, support programs, and co-curricular activities. It should
particularly address vulnerable populations such as students with disabilities and international students, as well as increase access for its female students to female faculty and advisors. (CFR 1.4, 2.13)

6. While the team affirms the substantial effort in building a community committed to understanding assessment of student learning, Zaytuna College must continue the critical work of assessing both direct and indirect evidence grounded in clear learning outcomes at the institution, program, and course levels. Zaytuna must also complete the development of its comprehensive program review process, using data-driven analysis in curricular decision making. (CFR 2.3.2.7)
<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy on credit hour</td>
<td>Is this policy easily accessible? X YES □ NO&lt;br&gt;Where is the policy located? In the catalog&lt;br&gt;Comments:</td>
</tr>
<tr>
<td>Process(es)/ periodic review of credit hour</td>
<td>Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? X YES □ NO&lt;br&gt;Does the institution adhere to this procedure? X YES □ NO&lt;br&gt;Comments:</td>
</tr>
<tr>
<td>Schedule of on-ground courses showing when they meet</td>
<td>Does this schedule show that on-ground courses meet for the prescribed number of hours? X YES □ NO&lt;br&gt;Comments:</td>
</tr>
<tr>
<td>Sample syllabi or equivalent for online and hybrid courses&lt;br&gt;&lt;i&gt;Please review at least 1 - 2 from each degree level.&lt;/i&gt;</td>
<td>How many syllabi were reviewed? 3&lt;br&gt;What kind of courses (online or hybrid or both)? Only on site courses exist&lt;br&gt;What degree level(s)? BA and MA&lt;br&gt;What discipline(s)? Islamic Law and Theology (BA) and Islamic Texts (MA)&lt;br&gt;Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? □ YES □ NO&lt;br&gt;Comments:</td>
</tr>
<tr>
<td>Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated)&lt;br&gt;&lt;i&gt;Please review at least 1 - 2 from each degree level.&lt;/i&gt;</td>
<td>How many syllabi were reviewed? NA&lt;br&gt;What kinds of courses? NA&lt;br&gt;What degree level(s)? NA&lt;br&gt;What discipline(s)? NA&lt;br&gt;Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? □ YES □ NO&lt;br&gt;Comments:</td>
</tr>
<tr>
<td>Sample program information (catalog, website, or other program materials)</td>
<td>How many programs were reviewed? 2&lt;br&gt;What kinds of programs were reviewed? Islamic Law and Theology; Islamic Texts&lt;br&gt;What degree level(s)? BA and MA&lt;br&gt;What discipline(s)? Islamic Law and Theology (BA); Islamic Texts (MA)&lt;br&gt;Does this material show that the programs offered at the institution are of a generally acceptable length? X YES □ NO</td>
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</table>
### MARKETING AND RECRUITMENT REVIEW FORM

Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution’s recruiting and admissions practices.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal regulations</td>
<td>Does the institution follow federal regulations on recruiting students?</td>
</tr>
<tr>
<td></td>
<td>X YES □ NO</td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
</tr>
<tr>
<td>Degree completion and cost</td>
<td>Does the institution provide information about the typical length of time to degree?</td>
</tr>
<tr>
<td></td>
<td>X YES □ NO</td>
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<tr>
<td></td>
<td>Does the institution provide information about the overall cost of the degree?</td>
</tr>
<tr>
<td></td>
<td>X YES □ NO</td>
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<tr>
<td>Careers and employment</td>
<td>Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable?</td>
</tr>
<tr>
<td></td>
<td>X YES □ NO</td>
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<tr>
<td></td>
<td>Does the institution provide information about the employment of its graduates, as applicable?</td>
</tr>
<tr>
<td></td>
<td>X YES □ NO</td>
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<td>Comments:</td>
<td></td>
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*§602.16(a)(1)(vii)

**Section 487 (a)(20) of the Higher Education Act (HEA) prohibits Title IV eligible institutions from providing incentive compensation to employees or third party entities for their success in securing student enrollments. Incentive compensation includes commissions, bonus payments, merit salary adjustments, and promotion.
decisions based solely on success in enrolling students. These regulations do not apply to the recruitment of international students residing in foreign countries who are not eligible to receive Federal financial aid.

Review Completed By: Frances M. Sweeney  
Date: October 5, 2019

**STUDENT COMPLAINTS REVIEW FORM**  
Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution’s student complaints policies, procedures, and records.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
</table>
| Policy on student complaints | Does the institution have a policy or formal procedure for student complaints?  
X YES ☐ NO  
If so, Is the policy or procedure easily accessible? Where? Yes, in Zaytuna Catalog  
Comments: |
| Process(es)/procedure | Does the institution have a procedure for addressing student complaints?  
X YES ☐ NO  
If so, please describe briefly: Students work with their advisor or with the Dean of the College  
If so, does the institution adhere to this procedure? X YES ☐ NO  
Comments: |
| Records | Does the institution maintain records of student complaints? X YES ☐ NO  
If so, where?  
Does the institution have an effective way of tracking and monitoring student complaints over time? X YES ☐ NO  
If so, please describe briefly: This is now folded in to the work of the Dean of the College  
Comments: |
*§602-16(1)(ix)
See also WASC Senior College and University Commission’s Complaints and Third Party Comment Policy.

Review Completed By: Frances M. Sweeney
Date: October 5, 2019

TRANSFER CREDIT POLICY REVIEW FORM
Under federal regulations*, WSCUC is required to demonstrate that it monitors the institution’s transfer credit policy and practices.

<table>
<thead>
<tr>
<th>Material Reviewed</th>
<th>Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)</th>
</tr>
</thead>
</table>
| Transfer Credit Policy(s) | Does the institution have a policy or formal procedure for receiving transfer credit?  
X YES ☐ NO  
Is the policy publically available?  
X YES ☐ NO  
If so, where?  
In the Zaytuna Catalog  
Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education?  
X YES ☐ NO |

Comments:

*§602.24(e): Transfer of credit policies. The accrediting agency must confirm, as part of its review for renewal of accreditation, that the institution has transfer of credit policies that--

(1) Are publicly disclosed in accordance with 668.43(a)(11); and

(2) Include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education.

See also WASC Senior College and University Commission’s Transfer of Credit Policy.

Review Completed By: Frances M. Sweeney
Date: October 5, 2019