

**REPORT OF THE WSCUC VISITING TEAM**

**SEEKING ACCREDITATION VISIT 2  
For Initial Accreditation**

**Mt. Madonna Institute**

November 13 - 16, 2019

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The team evaluated the institution under the WSCUC Standards of Accreditation and prepared this report containing its collective judgment for consideration and action by the institution and by the WASC Senior College and University Commission. 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. Once an institution achieves either candidacy or initial accreditation, the team report and Commission Action Letter associated with the review that resulted in the granting of either candidacy or initial accreditation and the team reports and Commission Action Letters of any subsequent reviews will be 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 Visit**

Established in 2005, Mount Madonna Institute (MMI) is a private, non-profit, independent, 501(c)3 educational institution located in Watsonville, CA. MMI is approved by the State of California Bureau for Private Postsecondary Education, National Ayurvedic Medical Association (NAMA), Yoga Alliance, and International Association of Yoga Therapists to offer professional instruction in the fields of ayurveda, yoga, and community studies.

MMI is located on the 350-acre campus of Mount Madonna Center, a retreat and conference center founded in 1978. The campus is owned by the Hanuman Fellowship (HFS) and serves in the capacity of a related entity to MMI, as represented in the WASC Senior College and University Commission (WSCUC) Related Entity Policy, providing fiscal and inspirational support through its board of directors.

The Hanuman Fellowship is a non-profit organization founded by the students of Baba Hari Dass in 1971. His students formed Hanuman Fellowship as a vehicle for the teachings of ayurveda and yoga and for the variety of projects developed by the Fellowship members. Projects directly under the Fellowship include Mount Madonna Center, Pacific Cultural Center, Ocean View Books, and Anjanyea's World Café. The Fellowship is affiliated with Mount Madonna K-12 School, Sri Ram Foundation, and Mount Madonna Institute.

In September 2014, the State of California passed SB 1247, which states that only schools accredited by an agency recognized by the US Department of Education would be able to continue California Bureau for Private Postsecondary Education (BPPE) State approval for degree programs, after July 1, 2020. MMI's desire to continue offering the Master of Arts in

Ayurveda, as well as developing other mission related degree programs, initiated the accreditation process with WSCUC.

WSCUC accepted MMI's application for eligibility December 14, 2015 and MMI filed the required Letter of Intent on February 4, 2016. The supplemental application for two additional degree programs, Master of Arts in Yoga Studies and Master of Arts in Ayurveda and Yoga Therapy, was approved on December 19, 2016, though the programs have not been implemented. WSCUC scheduled the initial seeking accreditation site visit for September 2017.

The institution submitted its Seeking Accreditation Visit 1 (SAV1) Report and supporting documents to WSCUC in June 2017. An evaluation team of five members from peer institutions along with a WSCUC liaison visited MMI from September 6-9, 2017 to conduct an initial seeking accreditation visit to include all standards and criteria for review. On March 9, 2018, MMI was notified that WSCUC accepted the SAV1 report and a Seeking Accreditation Visit 2 (SAV2) was scheduled for fall 2018. The date was eventually moved to fall 2019 at the request of MMI and approved by WSCUC. The Commission letter after the SAV 1 included six commendations and a detailed list of issues in all four standards for further development. The Commission found that MMI demonstrated evidence of compliance for Standards 1 and 2 sufficient for Candidacy and that the institution did not demonstrate evidence of compliance for Standards 3 and 4 at a level sufficient for Candidacy or Initial Accreditation.

In 2019, Mount Madonna Institute has 130 students enrolled in several professional training certificates and one master's degree (8 students). MMI is considering two additional master's degree programs in the future. The institute currently employs 37 full- and part-time faculty and 18 staff members.

MMI submitted its Seeking Accreditation Visit 2 (SAV2) Institutional Report to WSCUC in September 2019, with a number of support documents. The team reviewed the MMI documentation and completed a summary worksheet in preparation for the team's conference call on October 25, 2019. During that call, the team discussed the MMI report, determined writing assignments, identified additional documentation needed, and developed a tentative list of necessary meetings for each team member during the onsite visit.

All team members participated in the offsite review of MMI's documents and all members contributed to the writing of the final report. Due to a schedule conflict, team member Robyn Nelson was not able to attend the onsite visit. The other four team members traveled to MMI for the on-site visit. After arriving at MMI on November 13, 2019, the team completed the final visit coordination and planning. On November 14<sup>th</sup> and 15<sup>th</sup>, the team conducted onsite reviews of institutional documents and held discussions with administrative personnel, members of the board of directors, faculty, staff, students, and stakeholders. In addition, the team reviewed all submissions made to the confidential email address that MMI made available to all interested parties. The exit meeting occurred during the morning on November 16, 2019.

### **B. The Institution's Seeking Accreditation Visit 2 Report: Quality and Rigor of the Review and Report**

The team found the report to be thorough and responsive to the issues raised and the recommendations made during SAV1. MMI organized the report by the WSCUC standards and CFRs allowing given information to be easily located, through a number of well-organized appendices. Almost everything evaluators needed was provided with the report and those items lacking were quickly and adequately provided when requested.

MMI's preparation of the report involved the widespread involvement of a full range of constituencies including faculty, administrative staff, students and others as appropriate. Internal

and external stakeholders engaged in what was described by faculty, staff, and administrators as a “rewarding and transformational process” of reflection, analysis, planning, and implementation. Since SAV1, MMI has developed a clear and achievable strategic plan, clearly disseminated due process procedures to employees and students, established an effective and widely understood system of governance, fostered a graduate culture of inquiry, completed and implemented an institutional effectiveness plan, instituted a faculty performance appraisal system, improved student support services, and refined a program review process among other key initiatives.

### **C. Response to Issues Raised in Past Commission Letter**

The Commission letter dated March 29, 2018 included 12 recommendations addressing CFRs from all four Standards. In MMI’s narrative report, supporting documents, and responses during the SAV 2 visit, MMI made notable progress in all 12 recommendations.

The team found MMI has moved toward functioning as an independent institution of higher education, through strengthening board governance, successfully hiring quality individuals in key positions and formalizing responsibilities, developing financial plans for sustainability, and implementing systems for continuous improvement, including a sound program review process.

After reviewing the evidence provided, the team finds that MMI has met all four Standards at the level sufficient for Initial Accreditation. This report sets forth the team’s reasoning for its finding, addressing each Standard and CFR in depth in Section II below.

The Commission recommendations and the institution’s response are discussed in depth by each Standard in Section II of this report.

## **SECTION II – EVALUATION OF INSTITUTIONAL COMPLIANCE WITH WSCUC’S STANDARDS**

## **Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives**

### **Institutional Purposes**

MMI's current mission and vision are clear, focused, and the result of an open and collaborative process involving key campus stakeholders. During the visit, the team interacted with faculty, administration, students, and the board of directors about MMI's institutional purpose and it was evident that there was considerable understanding and support for the mission. The educational focus of the institution is in the fields of Yoga, Ayurveda Sciences, and Community Studies. The mission is presented in the academic catalog, in all in-house publications and handbooks, and on the website. (CFR 1.1)

Data concerning student learning outcomes, and educational objectives, including student achievement, retention, and graduation rates, were available on the website and catalog. Review of documents and meetings with faculty, staff, administration, and the board of directors revealed that graduation and retention data are regularly presented to the Academic Affairs Committee of the board, president, provost, and faculty. Identified as an area needing attention during SAV1, the Office of Institutional Effectiveness has increased its capacity and expertise by attending conferences, participating in workshops, and engaging professional consultants. (CFR 1.2)

### **Integrity and Transparency**

MMI maintains a culture of intellectual freedom and the board of directors approved an academic freedom policy that is published and readily available. In interviews with faculty and the provost it was evident that MMI valued faculty input, cared about academic freedom, and supported a model of collaboration. In addition, the team heard several examples of faculty praise related to transparency and open dialogue. Since SAV1, MMI updated and approved the Academic Freedom policy, incorporated the policy into the bylaws, and published the policy in

the website, catalog, and Faculty Handbook. The Academic Freedom and Grievance and Due Process Policies are reviewed annually by the faculty, administration, and board, as well as with new employees at the time of hire. (CFR 1.3)

MMI has a diversity policy, inclusion plan, and handbook that is governed and administered in a nondiscriminatory manner while responding to the educational needs and claims of the constituencies it serves as determined by its bylaws, mission, and policies. It was clear to the team when interviewing campus constituencies that MMI supports diversity in teaching, promotes cultural differences, and recognizes the rights of all individuals. (CFR 1.4)

Through detailed review of all available documents and several interviews with administration, members of the MMI board of directors, and the president of Hanuman Fellowship, the team found the institute able to operate as an academic institution of higher education. The board has an effective and widely understood system of governance with several updated policies that are disseminated to campus constituencies and available in the catalog and on the website. (CFR 1.5)

MMI has published and made readily available policies on student grievances and complaints. There is no evidence of any regulatory agency or accrediting body raising questions or concerns about the integrity of its operations. Records for faculty, staff, and student complaints and grievances are maintained and properly stored. The team observed accurate and consistent representation of MMI in our meetings with stakeholders, review of publications and policies, and the responsiveness of faculty, staff, and administration to our requests. Furthermore, the team found that the institution truthfully and accurately represents its goals, programs, services, and costs to students and displays high ethical standards in its operations when dealing with the public at large. (CFR 1.6)

MMI policies include conflict of interest on the part of the governing board, avoidance of discrimination behavior, right to privacy, and compliance with Americans with Disability Act. MMI undergoes external financial audits in accordance with generally accepted auditing principles and standards. The administration and governing board reviews results from audits, including findings and management letter recommendations. The team found that MMI adheres to ethical standards in its operations and relationships. There was an inconsistency found in the bylaws and MOU between the Hanuman Fellowship and MMI during SAV1. A revised MOU approved on September 15, 2018 by both boards ensures accountability for collaborative but separate management responsibilities for shared resources, volunteer services, and facilities management. (CFR 1.7)

As evident in its interaction with various team members, WSCUC staff, and completion of WSCUC required forms and progress reports, MMI accepts the standards and related policies of WSCUC and agrees to comply with these standards and policies as currently stated or modified. Further, MMI acknowledges that WSCUC may within its own rules and policies make disclosures about MMI accreditation status to members of the public. (CFR 1.8)

*The team's finding, which is subject to Commission review, is that the institution has demonstrated sufficient evidence of compliance with Standard 1 to achieve initial accreditation.*

## **Standard 2: Achieving Educational Objectives Through Core Functions**

### **Teaching and Learning**

Teaching and learning are at the heart of Mount Madonna Institute. Students and alumni report a transformative and rigorous learning experience with highly engaged faculty. Faculty report deep engagement with the learning of their students, utilizing student feedback, and both direct and indirect measures of learning to regularly guide actions for improvement to their courses. MMI has placed increased emphasis on developing regular processes for review, evaluation and analysis of policies, procedures and standards of performance. The institution and faculty have demonstrated a commitment to improving assessment efforts and to creating a graduate culture focused on student learning and success.

The MA in Ayurveda is a practice-oriented graduate degree with a focus on application or transmission of existing knowledge (evidence-based practice) or the development of new applications of knowledge within their field, rather than the development of original scholarship. To foster a graduate culture, MMI revised the program learning outcomes and curriculum to increase research literacy as an important component of professional practice. Other changes MMI has undertaken include replacing the thesis requirement with a capstone project, establishing a mandatory research journal club, and instituting a research symposium. The program is 36 semester units which is consistent with many graduate programs and includes didactic courses and clinical practice required by professional practice accreditation. The current full-time faculty workload is 85% teaching, and the clinical faculty workload is 95% clinical instruction. The current faculty are well-qualified and the faculty load is sufficient for the graduate enrollment. (CFR 2.1)

The vision, mission and goals of MMI clearly reflect the institution's intent to meet the increasing demand for trained practitioners of alternative and complementary healthcare. The MMI catalog on the institution website presents admission, pre-requisite and experiential requirements. Learning outcomes reflect the integration of theory, clinical application, and evidence-based practice. The time commitment for a student is clearly articulated. Goal 2 of the Strategic Plan for MMI articulates the importance of student achievement and a graduate culture to the institution. As a result of the completed program review, academic rigor has been strengthened in the curriculum, and inclusion of concepts related to integrative medicine has been increased to support professional practice and comparative research. In response to the WSCUC recommendation to clarify faculty roles and responsibilities, MMI clearly differentiated clinical and core faculty workload. (CFRs 2.2, 2.2b)

MMI has developed clear expectations and procedures to ensure institutional learning outcomes (ILOs) and program learning outcomes (PLOs) are communicated and understood at all levels of the organization. The institution has mapped the ILOs and PLOs to ensure programmatic alignment. ILOs, PLOs, and course learning outcomes (CLOs) are now published in all syllabi. Students report familiarity with learning outcome expectations and are asked to self-evaluate their accomplishment of outcomes at the conclusion of each course. Faculty are starting to employ rubrics to evaluate student learning in light of the outcomes, and the Director of Institutional Effectiveness (IE) is recording the data for additional analyses. (CFR 2.3)

Through the leadership of the Director of IE, the faculty revised the ILOs and PLOs to more clearly reflect graduate level learning, created curriculum maps and rubrics, and completed a program review of the MA program. Faculty use formative assessment methods to provide students with feedback following each assignment. These efforts are appreciated by the students,

who stated that obtaining more detailed and meaningful feedback on their performance and engaging in active learning have improved their learning. The institution is in the early stages of developing formalized program assessment processes and has created a timeline for summative assessment of PLOs. The Director of IE is responsible for leading the program assessment process, including aggregating the data, explaining the findings to her faculty colleagues and engaging them in utilizing the results for improvement. The team observed that while the faculty clearly understood and valued course assessment, they deferred to the Director of IE for all questions related to program assessment. Some professional development for faculty around program assessment has been scheduled. Greater faculty development opportunities and shared responsibility for program assessment will help MMI to assure meaningful student learning throughout the program and promote a culture of assessment. The team recommends that MMI continue providing professional development for faculty to promote a culture of assessment that includes use of aggregated program level data. (CFRs 2.4, 2.6, 3.3)

Student engagement in learning has been enhanced by clarity of the program learning outcomes, which are challenging students to meet high expectations and are used to provide feedback in several ways. Students report that learning outcomes and expectations for learning are clearly communicated to them, and that feedback on their learning is relevant to the stated expectations. (CFR 2.5) Faculty report that they believe that almost all students achieve expected learning outcomes in courses and noted that additional support and guidance are provided to assist students who are not meeting expectations. The plan to assess program- and institution-level learning outcomes utilizing aggregated rubric data is scheduled to begin in December 2019. Faculty reported looking forward to the upcoming workshop, which will include rubric norming and scoring. Faculty shared the agenda for this activity with the team during the visit. Continuing

to promote this level of attention to program assessment will help MMI to ensure that its graduates consistently meet expectations for student learning and will allow for informed changes for improvement to the curriculum. (CFR 2.6)

MMI has completed its first full program review, which included examination of student learning, student success measures, consideration of faculty experience, comparison with external programs, and an external review. The review led to multiple improvements within the program. The team observed that the administration and the faculty took seriously the recommendations from SAV1 to evaluate how students learn and if they are achieving articulated outcomes. (CFR 2.7)

### **Scholarship and Creative Activity**

MMI is a teaching institution with a focus on preparing competent practitioners. The current workload for core (theory) faculty and clinical faculty includes 5% of the workload in support of the scholarship of practice. The institution plans to increase the time spent by core (theory) faculty on scholarly creative work to 10% over the next 5 years. The budget reflects support for attendance at research-focused conferences and MMI has also established an annual research symposium to bring internationally acclaimed Ayurveda and yoga scholars to the community. These activities have the potential to enhance faculty and student conversations leading to innovation and professional growth. (CFR 2.8)

MMI is a non-tenure institution, and the only promotion available is from clinical (part-time who train and teach students) to core (full-time who make programmatic decisions) faculty. This promotion is a recognition of leadership potential and responsibility. MMI has adopted a process, which they believe fosters development of faculty talents and achievements, improves communication and teamwork, stimulates self-evaluation, and enhances quality improvement.

Faculty complete a self-evaluation which includes information on areas of excellence, faculty development, service, and research. The process includes a 10-item peer review of the knowledge, skills and attitudes important to an effective faculty member. A percentage of the final appraisal includes student rating of instruction and all student comments are shared with individual faculty members. (CFR 2.9)

### **Student Learning and Success**

MMI tracks its students and their progress toward the MA Ayurveda degree. They disaggregate data to examine potential issues on an individual basis. To date, each cohort has been a small number of students, and the faculty and staff are able to provide adequate support to promote student success. The institution tracks retention and graduation and benchmarks its student success compared with the small number of peers available. (CFR 2.10)

MMI provides a detailed description of its MA Ayurveda program on its website and in its catalog. The expectations and requirements are clear. Students have ready access to accurate, current, and complete information about admissions, degree requirements, course offerings, and educational costs. Students report a thorough understanding of the requirements of the program. Most students are medical practitioners and they tend to be older and present specific needs that respond to their professional and personal lives. The adult learners in the MA Ayurveda program have a different set of co-curricular needs and expectations from students in undergraduate or more traditional onsite graduate programs. Many co-curricular experiences involve work in the students' home communities (e.g. presentations at local libraries) or in the greater MMI region. Students and alumni feel that they are adequately supported and mentored as they move forward into their career paths. There is evidence that MMI adequately supports the students in its program. (CFRs 2.11, 2.12, 2.13)

MMI is hoping to provide financial aid to its students once it meets the requirements set by the Department of Education. During the site visit, the team observed that the institution may not be fully aware of the complexities and regulatory issues involved in offering financial aid and that changes may be needed in the organizational structure of MMI. The team recommends that MMI determine the costs and benefits of providing financial aid that complies with federal regulations. (CFRs 2.13, 3.1)

MMI's MA in Ayurveda program specifies the transfer credit that is accepted for students who enroll in the program. This information is readily available both at the MMI website and in the catalog. Because the program is very specialized, transfer credit must be related to the field. (CFR 2.14)

*The team's finding, which is subject to Commission review, is that the institution has demonstrated sufficient evidence of compliance with Standard 2 to achieve initial accreditation.*

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

#### **Faculty and Staff**

Faculty responsibilities are detailed in a Faculty Handbook. There is one full-time faculty member who serves as chair of the MA Ayurveda program. (CFR 3.1) The MMI community began with much support from volunteer practitioners and has evolved to faculty members who are carefully screened and many now serve as paid faculty in the MA program. Faculty members include core faculty and clinical faculty. As described above, MMI does not actively recruit new faculty, but with such a close national and international academic community, qualified individuals from around the world send unsolicited employment interests. (CFR 3.2) MMI has allocated funding for faculty development and implemented a supportive development policy. Faculty are encouraged to take advantage of continuing education opportunities. There are

shared opportunities for students and faculty to learn through research symposia which are held on campus. All faculty members are expected to participate in the December 2019 Assessment Workshop. (CFR 3.3)

In terms of staff, the team noted that MMI could benefit from closer connections to professional associations in higher education such as the American Association of Collegiate Registrars and Admissions Officers (AACRAO), National Association of College and University Business Officers (NACUBO), the Association of Governing Boards (AGB), and the like. The team recommends that MMI enhance the professional development and support the membership in professional organizations for administration, student support service personnel, and the board. (CFR 3.3)

The board takes seriously the concern that more financial support will be required to support faculty and staff in the future and is making plans to be financially able to effect appropriate changes.

### **Fiscal, Physical, and Information Resources**

MMI is a 501(c) (3) not-for-profit organization established principally for the purpose of operating an educational facility in California. MMI follows generally accepted US accounting principles. MMI provided the team with audited financial statements for the years ended September 30, 2017 and September 30, 2018. The financial statements for FYE September 30, 2017 were conducted for MMI as a stand-alone entity, whereas the financial statements for FYE September 30, 2018 were consolidated statements with Hanuman Fellowship (Advaita Society) as was done in years prior to the FYE September 30, 2017. Per review of the finance committee meeting notes, MMI thought that due to their consideration for accreditation with WSCUC, they needed stand-alone financial statements. It was later determined that the supplemental schedule

provided in the consolidated statements met the needs of the WSCUC review. The audits were performed by an independent external auditing firm. In the two years provided, the auditors expressed an opinion that the financial statements “present fairly, in all material respects,” the consolidated financial position of Hanuman Fellowship and MMI. The statement of activities indicates a modest positive change in net assets for the FYE September 30, 2017 and a small negative change in net assets for the FYE September 30, 2018 for MMI. (CFR 3.4)

The audit firm also provided a communication of deficiencies, material weaknesses and other matters where they identified a material weakness in internal controls around the personnel records documentation and substantiation maintained by MMI. The audit firm recommended strengthening the procedures around the documentation of pay rates for all employees and stipends for volunteers. Although not significant to manifest a material misstatement in the financial statements, the auditors believed it merited the attention of those charged with governance. MMI had provided a response within the letter stating that procedures would be implemented by September 30, 2019. The team also noted that the audit report took over 10 months to issue and was told that this was due, in part, to the creation and hiring of CFO’s for each organization. The team was told that the CFO had recently delivered the audit workpapers for the FYE 9/30/2019 to the auditors and the work was scheduled to be completed in January 2020. The team noted that the audits have been delayed, for whatever reason, compared to traditional practice in higher education. Going forward the team recommends that MMI obtain an audit on a schedule that will permit timely submission to the WSCUC annual report (due in May of every year). (CFR 3.4)

During the visit, the team met with the CFO and her staff to review the forms and procedures recently implemented that will enable MMI to document the required personnel

information for employees and volunteers. The team also followed up on the conversion to accrual accounting and the tuition recognition error that had been identified in the reports reviewed at SAV1 and found that the accounting staff has completed the conversion to accrual accounting and has developed a methodology by which they calculate and record the revenue earned for the respective accounting period accurately. In conversation with the independent auditor, the team confirmed the accuracy of the revenue recognition in the FYE 2018 audit. (CFR 3.4)

The team also reviewed the budget to actual reports for MMI for the nine months ended June 30, 2019 as well as the five-year strategic planning budget that had been developed under the recently adopted Resource and Budgetary Process. The process, led by the CFO, invites input from each college, school or department and links the review of the resource allocation to MMI's mission and goals as documented in the strategic plan. The team saw evidence, through the development and review of key financial performance indicators, of close pro-active monitoring of the budget by the leadership to ensure positive operating results as well as continued refinement of the enrollment model and alignment with the strategic plan. The team also noted the inclusion of non-tuition revenue sources such as growth in the auxiliary revenues and fundraising, as a way to lessen MMI's reliance on tuition revenue. (CFRs 3.4, 3.8)

### **Organizational Structures and Decision-Making Processes**

MMI is a wholly owned subsidiary of HFS that was created to contain and deliver the way of Ayurveda through formally training and graduating exceptional practitioners. This relationship is outlined in both the by-laws of MMI and a memorandum of understanding that were revised September 2018, and amended August 2019. The team noted improved clarity with regard to the areas of responsibility for the board, as well as the resources shared by the two

organizations HFS, as the sole member, continues to have ultimate authority over the approval of the annual budget and expenditures greater than \$30,000. The team witnessed a highly-qualified board of directors with diverse areas of expertise, who are dedicated to selfless service and committed to fostering effective institutional governance of MMI. (CFRs 3.6, 3.7, 3.9)

All land and facilities used by MMI are owned by HFS with the current memorandum of understanding outlining the financial responsibilities each party has for the physical space they use. The memorandum of understanding is to be reviewed, at the very minimum, once every two years to enable the parties to modify the terms in light of changes needed. (CFRs 3.5, 3.7).

The team reviewed the organizational chart of MMI and found many improvements in the structure since the SAVI visit and report. The team noted that the responsibility for faculty was more appropriately placed with the chair for the respective program who then reports to the Provost. The team believes that this revised structure allows the provost oversight and decision-making responsibilities for academic programming which enables her to provide effective educational leadership and management. (CFR 3.6)

It is clear that MMI is rich with talent in their faculty and staff and with the hiring of a CFO dedicated to the operations of MMI, and the creation of a leadership team for the CEO, they have been able to provide a clear definition of authority, roles, and responsibilities for full-time and part-time faculty and staff. (CFRs 3.7, 3.8, 3.10)

The team noted the positive improvements made by the new CFO through more active participation in the development and implementation of sound financial practices, the valuation of in-kind services, and better fiscal management and planning through an integrated budget process. (CFR 3.8)

The MMI board is made up of 12 members: 10 from the community at large and 2 identified by MMI as interested persons. Standing board committees include Audit, Academic Affairs, Governance & Nominating, and Finance Budgeting & Planning. The team was able to meet with 11 of the 12 board members and found that the board has been meeting every other month and created a new Strategic Plan (see CFR 4.3).

The team found that the leadership of the board has changed significantly since the last visit, and recognizes the intentional recruitment of board members who are dedicated to the mission of MMI, and have provided leadership in the development and monitoring of the strategic plan. Through their diverse areas of expertise, the board is well positioned to build important relationships with local communities that can broaden the knowledge and recognition about Ayurveda and the mission of MMI. Overall, the team concluded that the MMI board is in compliance with the WSCUC Governing Board Policy. (CFR 3.9)

*The team's finding, which is subject to Commission review, is that the institution has demonstrated sufficient evidence of compliance with Standard 3 to achieve initial accreditation.*

## **Standard 4: Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement**

### **Quality Assurance Processes**

Since SAVI, MMI has come to employ quality assurance processes in both academic and non-academic areas, including assessment of student learning, academic program review, and strategic planning. MMI has developed procedures for approving new courses, certificate programs and master's degree programs. The Director of IE leads the collection, aggregation and analysis of evidence. The Director of IE has undertaken efforts to locate historical evidence that MMI has in its files and generate useful analyses of it. The board, president and provost each described the importance of using evidence in decision making. Faculty reported that evidence was helping them to be better teachers. MMI recognizes that it needs to engage in formal assessment of its co-curricular offerings. (CFR 4.1)

MMI has consolidated the assessment and institutional research functions into an Office of Institutional Effectiveness, developed a position description for the Director of IE, and provided a 15% release time for a core faculty member to serve as Director of IE. The Director has been supported with consultants in key areas, such as in institutional research, through membership in the Association of Institutional Research and participation in regional conferences, such as the California Association of Institutional Research and the WSCUC Academic Resource Conference. One MMI board member is a recognized expert in assessment, has provided guidance and support to the Director of IE, and is scheduled to lead a 3-hour assessment workshop and rubric norming session in December 2019.

The position description for the Director of IE lists a great number of responsibilities, under the headings of "Institutional Research and Planning," "Assessment of Student Learning," and "Program Review." The Director reports to the provost, and provides data for the board, the

president, the CFO and the faculty. All members of the community described their use of requested data, and broadly reported excitement about using the evidence to inform decisions. While MMI is small, the team was concerned that the responsibilities of the role currently require more than the 15% FTE time currently allocated. The team recommends that MMI monitor the workload and activities of the Director of IE to ensure that there are adequate resources to carry out responsibilities necessary for the continued success of MMI. (CFR 4.2)

### **Institutional Learning and Improvement**

The faculty, administration and board of MMI demonstrated engagement with mission-driven, evidence-informed practice. These groups, plus students and alumni, expressed enthusiasm for and a commitment to this evolution in practice, described resultant improvements to MMI, and looked forward to future activities.

Since SAV1, MMI has taken steps to incorporate gathering, analyzing and interpreting evidence in its practice. The Office of Institutional Effectiveness was created, and a director was appointed. Student learning outcomes were revised to better articulate expected learning, aligned to the curriculum, and a plan for assessment was developed. A clear program review guide was written, and a full review of the master's program was completed, resulting in a multi-step action plan. The strategic plan includes a measurable set of key performance indicators (KPIs), and the board requests evidence from the Director of IE to evaluate progress. The team observed an emergent and growing culture of evidence and improvement. (CFR 4.3)

MMI has developed an Institutional Effectiveness Plan that lays out a set of guiding principles for assessment, clarifies the goals and uses for assessment, delineates the roles of the president, provost, Director of IE, the faculty, and student support staff, and includes a schedule for assessment of institutional and program learning outcomes. Faculty described use of

evidence, including indirect evidence provided via a rich student course-evaluation form, to guide changes to course design. A co-curricular offerings handbook provides the learning outcomes and syllabi for co-curricular experiences. Assessment of the co-curriculum is to be done through student-created portfolios that include student reflections on their learning. The co-curricular program has not yet been assessed, but the Director of IE noted that there are plans to do so. (CFR 4.4)

Multiple stakeholders have been included in the assessment process. Student feedback and self-reflection on achievement of the learning outcomes is utilized as an indirect measure of achievement. Internship and externship supervisors employ rubrics in their observations of students. Alumni are asked about their experiences and invited to provide feedback to help improve the program. Faculty also report engaging in a “gap analysis” to understand market needs and look for gaps between those needs and what they are teaching. An example of this was the recognition that their students are using their education in the market as practitioners, rather than as researchers. This helped to guide a change in the culminating experience from a research thesis to a capstone project. (CFR 4.5)

Following SAV1, MMI engaged in a strategic planning process that established a five-year plan with four goals, each with multiple initiatives, strategies, KPIs, and budget allocation to support efforts. The planning process included all members of the community, including the board, administration, faculty, staff, and students. The goals include (1) becoming a premier institution, (2) achieving student success through enhancing the student experience and promoting graduate culture, (3) ensuring institutional sustainability, and (4) increasing impact by expanding contributions to integrative health services and community well-being. During each bi-monthly meeting the board engages with KPI evidence and utilizes it to make informed

decisions. The plan is well-aligned to MMI's mission and establishes a path forward for long-term success of the institution. (CFR 4.6)

The strategic plan, institutional effectiveness plan, and co-curricular offerings handbook are all examples of MMI's transformation to an institution that looks outward and forward. The team observed through the report and interviews with faculty, staff, administrators and the board, that significant consideration of the outside world has become important to MMI. In particular, the MMI community demonstrates consideration of the current and future states of health care in the US, especially the rise of Ayurveda as a partner to Western medical care, as well as the world of higher education, in informing its own work. Members of the MMI community spoke of their work as fitting into a greater landscape in higher education, including how they can learn from and partner with other higher education institutions that offer Western medical care programs, such as the University of California at San Francisco (UCSF), and be recognized for their own unique, high-quality contributions. (CFR 4.7)

*The team's finding, which is subject to Commission review, is that the institution has demonstrated sufficient evidence of compliance with Standard 4 to achieve initial accreditation.*

### **SECTION III. PREPARATION FOR ACCREDITATION UNDER THE 2013 HANDBOOK OF ACCREDITATION**

The team reviewed the MA in Ayurveda, MMI's only academic degree program, which is based in integrative health. The meaning, quality and integrity of the degree is apparent in its values and goals. As stated in the self-study, "Ayurveda is a 5,000-year-old holistic system of health and well-being continuously practiced throughout South Asia and introduced to the United States in the middle of the last century. Ayurveda and Yoga are complementary [to each other] and complementary sciences that could become better integrated into American and Western Health Sciences, especially in the areas of disease prevention and promotion of health and well-

being.” MMI, and specifically the MA in Ayurveda, is poised to influence healthcare in Western culture.

The core values of service to the greater community, self-development for health and well-being, and continual lifelong learning guide MMI in achieving its mission to integrate mind, body, and spirit by providing theoretical and practical professional education and training in classical systems of Yoga, Ayurveda, and Community Studies.

The increasing demand for integrative healthcare that is efficient and effective positions graduates of the MA Ayurveda to be leaders in holistic health. The team interviewed alumni who have written books on Ayurveda and Yoga and are scholars in the field in their own right.

The MMI leadership has considered the strategic niche of their programs and the board has developed a strategic plan with an eye to sustainability. The goal of Impact captures their plan for measured growth that is responsive to the needs of American healthcare.

#### **SECTION IV. INVENTORY OF EDUCATIONAL EFFECTIVENESS INDICATORS**

The information provided by MMI in the Inventory of Educational Effectiveness Indicators accurately reflects the formal assessment of learning that has taken place for the ILOs and PLOs to date and includes correct information about the program review that has occurred.

#### **SECTION V. FINDINGS, COMMENDATIONS AND RECOMMENDATIONS**

MMI is clearly dedicated to providing and assessing high quality educational programs that satisfy WSCUC’s expectations. The team finds that Mount Madonna Institute has met all of the standards at a level sufficient for Initial Accreditation.

The team commends Mt. Madonna Institute for:

1. meaningful progress toward developing robust processes and institutional structures while protecting and maintaining the spiritual context and foundations of all of MMI's goals and those of the larger community;
2. faculty and administrators who exhibit deep and devoted mentorship of students and student learning;
3. use of assessment and program review to enhance academic rigor in the MA Ayurveda program, allowing MMI to impact the field through the strength of the program's graduates;
4. development of a realistic, achievable strategic plan with key performance indicators that lays the foundation for sustainable growth;
5. fostering effective institutional governance by creating a highly-qualified board of directors with diverse areas of expertise, who are dedicated to selfless service and committed to the principles of wellness and positive transformation;
6. execution of a detailed long-term financial plan that includes an articulated decision-making process tied to strategic initiatives.

The team recommends that MMI:

1. continue providing professional development for faculty to promote a culture of assessment that includes use of aggregated program level data (CFRs 2.4, 2.6, 3.3);
2. enhance professional development and support membership in professional organizations for administration, student support service personnel, and the board (CFR 3.3);

3. carefully monitor workload and activities of the Office of Institutional Effectiveness to ensure that there are adequate resources to carry out responsibilities necessary for success of the institution (CFRs 4.1, 4.2);
4. in preparation for the possibility of offering federal financial aid, determine the cost/benefit to ensure that the appropriate organizational structures are in place to comply with federal regulations (CFRs 2.13, 3.1); and
5. obtain an audit on a schedule that will permit timely submission for the WSCUC annual report. (CFR 3.4)

## APPENDICES

### FEDERAL COMPLIANCE FORMS

#### CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)
Policy on credit hour	<p>Is this policy easily accessible?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Where is the policy located?            Credit Hour Policy is located:</p> <ol style="list-style-type: none"> <li>1. Catalog on the MMI website:  <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=63">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=63</a> Page #63</li> <li>2. Student Rights and Responsibilities page:  <a href="https://cdn.mountmadonnainstitute.org/students-rights.pdf">https://cdn.mountmadonnainstitute.org/students-rights.pdf</a></li> <li>3. All Course Syllabi</li> </ol> <p>Comments:            - In the program catalog posted on the website: Page # 63 in the catalog            - Each Course Syllabus includes the credit hour policy.            - On the website Admissions page - <a href="https://cdn.mountmadonnainstitute.org/students-rights.pdf">https://cdn.mountmadonnainstitute.org/students-rights.pdf</a></p>
Process(es)/ periodic review of credit hour	<p>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)?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Does the institution adhere to this procedure?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments:            MMI adheres to a procedure for periodic review of credit hour assignments by the provost, the chair, faculty, and the Curriculum and Assessment Committee, in order to ensure accuracy and consistency.</p> <p>The Curriculum and Assessment Committee reviews each credit hour assignment prior to the start of a new program. This review is sent to provost for approval.</p> <p>Any faculty member may ask for a review at any time.</p>
Schedule of on-ground courses showing when they meet	<p>Does this schedule show that on-ground courses meet for the prescribed number of hours?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments:            Program / Course Schedules demonstrate that class sessions meet the prescribed hours for each course.</p> <p>The “General Weekend Content” in the Catalog outlines course hours and specifies each aspect of the Course session content in the catalog on the website:  <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=14">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=14</a> Page #14</p> <p>A complete “Program Course List” with Hours and Credit Award is provided in the catalog on the website:  <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=21">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=21</a> Page #21</p>
	<p>How many syllabi were reviewed? No syllabi were reviewed because MMI does not offer online or hybrid courses.</p>

Sample syllabi or equivalent for online and hybrid courses <i>Please review at least 1 - 2 from each degree level.</i>	What kind of courses (online or hybrid or both)?
	What degree level(s)?
	What discipline(s)?
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?
	Comments: Not applicable. MMI does not offer online or hybrid courses.
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) <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed? Not applicable. MMI does not have any courses in the MA Program that do NOT meet the prescribed hours. Internships and clinical work are considered co-curricular learning.
	What kinds of courses?
	What degree level(s)?
	What discipline(s)?
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded?
	Comments: Not Applicable: MMI does not have any courses in the MA Program that do NOT meet the prescribed hours.
Sample program information (catalog, website, or other program materials)	How many programs were reviewed? 1 – Master of Arts - Ayurveda
	What kinds of program information were reviewed? MMI College of Ayurveda Catalog <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf</a> - Website; <a href="http://www.mountmadonnainstitute.org">www.mountmadonnainstitute.org</a> - Samples of Course Syllabi from WSCUC Self Study <a href="https://wascsenior.app.box.com/s/h4z72ubbxwpob7ty0g65ldf5xyn12pkj">https://wascsenior.app.box.com/s/h4z72ubbxwpob7ty0g65ldf5xyn12pkj</a>
	What degree level(s)? MA
	What discipline(s)? MA-Ayurveda
	Does this material show that the programs offered at the institution are of a generally acceptable length? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: Master of Arts degree in Ayurveda is a “generally acceptable length”. Program Course length typically consists of an eighteen-month period including completion of coursework, Capstone Project, and clinical work.
	Catalog on the website: <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=22">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=22</a> . Page #22 – describes the length of the program.

Review Completed By: Paula S. Krist  
Date: November 9, 2019

**MARKETING AND RECRUITMENT REVIEW FORM**

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

<b>Material Reviewed</b>	<b>Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.</b>
**Federal regulations	<p>Does the institution follow federal regulations on recruiting students?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments:                      The Institute does not offer any form of “Recruitment Incentive Compensation, Commissions, Bonus Payments, or Merit Salary Adjustments” based on enrolling students.                      In the catalog on the website: <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf</a></p>
Degree completion and cost	<p>Does the institution provide information about the typical length of time to degree?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Does the institution provide information about the overall cost of the degree?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments:  <b>Completion Dates:</b>                      The MMI Master of Arts degree in Ayurveda is an eighteen-month program to be successfully completed within the timeframe allowed for Student Academic Progress. The required “completion time period” is stated in the Enrollment Agreement as 150% of the Program Scheduled Start/Completion Date. Specific dates are outlined in the agreement.                      For the Master of Arts degree in Ayurveda, the 150% Completion Date the student must meet is no more than 3 years without the student being held accountable to Student Academic Progress, including the possibility of academic probation or dismissal.                      Students are informed of the above dates during the application interview, prior to enrollment, and at intervals during the program by the Program Coordinator and/or Registrar. Student progress is closely monitored jointly by the Program Coordinator and Registrar. Students are counseled and may receive an Academic Warning if completion time is at risk.                      In the catalog on the website, Page #21 /Graduation Requirements/Academic Requirements states “Academic Requirements: Successful completion of all course assignments, clinical activities, and hours required in the program, within the maximum time frame required for Student Academic Progress.”  <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=21">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=21</a> page #21</p> <p><b>Tuition:</b>                      Program tuition, all school fees, and optional housing fees are fully disclosed on the website and catalog. All fees are personally discussed in the Student Interview, prior to enrollment.  <b>Tuition:</b> In the catalog on the website:  <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=59">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=59</a> page #59  <b>Additional fees:</b> In the catalog on the website:  <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=61">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=61</a>, page #61  <b>Meals and lodging fees:</b> In the catalog on the website  <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=61">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=61</a>, page #61</p>
Careers and employment	<p>Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Does the institution provide information about the employment of its graduates, as applicable?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO (only by presenting anonymous data on website)</p>

Comments:

Mount Madonna Institute does not provide employment guidance at this time. Mount Madonna Institute cannot and does not guarantee employment or salary. In the catalog on the website:

[https://cdn.mountmadonnainstitute.org/MMI\\_Catalog\\_August2019.pdf#page=56](https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=56) page #56

Students receiving the Master of Arts degree in Ayurveda are qualified to provide Ayurvedic health consultations and recommendations to clients in a variety of settings from integrative medical clinics to private practices. Such graduates also are qualified to teach Ayurveda classes at introductory and intermediate levels. In the catalog on the website: [https://cdn.mountmadonnainstitute.org/MMI\\_Catalog\\_August2019.pdf#page=6](https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=6) page #6

The Institute also provides learning resources including the computer and library facilities, faculty, registrar and peer assistance in assessing challenges and potentials, and academic counseling and career information as part of the curriculum. In the catalog on the website:

[https://cdn.mountmadonnainstitute.org/MMI\\_Catalog\\_August2019.pdf#page=56](https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=56) page #56

Students are introduced to job opportunities in AY-MA-509 Counseling, Ethics and Management course - In the catalog on the website: [https://cdn.mountmadonnainstitute.org/MMI\\_Catalog\\_August2019.pdf#page=23](https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=23) page #23

\*§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: Paula S. Krist Date:  
November 15, 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.

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Policy on student complaints	<p>Does the institution have a policy or formal procedure for student complaints?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, Is the policy or procedure easily accessible? Where?</p> <p>The Policy is easily accessible at Catalog on the website:  <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=63">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=63</a> - Page #63</p> <p>Comments:</p>
Process(es)/ procedure	<p>Does the institution have a procedure for addressing student complaints?  <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, please describe briefly:</p> <p>Yes, the Institute has a formal procedure for student complaints. The Institution also maintains records of complaints and grievances by institutional personnel.</p> <p>STUDENT GRIEVANCE (COMPLAINT) POLICY            Student grievances/complaints may be submitted directly to the instructor or other Institute staff member directly involved. If not satisfactorily resolved at that level, the complaint/grievance may be taken to the head of the college or school. If not satisfactorily resolved, it may be taken to the Institute’s Ombudsman. If still not satisfactorily resolved, the grievance may be taken to the Student Grievance Committee, composed of the Dean or Head of School (who will serve as chair of the committee), a student representative selected by vote of the student body in the first month of each academic year, and a faculty member appointed by the Chief Academic Officer. The Grievance Committee will:</p> <ol style="list-style-type: none"> <li>1. Hear the grievance.</li> <li>2. Hear the Institute’s response, including any charges against the student.</li> <li>3. Review any actions taken, either by the student or by the Institute or its members.</li> <li>4. Prepare a recommendation to the Chief Academic Officer.</li> <li>5. If the circumstances include the CAO and the CAO does not accept the recommendations of the committee, the chair will refer the matter to the Institute’s Board of Directors for decision. In all other circumstances, the decision of the CAO shall be the final decision.</li> <li>6. The CEO maintains all formal complaint records on the secure Institute network for a minimum of 5 years. These records are periodically reviewed and analyzed for any consistent patterns that need to be addressed. The CEO then assigns the most appropriate individual or group to investigate and resolve any recurring issues.</li> <li>7. Students may also address their grievances to the Bureau for Private Postsecondary Education, 2535 Capitol Oaks Drive, Suite 400, Sacramento, CA, 95833; (888) 370-7589; Fax (916) 263-1897; <a href="http://www.bppe.ca.gov">www.bppe.ca.gov</a>.</li> </ol> <p>If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Comments:</p>

Records	<p>Does the institution maintain records of student complaints? x <input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, where?</p> <p>The president maintains an electronic folder in the secure Institute Network for all records of student complaints, for a period of not less than five years.</p>
	<p>Does the institution have an effective way of tracking and monitoring student complaints over time? X <input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If so, please describe briefly:</p>
	<p>Comments:</p> <p>The president maintains all formal complaint records on the secure Network for a minimum of 5 years. These records are periodically reviewed and analyzed for any consistent patterns that need to be addressed. The president then assigns the most appropriate individual or group to investigate and resolve any recurring issues.</p>

\*§602-16(1)(1)(ix)

See also WASC Senior College and University Commission's Complaints and Third Party Comment Policy.

Review Completed By: Paula S. Krist

Date: November 15, 2019

**TRANSFER CREDIT POLICY REVIEW FORM**

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

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Transfer Credit Policy(s)	Does the institution have a policy or formal procedure for receiving transfer credit? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Is the policy publicly available? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where?  Yes, Mount Madonna Institute has a Transfer Credit Policy and a formal procedure for receiving transfer credit. MMI reviews the outlined processes in the policy and is consistent with the policy in response to any credit transfer request.  This policy is publicly disclosed: In the program catalog posted on the website: <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=55">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=55</a> , page # 55  The Transfer Credit Policy Statement is publicly disclosed as above, and it addresses credit earned at another institution of higher education and includes a “statement of criteria” regarding Transfer of credit.
	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? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: Transfer of Credit Policy includes a ‘statement of criteria’ in the policy. Found in the program catalog posted on the website: <a href="https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=55">https://cdn.mountmadonnainstitute.org/MMI_Catalog_August2019.pdf#page=55</a> , page # 55

\*§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: Paula S. Krist  
Date: November 9, 2019