

## **Accreditation Records Retention Policy**

### Purpose

The purpose of this policy is to ensure that necessary Northwest Commission on Colleges and Universities (“NWCCU”) accreditation records are adequately protected and maintained, and to ensure that records of nominal value or that are no longer needed by NWCCU are properly and timely discarded.

### Policy

This policy represents NWCCU’s position regarding the treatment, retention and disposal of Accreditation Records, as defined below.

### Definition of “Accreditation Records”

“Accreditation Records” as defined under this Policy are complete and accurate records, in any format, created or received by an individual identified in paragraph D below, of all of the following:

- An institution’s last full review whether related to candidacy, initial accreditation, or reaffirmation, including any documents or materials relating to on and offsite evaluation team reports, the institution’s responses to on and offsite reports, periodic review reports, reports of special reviews conducted between regular reviews, and a copy of the institution’s most recent institutional self-study report; and
- NWCCU decisions made throughout an institution’s affiliation with NWCCU, which shall include decisions related to:
  - Eligibility, candidacy and accreditation, substantive changes, and all reviews, reports, institutional responses, and other correspondence relied upon by the Commission in reaching those decisions;
  - Any final NWCCU decision to deny, suspend, revoke or terminate the accreditation or eligibility of the institution, including all reviews, reports, institutional responses, and other correspondence relied upon by the Commission in reaching those decisions.

### Applicability

This policy applies to all NWCCU employees and independent contractors as well as to Commissioners, on and offsite evaluation committee members (“committee members”), and other NWCCU volunteers whose work or services provides them access to NWCCU Accreditation Records.

### Responsibilities

## Accreditation Records Retention Officer

The President shall appoint the NWCCU's Accreditation Records Retention Officer. S/he shall have responsibility for overseeing and ensuring compliance with this Policy. Any questions regarding this Policy shall be directed to the Accreditation Records Retention Officer, including but not limited to questions related to: (i) online server access, use and Accreditation Records storage protocol, and (ii) determining whether documents not specifically identified in Appendix A come within the scope of Accreditation Records in accordance with this Policy.

Upon notification of an event resulting in the creation of an Accreditation Record, the Accreditation Records Retention Officer shall be responsible for coordinating with all applicable individuals for the purpose of compiling the formal Accreditation Record. In compiling an Accreditation Record the Accreditation Records Retention Officer shall give special attention to identifying those records not specified in Appendix A.

## Commissioners/Committee Members/Volunteers

Commissioners, committee members, and other NWCCU volunteers who create or have access to Accreditation Records are responsible for being familiar with this Policy and properly managing Accreditation Records in compliance with this Policy. Within thirty (30) days (or less in the case of a matter subject to appeal in accordance with the Institutional Appeals Policy) of the submission of any report or the final rendering of any Commission action or other NWCCU decision through which an Accreditation Record is created and must be compiled and preserved, the Commissioners, committee members, and other volunteers that come into possession of such Accreditation Records shall act as follows with regard thereto:

- return or otherwise deliver all Accreditation Records to NWCCU staff that are necessary to complete NWCCU's Accreditation Record; and
- ensure the secure destruction or purge of all Accreditation Records held in duplicate by NWCCU in a manner consistent with NWCCU's applicable commitments of confidentiality to its affiliated institutions.

Commissioners, committee members, and other volunteers should seek guidance from the Accreditation Record Retention Officer regarding the appropriate method and manner for retaining, archiving, and/or destroying Accreditation Records.

## Employees/Independent Contractors

Employees and independent contractors are likewise responsible for being familiar with this Policy and for managing the Accreditation Records in their possession, custody or control in accordance with this Policy.

Following the submission of any report or the final rendering of any Commission action or other NWCCU decision, the NWCCU employee or independent contractor principally assigned to the subject institution shall consult with the Accreditation Records Retention Officer for the general purpose of providing notice of a record creating event and identifying all documents and materials comprising the formal Accreditation Record.

#### Litigation Holds & General Record Retention

From time to time, the President of NWCCU may issue a "legal hold," suspending the destruction of any records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations, or similar proceedings. Employees and independent contractors will be informed of any suspension in the further disposal of such documents. If an employee or independent contractor is in doubt, the document should be saved. If and when an employee or independent contractor is notified of a litigation hold, any documents relevant to the subject matter of the lawsuit, investigation or proceeding should not be discarded.

In all other circumstances, records listed in the schedule set forth in Appendix A must be retained for the periods of time set forth on that schedule. The schedule reflects legal obligations for document retention.

Please note that failure to follow this policy can result in possible civil and criminal sanctions against NWCCU and its officers, directors and employees, and possible disciplinary action against responsible individuals, up to and including termination of employment.

<b>Type of Record</b>	<b>Retention Schedule</b>	<b>Destruction/Storage</b>
Eligibility Applications	Last full accreditation cycle	Shred or Purge Electronically
Eligibility Action Letters and Related Correspondence	Permanent	
Institutional Reports	Last full accreditation cycle	Shred or Purge Electronically
Annual Reports	Last full accreditation cycle	Shred or Purge Electronically
Mission & Core Themes Reports and Related Correspondence	Permanent	
Mid-Cycle Reports and Related Correspondence	Permanent	
Ad Hoc Reports and Related Correspondence	Permanent	
Accreditation Reviews, Including Evaluation Committee Reports, Evaluation Committee Recommendations, and Institutional Responses	Last full accreditation cycle	Shred or Purge Electronically
Substantive Change Proposals	Last full accreditation cycle	
Substantive Change Decisions	Permanent	
Complaints	Last full accreditation cycle	Shred or Purge Electronically
Other Material Correspondence, including changes of ALO, correspondence from USDE, and Correspondence from the Institution	Last full accreditation cycle or as otherwise determined by responsible party	Shred or Purge Electronically