

BOARD OF HIGHER EDUCATION

REQUEST FOR BOARD ACTION

		NO.:	BHE 21-35
		BOARD DATE:	December 15, 2020
NEW INSTITUTION APPLICATION OF BOSTON ISLAMIC SEMINARY TO AWARD THE DEGREE MASTERS OF ISLAMIC RELIGIOUS LEADERSHIP			
MOVED:	The Board of Higher Education (BHE) hereby conditionally approves the amended Articles of Incorporation of BOSTON ISLAMIC SEMINARY with the authority to award the following degree: Master of Islamic Religious Leadership .		
	<p>Provided further that the BHE will undertake to review, during the twelve year period set forth in 610 CMR 2.05(5), the continued progress of the institution toward meeting and maintaining compliance with the BHE's regulations, the Visiting Committee's recommendations, the goals and representations set forth in connection with the institution's petition to the BHE, and its compliance with the following conditions:</p> <ol style="list-style-type: none">1. For the first five years of operation, the institution shall submit to the BHE semi-annual status reports by January 15th and July 15th of each year, providing narrative and statistical information on the institution's compliance with BHE standards and with the goals and representations set forth in connection with the institution's petition, including the institution's enrollment, finances, student learning outcomes, and other information as requested by Department staff.2. Within the first two years of the program's operation, the Department will schedule a periodic review to monitor the institution's ongoing compliance with the Board's regulations. <p>Boston Islamic Seminary's conditional approval to award the Master of Islamic Religious Leadership shall continue through the first five years of operation. The conditional approval period, and the conditions imposed upon its approval , may be extended once by the Commissioner, for up to an additional five years, upon a determination that there are outstanding issues of compliance with the BHE's regulations.</p>		

VOTED:	Motion adopted by BHE 12/15/2020.
Authority:	Massachusetts General Laws Chapter 69, Section 30 et seq.; 610 CMR 2.05(5).
Contact:	Cynthia Farr Brown, Ph.D., Associate Commissioner for Regulatory and Veterans Affairs Patricia Marshall, Ph.D., Deputy Commissioner of Academic Affairs and Student Success

BOARD OF HIGHER EDUCATION

December 2020

Boston Islamic Seminary

New institution authorization to offer the following degree: Masters of Islamic Religious Leadership

Background and Degree Authority Requested

Boston Islamic Seminary (BIS) has requested initial authorization from the Board of Higher Education to amend its Articles of Incorporation in order to operate as a post-secondary institution in the Commonwealth and offer the degree, Masters of Islamic Religious Leadership (MIRL). BIS proposes to offer this program at its facility leased from Al-Huda, Willow St., Chelsea, MA. The Seminary had secured initial funding for the MIRL program and plans to enroll students and begin the program in Fall, 2021.

INSTITUTIONAL OVERVIEW

Boston Islamic Seminary provides educational programs to the greater Boston community. Following discussions and preparation beginning in 2008, the Muslim American Society (MAS) - Boston recruited the initial Board of Director members for the Seminary, who hired the first staff and oversaw the raising of money for BIS's early operations. The Seminary was then located in the Islamic Society of Boston Cultural Center (ISBCC) in Roxbury. Initially BIS offered non-degree classes for adult learners as continuing education, professional development, and fellowship programs.

The comprehensive mission of BIS is to "prepare exemplary and professional Muslim American religious leaders for compassionate service to society." The Seminary holds these values:

Continuity and Authenticity

The Boston Islamic Seminary is committed to the authentic, balanced spiritual and intellectual heritage of Islam, deeply rooted in the compassionate teachings and wisdom of the Qur'an and the Prophet Muhammad (PBUH).

Relevance and Practicality

We are committed to work together to develop practical Islamic solutions at the individual, family, and community levels that also enrich our broader environment.

Responsiveness and Rightfulness

We will train competent Muslims leaders who have the knowledge and skills to help communities navigate new issues and unforeseen circumstances with wisdom, integrity and dignified human interaction.

The proposed MIRL program addresses a need identified by BIS and its partner and community organizations: preparing Islamic religious leaders and educators. As noted by BIS, Islamic seminaries and programs are a relatively new development in American higher education. The longest standing program to train religious leaders for the American Muslim community is located at Hartford Seminary (Connecticut), a historically Christian institution whose Islamic Chaplaincy program has filled needs for religious workers in secular institutions such as hospitals and universities, but which has not been able to develop religious leaders for Muslim community settings. Many U.S. Muslim organizations rely on informally educated community members or hire those trained in overseas seminaries.

Research conducted by BIS in preparation for their application showed that less than half of U.S. Imams have at least a B.A. in Islamic studies, and that 94% of Imams who have a degree in Islamic studies, either at the baccalaureate or graduate levels, studied abroad to obtain it.¹ Only a few of the U.S. institutions that prepare people for religious leadership roles in the American Muslim community are either affiliated with accredited institutions or plan to seek regional or specialty accreditation,² while other religions and denominations that are the approximate size of the American Muslim community are supported by six to ten seminaries, most of which are accredited.³ The Board and leadership of BIS do plan to seek accreditation in the future. The need that the proposed degree program can fill is therefore well-documented and continues to grow as the U.S. Muslim community grows.

In August 2018 BIS presented their application to receive degree-granting authority for the MIRL degree. The intended mission of the MIRL program is to “to equip students with the Islamic knowledge and contemporary skills necessary to serve successfully in a variety of religious leadership roles in the United States.”

The program focuses on what BIS characterizes as practical ministry, and will prepare its graduates for roles such as *Religious and Spiritual Leader*, (for example imams), to provide Muslims with religious, moral, and spiritual guidance and education; *Religious Counselor and Arbitrator*, providing counseling and/or arbitration in family matters such as marriage, divorce, and inheritance, and personal counseling; and *Outreach Ambassador*, representing the Muslim community effectively to the larger public.

The proposed Masters in Islamic Religious Leadership program has the following student learning outcomes: Upon completion of the program, students will be able to:

¹ Baghby, Ihsan, *The American Mosque 2011, Report Number 2* (Islamic Society of North America, 2012).

² Internally produced Landscape Analysis by the Boston Islamic Seminary (2016). An example of an institution that is affiliated with an accredited seminary is [Bayan Islamic Graduate School](#), affiliated with Chicago Theological Seminary. An example of a seminary that will seek accreditation is [The Islamic Seminary of America](#) (Texas).

³ Boston Islamic Seminary-produced comparative analysis of seminaries supporting religious communities approximately the same size as the Muslim community in America (2017).

1. Explain Islamic teachings clearly on the basis of normative religious texts and interpretive frameworks
2. Analyze our contemporary reality critically from an Islamic perspective
3. Synthesize text and context in analyzing and addressing new problems, appropriately considering the needs of different audiences and diverse community members
4. Follow normative practices in observing and leading Islamic religious rituals and services
5. Internalize the values of humility, selflessness, and dedication to service and apply the principles of religious leadership in a variety of community and institutional settings
6. Demonstrate a commitment to Islamic ethics and spirituality in daily behavior and through plans for on-going personal development
7. Relate with diverse individuals and groups inside and outside the Muslim community to partner on matters of common concern
8. Communicate effectively both orally and in writing
9. Display advanced competence in the areas of critical thinking, research and writing, Islamic leadership, and pastoral care.

ORGANIZATION AND GOVERNANCE

Boston Islamic Seminary is overseen by a Board of Directors, which upholds the Seminary's mission and sets its policies, monitors their implementation, and provides general oversight of its activities. The Board appoints and evaluates the Seminary's President, who in turn hires and evaluates all other staff or delegates that hiring and evaluation to other leadership.

The academic and non-academic work of the MIRL program at BIS is organized around four principal positions that constitute the Seminary's initial leadership structure. These are:

1. President and Dean of Academic Affairs (chief executive officer and chief academic officer, currently one person)
2. Dean of Administrative and Financial Affairs (chief financial officer and chief operating officer)
3. Dean of Student Affairs (chief student affairs officer)
4. Director of Development (chief advancement officer)

The President and Dean of Academic Affairs oversees the program and all instructional and faculty matters. All non-teaching matters related to students fall under the Dean of Student Affairs, including admissions, financial aid, registration, and various student services. The Dean of Administrative and Financial Affairs oversees finance, the facility, the library, and other operational functions. The Director of Development oversees fundraising, development, and marketing and outreach. This number of administrators and staff is expected to grow as enrollment grows.

Upon BHE approval, Boston Islamic Seminary Intends to recruit for its first cohort of students to begin the program in Fall, 2021.

FACULTY

Boston Islamic Seminary intends to maintain a low student-to-faculty ratio of not more than 10:1. The size of the initial faculty will be small (one FT and one PT faculty in year one for the initial 10-student cohort), and will gradually increase to approximately five FT and five PT faculty, for a student body of 45, by year 5. The planned faculty and student enrollment numbers are included in Table 1 below. The student enrollment numbers assume 15 % attrition

Table 1

MIRL Program Faculty

	Year 1	Year 2	Year 3	Year 4	Year 5
FT Faculty	1	2	3	5	5
PT Faculty	1	3	5	5	5

MIRL Program Projected Student Enrollment

	Year 1	Year 2	Year 3	Year 4	Year 5
Enrollment	10	22	36	42	45

The role, workload and contracts of faculty will be characterized by the following:

- Full-time faculty will engage in teaching and scholarly endeavors; program and course development; student advising; community service; and other duties as determined by the Seminary administration.
- The Seminary also has categories for Visiting Faculty, external faculty appointed to perform specific academic functions and duties for a specified time period or project duration; Adjunct Faculty, whose duties will consist entirely of teaching; and Part-Time Faculty, who are pro-rata faculty with the same qualifications and range of responsibilities as full-time faculty.
- As BIS will only offer a single degree program, and as the Seminary plans that the student body will remain small, faculty will not be organized into academic departments.
- The Seminary will appoint faculty for fixed terms and will not award tenure. Procedures for hiring, evaluation, renewal, and promotion in rank are detailed in the Faculty Handbook.

Detailed information about additional policies regarding and expectations of faculty, performance reviews, and participation in governance is provided in the Faculty Handbook.

ADMISSION

Boston Islamic Seminary plans to enroll students who present clear evidence of their commitment to and preparation to be successful in the MIRL program. Application materials will be considered holistically in order to identify applicants “who have the ability, interest, and maturity to manage the rigors of the program, as well as the potential for future scholarly and professional growth and effective service to the community.” (Program of Study Updated Oct. 2020). Admission and/or enrollment will not necessarily be limited to Muslim students. Although BIS recognizes that the student body may, through self-selection, consist entirely or almost entirely of Muslims, it has repeatedly affirmed its commitment to student diversity.

Applicants will complete an application; submit certified transcripts of their undergraduate work; provide four (4) letters of recommendation, two from an accredited academic program and two from a mosque, Islamic center, or similar organization in the U.S.; and submit a personal statement addressing the candidate’s reasons for pursuit of the MIRL degree and their intended future goals. Applicants will also pay a \$100 application fee. Once submitted there will be a required initial interview, followed for screened-in candidates by an extended on-site interview and evaluation process.

Screened-in applicants must present evidence of memorization of at least one thirtieth (*juz’*) of the Qur’ān; written and oral evaluation to assess basic competencies in the core Islamic sciences including Qur’an, Prophetic Traditions (*Hadith*), Prophetic Biography (*Sira*), Islamic Jurisprudence (*Fiqh*) and Islamic Spirituality (*Tazkiyah*); and intermediate level competence in Classical Arabic, to be assessed by a written evaluation and oral interview.

BIS notes that meeting the minimum admissions criteria does not guarantee admission, and that admission may be offered to applicants who do not yet meet certain criteria if other indicators suggest they will succeed in the program.

GRADUATION REQUIREMENTS

To earn the Masters in Religious Leadership at Boston Islamic Seminary, students must complete the equivalent of three years of full-time study (six semester and two required summer internships between academic years 1 and 2 and academic years 2 and 3), earning a minimum of 102 credits.

All graduating students must:

- Complete all coursework (102 credit hours) including two summer internships.
- Maintain an overall GPA of 3.0 (on a 4.0 scale).
- Maintain good standing in terms of character, comportment, and personal development as assessed through regular narrative evaluations.
- Maintain an intermediate level of competency in Classical Arabic.
- Pass a Qur'an recitation (tajwīd) and memorization (hifz) of at least 3 thirtieth portions (juza) of the Qur'an.

- Demonstrate religious integrity and readiness for service and leadership.
- Pass a comprehensive exit exam and complete an exit interview.

To earn Distinction, graduating students must pass each of an additional six (6) designated courses with a minimum grade of 3.0 as well as maintain the overall graduation GPA of 3.0.

PROJECTED ENROLLMENT

Boston Islamic Seminary plans to recruit approximately ten (10) students in the first year of operation. Table 1 shows the planned growth of enrollment for the first five years. BIS projects that in five years there will be 45 students enrolled in the MIRL program.

ACADEMIC AND RELATED MATTERS

Over the course of a three-year program, students in the proposed Master of Islamic Religious Leadership program will complete 102 academic credit hours, which includes a six (6) semester Core Curriculum of four (4) courses per semester and two summer internships of six (6) credits each. Students wishing to graduate with Distinction complete an additional eighteen (18) credits taken as one additional three (3) credit course per semester. **Attachment A.**

The Visiting Committee as well as staff were able to review extensive materials including sample syllabi, curriculum planning documents, and the credentials of proposed faculty. The Visiting Committee, three of whose members had extensive theological studies experience including in Islamic studies, also had ample opportunities to discuss the program of study with the proposed faculty and leadership of BIS. The proposed program appears to be sufficiently broad and rigorous so as to meet both the overall mission of the Seminary and specific educational outcomes of the proposed MIRL program.

The proposed program will utilize direct and indirect, qualitative and quantitative measures to assess program effectiveness. BIS plans to use mostly direct assessments at the course level, and indirect and qualitative assessments at the program level. Program-level assessments will include evaluations by internship supervisors; summative assessments including a final examination with both written and oral components and an exit survey; and both alumni and employer surveys as students graduate and enter (or re-enter) the workforce.

MIRL faculty have completed an initial mapping of the student learning outcomes to the courses in the program. As the program moves to implementation, a fuller system of formative and summative assessment will be developed.

RESOURCES AND BUDGET

The financial plan of BIS for the MIRL program is to fund its operations through a combination of tuition and fees, pledges, and direct fundraising, and to begin to build a modest endowment. The Visiting Committee provided detailed recommendations about ways to best secure the

necessary resources and demonstrate future financial stability as required by 610 CMR 2.07(3)(f). Department staff reviewed the financial plan with BIS several times and agreed with BIS that the best way to meet those recommendations and be in compliance with the applicable regulations was to show evidence of sufficient resources to fund the first full year of the program's operations.

BIS has subsequently presented evidence that it has raised through donations or pledges or anticipates receipt of tuition and fees revenues in excess of \$1.4M, sufficient to operate the institution in its first year. **Attachment B**. In addition, the Seminary is pursuing a line of credit in the amount of \$1.2M to further support its initial startup and first three years of operation. Staff believe these resources are sufficient to show reasonable present and future financial stability at this point in the institution's development.

Because BIS expects to seek additional funds from new sources as the MIRL program evolves, there may be shifts in the allocations among sources of funds in subsequent years (other than net tuition and fees). These proportional changes would appear in adjusted revenue amounts in the following fiscal year.

In order to provide additional assurance as the program gets underway, and in recognition of its specialized mission and audience, the Visiting Committee recommended that BIS secure a teach-out agreement with a like institution. BIS has signed a Memorandum of Understanding with the New Jersey Institute for Islamic & Arabic Studies - Manara Institute (NJII), an institution of higher education licensed by the State of New Jersey. Through this agreement NJII has agreed to teach out BIS students should BIS close or suspend its program.

Budget

The College has submitted a projected five-year operating budget showing a positive fund balance in each year. **Attachment C**. A member of the Visiting Committee and Department staff reviewed the proposed budget both during and after the site visit, particularly as plans for the facility and staffing were revised based upon the Visiting Committee's recommendations, and the projections and budgeting were determined to be reasonable at this point in the program's development.

Tuition and Fees

Tuition and fees are slated to begin at \$16,250 per year and to increase by 3% annually. A sample student budget is illustrated below (Table 2).

While federal financial aid cannot be available to students unless and until the institution is accredited by a body recognized by the U.S. Department of Education for Title IV funding, BIS has solicited promises of support through regional and national Islamic organizations such as the Muslim American Society to support students through scholarships and other funding. The

public will be adequately informed that applicants will not be eligible for federal financial aid at this time.

Table 2: Sample Student Costs

Tuition	\$16,000.00
Student services and activities fee	250.00
Health insurance	3,000.00
Books and materials	1,500.00
TOTAL	\$20,750.00

Facilities

Boston Islamic Seminary presented two other facilities in the course of the application process before presenting the current facility, Al-Huda, 14 Willow St., Chelsea, MA. The details of the successive facilities are discussed in the external review section below.

The Al-Huda facility has been carefully evaluated by a member of the Visiting Committee and by Department staff, and it meets the Board's standards. The facility provides adequate classroom and office space, study and library facilities, and access to religious facilities consistent with the mission and focus of the proposed program. The site was updated relatively recently, complies with safety codes, and is accessible to the physically disabled. BIS staff added provisions to the lease and made changes in the facilities, such as adding a private room for counseling of students, after recommendations made by staff.

Library and Information Technologies

Boston Islamic Seminary intends to both create and maintain a physical library facility at its site, and to enter into membership with and utilize the resources provide to the member institutions of the Boston Theological Interreligious Consortium (BTIC). A core collection of over 4,000 books was donated to BIS for the support of the proposed program and will be housed and available to faculty and students at Al-Huda. Following comments by the Visiting Committee and later detailed in their written report, and as part of its commitment to building a strong foundation for the proposed program, BIS hired a qualified, part-time library manager who has already begun to organize the collections, library policies, and readying support for future students and faculty to have access to key resources for this graduate level program. The Seminary has also secured a letter of support from BTIC which pledges to create an appropriate pathway for BIS's participation in the consortium after it receives degree-granting authority.

Public Disclosure

Boston Islamic Seminary is committed to adding to its website a full complement of digital and print materials that fully and accurately describe the mission, objectives, academic programs, expectations, and policies and procedures of the institution. Once authorized to grant degrees, BIS will publish full information on the program and its operation as it begins the recruitment process.

EXTERNAL REVIEW AND INSTITUTION'S RESPONSES

The Visiting Committee review of the proposed Boston Islamic Seminary MIRL program was conducted under the leadership of Martin B. Copenhaver, M.Div., Chair. The Committee included:

- Martin B. Copenhaver, M.Div., President of Andover Newton Theological School (retired)
- Andrew Soll, Vice President for Finance and Facilities (retired), Salem State University
- Javier A. Viera, Ed.D., Vice Provost and Dean of the Theological School, Professor of Pastoral Theology, Drew University
- Timur R. Yuskaev, Ph.D., Director of Imam and Muslim Community Leadership Program, Co-Director of Islamic Chaplaincy Program, Associated Professor of Contemporary Islam, Hartford Seminary

Review Process

After an initial review of all documents, the Committee made a site visit on November 12-13, 2019. Shortly before the visit began, BIS notified the Department that it would be presenting a different facility than what was proposed in its initial application. The original proposed facility was the Islamic Society of Boston Cultural Center (ISBCC), a mosque and community center complex located at 100 Malcolm X Blvd., Roxbury, MA, where BIS had operated since its initial organization until sometime in 2019. The application BIS submitted in 2018 had described extensive space planning keyed to the ISBCC. The new proposed facility was located at 31 Quint Ave., Allston, MA, a former Congregational church. As will be described, this facility was ultimately not the one BIS chose after the Visiting Committee advised BIS that it did not meet the Board's Physical Resources standard.

During the site visit the Committee obtained information from in-person meetings with:

Loay Assaf, IT Specialist
Abdulla Awad, Dean of Administration
Sawsan Berjawi, Former Continuing Education Coordinator, Consultant
Hassan Elalami, President of the Board
Hossam Eljabri, Board Member

Amr Elmoslehy, Board Member
Dr. Sharif El-Toubgui, Academic Committee Member
Dr. Noor Hashem, Faculty Member
Dr. Ayman Ibrahim, Faculty Member
Salma Kazmi, Former Executive Director, Consultant
Sayem Khan, Architect
Dr. Suheil Laher, Faculty Member
Dr. Bayouny Nehela, President and Dean of Academic Affairs
Dr. Aaron Spevack, Faculty Member
Wafaa Wahabi, Operations Manager

The Visiting Committee assessed the institution's compliance with 610 CMR 2.07(3) and its overall readiness to offer the proposed degree. The Committee reviewed all of the documents presented in the original application as well as conversations and presentations conducted during the site visit to prepare its initial report. The Committee also requested additional documents during and after the site visit which BIS provided in a timely manner. The Committee submitted its initial report on December 27, 2019 and Department staff conveyed it to BIS on December 30, 2019.

Findings

The Visiting Committee found BIS **met** the standards **Mission, Planning and Evaluation**, and **Programs and Instruction**.

The Committee found the mission to be clearly stated and consistently communicated in print and digitally as well as verbally by the BIS community. The Committee further found BIS's Institutional Evaluation Plan to be "thorough, detailed, and inclusive."

Regarding Program and Instruction, the Committee found the proposed program to be specific and appropriate to the mission of BIS, with well-defined objectives, suitable course descriptions, sample syllabi suitable for the stated goals, and a well-qualified faculty as identified through the submitted curriculum vitae. The Committee found the admissions and graduation standards, enrollment plans, and stated student charges as well as plans regarding financial aid all met this standard.

The Committee found BIS **partially met** the standards **Organization and Governance; Faculty; Student Services**; and **Discrimination**. The specific matters recommended for further action by BIS can be found in Appendix A.

The Committee found that the institution **did not meet** the **Public Disclosure** standard, based on existing publications and statements contained therein regarding plans for the proposed degree program and proposed enrollment dates. The Committee also found that BIS did not meet the **Physical Resources** standard based on the present condition of and plans for the proposed Allston, MA facility. Further, the Committee found that BIS did not meet the **Library**

and Information Resources standard based on the limited resources secured at the time of the site visit.

The Committee stated that it **could not make a definitive assessment** of the institution's future financial stability and made numerous recommendations regarding the **Financial Resources** standard. The Committee **could not fully assess** whether BIS met the **Other Laws, Rules and Regulations** standard.

The list of all concerns and recommendations the Visiting Committee made in its December 27 report can be found in Appendix A.

Boston Islamic Seminary Response

Even before receiving the report, based on exit meeting information and conversations during the site visit, BIS leadership and staff began working to address the Committee's concerns. For example, BIS appointed a part-time library manager; planned training for the members of the Board of Directors; and secured additional financial pledges for the support of the program. BIS also notified the Department on January 29, 2020 that it was withdrawing the Allston site from consideration and had secured a long-term lease with another facility located in Chelsea, MA.

BIS responded formally to the Visiting Committee report on February 12, 2020. Department staff carefully reviewed that response, the revised BIS website, and the extensive documentation included. Department staff also engaged with a member of the Committee to review the documentation regarding the proposed Al-Huda facility in Chelsea. An initial assessment of this facility was completed on February 26, 2020.

A delay in considering the proposed site occurred due to the COVID-19 pandemic when DHE staff were directed to begin work remotely (on March 17, 2020) and when parallel limitations on the use and occupancy of public facilities, such as those at Al-Huda, were imposed as public health measures.

During this time, Department staff prepared an addendum to the new institution application that asked BIS to describe how it was planning to carry out its proposed program should pandemic conditions continue, which BIS provided on June 29, 2020.

A member of the Committee and a Department staff member were able to conduct an in-person site visit at the new Al-Huda facility, which occurred on July 14, 2020. Following this visit, on July 20, 2020 the Committee member provided a report finding that the Al-Huda facility largely met the standards of the Board.

Staff provided detailed written and oral feedback on August 7, 2020 regarding remaining issues and questions that BIS needed to address in order to be in compliance with all standards, including legal issues surrounding BIS's by-laws and anti-discrimination standards contained in

the Faculty and Student Handbooks and required changes to budget and financing to enable BIS to meeting the financial stability and adequacy requirements of 610 CMR 2.07(3)(f).

Department staff found BIS's responses, including the adequacy of the Al-Huda facility, financial assurances, and responses to many other recommendations and suggestions from the Committee and staff, along with the guidance from DHE Legal Counsel on the questions related to non-discrimination in policies employment, to provide sufficient assurances that Boston Islamic Seminary is in compliance with the BHE's regulations governing degree-granting authority and is prepared to receive its initial authorization from the BHE to award the MIRL degree, pending certain conditions.

PUBLIC COMMENT

The required public comment period opened on November 23 and closed on December 14.

STAFF ANALYSIS AND RECOMMENDATION

Staff has thoroughly reviewed all documents submitted with the petition for degree granting authority, the Visiting Committee report and recommendations, analysis and report on the Al-Huda site, and the petitioner's responses to those reports, and has met with the petitioners twice since the site visit.

The Visiting Committee recommended to the DHE that the program be approved pending steps to either remediate the original proposed facility or to locate another facility that met the Board's standards. Since BIS has since located another facility that was reviewed by a member of the Visiting Committee and staff and found to be sufficient, staff believe the revised application now meets all applicable standards of 610 CMR 2.00.

Staff recommends certain conditions be placed on BIS's degree-granting authority due to the inability to fully evaluate BIS's compliance with certain criteria in 610 CMR 2.07(3), specifically those relating to the institution's future financial stability, as this is a new institution which must raise revenue sufficient to operate from year to year. These conditions are: 1) For the first five years of operation, BIS will submit to the BHE semi-annual status reports by January 15th and July 15th of each year, providing narrative and statistical information on the institution's compliance with BHE standards and with the goals and representations made in their application for degree-granting authority, including the institution's enrollment, finances, student learning outcomes, and other information as requested by Department staff; and 2) Within the first two years of the program's operation, the Department will schedule a periodic review to monitor BIS's ongoing compliance with the Board's regulations.

Staff find that the proposal meets the requirements outlined in 610 CMR 2.07, with the conditions specified. Recommendation is for conditional approval of the Seminary's Articles of Amendment to be able to offer the degree of Masters in Islamic Religious Leadership.

Attachment A

Masters in Islamic Religious Leadership Detailed Curriculum

Year 1			
Fall 1	Course ID	Course Title	Credits
	IRL-511	A Light Among the People: Living the Qur'ān (Thematic Approach)	4
	IRL-521	The Sunna of the Messenger (Thematic Approach)	4
	IRL-531	Islamic Belief and Faith ('Aqīda)	3
	IRL-541	<i>Fiqh</i> of Worship and Transactions	4
		Total Semester Credits	15
	IRL-721	Logic and Rhetoric (Distinction)	3
Spring 1	Course ID	Course Title	Credits
	IRL-522	Philosophy of the Prophetic <i>Sīra</i> (Makkī and Madanī)	4
	IRL-542	<i>Fiqh</i> for Daily Life	3
	IRL-543	<i>Uṣūl al-Fiqh</i> (Legal Theory) & <i>Maqāṣid al-Sharī'a</i> (Objectives of Islamic Law)	4
	IRL-551	Comparative Ethics	4
		Total Semester Credits	15
	IRL-512	Thematic <i>Tafsīr</i> (Exegesis) of the Qur'ān (Distinction)	3
Summer 1	Course ID	Course Title	Credits
	IRL- 600	Summer Internship I	3
	IRL- 601	Summer Internship 1 Project Symposium	3
		Total Semester Credits	6
Year 2			
Fall 2	Course ID	Course Title	Credits
	IRL-523	Islamic History & Civilization	4
	IRL-532	Advanced Applied 'Aqīda	3
	IRL-611	Intellectual Foundations of the Modern World	4
	IRL-722	Public Speaking and Communication	4
		Total Semester Credits	15
IRL-711	Leading Yourself and Others (Distinction)	3	

Year 2			
Spring 2	Course ID	Course Title	Credits
	IRL-524	Schools of Islamic Thought (Historical & Contemporary)	4
	IRL-552	<i>Tazkiya</i> (Spirituality and Purification)	3
	IRL-544	<i>Fatwā</i> (Legal Rulings) and Contemporary <i>Fiqh</i> Issues	4
	IRL-731	Psychology & the Social Environment in the Light of Revelation	4
		Total Semester Credits	15
	IRL-612	Islam in America (Distinction)	3
Year 3			
Summer 2	Course ID	Course Title	Credits
	IRL-700	Summer Internship 2	3
	IRL-701	Summer Internship 2 Project Symposium	3
		Total Semester Credits	6
Fall 3	Course ID	Course Title	Credits
	IRL-545	Comparative <i>Fiqh</i> of the Family	4
	IRL-613	Religions in Contemporary America	4
	IRL-712	Qualities and Duties of an American Muslim Religious Leader	4
	IRL-732	Principles of Pastoral Care	3
		Total Semester Credits	15
	IRL-723	Understanding and Engaging the Media (Distinction)	3
Spring 3	Course ID	Course Title	Credits
	IRL-553	Applied Ethics	3
	IRL-614	Religious and Social Movements in American History	4
	IRL-724	Interfaith and Media Engagement	4
	IRL-733	Marriage, Family & Youth Counseling	4
		Total Semester Credits	15
	IRL-615	Contemporary Muslim Challenges (Distinction)	3

Attachment B: Boston Islamic Seminary Financial Summary – November 2020

Item	Amount
Cash On Hand	\$ 379,220.49
Checks	\$ 210,000.00
Confirmed Commitments & Pledges	\$ 685,000.00
Tuition and fees to be collected	\$ 162,500.00
TOTAL INCOME	\$ 1,436,720.49

Tuition Revenues to be collected	Amount
# of Projected Students to enroll	10
Tuition and fees	\$ 16,250.00
Total	\$ 162,500.00

Checks received but not deposited	Amount
Check #1	\$ 100,000.00
Check #2	\$ 50,000.00
Check #3	\$ 25,000.00
Check #4	\$ 10,000.00
Check #5	\$ 10,000.00
Check #6	\$ 5,000.00
Check #7	\$ 5,000.00
Check #8	\$ 3,000.00
Check #9	\$ 2,000.00
Total	\$ 210,000.00

Confirmed commitments & pledges	Amount
pledge #1 - S.	\$ 200,000.00
pledge #2 - A.	\$ 200,000.00
pledge #3 - O.	\$ 100,000.00
pledge #4 - Z.	\$ 100,000.00
pledge #5 - F.	\$ 50,000.00
pledge #6 - K.	\$ 25,000.00
pledge #7 - W.	\$ 10,000.00
Total	\$ 685,000.00

Documentation provided for bank balance, checks, and pledges on November 23, 2020.

Attachment C: Boston Islamic Seminary Revenue and Expense Five Year Projections

	Year 1 (2021/22)	Year 2 (2022/23)	Year 3 (2023/24)	Year 4 (2024/25)	Year 5 (2024/25)
INCOME		101,298	347,780	394,042	461,200
Non-Sponsored Tuition - MIRL Program	105,000	135,000	144,000	153,000	157,680
Tuition - Non-Degree Program	5,000	11,000	18,000	21,000	22,500
Student Activities Fees	45,000	99,000	162,000	189,000	202,500
Student Health Fees	150,000	200,000	250,000	300,000	350,000
National Donors/Annual Giving	200,000	200,000	200,000	200,000	200,000
Founder's Circle	5,000	10,000	20,000	40,000	60,000
Endowment Income	49,173	50,649	52,167	89,555	92,240
MAS Student Sponsorships	68,000	68,000	68,000	68,000	68,000
Mosque Sponsorships	491,000	582,000	636,000	709,000	775,000
Donor Pledges	1,118,173	1,456,947	1,897,947	2,163,597	2,389,120
Total Income					
EXPENSES	90,041	185,484	286,572	491,950	506,710
Compensation & Benefits					
Salaries - Fulltime Faculty	54,008	73,097	93,314	134,390	137,342
Benefits - Fulltime Faculty	6,753	13,911	21,493	36,896	38,003
Payroll Taxes - Fulltime Faculty	3,939	12,171	20,895	21,520	22,165
MIRL Part-Time Faculty	19,695	24,342	25,074	25,824	26,598
	426,739	439,541	473,594	487,802	539,332

Non-Degree Program Part-Time Faculty	85,348	87,908	94,719	97,560	107,866
Salaries - Staff	32,005	32,966	35,520	36,585	40,450
Benefits - Staff	718,528	869,420	1,051,181	1,332,528	1,418,467
Payroll Taxes - Staff	50,000	51,500	53,045	54,636	56,275
Total Compensation & Benefits	12,000	12,360	12,731	13,113	13,506
Marketing Expenses MIRL Program	62,000	63,860	65,776	67,749	69,782
Non-Degree Programs	37,500	45,000	52,500	67,500	75,000
Marketing Expenses Total	5,000	11,000	18,000	21,000	22,500
Fundraising Expenses	50,000	110,000	180,000	210,000	225,000
Student Activities	45,000	99,000	162,000	189,000	202,500
Student Services	-	30,000	40,000	50,000	60,000
Student Health Insurance	-	10,130	34,778	39,404	46,120
Student Financial Aid	18,000	18,000	18,000	18,000	18,000
Uncollectible Accounts	20,000	20,000	20,000	20,000	20,000
Facilities Rent Expense	5,000	5,150	5,305	5,464	5,628
Utilities & Maintenance	2,500	2,500	2,500	1,000	1,000
AV & Other Equipment	45,500	45,650	45,805	44,464	44,628
Furnishings	5,000	5,150	5,305	5,464	5,628
Facilities Total	5,000	5,000	5,000	5,000	5,000
	5,000	5,000	5,000	5,000	5,000

Faculty Training	5,000	5,000	5,000	5,000	5,000
Library					
Printed Material Acquisition	15,000	15,000	15,000	15,000	15,000
Online Resources	25,000	25,000	25,000	25,000	25,000
Partnership Fees	15,600	15,600	15,600	15,600	15,600
Library Total	40,600	40,600	40,600	40,600	40,600
Information Technology Services					
Tech Infrastructure	1,024,128	1,344,810	1,710,944	2,082,708	2,225,223
Ongoing maintenance	94,045	112,137	187,003	80,889	163,897
IT Services Total					
Total Expenses					
Net Income / (loss)					

Appendix A: Recommendations from the Visiting Committee Report December 2019

Organization and Governance

The Committee found the By-laws lacked some key provisions such as a definition of conflict of interest, required by 610 CMR 2.07(3)(b); and the fact that terms of office for directors were spelled out in another BIS document, "Organizational Duties and Authorities," but not in the By-laws. In addition the Committee found that the By-laws did not discuss the distinction of "roles, functions and identities of the governing board of the institution and of the administration and faculty to ensure the appropriate separation and independence of board, administration and faculty." [610 CMR 2.07(3)(b)] The Committee recommended:

- 1) That BIS redraft the By-laws to bring them in compliance with 610 CMR 2.07(3)(b).
- 2) That BIS review the document, "Organizational Duties and Authorities" to determine if matters addressed there should be included in the By-laws.

Faculty

The Committee made recommendations to clarify and improve the Faculty Handbook:

- 1) In Duties and Authorities of the Dean for Student Affairs, adding an additional bullet and articulation of the function of Title IX and Affirmative Action officer(s).
- 2) In Faculty-Student Relationship, reconsideration of the language presently used, and an expansion of the expectations for and boundaries of Faculty-Student Relations.

The Committee made additional, optional recommendations:

- 3) In the portion on The Faculty Contract, include a further description of and responsibilities of a Committee on Faculty (or Faculty Review and Promotion Committee).
- 4) In Section IV: Organizational Structure, the portion on the Duties and Responsibilities of the Board of Directors needed further articulation of:
 - a. The review process and contract renewal criteria for the President of the Seminary.
 - b. The addition of the Board's responsibility to confer degrees approved by the Faculty.
 - c. Approve promotion of Faculty upon the recommendation of the President and Dean of the Seminary.
- 5) In the description of the Duties and Authorities of the Dean of Academic Affairs, an additional bullet that addresses provisions for the professional development of the Faculty.
- 6) In the portion on The Faculty Contract, include a further description of and responsibilities of a Committee on Faculty (or Faculty Review and Promotion Committee).

- 7) In the description of Faculty Benefits, an additional description for Religious Holidays to be included and clarified.
- 8) In the discussion of Performance Reviews, clarification on who reviews the faculty, as well as a description of the role of the Committee on Faculty in said reviews. Articulation of the methodology of faculty reviews, as well as the maintenance of records of these reviews, to be included.
- 9) In the description of General Rules for Promotion, a description of the role of the Committee on Faculty in the promotion process.
- 10) In the portion on the Grievance Procedure: Informal Complaint and Resolution Process, additional clarification on what the procedure is should the complaint involve the President of the Seminary
- 11) In the section describing Termination of Contract, to provide clarification on whether just one Unsatisfactory Performance Appraisal can result in termination, or if there is some minimum number. Further, this portion of the document should also detail whether a faculty member has the ability to appeal, and if so, what the appeals process involves.
- 12) In the section on Annual Vacation, more specificity.

Student Services

The Committee found the materials incomplete. BIS submitted an Admissions Policy, Financial Aid Policy, Student Grievance/Complaint Procedure, and Student Handbook. The Committee found that the submitted documents address standards 1 and 4 in section 2.07(3)(e). However other elements pertinent to 2.07(3)(e) were either missing or underdeveloped, including the institution's affirmative action policy, provisions addressing the state mandate that all students be covered by health insurance, and an explanation of the institution's system of academic counseling. The Committee made the following recommendations:

- 1) Prepare and submit to the Department more detailed descriptions of student services, including a significantly updated Student Handbook, responding to all parts of 610 CMR 2.07(3)(e) and other relevant state statutes and regulations.
- 2) Ensure descriptions of student services indicated the ways in which BIS is prepared to address academic and other needs of students.
- 3) Clarify who within the administration carried out the functions of the Registrar. Increase the specificity of policies, such as how a student might withdraw from the Seminary.

Suggestions were to consider revisiting the Academic Honor Code with the purpose of expanding and clarifying it; further developing the proposed plagiarism policy; and more clearly articulating the Student Grievance Procedure.

Financial Resources

The Committee lauded the work of BIS to frame a workable financial structure, though they noted that a comprehensive financial history of BIS could not be discerned from the materials

submitted and that the budget and planning documents submitted were difficult to navigate. The Committee's over-riding concern was in regard to revenues and the ability of BIS to show future financial stability under 610 CMR 2.07(3)(f). Their recommendations were:

- 1) Prepare and submit to the Department within 60 days from the date of its report a long-term financial plan (through June 2022 at a minimum) that forecasts revenues and expenditures in greater detail.
- 2) Monitor studies and demographic trends that support and provide evidence of demand for the proposed program.
- 3) Separate the cost of salaries from related payroll taxes and employee benefits to assure the financial model adequately accommodates the full cost of compensation for all personnel and that budgeted salary rates were sufficient to attract quality faculty.
- 4) Review the resources required to operate and improve appropriate facilities to be sure they were adequately represented in the budget.
- 5) Clarify with proposed partner institutions what library privileges and services will be available to Seminary students and determine the cost for access.
- 6) Incorporate into the projected budget costs for items such as services to students with disabilities, services to veterans, psycho-social counseling services for students, student health care, faculty training and development, and the like, whether provided by staff or through contracts.
- 7) Consider adopting a student information system and a financial transaction and reporting system designed for institutions of higher education, and budget for the acquisition, implementation and maintenance of such systems to assure that records are secure, including provisions for off-site storage of data back-ups.
- 8) Review how administrative tasks will be accomplished, what systems will be employed, and what safeguards can be put in place to provide adequate separation of duties and protections against fraud and abuse while meeting all applicable external regulatory and reporting requirements.
- 9) Develop a "teach out" contingency plan no later than 120 days from the date of this report, with potential service providers, costs, timetables, etc. identified to ensure student transition to another institution in advance of dissolution of BIS, should that occur in the future. BIS should monitor developments in the Massachusetts legislature that may result in specific requirements in this regard.
- 10) Consider ways to develop a more diverse revenue stream, such as an endowment or other instrument to assure adequate funding into the future.
- 11) Meet with DHE staff on a quarterly basis through at least June 2023 or the end of the third year of operation of the graduate program, whichever is later, to review financial performance, enrollment levels, etc.

Public Disclosure

As noted above, the Visiting Committee had concerns about certain publication and a Web page. They recommended:

- 1) Immediately ceasing distribution or other use of the Academic Offerings Catalog, the overview brochure, and any other documents, printed or electronic, that suggest that BIS is offering a master's degree or will be offering such at a date certain.
- 2) Continuing to refine the student handbook and develop a comprehensive catalog and other documents to bring BIS's publications, both printed and electronic, into alignment with the requirements of 610 CMR 2.07(3)(g)(1).

They also suggested investigating federal and state publication and notice requirements and prepare appropriate publications, reports and notices as the requirements apply to the institution.

Physical Resources

As discussed in the narrative, the Committee had numerous concerns about the facility in Allston, MA. They provided extensive feedback about it which are not included in this summary, as this was not ultimately the facility that BIS will be using for its proposed program.

Library and Information Resources

The Committee found that the resources presented were insufficient to meet the Board's standard in this area. They recommended:

- 1) Entering into negotiations with the Boston Theological Interreligious Consortium (BTIC) to create an agreement whereby students enrolled at BIS can use the libraries and information resources of the member schools.
- 2) Plan for professional staff to support the library function, including an adequate budget.
- 3) Incorporate all library- and consortium-related costs into the budget plan.
- 4) Identify and prepare a space to serve as a library.

Discrimination

The Committee recommended a general review of policies and statements having to do with discrimination for consistency and compliance.

Other Laws, Rules and Regulations

The Committee did not receive enough information to make determinations in this area.

Accreditation

BIS does not have current plans to pursue accreditation for the MIRL program, therefore this standard was not applicable.