

REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To Sofia University

11-14 April 2022

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SECTION 1 – OVERVIEW AND CONTEXT

A. Description of the Institution and Its Accreditation History

Background, Mission, & History: Sofia University (Sofia) was founded in 1975 as the California Institute of Transpersonal Psychology by Robert Frager and James Fadiman, in response to the academic, psychological, and cultural zeitgeist of the 1970s. With an initial focus on graduate degrees in transpersonal psychology, the institution has expanded to also offer graduate degrees in psychology, counseling, business administration, and computer science, as well as undergraduate degrees in business and psychology. The primary campus is located in Palo Alto, California, and a secondary campus was acquired in Costa Mesa, California in 2018. The institution changed its name to the Institute of Transpersonal Psychology in 1986, and to Sofia University in 2012. The institution was granted initial candidacy by WSCUC in 1991 and achieved initial accreditation in 1997. (Sofia website, 2022, institutional report, and WSCUC records)

In 2014, Sofia transitioned ownership from Sofia University to Sofia University, FPC, and received Substantive Change Commission approval as a for-profit institution. In 2015, Sofia hosted an accreditation visit and received reaffirmation from the Commission for seven years, with a notice of concern. A Special Visit occurred in Fall 2016 with a continuation of the notice of concern. A subsequent Special Visit occurred in 2019, and the notice of concern was removed by the Commission. A change of ownership occurred in 2019 from Sofia University, FPC, to Beitou Holdings (Canada), LLC, which had been a part of the previous ownership group, and received Substantive Change Final Commission approval in 2020. A Follow-up Special Visit occurred in 2021 to review the change in ownership, and the Commission received the Team report and continued with the previously scheduled off-site review in fall of 2021 and accreditation visit in spring of 2022. (Sofia website, 2022, institutional report, and WSCUC records)

As Sofia transitions back from fully online during the COVID-19 pandemic, the institution is finally able to start their planned expansion at the Costa Mesa location acquired shortly before the pandemic. The institution is envisioning an undergraduate-focused campus at that location with a residential option, while continuing its more graduate-focused offerings and bachelors degree completion through its Palo Alto location. The institution is still reviewing the mix of face-to-face versus online in a post-pandemic environment, and it does plan on sunseting the clinical Psychology Doctorate (PsyD) program. (conversations throughout the visit)

From 2014-2015 to 2020-21 the institution's domestic enrollment declined from 261 to 193, with the decline beginning in the 2017-2018 year. Domestic student enrollment is overwhelmingly female, accounting for 73% of the enrollment in 2014-2015, and 76% of the enrollment in 2020-2021. From 2018-2019 the enrollment shifted from 57% international to 18% international in 2020-2021, and from 69% white (excluding international and unknown) in 2018-2019 to 62% white (excluding international and unknown) in 2020-2021. The average student age has changed slightly from 40 in the 2014-2015 academic year to 38.6 in the 2020-21 academic year with some variation in the intervening years. The largest enrolled program has transitioned from the Master of Arts in transpersonal psychology (32% of domestic enrollment)

at the time of the last visit to the PhD in psychology (26% of enrollment in 2020-21). (Sofia institutional report and conversations throughout the visit)

In addition, the institution has had an online MBA offered in China (taught in Mandarin by Sofia faculty with the assistance of translators when necessary) with a partner institution which started with 69 students in 2016, peaked at 1660 students in 2019, and had declined to 1127 by spring of 2021. Sofia University and the partner have ended admission to the program, and Sofia is now teaching out students through that partnership, while starting new partnerships in China for the Masters in Transpersonal Psychology and the MBA (taught in Mandarin by Sofia faculty with the assistance of translators when necessary). Several students from the online MBA program have matriculated to Sofia's online PhD in Psychology. (Sofia institutional report and conversations throughout the visit including current students and alumni).

In recent years there has been a significant shift in institutional leadership. A new president, Allan Cahoon, joined the institution in 2020, a new provost, Carol Lee Humphreys, joined in 2021, and a new vice president for administration and CFO, Chris Nguyen, was appointed by the institution in 2020.

Dr. Cahoon had previously served as president of Royal Roads University, in Victoria, British Columbia (Canada) from 2007 to 2018, and had joined the Board of Trustees of Sofia University in 2018 before moving to the presidency of Sofia. He has served as president of the Inter-American Organization of Higher Education and has a variety of experiences in strategic academic partnerships in China; he was appointed honorary president of Shanghai Lida University in 2020. He earned his Ph.D. from Syracuse University. (Sofia institutional report and web site)

Dr. Humphreys had previously served as provost and vice president of academic affairs at Saybrook University from 2011-2018. During her time with Saybrook University, she also served as Accreditation Liaison Officer with WSCUC and led a successful reaffirmation of the institution. She earned her Ph.D. from Miami University of Ohio. (Sofia institutional report and web site)

Mr. Nguyen previously served as vice president for administrative services and chief business officer at San Joaquin Delta College from 2018-2020, vice president for administrative services and chief business officer at SUNY Ulster (NY) from 2016-2018, and in various administrative roles at KIMEP University (Almaty, Kazakhstan) from 2011-2016. He earned a JD from New York Law School and an MBA from Hofstra University. (Sofia institutional report and web site)

There are currently eleven full-time and eight part-time faculty (List of Faculty).

B. Description of Team's Review Process

The Team reviewed Sofia's Self-Study report and the supplementary materials prior to the off-site review. From these materials, the Team met virtually on December 1, 2021 and developed

multiple lines of inquiry that were conveyed during the conference call with the Sofia leadership Team on December 2, 2021, and via email to the ALO on December 6, 2021.

In addition, the Team requested additional documentation from Sofia including updates on the strategic plan, academic master plan, curricula vitae for all faculty and staff, updated enrollment and financial data, international recruiting agency agreements and updated academic partners agreements, updated academic catalog, updated strategic enrollment management plan, benchmark and assessment data and processes, and the most recent fiscal audit; most materials were received prior to the on-site review at the Palo Alto campus on April 11-14, 2022. The financial aid audits were received on April 12, 2022.

A physical visit to the branch campus was conducted by a Team member on April 9, 2022.

During the on-site review, members of the Team met with institutional leaders, faculty, staff, students (domestic and international), alumni (domestic and international), key administrative staff in multiple meetings including finance and accounting, institutional research, program review and assessment, academic advisors, equity inclusivity and diversity task force, admissions and enrollment, information technology and instructional design, faculty senate, student services, and the governing board. While visiting the Palo Alto campus the Team also toured the facilities. The Team reviewed all emails that came to the confidential account.

The visit concluded with an exit meeting that was attended by a representation of leadership and staff of the institution.

C. Institution's Reaccreditation Report and Update: Quality and Rigor of the Report and Supporting Evidence

The report was begun in fall 2020 under the leadership of a prior institutional provost. A Self-Study/Accreditation Planning Team was established, and after several meetings, assignments were divided and drafting chapters began. With the resignation of the prior provost in January 2021, an external consultant was hired. Several drafts were developed with the coordination of institutional research, student services, human resources, finance, and marketing, and the process was coordinated by academic leadership. A former WSCUC Vice President, Dr. Richard Osborn, was contracted for feedback and guidance. The Board of Trustees reviewed and approved a draft of the institutional report at its June 2021 meeting, and that draft was shared with the Faculty Senate and the Provost's Council. The current provost, Dr. Carol Humphreys, solicited additional feedback from these bodies and revised the draft. A final version was approved at the September board of Trustees meeting.

The institution has incorporated a great deal of information, based on considerable feedback from WSCUC in the form of Special Visits and Structural Change reviews since the last reaffirmation. The eighty-five-page report included 122 attachments (many of which were multiple resources). The report described, in a narrative form, activities over the last several years that reflect the standards and components of a self-study report. The Team found the report to be in alignment with findings from in-depth conversations with various Sofia constituencies during the on-site visit. As part of the report, the University provided numerous

documents, graphs, and other exhibits to support their claims of adequately addressing each of the WSCUC standards. The Team found much activity in process across the institution. Additional documentation was provided when requested, for the most part, more than two months before the on-site visit. The additional documentation, as well as the on-site visit, reinforced the “in process” status of many initiatives. The Team was concerned about the lack of reference or inclusion of findings from multiple financial aid audits that came to light in the document review that occurred on-site.

SECTION 2: EVALUATION OF THE INSTITUTIONAL ESSAYS

COMPONENT 1: Response to Previous Commission Actions

Recent Accreditation History: Sofia has been accredited by WSCUC since 1997. The most recent WSCUC accreditation history includes:

1. Reaffirmation Visit in 2015 with the July 15, 2015, letter indicated a reaffirmation of accreditation for seven years, issued a Notice of Concern, scheduled an offsite review in fall 2021 and accreditation visit in spring 2022, and Special Visit in fall 2016 to review progress on the following issues:
 - a. Mission and vision
 - b. Student success
 - c. Strategic planning
2. The Special visit in 2016 with the February 17, 2017, letter continued the Notice of Concern, and scheduled a Special Visit in spring 2019 to review progress on the following issues:
 - a. Achieving a better balance between academic excellence and operating and fiscal needs and ensure that management considerations do not overshadow the academic mission of the institution
 - b. Develop an awareness of best practices of higher education and apply those practices to the development of a comprehensive strategic plan, including specific academic priorities that inform enrollment, operational, and fiscal plans
 - c. Develop an evidenced-based academically focused strategic plan with input from multiple stakeholders including the institution’s faculty, staff, and students
3. The Special Visit in 2019 with the June 28, 2019, letter removed the Notice of Concern, and scheduled an interim report for spring 2020 to address the following issues:
 - a. The status of a permanent CFO
 - b. Enrollment management and status update
 - c. Financial status and progress toward sustainability
 - d. The status of the implementation of the strategic plan
 - e. The status of the IR function, especially focused on assessment of student learning

4. Change in Ownership structural change February 26, 2020, letter deferred consideration of the proposed Change of Ownership to Beitou Holdings (Canada), Ltd. pending receipt of the institution's pre-acquisition review letter from the U. S. Department of Education, issued a Warning regarding timely notification of change of ownership with respect to at least 25% ownership interest, and scheduled a Special Visit in fall 2020 on board governance, leadership transition, enrollment, and impact on academic offerings.

5. Change in Ownership structural change July 8, 2020, letter approving the proposed Change of Ownership, removed the Warning, and continued with the Special Visit in fall 2020, Offsite review in fall 2021, Accreditation Visit in spring 2022, and required a post-implementation visit within six months.

6. The Special Visit in 2020 with the March 3, 2021, letter continued with the previously scheduled reaffirmation review with the Offsite Review in fall 2021 and the Accreditation Visit in spring 2022, with the following recommendations:

- a. Align its various strategic planning initiatives, integrating its academic master planning, marketing and enrollment projects, and budgetary processes, which will require review and refinement, as well as clear ownership of the plan as a whole and in its parts, fully articulated and measurable goals, and demonstrable metrics that inform organizational decision-making
- b. Ensure that curriculum and program development both domestic and international involves robust faculty oversight, which includes creating learning outcomes that are appropriate to the discipline, to the degree level, and to the university's mission and ILOs
- c. Continue to develop effective student learning assessment and program review processes that connect CLOs, PLOs, and ILOs in an observable and measurable way and that ensure faculty incorporates the appropriate learning outcomes into curricula to use for assessment and improvement of student learning
- d. Develop an appropriate feedback mechanism that ensures assessment information is both received and acted on by appropriate academic leadership to foster continual improvement in educational outcomes

The University responded directly to the recommendations outlined in the 2020 Special Visit in the institutional self-study. While all these items are in process due to the short time between the spring letter and the fall submission, Sofia appears to be moving forward on these issues. (Sofia institutional report and conversations throughout the visit)

COMPONENT 2: Review Under WSCUC Standards And Compliance with Federal Requirements

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

After reviewing Sofia University's self-study, examining documents, and visiting with faculty, staff, trustees, and students, the Team evaluated Sofia University's defining of its institutional purposes and ensuring education objectives as outlined in Standard 1.

A. Institutional Purposes (CFRs 1.1-1.4)

In the institutional report, Sofia University explains that the institution's "mission, values, and purpose" have remained focused despite changes in the university and its name over the years.

An examination of the mission statement on the institution's website indicates that its "curricula focus in [sic] areas of inquiry: the intellectual, emotional, spiritual, physical, social and creative aspects of life." Evidence of this mission-driven focus was apparent during the visit in the conversations with faculty, students, and administrators. Nevertheless, it is curious that "transpersonal" does not appear in the public statements of purposes and objectives.

The report identifies the institution's "ability to define and execute its institutional purpose" as an area of strength (CFR 1.1). Other indicators of the institution's purpose, values, and character came from members of the Sofia community. Across the two days of the visit, it was apparent that the educational objectives "are widely recognized throughout the institution, are consistent with stated purposes, and are demonstrably achieved" (CFR 1.2).

The Team concurs with the institution's self-assessment that it "can improve at articulating how transpersonal theories, tenets, and practices can translate to newer Sofia programs that are not in psychology (business and computer science and resonate better with international students and their communities" (CFR 1.1). The faculty chair in Computer Science was able to explain how these tenets and theories are deployed in that discipline and program, but it was not as clear that students had assimilated these theories and tenets.

Not only are the university's educational objectives well-known internally, as previously stated, the university's website includes public documentation of its measures of retention and graduation (CFR 1.2). These measures of student achievement were disaggregated by race and ethnicity for each degree program and made available to the visiting Team in the documents requested after the off-site review. Yet, the institution seemed reluctant (or unable) to explain the existence of an equity gap between its Black or African-American and multiracial students' graduation rates and that of other students.

The Faculty Handbook includes language demonstrating the institution's commitment to academic freedom for its faculty. It was not readily apparent that academic freedom applied to students and staff (CFR 1.3). A public statement that students, faculty, and staff receive due process could be developed and disseminated to demonstrate that "faculty and students are protected in their quest for truth" (CFR 1.3).

Sofia University is a fairly diverse community of staff, faculty, and students. However, in the meeting with the Equity, Inclusion, and Diversity (EID) Taskforce, it was not clear that the university's members fully understand principles of equity and inclusion. The taskforce members frankly acknowledged that its EID efforts were still nascent; that is, at the educational stage in which the members were learning about EID (including accessibility and cultural competency).

There is an opportunity here, and perhaps the university may need outside expertise to advance the work that is just beginning to take place to further develop mission-informed equity, inclusion and diversity. Executive leadership will need to ensure, beyond the creation of the taskforce, that “the institution demonstrates an appropriate response to the increasing diversity in society through its policies, its educational and co-curricular programs, its hiring and admissions criteria, and its administrative and organizational practices” (CFR 1.4).

B. Integrity and Transparency (CFRs 1.5-1.8)

The institution's primary purpose is clearly education, and it “does not experience interference in substantive decisions or educational functions” (CFR 1.5). Moreover, the institution “truthfully represents its academic goals, programs, services, and costs to students and to the larger public” (CFR 1.6). It was not as clear that Sofia has demonstrated “that its academic programs can be completed in a timely fashion,” especially for Black or African-American and multiracial students (CFR 1.6). Despite this gap, as mentioned above, the university does treat “students fairly and equitably through its established policies and procedures addressing student conduct, grievances, human subjects in research, disability, and financial matters” (CFR 1.6).

In all but one area of its operations, the university “exhibits integrity and transparency . . . as demonstrated by the adoption and implementation of appropriate policies and procedures, sound business practices, timely and fair responses to complaints and grievances, and regular evaluation of its performance in these areas” (CFR 1.7). As discussed in a separate component below, the university's finance operations are in need of improvement; though its “finances are regularly audited by qualified independent auditors” (CFR 1.7).

The Team has recommended that Sofia “rectify the financial aid compliance and audit findings from multiple years, keeping WSCUC informed of [its] progress” (CFRs 1.7, 1.8, and 3.4). It has also recommended that the university “establish and document internal controls for all accounting functions” (CFRs 1.7 and 4.1).

Summary

The Team's finding, which is subject to Commission review, is that the institution has provided sufficient evidence to demonstrate compliance with the Standard.

Standard 2: Achieving Educational Objectives Through Core Functions

After reviewing Sofia University's self-study, examining documents, and visiting with faculty, staff, trustees, and students, the Team evaluated Sofia University's achievement of educational objectives as outlined in Standard 2.

A. Teaching and Learning (CFRs 2.1-2.7)

The Team examined the programs currently offered by Sofia University. In Sofia's online catalog, programs noted include two bachelor's degree completion programs, four master's degree programs (two of which are also offered fully online), and one doctorate program. However, on the WSCUC website, they have authorization for 10 online programs and 18 total programs. All of Sofia's programs are related to or are purported to include some form of transpersonal psychology. After examining the requirements for each program, the Team determined that the programs are appropriate in content, standards, and rigor (CFRs 2.1 and 2.2). Many of the programs are infused with transformational education that includes active learning, genuine reflection, and application to their careers (CFRs 2.2 and 2.5).

For the most part the programs are staffed by sufficient numbers of faculty qualified for the type and level of curriculum offered; however, in some instances instructors are not qualified for the level and/or subject (CFR 2.1). The Team reviewed the CVs and teaching assignments of the faculty and found at least one person with a master's level teaching in the doctorate program, in addition to several instructors who teach in areas that do not match their degrees. The Team encourages the institution to complete a review of the qualifications and knowledge base of faculty and develop hiring practices and policies that support the future vision of the University. (CFR 2.1)

After reading the self-study, interviewing faculty, and reading documents, the Team confirmed that the university recently established a program review process with external reviewers and conducted initial program reviews of each program. The program review schedule shows that Sofia has plans to conduct two to three subsequent program reviews each year starting in 2023, rotating through a three-year cycle. The recommendations which emerge from program reviews are regularly monitored by the Provost and Program Chair (CFR 2.7).

Assessment of student learning outcomes was recently embedded as part of the newly established program review process. Assisted by an external consultant, program faculty have aligned their program learning outcomes (PLOs) with the institutional outcomes (ILOs) and assess mastery of the PLOs through a signature assignment in a capstone course (CFRs 2.4, 2.5, and 2.6). (Faculty are expected to use this established process for new courses and programs as well.) Currently the assessments and program review are monitored by the Provost's Office. The Team recommends that the assessment and program review processes be overseen by a dedicated person or committee in order to ensure assessment of student learning outcomes and the program reviews continue on a regular schedule and are used to close the loop (CFRs 2.4 and 2.6).

B. Scholarship and Creative Activity (CFRs 2.8 and 2.9)

According to the Faculty Handbook, "All Core faculty are expected to be involved in scholarship following Boyer's four categories of discovery, integration, application, and teaching

” (Faculty Handbook 40 and CFRs 2.8 and 2.9). Through interviews, the Team learned that very few core faculty members are active in research. The Team encourages the faculty, especially in the doctoral program, to be active in research.

C. Student Learning and Success (CFRs 2.10-2.14)

The Team learned that Sofia University does an excellent job providing individualized support to students from admission through graduation and offers co-curricular programs that are designed to support the students’ personal and professional development (CFRs 2.10, 2.11, 2.12, 2.13, and 2.14). Furthermore, all students are assigned a faculty advisor. Advisors provide guidance with respect to the overall program, required courses, and practicum experiences (CFR 2.12). As part of developing a more data informed culture, the university is encouraged to more regularly analyze disaggregated data to inform adjustments and improvements with respect to student success (CFR 2.10). In addition, the Team learned that assessment of co-curricular learning is not yet occurring (CFR 2.11). It is recommended that Sofia University begin to evaluate the student learning which occurs outside the classroom.

Summary

The Team’s finding, which is subject to Commission review, is that the institution has provided sufficient evidence to demonstrate compliance with the Standard.

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

After reviewing Sofia University’s self-study, examining documents, and visiting with faculty, staff, trustees, and students, the Team evaluated Sofia University’s development and application of resources and organizational structures to ensure quality and sustainability as outlined in Standard 3.

A. Faculty and Staff (CFRs 3.1-3.3)

As identified in Sofia’s Administrative and Faculty Handbooks, the institution clearly practices recruitment, hiring, orientation and incentives aligned with its educational objectives, However, some inconsistency was observed in the level of credentials of faculty teaching in the master’s and PhD programs. Sofia can strengthen its commitment to providing quality education to its students by consistently employing faculty and staff who possess sufficient professional qualifications, numbers, and diversity to achieve the institution’s educational objectives. Some faculty members lack credentials for the subjects being taught. As mentioned previously, for example, a faculty member with a masters teaching in the PhD program. Faculty evaluating processes are used to improve teaching and learning throughout the institution (CFRs 3.2 and 3.3).

B. Fiscal, Physical, and Information Resources (CFRs 3.4 and 3.5)

Sofia has been challenged historically to maintain financial resources that can and will allow the institution to operate in a manner that leads to long-term sustainability. The institution's financial audits have indicated, for the past 3 consecutive years, negative net revenue. Their Compliance Audits also indicate repeated findings within the past 3 consecutive years. (CFRs 3.4 and 3.5)

At present, it appears that the institution provides access to information and technology resources sufficient in scope, quality, and kind at both its physical and online sites. As identified in attachment 2.27, submitted to the Team in its institutional report, Sofia uses the Canvas LMS platform and is currently transitioning to a standardized learner-centered course template for all of its courses (CFRs 3.4 and 3.5). With the three years of negative net revenue, the Team is concerned that the necessary financial resources to maintain adequate technology to provide the services consistent with the institution's educational objectives and student learning outcomes could be in question due to its financial uncertainties.

C. Organizational Structures and Decision-Making Processes (CFRs 3.6 and 3.10)

The institution has recently had a high turnover in key leadership positions. At present, the institution's current leadership is characterized by integrity, appropriateness, and accountability. The institution's organizational structures and decision-making processes appear to be clear and consistent with its purposes. The Team is comfortable in concluding that the current full-time leadership can, over time, surely lead Sofia in the proper direction (CFR's 3.6, 3.7, and 3.8).

Sofia has a governing board of Trustees that is consistent with both legal and fiduciary authority. Including but not limited to the evaluation of the CEO, the board appears to exercise appropriate oversight of the institution's integrity, policies, and ongoing operations. The Board is composed of diverse members with various qualifications germane to the governance of an institution of higher learning (CFR 3.9). While the leadership team of the institution has had multiple interactions with the Board, other members of the Sofia community expressed concern about a lack of clear communication extending for a period of time (CFR 3.10). During the visit the institution took advantage of the physical presence of board members and faculty and staff on site to host a social event for the Sofia community.

Summary

The Team's finding, which is subject to Commission review, is that the institution has provided sufficient evidence to demonstrate compliance with the Standard.

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

After reviewing the self-study; institutional documents; and interviews with faculty, staff, trustees, and students, the Team evaluated Sofia University's achievement of educational objectives as outlined in Standard 4.

A. Quality Assurance Processes (CFRs 4.1 and 4.2)

Sofia University has made many changes in structure and personnel to stabilize and expand the university. These changes appear to be overwhelmingly positive; however, the sheer volume of change means that a number of processes, including quality assurance and assessment processes, are not yet fully developed. As a key example, at the time of the site visit, the institutional researcher was very new to the job and was unable to answer many of the Team's questions, thus suggesting a potential weakness in the institutional research function, which is key to data collection and dissemination to inform quality assurance processes (CFRs 4.1 and 4.2). The Team also discovered a lack of internal financial controls and repeated financial aid audit concerns indicating a need for greater quality assurance protocols in this area (CFR 4.1).

B. Institutional Learning and Improvement (CFRs 4.3-4.7)

The university's self-study details, and faculty and administrators further elucidated, the focus placed on program review in advance of the site visit. Notably, the university engaged a qualified external consultant to assist in initial assessment processes; involved faculty (including adjunct faculty), staff, and alumni/ae (CFR 4.5); and internally reviewed findings (CFR 4.6). After completing baseline program assessments on most programs and conceptual reviews for programs with insufficient data or low enrollment, the university has begun to reflect on and implement changes (CFRs 4.1, 4.2, and 4.6). Equally importantly, the university has established and committed to a program review calendar (CFRs 4.3 and 4.4). The widely voiced enthusiasm for what the self-study process has taught the university and for the ways in which this process brought about greater collaboration and understanding are positive signs for the continued establishment of a culture of assessment and quality assurance (CFRs 4.1 and 4.4).

The university is in the closing years of a strategic plan inherited from a previous administration. In addition, the university is in the process of completing strategic enrollment and marketing plans as well as an academic master plan. Numerous faculty and administrators, including the president, told the Team that they were intentionally delaying the creation of a new strategic plan so that it might be informed by the reaccreditation process and feedback. As quality assurance processes are refined and implemented and institutional learning and improvement plans mature, it will be critical to ensure continued alignment with the university's mission (CFRs 4.2 and 4.6).

Finally, the university has considered the changing higher educational environment regarding several dimensions of its operations and planning (CFR 4.7). The expansion of university operations into online and on-ground offerings for overseas students from China, India, and Vietnam has led to partnerships with overseas recruiters and the acquisition of the Costa Mesa campus. Although several administrators have referred to the Costa Mesa campus as critical to the university's future both for its ability to host J-1 students and its facilities, they also reaffirmed a continuing commitment to a presence in the Palo Alto area for its strategic proximity to the technology giants of Silicon Valley.

Summary

The Team's finding, which is subject to Commission review, is that the institution has provided sufficient evidence to demonstrate compliance with the Standard.

Federal Requirements

1–Credit Hour and Program Review Length

The institution's policies and procedures for determining credit hours and program length were reviewed and were found to be in alignment with the Department of Education's definition of a credit hour and WSCUC's credit hour policy. A sampling of syllabi were reviewed to assess this metric. The institution follows the quarter system, and program information, length, and time are found on the institution website and the academic catalog.

2–Marketing and Recruitment Review

The institution does follow federal regulations on recruiting students, providing information about the typical length of the time to degree and provides information about the overall cost of the degree. The institution also provides information about the kinds of jobs for which its graduates are qualified and provides information about the employment of its graduates, as applicable.

3–Student Complaint Process Review

The Team confirmed that Sofia University has a faculty/staff complaint policy, located in the Faculty and Employee Handbooks, as well as a student complaint policy which can be found in the Academic Catalog and the Student Handbook. The institution's Title IX policy can be found on the Sofia website and in the Student Handbook. HR oversees the faculty and staff policies, while the Dean of Student Services oversees the student policy. Students are taught about the complaint process during their orientation and are required to complete Title IX trainings prior to being allowed to register for classes. The HR Director serves as the Title IX Coordinator and the Dean of Student Services serves as a Deputy Coordinator.

4–Transfer Policy Review

The Team was able to confirm that the university's transfer policy is published and readily available to students and prospective students. The transfer policy is clearly articulated in the institution's academic catalog, both in the general application section and in degree-specific sections, available on the Sofia University website. Limitations and exclusions to the transfer, procedures for international course transfer, and mechanisms for prior learning credit obtained from the U.S. military are also outlined, and the treatment of transfer credit for SAP is explained. Applicants are explicitly encouraged to consult with admissions counselors and academic advisors for review of prior academic work.

Final determination of compliance with the Standards rests with the Commission.

Component 3: Degree Programs: Meaning, Quality and Integrity of the Degrees

The Team read about Sofia University's mission in their self-study, and subsequently in each meeting during the accreditation visit, the topic of transpersonal psychology was repeatedly mentioned as an important part of the institution's identity. The University's unique focus on a transpersonal experience is explicitly embedded in each program, thus the meaning of each degree is clearly rooted in transpersonal psychology which requires students to engage in self-transformation, reflection, and application.

The Team identified several processes by which Sofia University utilizes to ensure the meaning, integrity and quality of their degree. The meaning of their degree is ensured by requiring each degree to include theories and practices in transpersonal psychology along with objectives related to self-discovery, self-cultivation, and self-transformation. Transpersonal ways of knowing are also integrated into Sofia's general education courses. In addition, Sofia only hires instructors who are committed to the mission and vision of the University. The integrity of the degree is maintained by purposefully offering degrees focused on a transpersonal experience and/or embedding transpersonal ways of knowing. When the program does not organically include transpersonal psychology, Sofia University purposefully embeds it into the curriculum, as the Team saw with Sofia's Business programs. Through the established assessment and program review process, Sofia University ensures the quality of their degrees. In addition, the faculty, under the guidance of the Provost and the Faculty Senate, provide approval of new programs along with oversight of the delivery and quality of all programs.

Sofia University has established degree requirements for each program. The requirements are tracked and enforced by the Program Chair, the Registrar's Office, and academic advisors. The Dean of Student Services reaches out to all faculty at mid-quarter and requests identification of students who are having difficulty. In addition, the Registrar's Office monitors attendance in the Learning Management System and notifies the Dean of Student Services of any students who have missed multiple class sessions.

The quality of the programs also relies heavily on the faculty. Sofia faculty were found to be highly committed to the University and shared examples of how they infuse transpersonal/transformational theories and ways of knowing into their courses and their interactions with students.

The Center for Innovative Teaching and Learning, Writing Lab, Library, and Instructional Designer provide professional development for faculty and students around the Learning Management System, the dissertation process, writing help, and research support.

When asked how they support a doctoral culture at Sofia, the faculty cited the Center for Innovative Teaching and Learning as offering dissertation support, they also mentioned the startup of a foundation to help faculty re-start their own research. In addition, faculty said they frequently weave their research into the courses since their expertise is specific to the courses they teach. Graduate students also have an opportunity to share their projects during one of the seminars (i.e., required in-person, on-campus meetings).

Component 4 –Educational Quality: Student Learning, Core Competencies, and Standards of Performance at Graduation Quality Assurance Processes (CFRs 4.1 and4.2)

Sofia University has made many changes in structure and personnel to stabilize and expand the university. These changes appear to be overwhelmingly positive; however, the sheer volume of change means that a number of processes, including quality assurance and assessment processes, are not yet fully developed. As a key example, at the time of the site visit, the institutional research director was very new to the job and was unable to answer many of the Team’s questions, thus suggesting a potential weakness in the institutional research function, which is key to data collection and dissemination to inform quality assurance processes (CFR 4.1, 4.2). The Team also discovered a lack of internal financial controls and repeated financial aid audit concerns indicating a need for greater quality assurance protocols in this area (4.1).

Institutional Learning and Improvement (CFRs 4.3-4.7)

The university’s self-study details, and faculty and administrators further elucidated, the focus placed on program review in advance of the site visit. Notably, the university engaged a qualified external consultant to assist in initial assessment processes; involved faculty (including adjunct faculty), staff, and alumni/ae (CFR 4.5); and internally reviewed findings (CFR 4.6). After completing baseline program assessments on most programs and conceptual reviews for programs with insufficient data or low enrollment, the university has begun to reflect on and implement changes (CFRs 4.1, 4.2, and 4.6). Equally importantly, the university has established and committed to a program review calendar (CFR 4.3, 4.4). The widely voiced enthusiasm for what the self-study process has taught the university and for the ways in which this process brought about greater collaboration and understanding are positive signs for the continued establishment of a culture of assessment and quality assurance (CFRs 4.1 and 4.4).

The university is in the closing years of a strategic plan inherited from the previous administration. In addition, the university is in the process of completing a strategic enrollment and a marketing plan as well as an Academic Master Plan. Numerous faculty and administrators, including the president, told the Team that they were intentionally delaying the creation of a new strategic plan in order that it might be informed by the reaccreditation process and feedback. As quality assurance processes are refined and implemented and institutional learning and improvement plans mature, it will be critical to ensure continued alignment with the university’s mission (CFR 4.2, 4.6).

Finally, the university has considered the changing higher educational environment regarding several dimensions of its operations and planning (CFR 4.7). The expansion of university operations into online and on-ground offerings for overseas students from China, India, and Vietnam has led to partnerships with overseas recruiters and the acquisition of the Costa Mesa campus. Although several administrators have referred to the Costa Mesa campus as critical to the university’s future both for its ability to host F-1 students and its facilities, they also

reaffirmed a continuing commitment to a presence in the Palo Alto area for its strategic proximity to the technology giants of Silicon Valley.

Component 5–Student Success: Student Learning, Retention, and Graduation

Sofia takes a college-ready approach to student success. It has defined student success as beginning with “recruiting qualified students who are a match for Sofia’s programs and [are] academically prepared to enter a degree-completion or graduate-level program of study.” This definition is consistent with the university’s mission, values, and character in terms of degree programs (CFR 2.2). However, this definition does not indicate what student success is other than admissions requirements.

The institution does report retention rates “for the percentage of new students who enrolled for three or more terms” as “a better projection of student success and approximation of potential graduation.” For its “domestic programs from 2014 to 2016, the average percentage of students enrolling in three or more terms was 66%. Between 2016 and 2020 this average jumped to 77%, a significant improvement in persistence rates.” A disaggregation of students completing three terms by gender, age, and ethnicities is provided in the report (CFR 2.10).

While gender parity for students completing three or more terms between 2017-2020 has been achieved (with men at 77% and women at 75%), “between 2017-2020 the three term retention for all ethnic groups averaged 77%, except for students identifying as Black or multiracial.” It is explained that “[h]ere, the percentage is 50% with the caveat that the total number of students identifying as Black was four, and for multiracial, the total was four.”

Regardless of the number of students disaggregated by race/ethnicity constituting this 50%, the visiting Team’s sense is that there is little curiosity shown about why the percentage is so low. Instead, it is glossed over with a statement that “[o]verall, these data show an absence of disparity in retention rates based on gender, age, and all other ethnicities,” except for Black and multiracial students. Following right after this sentence is the statement that “Sofia anticipates that students identifying as Black and multiracial will soon reach comparable retention rates” as all other ethnicities. Absent from this assertion are any indications of why these rates are low, as mentioned earlier, and how comparable retention rates will be achieved. (CFRs 1.4, 4.3, and 4.4)

For students enrolled in the MBAO, the institution reports a retention rate of 99%. It states that this “near perfect retention rates [sic] . . . is an impressive figure and provides an opportunity for reflection on the structural and academic features contributing to these rates,” for Chinese students in this global program, and on “the cultural factors that influence retention.” Taking the MBAO students’ retention rates when compared to those of Black and multiracial students, the set of “cultural factors” as well as “the structural and academic features” influencing retention appears to code one set of students—i.e., Black and multiracial students—as deficient or as lacking something culturally. The visiting Team recommends that Sofia examine the structural features over which the university has control rather than “cultural factors” that it has little

control over in order to create interventions that might increase Black and multiracial students' retention as it furthers a mission-informed examination of equity, inclusion, and diversity, and develops policies and practices across the organization. (CFRs 1.4, 4.3, and 4.4; WSCUC Equity and Inclusion Policy).

With respect to graduation rates, Sofia reports that the “two-year BAP completion program shows a 43% graduation rate over two and four years.” As stated in the institutional report, this “figure is based on a total of 12 students.” Following this mention of total numbers of students in this program, the institution provides the following assertion: “these data are preliminary and indicate a need for more targeted student support.” Unremarked is what this support might include. The paragraph concerning the BAP graduation rates ends with this: “As this program expands to include a STEM focus, it will increase its attractiveness thereby increasing graduation rates.” The logic seems to be that increased enrollment will lead to increased graduation rates; however, this reasoning is fallacious.

As concerning as the bachelor completion program rates are the rates for the PhD program: “28.3% of students . . . graduated within five years” and “nearly two thirds of students who initially enrolled in the program [do] not earn . . . a degree after seven years” for what is reported on the website as a three-year program. The institution explains “by way of comparison, according to the American Psychological Association, doctorates in psychology research programs in 2013-2014 took an average of seven years from starting graduate school to completion.” Since this is a comparison, only 1/3 of students in the PhD program met this completion standard. To reduce time-to-completion rates in the doctoral program, the institution created in 2019, “a sequence of six dissertation courses . . . with specific deliverables for each course.” Moreover, its “Dissertation Office supervises every student enrolled in the dissertation courses to offer the necessary academic support for timely completion of dissertations, which includes progress reports twice a quarter.” The university is to be lauded for instituting these interventions. (CFR 2.13)

Also reported in the institution's discussion of student success are the clinical licensure exams pass rates. 71% of graduates of the MACP program in 2018 passed the California Board of Behavioral Sciences for Licensed Marriage. The pass rates on the clinical psychologist license exam for graduates of Sofia's Doctorate in Clinical Psychology from 2018 to 2019 declined from 69% to 64%. This program's “viability is being explored by the provost, cabinet, and Board of Trustees,” since “[w]ithout APA accreditation . . . portability and student employment options” are limited.

In an effort to identify student learning and performance, the institution has formalized measuring learning and performance only in the “past four years.” “Assessment of program learning objectives . . . began in the 2019-2020 school year.” While alignment of course objectives, ILOs, and PLOs is sought, the results of the assessment of “course deliverables . . . revealed that most assignments assessed supported PLOs while there were some assignments that did not.” It is unclear what will be done considering this assessment with the assignments that did not support PLOs. Is it the case that better “alignment of course objectives, ILOs, and PLOs [will] improve alignment [of what?] with ILOs”? There is a circuitous logic here. The discussion of direct assessment ends with the claim that “[a]ssessment of course learning

objectives will now become a regular function of each program.” The Team’s questions about this are: why is this assessment only beginning now, and will it be sustained? The Team recommends that the university create an assessment infrastructure adequate to assess student learning at program and institution levels (CFRs 2.6 and 4.1).

Brief as the discussion of direct assessment in contrast is a much longer discussion of indirect forms of assessment of learning: i.e., course evaluations and student satisfaction surveys of alumni. It should be noted that, while the institution is making efforts to assess student learning indirectly, direct evidence of artifacts of students’ work should be increased since it is more telling of students’ learning than is indirect evidence such as alumni satisfaction surveys.

Showing a desire to increase student success, the institution has focused on creating “a culture of caring.” This culture consists of multiple efforts such as monitoring student progress through midterm evaluations, the use of bilingual TAs, student advisement, the creation of a virtual writing lab (which during the visit, the Team learned that more students should be encouraged to use the writing lab), a career resource center, a student senate, and program review. (CFRs 4.1 and 4.3)

The institution did not discuss the graduation rate dashboard.

Component 6–Quality Assurance and Improvement: Program review, assessment, use of data and evidence

Sofia University is just starting to use assessment of student learning and program reviews to inform decision-making. As of now, assessment of program learning outcomes is completed as part of the program review process (CFRs 2.2, 4.1, and 4.3). The IR Director is very new, but plans are in place for assessment of student learning outcomes to fully reside under the Office of Institutional Research, while program reviews reside under the Provost (CFR 4.2).

When asked about examples of using program review results to inform decision-making and improve teaching and learning, the Provost shared examples of actions taken by program chairs in response to the recommendations received during the program review process. For example, in the PhD Transpersonal Psychology program a recommendation was given to conduct additional trend analysis to help identify areas for improvement. In response the chair has instituted anonymous student evaluations in each Canvas course and plans to conduct exit interviews with each student one the Registrar indicates through the degree check that a student is ready to graduate (CFRs 4.3, 4.4, 4.5, and 4.6).

Assessment of student learning is embedded in the program review process. As part of the review process, program recommendations are broken down into the following categories:

- Key Recommendations
- Curriculum Recommendations
- Additional Assessment of Student Learning

Program chairs report on their progress towards the program review recommendations at their monthly Chairs Council meetings and in their biweekly one-on-one meetings with the Provost

(CFRs 4.3 and 4.4). Chairs provide written responses to the Provost. The Team received the written response provided by the PhD Transpersonal Psychology Program Chair. In it the Chair mentions the following actions they have taken with response to the assessment of student learning in the program:

- The PhD program will continually conduct academic assessments and adjust the assignments to ensure they are in alignment with the CLOs and therefore the PLO.
- The PhD program revised the rubric associated with the course assignment and also decided to limit the course to students who are more advanced in the PhD studies.
- We continually seek to ensure alignment and integration of assignments to PLOs and ILOs, and select those aligned assignments for assessment thereby providing confidence in the evidence and data gathered.
- We are in contact with alums to see how they have deployed their skills since leaving Sofia.

Prior to the self-study, Sofia did not regularly use institutional data to support and inform decision-making, planning and improvement. The Sofia University Self-Study Committee told the Team that “one of the big ah-ha moments was realizing how important it was to look at figures and numbers and actually use them in decision-making.” The committee also stated that they used to be more siloed, but now “all staff, all faculty meet far more often rather than decisions held only in Provost Council or committees” (CFRs 2.2, 4.5, 4.6, and 4.7).

In a meeting with Institutional Research, the VP of Finance commented that the IR Office used to be more reactive, but they plan to “focus more on being proactive with data and reports that the institution needs to make data-driven decisions.” Two examples given where data has been used to inform decisions were (1) the Global College end-of-course evaluations showed that adjustments needed to be made not only to the language but also for the adult Chinese learner who are different than the US adult learner and (2) a survey to alums is where they learned of an interest in a PhD in Mandarin, which is now in the works.

In a meeting with the Chairs Council it was shared that the decision to discontinue the PsyD program was based on the self-study, the fact that they only had 8 students in the program, and the cost to become fully accredited by APA.

Sofia University acknowledges that they could do a better job at using institutional data more consistently to support and inform decision-making, planning and improvement. The Team heard several times of plans to use data more in decisions from now on (CFR 4.5).

Component 7: Sustainability: Financial Viability; Preparing for the Changing Higher Education Environment

Sofia University is a for profit university that derives 100% of its revenue from student tuition and fees. Sofia's financial sustainability and viability are directly linked to enrollments. The university has faced financial challenges in recent years, posting negative balances. As identified in prior WSCUC reviews, Sofia University has struggled financially over the past

several years with continued negative net income. In fact, Sofia University has functioned with an operational deficit from 2018 through 2021, thereby jeopardizing compliance with CFR 3.4.

The Team found the university primarily focuses on enrollments for its financial stability yet has been unable to meet its enrollment targets up to the time of the visit.

Based on their financial audits from McClintock and Associates, the following has been presented, FY 2018/2019 with a net loss of (\$2,524,566), FY 2019/2020 with a net loss of (\$3,226,639), and FY 2020/2021 with a net loss of (\$176,468). Although FY 2020/2021 indicates a lower net loss, it also indicates three (3) consecutive years of net loss which is of high concern/risk to the future of the university. The institution is not financially stable based on the audited financial statement outcomes from McClintock and Associates.

Sofia University states that some of the past financial turmoil can be attributed to complications with a change in ownership, senior executive leadership, and loss of international students. However, in the institutional report it states that the institution “recently” hired an admissions director and hired in July 2021 a new Provost, Carol Humphreys, which tends to be the same pattern as the past regarding “senior executive leadership” (CFR 3.1 and 3.4).

The audited financial statements, submitted by McClintock and Associates, indicate in Fiscal year 2020-2021 that the institution had an increase in revenue by approximately \$1M due to their Short-Term Study Program. However, based on the three (3) years of audited financial statements—the 2019 independent financial audit identifying significant deficiencies and the unqualified 2020 and 2021 independent financial audits—the institution is not yet financially stable and resources are not sufficient to ensure long-term viability. (CFR 3.4)

In 2020 and 2021, the institution was able to access multiple federal resources available to institutions in response to the COVID-19 pandemic. These included Payroll Protection Plan loan(s) and various HEERF grants. This artificially bolstered the financial position in the short term.

The institution met the certain criteria for their PPP loan forgiveness and during July 2021, the entire PPP loan balance of \$667,700 was forgiven. This has been of assistance in increasing the revenue to be indicated no longer as a debt, however, as a revenue in their Profit and Loss. It is unclear if the federal government intends to continue providing such relief. Therefore, per its own cash flow projections, it still indicates they are functioning at a net loss.

The institution's Financial Audits had two (2) identical Findings for both FY 2019/2020 and FY 2020/2021. The first Finding states, Management was not properly earning the tuition deposits received of the two-year online Master of Business Administrative program. Management had established a process for recognizing the revenue related to these tuition deposits received, however, the timing of the revenue recognition was not accurate. Accordingly, there were errors made during the revenue recognition process for these transactions during the year.

It was recommended that the institution develop and implement a month-end reconciliation of the prepaid tuition account to properly reflect the amount of prepaid tuition and to properly recognize the corresponding tuition revenue as the students' progress through their program (unearned tuition).

Sofia University concurred with the finding and stated that it was in the process of fine tuning its internal controls to record these online Master of Business Administration program tuition revenues more accurately in each quarter and conduct the monthly reconciliation as recommended to reflect the amount of prepaid tuition and to properly recognize the corresponding tuition revenue as the students' progress through their program.

The concern with this Finding is it was a financial audit Finding for FY 2019/2020 and FY 2020/2021. In addition to being a repeat Finding, the institution has the same response to both years. There had not been a change indicated by the findings in the FY 2020/2021 audit.

The second (2) Finding states, Sofia was unable to generate a report out of their student information system that could accurately arrive at a student-by-student 90/10 calculation for purposes of financial statement disclosure. One area not addressed is its analysis and understanding of recent or potential legislation that may impact the for-profit education landscape (CFR 4.7). For example, recently introduced legislation seeks to modify 90/10 measurements to include military benefits, and other for-profit peers are analyzing past requirements such as Gainful Employment to ensure adequate preparation for potential future legislation (CFR 3.4).

The audit states Sofia should improve procedures related to employee training coding to ensure the 90/10 calculation is computed in accordance with the federal regulations. Management should continue to follow established procedures to ensure that, in the future, all Title IV aid received in the audit period is included in the 90/10 calculation and that the calculation is free of clerical errors.

Sofia University concurred with the Finding and stated they were in the process of developing policy and procedures to avoid similar problems in the future and fully follow ED guidance and requirements. Sofia stated they were in the process of seeking an outside consultant to assist with calculating the 90/10.

In the audited financial statements for FY 2018/2019, FY 2019-2020, and FY 2020-2021 the following is a breakdown of the 3 consecutive years.

Under the federal regulations, the Department of Education calculates the institution's composite score based on a three-factor financial responsibility ratio. An institution which does not meet ED's minimum composite score of 1.5 can demonstrate financial responsibility by meeting the "zone alternative" or posting a letter of credit in favor of ED. The "zone alternative" includes a delayed method of cash funding for Title IV aid, and the providing of additional information of ED, upon request. Out of a possible score of 3.0, as of June 30, 2021, the institution had a composite score equal to 1.0 for FY 2018/2019, -0.07 for FY 2019/2020 and 1.6 for FY 2020/2021 out of a possible score of 3.0. The audited financial statement does indicate from FY 2018/2019 to FY 2019/2020 the composite was decreasing which indicates the financial weakness of the institution, However, in comparing FY 2019/2020 and FY 2020-2021, the composite score went to the minimum required for not being on ED concerns with a 1.6. This indicates the institution is going in the right direction with the \$1M increase in revenue and the \$1.2M line of credit utilization conversion to equity for the owner. The concern would be as stated in the institution's report, "Sofia University is a for profit university that derives 100% of its revenue from student tuition and fees." Therefore, if the enrollment does not

increase it will not be financially stable for the university's future unless the owner continues to donate millions of dollars (CFRs 3.4 and 3.8).

Regarding the institution's default rate for 3 consecutive years, it is to be acknowledged that the institution's rates are very strong and extremely powerful. The results of their default rates are FY 2018-2019 4%, FY 2019-2020 3% and FY 2020-2021 1.2%. This is a very strong outcome to the value and knowledge given to the students regarding paying their loans back to the Department of Education.

Taking into consideration the 3 consecutive years of Net Loss, the audited financial statements indicate high expenses for the 3 years which surpasses the revenue/tuition the institution has reported. However, there has been a tremendous change of almost \$2M decrease in expenses comparing FY 2019/2020 (\$8,417,634) and FY 2020/2021 (\$6,565,928).

In the Strategic Enrollment Management Plan it states that some of their internal weaknesses are 1). Limited financial resources affect the ability to invest in better systems, more staff, and ultimately negatively impacts recruitment and marketing efforts. 2). Students are increasingly looking for "professionally accredited programs." The cost of seeking these professional educational qualifications can be substantial. These 2 internal weaknesses are an example of the financial futures stability of the university, especially with "professionally accredited programs". In the future, both education and service to students are valuable to obtaining professional accreditation for specific programs (CFR 3.4, 4.6).

Overall, Sofia University has not strongly demonstrated evidence of strong compliance with Component 7 at a level sufficient for long term reaffirmation, recognizing that only the WSCUC Commission can make a final determination.

Component 8: Institution-Specific Themes

N/A

Component 9: Conclusion: Reflection and Plans for Improvement

Noting "one of the most valuable parts of this effort," the institution reflects that "the self-study process has enabled Sofia to make changes where . . . gaps" in "accurate assessments and methods" were discovered. Preparing the report "brought faculty together, working collaboratively with senior management to fully address disparities with a clear and strong desire to create a learner-centered, transformational experience of the highest quality for Sofia students." In addition, "[d]eep and enthusiastic engagement occurred as faculty coalesced in the creation of new processes such as data dashboards, learning assessment, revision of learning outcomes, and the establishment of program reviews that included full participation of the Office of Institutional Research" (CFRs 2.4, 3.1, 4.4, and 4.6).

Addressing issues that arose in the past with respect to governance, the institution remarks that a "stronger, more experienced Board, as is evidenced by new appointments in the last two years of highly qualified individuals, and efforts at better communication with the Faculty Senate including more regular meetings with the president and provost, contribute to stronger shared governance" (CFRs 3.7, 3.9, 3.10, and 4.3). Also related to this, in its notes on transformation and priorities, Sofia acknowledges that it "has survived a challenging period of instability with a

new appreciation for the power of collaborative stakeholder engagement . . .” Such improvements were apparent to the Team during its visit.

Areas for improvement include “the lack of a well-developed cyclical process for program reviews, an established and thoughtful data-driven process for learning assessment, and a much-needed refresh of PLOs and their alignment with ILOs.” While the Team notes efforts in these areas, it also noted that there is a need to develop a more thorough institutional assessment infrastructure.

Among its future priorities, Sofia has identified the following:

- Financial viability and sustainability
- Mission-aligned academic quality and credibility with faculty-driven assessment
- Innovative, relevant, competitive, demand-based academic programming
- Regulatory accreditation, compliance, and alignment with WSCUC standards
- A renewed culture of collaboration, transparency, and integration across programs
- Marketing and recruitment for 2021 and beyond

These priorities are reflected in the Strategic Plan Update and other planning. It will be necessary to ensure continued growth and sustainability.

Section III – Other Topics, as Appropriate (such as Substantive Change)

N/A

Section IV – Findings, Commendations, and Recommendations from the Team Review

Findings

Commendations

Sofia University is to be commended for:

1. An engaged, invested, and well-rounded Board that is both supportive and uniquely equipped in experience and expertise to oversee Sofia University’s transformation.
2. Instructional technology and instructional design personnel who have assisted faculty and students in implementing shared and user-friendly course blueprints and are poised to assist faculty in moving Sofia University’s online instruction to the next level.
3. A strong and vibrant enthusiasm for the future of the institution expressed by all constituents.
4. A meaningful self-study process that has yielded a greater understanding of and collaboration across the institution.
5. A university-wide commitment to a shared identity and commitment to transpersonal psychology.

Recommendations

The Team recommends Sofia University:

1. Rectify the financial aid compliance and audit findings from multiple years, keeping WSCUC informed of your progress. (CFR 1.7, 1.8, 3.4)
2. Appoint a knowledgeable Financial Aid Director separate from the VP/CFO and ensure the training of both in U.S. Department of Education compliance. (CFR 3.1, 3.4, 3.8)
3. Establish and document internal controls for all accounting functions. (CFR 1.7, 4.1)
4. Create a data-informed culture in which leaders have access to relevant information in order to make data-informed decisions. (CFR 4.1, 4.2)
5. Complete an institution-wide review of the organizational structure, qualifications, and knowledge base of faculty and staff and develop hiring practices and policies that support the future vision of the University. (CFR 1.4, 2.1, 3.1)
6. Undertake a mission-informed examination and further development of equity, inclusion, diversity, and accessibility that thoughtfully address student success equity gaps and policies and practices across the institution. (CFR 1.4, WSCUC Equity and Inclusion Policy)
7. Complete institutional planning with the strategic enrollment and marketing plan, the Academic Master Plan—including degree completion programs—and begin the next strategic planning cycle with action plans that include budgets and responsible personnel. (CFR 4.3, 4.6)
8. Increase regular communication between the Board of Trustees and university personnel, including both faculty and staff. (CFR 3.10)

APPENDICES

I. Off-Campus Locations Review

Institution: Sofia University
Type of Visit: Accreditation Visit
Name of reviewer/s: Michele A Starkey
Date/s of review: April 9, 2022

A completed copy of this form should be appended to the Team report for all visits in which off-campus sites were reviewed¹. One form should be used for each site visited. Teams are not required to include a narrative about this matter in the Team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the Team report.

1. Site Name and Address

Sofia University Costa Mesa Campus
3333 Harbor Boulevard
Costa Mesa, CA 92626

2. Background Information (number of programs offered at this site; degree levels; FTE of faculty and enrollment; brief history at this site; designation as a branch campus standalone location, or satellite location by WSCUC)

Sofia University started moving into the Costa Mesa campus in 2018, but the first on campus students just started attending in Fall 2021. The campus currently offers two programs: MS Computer Science and MBA. Both programs are at the Masters level. The administration is hoping to begin offering doctorate and bachelor level degree programs at this campus soon.

Several staff members are based at this campus (Senior Registrar, Director of Admissions & Alumni Affairs, Marketing, Director of Global College, and Facilities). Staff are allowed to select which campus will be their home base; however, they can work remotely as well. All departments are university departments. There are no departments which only support the Costa Mesa campus beyond the Facilities specific personnel at each campus.

No faculty are assigned to this campus in-person courses are streamed synchronously from the Palo Alto campus for students in the Costa Mesa classrooms. Classroom Managers at the Costa Mesa campus help facilitate the courses. Every fourth course meeting, the instructor comes to the Costa Mesa campus to stream the course. That way the Costa Mesa students do get some direct contact with the faculty member. The students attended from both campuses are J1 Visa students who need to have seat time as part of their visa. Their course schedules are a mix of online and in-person/streamed courses.

¹ See Protocol for Review of Off-Campus Sites to determine whether and how many sites will be visited.

3. Nature of the Review (material examined and persons/committees interviewed)

The reviewer arrived at 9:00 am; met with the provost; received a tour of the campus from the Facilities Director; met 1-1 with the Global College Director, Director of Admissions & Alumni Affairs, Senior Registrar, New Student Liaison, Associate Vice President for Academic Innovation & Chair of the Business Programs. The reviewer then met with four students, had lunch, and observed a class in action. The reviewer left at 1:30 pm.

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
<i>For a recently approved site.</i> Has the institution followed up on the recommendations from the substantive change committee that approved this new site?	Most of the recommendations were for subsequent or future substantive change submissions.	In the event that the proposed new location is expanded, administration must present additional organization structure and information to the WSCUC office for review per Substantive Change requirements.
<i>Fit with Mission.</i> How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)	This campus allows Sofia to continue offering their current curricula focus, as well as expand into additional doctoral and bachelor business degrees. The site is currently not fully used, but plans are in place to host graduation there, possibly add residence halls down the road, rent out spaces and be a hub for community and academic events.	

<p><i>Connection to the Institution.</i> How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)</p>	<p>Every person I spoke to felt fully connected and integrated with the Palo Alto campus and did not see the Costa Mesa campus as "separate" from the actual institution. Everyone spoke of regular meetings with staff and faculty at both locations, as well as the multiple tools they use to communicate (Slack, Zoon, Teams).</p>	
<p><i>Quality of the Learning Site.</i> How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)</p>	<p>The classrooms are updated and fully equipped with technology to facilitate learning and faculty-student contact. The Facilities Manager has been directing the site since before Sofia began leasing the property. IT staff and Classroom Managers ensure the streaming goes smoothly each Saturday when classes are in session. The provost regularly visits the site (once a month) and faculty have scheduled visits as well (every fourth class meeting). Most rooms are auditorium seating, but there are two seminar style rooms.</p>	<p>The classrooms are set up so that students can only see the faculty at the opposite campus. In addition, the layouts of the classroom do not easily facilitate group work or student-student interaction. Recommend looking into how student-student interaction/collaboration might be fostered.</p>

<p><i>Student Support Services.</i> What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)</p>	<p>Students on both campuses are supported by the Admissions counselors, new student liaison, Registrar, Financial Aid, Students Accounts staff, faculty, department chairs and classroom managers. The abandoned Law Library is located at the Costa Mesa site, but all library services are provided online for students. Tutoring and learning support are available to all students. the students I spoke to at the Costa Mesa site aid the faculty member ensures they get the academic support they need, and they have not yet needed tutoring.</p>	
<p><i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4, 4.6)</p>	<p>Most of the Sofia faculty are not full-time, they are either core faculty at less than 1.0 or adjunct. All Sofia faculty teach at both campuses (either streaming to the other campus or at a distance). No faculty are assigned solely to the Costa Mesa campus at this time. Faculty lead curriculum and assessment of student learning.</p>	
<p><i>Curriculum and Delivery.</i> Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)</p>	<p>All programs at the Costa Mesa campus are the exact same programs taught at the Palo Alto campus. The two campuses are integrated very well.</p>	

<p><i>Retention and Graduation.</i> What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)</p>		<p>This is a newer campus thus this data is not yet available for this student population.</p>
<p><i>Student Learning.</i> How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)</p>	<p>Assessments are automatically included as part of the university and program level assessments that are being conducted.</p>	<p>Eventually, Sofia will want to compare results of students based at the Costa Mesa campus to results of students based at the Palo Alto campus to see if any differences.</p>
<p><i>Quality Assurance Processes:</i> How are the institution's quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)</p>	<p>All reports and quality assurance processes are designed at the university level so this site is automatically included in those processes.</p>	<p>Comparisons by site may want to be looked at down the road.</p>

II. Distance Education Review

A completed copy of this form should be appended to the Team report for all comprehensive visits to institutions that offer distance education programs² and for other visits as applicable. Teams can use the institutional report to begin their investigation, then, use the visit to confirm claims and further surface possible concerns. Teams are not required to include a narrative about this in the Team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the Team report. (If the institution offers only online courses, the Team may use this form for reference but need not submit it as the Team report is expected to cover distance education in depth in the body of the report.)

1. Programs and courses reviewed (please list)

Master of Science in Computer Science
MSCS3801: Discrete Mathematics for Computer Science
MSCS3803: Algorithms in Python and R
MSCS3806: Advanced Topics in AI and Machine Learning
MSCS3921: Cyber Security: Forensics and Attack Analysis
Bachelor of Arts in Psychology Completion Program
PSB100: Introduction to Psychology
PSB103: Personality Theory
PSB201: Abnormal Psychology
PSB404: Psychology and Social Structure
Master of Business Administration
MBA4601: Marketing 2
Master of Business Administration (Chinese Language)
MBAO1210: Personality and Motivation
Master of Arts in Transpersonal Psychology (Chinese Language)
MTPO7801: Spiritual Development Across the Lifespan
MTPO7201: Seminar in Professional Ethics
Global PhD in Transpersonal Psychology
GPHD6415: Transpersonal Psychology and Social Structure
DOC9001: Dissertation: Committee Formation and Final Proposal
GPHD9825: Research Practicum

The reviewed courses listed above are winter 2022 courses that appeared in their Canvas pages and/or stated explicitly in their syllabus that they were conducted either asynchronously online or online with Zoom meetings. No spring 2022 courses were available to review.

2. Background Information (number of programs offered by distance education; degree levels; FTE enrollment in distance education courses/programs; history of offering distance education; percentage growth in distance education offerings and enrollment; platform, formats, and/or delivery method)

² See Distance Education Review Guide to determine whether programs are subject to this process. In general only programs that are more than 50% online require review and reporting.

In the wake of COVID, the delineation of online and in-person education has become blurred, making determination of FTE and growth in distance education difficult to judge. WSCUC lists the following nine programs as offered at Sofia University in distance education format: BSBA, BAP, BALA, MBA, MSCS, MACP, MBAO, MATP, and PhDTP. Sofia University publications indicate fewer online degree programs: the academic catalog lists four (BAP, BSBA, MACP, and MATP), and the Student Handbook lists a slightly different set of four (the BA Completion programs, MATPO, and PhD in Psychology TP concentration). The Team was informed that few programs are offered fully online (MATPO, MBAO, PhD). In meeting with professors and administrators, the Team was informed that students were surveyed about the spring semester, and the overwhelming majority preferred to return in a hybrid basis.

During the visit, the Team received spring 2022 headcounts for online programs (FTEs were not provided):

9	BAP
55	MATP
54	PhD
521	MBAO (Chinese language)
123	MATPO (Chinese language)

Sofia utilizes Canvas as their LMS for online, hybrid, and in-person courses. Templates have been developed and are in use for online courses. These templates make navigation of courses easy for students. The landing page for each course has a similar look and feel and the navigation bar contains similar elements. Courses also include a “Getting Started” module that orients students to the technology and expectations for the class; this module includes an “I’m here and ready!” assignment is included in courses.

Online courses vary in their formats. Some are asynchronous, some have required Zoom meetings, and some are hybrid with weekend or other face-to-face meetings. Most courses had required discussions, many had recorded (audio and/or video, in some cases with Chinese subtitles) lectures, some incorporated outside videos or Ted talks. Most had a depth and breadth of content and activities; however, some courses (e.g., PSB100) were rather more skeletal, and two reviewed MSCS courses appeared to rely on Khan Academy talks for refresher or instruction for foundational concepts and the textbook for both readings and assignments without further instructor-provided content.

3. Nature of the review (material examined and persons/committees interviewed)

Canvas courses (see list above), IT and Instructional Designer, Global College Team, AVP Academic Innovation, Program Chairs Master of Arts in Transpersonal Psychology and Master of Science in Computer Science, Part-time Faculty, Current Students, and Alumni/ae.

Observations and Findings

Lines of Inquiry (refer to relevant CFRs to assure comprehensive consideration)	Observations and Findings	Follow-up Required (identify the issues)
<i>Fit with Mission.</i> How does the institution conceive of distance learning relative to its mission, operations, and administrative structure? How are distance education offerings planned, funded, and operationalized?	Faculty and administrators were quite clear that all programs flow from their focus on transpersonal psychology, and that the online programs are an enactment of bringing transpersonal psychology to the world.	N/A
<i>Connection to the Institution.</i> How are distance education students integrated into the life and culture of the institution?	Time zone and language appear to be barriers to full integration of the MBAO and MATPO students into the university. In the meeting with Global College alums, the desire for more interaction was expressed.	The university is intentionally trying to increase engagement of members of the Global College. These efforts should be encouraged, and where possible, expanded.
<i>Quality of the DE Infrastructure.</i> Are the learning platform and academic infrastructure of the site conducive to learning and interaction between faculty and students and among students? Is the technology adequately supported? Are there back-ups?	The IT person and the Instructional Designer both received high praise from faculty, and positive comments from students about the transition to online during COVID bore this out.	The IT person is just one person (albeit a very competent and helpful person, as the Team experienced firsthand). It is recommended that additional resources be deployed here. The Instructional Designer has worked effectively with faculty to develop and deploy helpful templates for online courses, but in-person courses would benefit from the use of such templates in Canvas as well.
<i>Student Support Services:</i> What is the institution's capacity for providing advising, counseling, library, computing services, academic support and other services appropriate to distance modality? What do data show about the effectiveness of the services?	The university has identified and provided a number of supports, including bilingual teaching assistants, and classroom managers. Assistance provided by IT was praised.	The university has not yet undertaken formal evaluation of co-curricular activities, including student support services. With changes in Chinese enrollment partners, this is an area to monitor.

<p><i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? Do they teach only online courses? In what ways does the institution ensure that distance learning faculty are oriented, supported, and integrated appropriately into the academic life of the institution? How are faculty involved in curriculum development and assessment of student learning? How are faculty trained and supported to teach in this modality?</p>	<p>Full-time as well as part-time/adjunct faculty teach online courses. Many MBAO and MATPO courses are taught by English-speaking instructors (using subtitles for videos, dual-language Canvas pages, and bilingual TAs). Many, but not all, online instructors teach in-person as well. Part-time faculty reported being given sample syllabi, efficient tech support, and either weekly or on-request meetings (varied by program). Both full-time and part-time faculty reported engagement in assessment of programs and student learning. The Instructional Designer and IT person were seen as great resources.</p>	
<p><i>Curriculum and Delivery.</i> Who designs the distance education programs and courses? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to on-ground offerings? (Submit credit hour report.)</p>	<p>Core faculty develop and provide sample syllabi. Working with faculty, the Instructional Designer has developed templates. Programs and courses appear to be equivalent in content, quality, and outcomes. The University states, “Sofia University programs are on a quarter system. All units associated with courses are quarter units: 1.0 unit generally requires 10 hours of class instruction and 20 hours of work outside class (a total of 30 hours per unit.)” (p. 36, Academic Catalog).</p>	

<p><i>Retention and Graduation.</i> What data on retention and graduation are collected on students taking online courses and programs? What do these data show? What disparities are evident? Are rates comparable to on-ground programs and to other institutions' online offerings? If any concerns exist, how are these being addressed?</p>	<p>The university reported that no information was available for the Bachelor completion programs, one-year retention rates of ~78% for MATP (but no differentiation for online vs. in-person). The MBA program review document did not include MBAO data.</p>	<p>Assessment disaggregated by modality will be important as the university strengthens its culture of assessment.</p>
<p><i>Student Learning.</i> How does the institution assess student learning for online programs and courses? Is this process comparable to that used in on-ground courses? What are the results of student learning assessment? How do these compare with learning results of on-ground students, if applicable, or with other online offerings?</p>	<p>To date, the university has focused its attention on program review independent of modality, and some programs have not yet received a full program review.</p>	<p>Maintenance of a regular assessment cycle will be important to establish.</p>
<p><i>Contracts with Vendors.</i> Are there any arrangements with outside vendors concerning the infrastructure, delivery, development, or instruction of courses? If so, do these comport with the policy on <i>Contracts with Unaccredited Organizations</i>?</p>	<p>Yes, the MBAO in particular has relied on such partnerships, but the university appears to be moving away from such agreements. The university reports compliance with WSCUC policy in these arrangements.</p>	<p>As Global College arrangements shift, it will be important to continue to monitor this area.</p>
<p><i>Quality Assurance Processes:</i> How are the institution's quality assurance processes designed or modified to cover distance education? What evidence is provided that distance education programs and courses are educationally effective?</p>	<p>The provision of sample syllabi, course templates, and engagement of faculty are designed to ensure consistent quality across modality. The recent creation of formal Guidelines for Academic Program Review can and should be applied to online programs as well, with program review data disaggregated by modality.</p>	

III. Federal Requirements

Compliance with WSCUC Standards and Federal Requirements Worksheet and Forms

Purpose of the Worksheet

This worksheet and federal forms serve three purposes:

1. To provide reviewers ready access to evidence that the institution is in compliance with Commission Standards and federal requirements
2. To present the institution's summary reflection on its level of adherence to Commission Standards
3. To give the institution the background needed to respond to "Component 2. Compliance with Standards: Review Under the WSCUC Standards and Compliance with Federal Requirements; Inventory of Educational Effectiveness Indicators."

The WSCUC Standards, CFRs, and Guidelines

The WSCUC Standards serve as the basis for judgments by review teams and the Commission. Each Standard is set forth in broad terms that are applicable to all institutions. Under each of the four Standards are two or more major categories that make the application of the Standard more specific. Under each of these categories are Criteria for Review (CFRs), which identify and define specific applications of the Standard. Guidelines, provided for some but not all CFRs, identify typical or common forms or methods for demonstrating performance related to the CFR; institutions, however, may provide alternative demonstrations of compliance. This worksheet contains all the CFRs and Guidelines from the *Revised 2013 Handbook of Accreditation*. An "X" in the cell indicates a cross-reference to other CFRs that touch on related issues.

Using this Worksheet

The third column of the worksheet asks the institution for evidence. The cells in this column direct the institution as to what type of evidence should be provided. Evidence may take one of these five forms and references to this information should be entered in the cell:

1. A link to a webpage on the institution's website (please provide the specific link)
2. A reference to page(s) of the institutional report or appendix (please provide the exact page number(s) of the report or appendix on which the evidence appears)
3. A reference to specific sections of an institution's handbook, manual, or guide (please provide the exact page numbers or attach PDFs of the relevant material, and specify the name of the document)
4. A reference to an attachment that is included with the worksheet upon submission, with the materials as specified in the cell, e.g., "List of professional accreditation agencies" (please provide the specific name of the attachment)
5. A reference to a specially written attachment that is included with the worksheet upon submission, e.g., "Up to one page description of..." (please provide the specific name of the attachment). The Commission expects that specially written attachments will not exceed 20 pages in total.

Compliance with Federal Requirements

In addition to the main worksheet, there are four forms that team members will review during the reaffirmation of accreditation and attach to their team report in order to ensure that the institution is in compliance with the cited federal requirements. The institution is expected to complete the forms with links to the needed information in anticipation of the team's review. Please do not check the "yes" or "no" boxes on the federal requirements forms as these check boxes are intended for team members when determining compliance.

Institutional Information

Institution: Sofia University

Date of Submission: 09/23/ 2021
Mo Day Year

Institutional Contact Name and Email:

Carol Lee Humphreys, PhD Provost, VP Academics, and ALO
Carol.Humphreys@Sofia.edu

Standard 1. Defining Institutional Purposes and Ensuring Educational Objectives

The institution defines its purposes and establishes educational objectives aligned with those purposes. The institution has a clear and explicit sense of its essential values and character, its distinctive elements, its place in both the higher education community and society, and its contribution to the public good. It functions with integrity, transparency, and autonomy.

Criteria for Review (1)	Guideline(s) (2)	Evidence (3)	Team Verification (4)
Institutional Purposes			
1.1 The institution's formally approved statements of purpose are appropriate for an institution of higher education and clearly define its essential values and character and ways in which it contributes to the public good.	The institution has a published mission statement that clearly describes its purposes. The institution's purposes fall within recognized academic areas and/or disciplines.	Webpage About Sofia - Sofia University Faculty Handbook Page 8 Attachment 4.16 2021 Catalog Page 1 Sofia University Catalog 2021-2022	X
1.2 Educational objectives are widely recognized throughout the institution, are consistent with stated purposes, and are demonstrably achieved. The institution regularly generates, evaluates, and makes public data about student achievement, including		https://www.sofia.edu/consumer-information/	X

measures of retention and graduation, and evidence of student learning. X 2.4, 2.6, 2.10, 4.2			
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Criteria for Review (1)	Guideline(s) (2)	Evidence (3)	Team Verification (4)
Integrity and Transparency			
<p>1.3 The institution publicly states its commitment to academic freedom for faculty, staff, and students, and acts accordingly. This commitment affirms that those in the academy are free to share their convictions and responsible conclusions with their colleagues and students in their teaching and writing. X 3.2, 3.10</p>	<p>The institution has published or has readily available policies on academic freedom. For those institutions that strive to instill specific beliefs and world views, policies clearly state how these views are implemented and ensure that these conditions are consistent with generally recognized principles of academic freedom. Due-process procedures are disseminated, demonstrating that faculty and students are protected in their quest for truth.</p>	<p>Faculty Handbook Page 56-57 Attachment 4.16</p>	<p>X</p>
<p>1.4 Consistent with its purposes and character, the institution demonstrates an appropriate response to the increasing diversity in society through its policies, its educational and co-curricular programs, its hiring and admissions criteria, and its administrative and organizational practices. X 2.2a, 3.1</p>	<p>The institution has demonstrated institutional commitment to the principles enunciated in the WSCUC Equity and Inclusion Policy.</p>	<p>Faculty Handbook: Pages 57, 63, 70 Attachment 4.16</p> <p>Sofia SPC Handbook Attachment 4.14 Pages: 7,8,9,10,11</p> <p>Catalog: Sofia University Catalog 2021-2022 Pages 64, 68-70</p> <p>Website, Diversity: Experience Sofia - Sofia University</p>	<p>X</p>
<p>1.5 Even when supported by or affiliated with governmental, corporate, or religious organizations, the institution has education as its primary purpose and operates as an academic institution with appropriate autonomy. X 3.6 – 3.10</p>	<p>The institution does not experience interference in substantive decisions or educational functions by governmental, religious, corporate, or other external bodies that have a relationship to the institution.</p>	<p>Bylaws: Attachment 2.10</p>	<p>X</p>

Criteria for Review (1)	Guideline(s) (2)	Evidence (3)	Team Verification (4)
<p>1.6 The institution truthfully represents its academic goals, programs, services, and costs to students and to the larger public. The institution demonstrates that its academic programs can be completed in a timely fashion. The institution treats students fairly and equitably through established policies and procedures addressing student conduct, grievances, human subjects in research, disability, and financial matters, including refunds and financial aid. X 2.12</p>	<p>The institution has published or has readily available policies on student grievances and complaints, refunds, etc. The institution does not have a history of adverse findings against it with respect to violation of these policies. Records of student complaints are maintained for a six-year period. The institution clearly defines and distinguishes between the different types of credits it offers and between degree and non-degree credit, and accurately identifies the type and meaning of the credit awarded in its transcripts.</p>	<p>Attachment 2.37</p> <p>Student Handbook</p> <p>Student Honor Code, Appendix D - page 70</p> <p>Protection of Human Subjects in Research - page 48</p> <p>Grievance Policy, Appendix B - page 58</p> <p>Withdrawal and Refund Policy - page 24</p>	<p>X</p>
<p>1.7 The institution exhibits integrity and transparency in its operations, as demonstrated by the adoption and implementation of appropriate policies and procedures, sound business practices, timely and fair responses to complaints and grievances, and regular evaluation of its performance in these areas. The institution's finances are regularly audited by qualified independent auditors. X 3.4, 3.6. 3.7</p>		<p>Integrity and Transparency</p> <p>Attachment 2.38</p> <p>https://wascsenior.box.com/s/ycol753so835c7y3w7z44vvo8wmh2cwg</p>	<p>X</p>
<p>1.8 The institution is committed to honest and open communication with the Accrediting Commission; to undertaking the accreditation review process with seriousness and candor; to informing the Commission promptly of any matter that could materially affect the accreditation status of the institution; and to abiding by Commission policies and procedures, including all substantive change policies.</p>		<p>President Allan Cahoon's cover letter is in the first three pages of the Institutional Report.</p> <p>University Institutional Report Certification Form is signed by President</p>	<p>X</p>

Standard 2: Achieving Educational Objectives Through Core Functions

The institution achieves its purposes and attains its educational objectives at the institutional and program level through the core functions of teaching and learning, scholarship and creative activity, and support for student learning and success. The institution demonstrates that these core functions are performed effectively by evaluating valid and reliable evidence of learning and by supporting the success of every student.

Criteria for Review (1)	Guideline(s) (2)	Evidence (3)	Team Verification (4)
Teaching and Learning			
2.1 The institution's educational programs are appropriate in content, standards of performance, rigor, and nomenclature for the degree level awarded, regardless of mode of delivery. They are staffed by sufficient numbers of faculty qualified for the type and level of curriculum offered. X 3.1	The content, length, and standards of the institution's academic programs conform to recognized disciplinary or professional standards and are subject to peer review.	List of professional accreditation agencies N/A BPPE Attachment 2.11 Faculty Attachment 2.12	X
2.2 All degrees - undergraduate and graduate - awarded by the institution are clearly defined in terms of entry-level requirements and levels of student achievement necessary for graduation that represent more than simply an accumulation of courses or credits. The institution has both a coherent philosophy, expressive of its mission, which guides the meaning of its degrees and processes that ensure the quality and integrity of its degrees. X 3.1 – 3.3, 4.3, 4.4		Attachment 2.19	X
2.2a Baccalaureate programs engage students in an integrated course of study of sufficient breadth and depth to prepare them for work, citizenship, and life-long learning. These programs ensure the development of core competencies including, but not limited to, written and oral communication, quantitative reasoning, information literacy, and critical thinking. In addition, baccalaureate programs actively foster creativity, innovation, an appreciation for diversity, ethical and civic responsibility, civic engagement, and the ability to work with others. Baccalaureate programs also ensure breadth for all students in cultural and aesthetic, social and political, and scientific and technical knowledge expected of educated persons. Undergraduate degrees include significant in-depth study in	The institution has a program of General Education that is integrated throughout the curriculum, including at the upper division level, together with significant in-depth study in a given area of knowledge (typically described in terms of a program or major).	Assessment General Education Attachment 2.20 Core Competencies Attachment 2.18	X

a given area of knowledge (typically described in terms of a program or major). X3.1 – 3.3			
Criteria for Review (1)	Guideline(s) (2)	Evidence (3)	Team Verification (4)
<p>2.2b The institution’s graduate programs establish clearly stated objectives differentiated from and more advanced than undergraduate programs in terms of admissions, curricula, standards of performance, and student learning outcomes. Graduate programs foster students’ active engagement with the literature of the field and create a culture that promotes the importance of scholarship and/or professional practice. Ordinarily, a baccalaureate degree is required for admission to a graduate program. X 3.1 – 3.3</p>	<p>Institutions offering graduate-level programs employ, at least, one full-time faculty member for each graduate degree program offered and have a preponderance of the faculty holding the relevant terminal degree in the discipline. Institutions demonstrate that there is a sufficient number of faculty members to exert collective responsibility for the development and evaluation of the curricula, academic policies, and teaching and mentoring of students.</p>	<p>Faculty are listed in each program in: Sofia University Catalog 2021-2022 Pages: 72-122</p> <p>Sofia University Catalog 2021-2022</p> <ol style="list-style-type: none"> 1. Bachelor of Arts in Psychology Bachelor of Arts in Psychology, Bachelor’s Degree in Palo Alto and Costa Mesa CA - Sofia University 2. Bachelor of Science in Business Administration Bachelor of Science in Business Administration - Sofia University 3. Master of Science in Computer Science Master 	<p>X</p>

		<p>of Science in Computer Science - Sofia University</p> <p>4. Master of Business Administration Master of Business Administration - Sofia University</p> <p>5. Master of Arts in Counseling Psychology Master of Arts in Counseling Psychology, Masters in Psychology Degrees and Graduate Programs in Palo Alto and Costa Mesa CA - Sofia University</p> <p>6. Master of Arts in Transpersonal Psychology Master of Arts in Transpersonal Psychology - Sofia University</p> <p>7. Doctor of Philosophy in Transpersonal Psychology Doctor of</p>	
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		Philosophy in Transpersonal Psychology - Sofia University	
2.3 The institution's student learning outcomes and standards of performance are clearly stated at the course, program, and, as appropriate, institutional level. These outcomes and Standards are reflected in academic programs, policies, and curricula, and are aligned with advisement, library, and information and technology resources, and the wider learning environment. X 3.5	The institution is responsible for ensuring that out-of-class learning experiences, such as clinical work, service learning, and internships which receive credit, are adequately resourced, well developed, and subject to appropriate oversight.	Syllabi Examples Attachment 2.09	X
2.4 The institution's student learning outcomes and standards of performance are developed by faculty and widely shared among faculty, students, staff, and (where appropriate) external stakeholders. The institution's faculty take collective responsibility for establishing appropriate standards of performance and demonstrating through assessment the achievement of these standards. X 4.3 – 4.4	Student learning outcomes are reflected in course syllabi.	Current Practices: Attachment 2.22	X
2.5 The institution's academic programs actively involve students in learning, take into account students' prior knowledge of the subject matter, challenge students to meet high standards of performance, offer opportunities for them to practice, generalize, and apply what they have learned, and provide them with appropriate and ongoing feedback about their performance and how it can be improved. X 4.4		Syllabi Examples Attachment 2.09	X
Criteria for Review (1)	Guideline(s) (2)	Evidence (3)	Team Verification (4)
2.6 The institution demonstrates that its graduates consistently achieve its stated learning outcomes and established standards of performance. The institution ensures that its expectations for student learning are embedded in the standards that faculty use to evaluate student work. X 4.3 – 4.4	The institution has an assessment infrastructure adequate to assess student learning at program and institution levels.	Assessment Outcome Folder Attachment 2.02	X

<p>2.7 All programs offered by the institution are subject to systematic program review. The program review process includes, but is not limited to, analyses of student achievement of the program's learning outcomes; retention and graduation rates; and, where appropriate, results of licensing examination and placement, and evidence from external constituencies such as employers and professional organizations. X 4.1, 4.6</p>		<p>Program Review Process Attachment 2.23 Attachment 1.16</p> <p>2021 Program Review Samples Attachment 2.35</p>	<p>X</p>
Scholarship and Creative Activity			
<p>2.8 The institution clearly defines expectations for research, scholarship, and creative activity for its students and all categories of faculty. The institution actively values and promotes scholarship, creative activity, and curricular and instructional innovation, and their dissemination appropriate to the institution's purposes and character. X 3.2</p>	<p>Where appropriate, the institution includes in its policies for faculty promotion and tenure the recognition of scholarship related to teaching, learning, assessment, and co-curricular learning.</p>	<p>Attachment 4.16</p> <p>Faculty Handbook Pages 31-34, 40-42</p>	<p>X</p>
<p>2.9 The institution recognizes and promotes appropriate linkages among scholarship, teaching, assessment, student learning, and service. X 3.2</p>		<p>Attachment 4.16</p> <p>Faculty Handbook Ranking 31-34</p>	<p>X</p>

Criteria for Review (1)	Guideline(s) (2)	Evidence (3)	Team Verification (4)
Student Learning and Success			
<p>2.10 The institution demonstrates that students make timely progress toward the completion of their degrees and that an acceptable proportion of students complete their degrees in a timely fashion, given the institution’s mission, the nature of the students it serves, and the kinds of programs it offers. The institution collects and analyzes student data, disaggregated by appropriate demographic categories and areas of study. It tracks achievement, satisfaction, and the extent to which the campus climate supports student success. The institution regularly identifies the characteristics of its students; assesses their preparation, needs, and experiences; and uses these data to improve student achievement.</p>	<p>The institution disaggregates data according to racial, ethnic, gender, age, economic status, disability, and other categories, as appropriate. The institution benchmarks its retention and graduation rates against its own aspirations as well as the rates of peer institutions.</p>	<p>IR data sets Attachment 2.13 Attachment 2.14 Attachment 2.15</p> <p>Sofia-University-Retention-and-Graduation-Rates.pdf</p>	<p>X</p>
<p>2.11 Consistent with its purposes, the institution offers co-curricular programs that are aligned with its academic goals, integrated with academic programs, and designed to support all students’ personal and professional development. The institution assesses the effectiveness of its co-curricular programs and uses the results for improvement. X 4.3 – 4.5</p>		<p>Program Review Process Attachment 2.23 Attachment 1.16</p> <p>2021 Program Review Samples Attachment 2.35</p>	<p>X</p>

Criteria for Review (1)	Guideline(s) (2)	Evidence (3)	Team Verification (4)
2.12 The institution ensures that all students understand the requirements of their academic programs and receive timely, useful, and complete information and advising about relevant academic requirements. X 1.6	Recruiting materials and advertising truthfully portray the institution. Students have ready access to accurate, current, and complete information about admissions, degree requirements, course offerings, and educational costs.	Advising Attachment 2.16	X
2.13 The institution provides academic and other student support services such as tutoring, services for students with disabilities, financial aid counseling, career counseling and placement, residential life, athletics, and other services and programs as appropriate, which meet the needs of the specific types of students that the institution serves and the programs it offers. X 3.1		Student Support Information Attachment 2.17 https://www.sofia.edu/dissertation-office/	X
2.14 Institutions that serve transfer students provide clear, accurate, and timely information, ensure equitable treatment under academic policies, provide such students access to student services, and ensure that they are not unduly disadvantaged by the transfer process. X 1.6	Formal policies or articulation agreements are developed with feeder institutions that minimize the loss of credits through transfer credits.	MOUS_ Partnerships Attachment 2.01 Higher Education Partnerships - Sofia University	X

Standard 3. Developing and Applying Resources and Organizational Structures to Ensure Quality and Sustainability
The institution sustains its operations and supports the achievement of its educational objectives through investments in human, physical, fiscal, technological, and information resources and through an appropriate and effective set of organizational and decision-making structures. These key resources and organizational structures promote the achievement of institutional purposes and educational objectives and create a high-quality environment for learning.

Criteria for Review (1)	Guideline(s) (2)	Evidence (3)	Team Verification (4)
Faculty and Staff			
3.1 The institution employs faculty and staff with substantial and continuing commitment to the institution. The faculty and staff are sufficient in number, professional qualification, and diversity to achieve the institution’s educational objectives, establish and oversee academic policies, and ensure the integrity and continuity of its academic and co-curricular programs wherever and however delivered. X 2.1, 2.2b	The institution has a faculty staffing plan that ensures that all faculty roles and responsibilities are fulfilled and includes a sufficient number of full-time faculty members with appropriate backgrounds by discipline and degree level.	Faculty FT PT Demo Attachment 2.12	X
3.2 Faculty and staff recruitment, hiring, orientation, workload, incentives, and evaluation practices are aligned with institutional purposes and educational objectives. Evaluation is consistent with best practices in performance appraisal, including multisource feedback and appropriate peer review. Faculty evaluation processes are systematic and are used to improve teaching and learning. X 1.7, 4.3, 4.4		Attachment 4.16 Faculty Handbook Pages 31-34 Attachment 4.14 Sofia University SPC Handbook p. 39	X
3.3 The institution maintains appropriate and sufficiently supported faculty and staff development activities designed to improve teaching, learning, and assessment of learning outcomes. X 2.1, 2.2b, 4.4	The institution engages full-time, non-tenure-track, adjunct, and part-time faculty members in such processes as assessment, program review, and faculty development.	Attachment 4.16 Faculty Handbook Page 38 Sample of Faculty, P/T, adjunct contracts	X

		Attachment 2.24 Attachment 2.25 Website for Center for Innovation in Teaching and Learning offers trainings, support and has applied for CEs Center for Innovation - Sofia University	
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Criteria for Review (1)	Guideline(s) (2)	Evidence (3)	Team Verification (4)
Fiscal, Physical, and Information Resources			
<p>3.4 The institution is financially stable and has unqualified independent financial audits and resources sufficient to ensure long-term viability. Resource planning and development include realistic budgeting, enrollment management, and diversification of revenue sources. Resource planning is integrated with all other institutional planning. Resources are aligned with educational purposes and objectives. X 1.1, 1.2, 2.10, 4.6, 4.7</p>	<p>The institution has functioned without an operational deficit for at least three years. If the institution has an accumulated deficit, it should provide a detailed explanation and a realistic plan for eliminating it.</p>	<p>Budget Process Attachment 2.26</p> <p>Year Budget Attachment 7.13</p> <p>Audits as submitted during annual reporting process – do not need to resubmit.</p>	X
<p>3.5 The institution provides access to information and technology resources sufficient in scope, quality, currency, and kind at physical sites and online, as appropriate, to support its academic offerings and the research and scholarship of its faculty, staff, and students. These information resources, services, and facilities are consistent with the institution’s educational objectives and are aligned with student learning outcomes. X 1.2, 2.1, 2.2</p>	<p>The institution provides training and support for faculty members who use technology in instruction. Institutions offering graduate programs have sufficient fiscal, physical, information, and technology resources and structures to sustain these programs and to create and maintain a graduate-level academic culture.</p>	<p>Faculty Training Attachment 2.27</p>	X
Organization Structures and Decision-Making Processes			
<p>3.6 The institution’s leadership, at all levels, is characterized by integrity, high performance, appropriate responsibility, and accountability.</p>		<p>Leadership Performance Review Attachment 2.28</p>	X
<p>3.7 The institution’s organizational structures and decision-making processes are clear and consistent with its purposes, support effective decision making, and place priority on sustaining institutional capacity and educational effectiveness.</p>	<p>The institution establishes clear roles, responsibilities, and lines of authority.</p>	<p>Organizational chart(s). Attachment 7.09</p>	X
<p>3.8 The institution has a full-time chief executive officer and a chief financial officer whose primary or full-time responsibilities are to the institution. In addition, the institution has a sufficient number of other qualified</p>		<p>Position descriptions for CEO and CFO. Executive Leadership folder Attachment 2.07</p>	X

<p>administrators to provide effective educational leadership and management.</p>			
<p>Criteria for Review (1)</p>	<p>Guideline(s) (2)</p>	<p>Evidence (3)</p>	<p>Team Verification (4)</p>
<p>3.9 The institution has an independent governing board or similar authority that, consistent with its legal and fiduciary authority, exercises appropriate oversight over institutional integrity, policies, and ongoing operations, including hiring and evaluating the chief executive officer. X 1.5 – 1.7</p>	<p>The governing body comprises members with the diverse qualifications required to govern an institution of higher learning. It regularly engages in self-review and training to enhance its effectiveness.</p>	<p>Board members' names and affiliations; Board committees and members; Board bylaws; Board minutes for the last two years.</p> <p>Board Packet Attachment 2.03</p> <p>Board of Trustees - Sofia University</p>	<p>X</p>
<p>3.10 The institution's faculty exercises effective academic leadership and acts consistently to ensure that both academic quality and the institution's educational purposes and character are sustained. X 2.1, 2.4, 2.5, 4.3, 4.4</p>	<p>The institution clearly defines the governance roles, rights, and responsibilities of all categories of full-time and part-time faculty.</p>	<p>Faculty Handbook</p> <p>Attachment 4.16</p> <p>Pages 26–27</p> <p>Catalog Pages 70-71</p> <p>Sofia University Catalog 2021-2022</p>	<p>X</p>

		Faculty Senate Charter Page 4 Attachment 1.02	
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Standard 4. Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement			
<i>The institution engages in sustained, evidence-based, and participatory self-reflection about how effectively it is accomplishing its purposes and achieving its educational objectives. The institution considers the changing environment of higher education in envisioning its future. These activities inform both institutional planning and systematic evaluations of educational effectiveness. The results of institutional inquiry, research, and data collection are used to establish priorities, to plan, and to improve quality and effectiveness.</i>			
Criteria for Review (1)	Guideline(s) (2)	Evidence (3)	Team Verification (4)
Quality Assurance Processes			
4.1 The institution employs a deliberate set of quality-assurance processes in both academic and non-academic areas, including new curriculum and program approval processes, periodic program review, assessment of student learning, and other forms of ongoing evaluation. These processes include: collecting, analyzing, and interpreting data; tracking learning results over time; using comparative data from external sources; and improving structures, services, processes, curricula, pedagogy, and learning results. X 2.7, 2.10		Assessment Infrastructure Attachment 2.29	X
4.2 The institution has institutional research capacity consistent with its purposes and characteristics. Data are disseminated internally and externally in a timely manner, and analyzed, interpreted, and incorporated in institutional review, planning, and decision-making. Periodic reviews are conducted to ensure the effectiveness of the institutional research function and the suitability and usefulness of the data generated. X 1.2, 2.10		IR capacity Attachment 2.30	X
Institutional Learning and Improvement			
4.3 Leadership at all levels, including faculty, staff, and administration, is committed to improvement based on the results of inquiry, evidence, and evaluation. Assessment of teaching, learning, and the campus environment - in support of academic and co-curricular objectives - is undertaken, used for improvement, and incorporated into institutional planning processes. X 2.2 - 2.6	The institution has clear, well-established policies and practices - for gathering, analyzing, and interpreting information - that create a culture of evidence and improvement.	Culture of Evidence Attachment 2.31	X
Criteria for Review (1)	Guideline(s) (2)	Evidence (3)	Team Verification (4)

<p>4.4 The institution, with significant faculty involvement, engages in ongoing inquiry into the processes of teaching and learning, and the conditions and practices that ensure that the standards of performance established by the institution are being achieved. The faculty and other educators take responsibility for evaluating the effectiveness of teaching and learning processes and uses the results for improvement of student learning and success. The findings from such inquiries are applied to the design and improvement of curricula, pedagogy, and assessment methodology. X 2.2 – 2.6</p>	<p>Periodic analysis of grades and evaluation procedures are conducted to assess the rigor and effectiveness of grading policies and practices.</p>	<p>Faculty Involvement in Assessment Attachment 2.32</p>	<p>X</p>
<p>4.5 Appropriate stakeholders, including alumni, employers, practitioners, students, and others designated by the institution, are regularly involved in the assessment and alignment of educational programs. X 2.6, 2.7</p>		<p>Stakeholder assessment Attachment 2.33</p>	<p>X</p>
<p>4.6 The institution periodically engages its multiple constituencies, including the governing board, faculty, staff, and others, in institutional reflection and planning processes that are based on the examination of data and evidence. These processes assess the institution’s strategic position, articulate priorities, examine the alignment of its purposes, core functions, and resources, and define the future direction of the institution. X 1.1, 1.3</p>		<p>Strategic Plan Update 2021 Attachment 1.09 Strategic Plan 2019 Attachment 1.07</p>	<p>X</p>
<p>4.7 Within the context of its mission and structural and financial realities, the institution considers changes that are currently taking place and are anticipated to take place within the institution and higher education environment as part of its planning, new program development, and resource allocation.</p>		<p>Anticipated Changes Attachment 2.34</p>	<p>X</p>

Synthesis/Reflections

1. After completing this analysis, what are the two or three most important issues that emerged from the review of the Standards?

Sofia has a dedicated team who are renewed in their commitment to the university, its mission, and a model of continuous, transparent, collaborative improvement. This was demonstrated in participants' responses, tasks, and activities during this process. Certainly, the impact of changes in owners, administrators, staff, Board members, and faculty in the past cannot be minimized as stability in leadership is critical. However, with a new and qualified leadership team in place, a great deal of positive work on the review of Standards process was accomplished. Sofia's faculty, staff, administration, the Board of Trustees and students have all expressed pride at the university's turnaround and are hopeful for the future. Even still, Sofia and its community members do recognize the need for improved faculty-driven assessment and program review. Stable leadership and guidance will support making these processes occur consistently. In addition, evidence of data-driven decision making, at all levels, but specifically at the Program Level can be improved. Going forward, data regarding assessment and program review outcomes will be driving academic prioritization, program growth, and course development. We realized that although we have a great deal of data over several administrations and a variety of WSCUC responses and reports, shared understanding of the data and the use of it to inform our current decisions is important. Department chairs and faculty will benefit from the regular dissemination of data and an increased understanding of it as they make decisions. In many ways, of utmost importance, although the university is now on the right track with strong financial oversight and budget processes and finances are significantly improved, all of us at Sofia remain committed to achieving financial sustainability. The President' Strategic Plan update has provided Sofia with goals and measurables that are guiding us in our current operations. In the areas of finances, Sofia University's new administrative team, owner, and Board of Trustees are engaged in thoughtful and transparent expenditures, continued reduction of deficits, and innovative programming and partnerships led with integrity to increase enrollment and achieve financial sustainability. Finally, of note, the review team regularly commented on how effectively Sofia pivoted during COVID19 to best serve its students and faculty. This dedication to the students and willingness to pivot will serve Sofia well as we move forward to face today's changing field of higher education.

2. Where does your institution see the greatest opportunities to improve student success and advance your mission?

Sofia sees the need for continued and consistent assessment of student success, courses, and programs. Once again, our academic offerings can only improve with consistent assessment and program reviews driven by those who engage most with the students, the faculty. Although administration will lend guidance and support with resources and education, the students will benefit from engaged faculty. The provost's goal is to gain buy-in from all participants while institutionalizing the systemic assessment and review processes that have now been created. As noted above and below, this assessment and review process will only improve as faculty and program leadership also gain in their understanding and use of data for decision making. These data-driven decisions will increase student success by identifying room for improvement in courses, programs, faculty training, and institutional support. These decisions will also inform program prioritization and resource allocation. Sofia further recognizes the need to Integrate

transpersonal/transformational theories, tenants, and ways of knowing into the non-psychology courses and programs (BA completion, MBA, MSCS, and MBAO). This is essential as we grow our programs in content and enroll more international students. These students and their communities will benefit from Sofia's commitment to academic excellence and a transformative education as we engage in international partnerships while remaining true to our mission.

3. Looking overall at the quality and effectiveness of institutional planning, communication, and data analysis, and other systems to support the review process, what are the institution's strengths and what are areas to be addressed or improved?

Sofia's 2021 updated Strategic plan reflects enhanced institutional planning and has provided us with a map for the continued improvement of the university. It was evident during this review process that in the areas of communication, transparency, data collection, collaboration, and policies, there has been significant improvement. New policies have been approved, program reviews have been completed, new hires have been made, and ILOS and PLOs have been aligned. The staff and faculty have improved morale and participated in this review with a renewed sense of commitment. Indeed, the review process was highly collaborative and involved almost all members of the Sofia community. Processes and engagement have clearly improved at Sofia. Nonetheless, there is still more to accomplish. Though our IR department is in place, Sofia acknowledges that analyzing, understanding, and using data to drive decisions is an area of improvement across departments. The team also noticed that it is time for relevant updates on policies, the website, handbooks, and documents. Finally, we are pleased to say that our relationship with WSCUC has improved, and that helped tremendously with the review process as we communicated transparently with our Liaison and the WSCUC staff. Across the university, Sofia community members have increased their understanding of WSCUC standards and the CFRS. Through this self-study process and the review of the standards, we have all improved.

FEDERAL COMPLIANCE FORMS

OVERVIEW

There are four forms that WSCUC uses to address institutional compliance with some of the federal regulations affecting institutions and accrediting agencies:

- 1 – Credit Hour and Program Length Review Form
- 2 – Marketing and Recruitment Review Form
- 3 – Student Complaints Form
- 4 – Transfer Credit Policy Form

During the visit, teams complete these four forms and add them as an appendix to the Team Report. Teams are not required to include a narrative about any of these matters in the team report but may include recommendations, as appropriate, in the Findings, Commendations, and Recommendations section of the team report.

1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

Under federal regulations, WSCUC is required to demonstrate that it monitors the institution's credit hour policy and processes as well as the lengths of its programs.

Credit Hour - §602.24(f)

The accrediting agency, as part of its review of an institution for renewal of accreditation, must conduct an effective review and evaluation of the reliability and accuracy of the institution's assignment of credit hours.

(1) The accrediting agency meets this requirement if-

(i) It reviews the institution's-

(A) Policies and procedures for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for courses and programs; and

(B) The application of the institution's policies and procedures to its programs and coursework; and

(ii) Makes a reasonable determination of whether the institution's assignment of credit hours conforms to commonly accepted practice in higher education.

(2) In reviewing and evaluating an institution's policies and procedures for determining credit hour assignments, an accrediting agency may use sampling or other methods in the evaluation.

Credit hour is defined by the Department of Education as follows:

A credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than—

(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or

(2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

See also WASC Senior College and University Commission's Credit Hour Policy.

Program Length - §602.16(a)(1)(viii)

Program length may be seen as one of several measures of quality and as a proxy measure for scope of the objectives of degrees or credentials offered. Traditionally offered degree programs are generally approximately 120 semester credit hours for a bachelor's degree, and 30 semester credit hours for a master's degree; there is greater variation at the doctoral level depending on the type of program. For programs offered in non-traditional formats, for which program length is not a relevant and/or reliable quality measure, reviewers should ensure that available information clearly defines desired program outcomes and graduation requirements, that institutions are ensuring that program outcomes are achieved, and that there is a reasonable correlation between the scope of these outcomes and requirements and those typically found in traditionally offered degrees or programs tied to program length.

Rev 03/2015

1 - 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	Is this policy easily accessible? r YES r NO
	If so, where is the policy located? Tuition & Fees - Sofia University
	Comments: Sofia University has adopted the WSCUC credit hour policy
Process(es)/ periodic review of credit hour	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)? r YES r NO
	If so, does the institution adhere to this procedure? r YES r NO
	Comments: During program review
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? r YES r NO
	Comments: Seminars, intensives, on-site classes all post hours of face-to-face meetings in schedules and in syllabi on canvas.
Sample syllabi or equivalent for online and hybrid courses <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed?
	What kind of courses (online or hybrid or both)?
	What degree level(s)? r AA/AS r BA/BS r MA r Doctoral
	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? r YES r NO
Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g.,	How many syllabi were reviewed?
	What kinds of courses?
	What degree level(s)? r AA/AS r BA/BS r MA r Doctoral
	What discipline(s)?

internships, labs, clinical, independent study, accelerated) <i>Please review at least 1 - 2 from each degree level.</i>	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input type="radio"/> YES <input type="radio"/> NO
	Comments:
Sample program information (catalog, website, or other program materials)	How many programs were reviewed?
	What kinds of programs were reviewed?
	What degree level(s)? <input type="radio"/> AA/AS <input type="radio"/> BA/BS <input type="radio"/> MA <input type="radio"/> Doctoral
	What discipline(s)?
	Does this material show that the programs offered at the institution are of a generally acceptable length? <input type="radio"/> YES <input type="radio"/> NO
	Comments:

Review Completed By: Sheila Lloyd
Date: May 09, 2022

2 - MARKETING AND RECRUITMENT REVIEW FORM

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

Material Reviewed	Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.
**Federal regulations	<p>Does the institution follow federal regulations on recruiting students? rx YES r NO</p> <p>Comments:</p>
Degree completion and cost	<p>Does the institution provide information about the typical length of time to degree? r YES r NO</p> <p>Does the institution provide information about the overall cost of the degree? r YES r NO</p> <p>Comments:</p> <p>Each program lists this information on the website:</p> <ol style="list-style-type: none"> 1. Bachelor of Arts in Psychology Bachelor of Arts in Psychology, Bachelor’s Degree in Palo Alto and Costa Mesa CA - Sofia University 2. Bachelor of Science in Business Administration Bachelor of Science in Business Administration - Sofia University 3. Master of Science in Computer Science Master of Science in Computer Science - Sofia University 4. Master of Business Administration Master of Business Administration - Sofia University 5. Master of Arts in Counseling Psychology Master of Arts in Counseling Psychology, Masters in Psychology Degrees and Graduate Programs in Palo Alto and Costa Mesa CA - Sofia University 6. Master of Arts in Transpersonal Psychology Master of Arts in Transpersonal Psychology - Sofia University 7. Doctor of Philosophy in Transpersonal Psychology Doctor of Philosophy in Transpersonal Psychology - Sofia University <p>We also have this on the catalog: https://www.flipsnack.com/sofiauniversity/sofia-university-catalog-2021-2022/full-view.html</p>

Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? r YES r NO
	Does the institution provide information about the employment of its graduates, as applicable? r YES r NO
	Comments: See above, all under each individual program description on the Sofia website.

*§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: Sheila Lloyd

Date: May 09, 2022

3 - 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	Does the institution have a policy or formal procedure for student complaints? r YES r NO
	If so, is the policy or procedure easily accessible? Is so, where? Student Handbook Pages 58-78 Catalog: Sofia University Catalog 2021-2022 Catalog Pages 66-67 https://www.sofia.edu/wp-content/uploads/2020/12/TITLE-IX-POLICY.pdf
	Comments:
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? r YES r NO If so, please describe briefly:
	If so, does the institution adhere to this procedure? r YES r NO
	Comments: Student Handbook Pages 58-78
Records	Does the institution maintain records of student complaints? r YES r NO If so, where? Hard copies in offices. Electronic copies in Student Services files.
	Does the institution have an effective way of tracking and monitoring student complaints over time? r YES r NO If so, please describe briefly:
	Comments:

*§602-16(1)(1)(ix)



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

Review Completed By: Sheila Lloyd

Date: May 09, 2022

4 – 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? r YES r NO
	If so, is the policy publically available? r YES r NO If so, where?
	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? r YES r NO
	Comments: Credit policy can be found: Catalog: Sofia University Catalog 2021-2022 Undergraduate Catalog: Page 5 Graduate: Page 9

*§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:
Date:

