Accreditation Records Retention Policy

The Accreditation Records Retention Policy represents WSCUC’s position regarding the treatment, retention and disposal of accreditation records, as defined below. The purpose of this policy is to ensure that necessary accreditation records are adequately protected and maintained by WSCUC in accordance with 34 CFR 602.15(b) of the Higher Education Act (HEA), and to ensure that records of nominal value or that are no longer needed by WSCUC are discarded properly and in a timely manner.

DEFINITION OF ACCREDITATION RECORDS

Accreditation records as defined under this policy are complete and accurate records, in any format, of all of the following:

1. An institution’s last full review whether related to seeking accreditation, initial accreditation, or reaffirmation. This includes all documents or materials related to institutional reports, reports of special reviews conducted between regular reviews, periodic review reports, substantive change reviews, review team reports, review team recommendations, and the institution’s responses to team reports.
2. WSCUC decisions made throughout an institution’s affiliation with WSCUC, which shall include decisions related to:
   a. Eligibility, candidacy and accreditation, substantive changes, and all reviews, reports, institutional responses, and other correspondence relied upon by the Commission in reaching those decisions.
   b. Any final WSCUC 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.

GENERAL RECORD RETENTION

Records of Commission decisions, substantive staff decisions, and significantly related correspondence, are retained permanently, pursuant to 34 CFR 602.15(b)(ii) of the HEA.

All other records are retained for the last full accreditation cycle, pursuant to 34 CFR 602.15(b)(i) of the HEA.

APPLICABILITY

This policy applies to all WSCUC employees and independent contractors as well as to Commissioners, on and offsite evaluation team members, committee members and other WSCUC volunteers whose work or services provides them access to WSCUC accreditation records.

RESPONSIBILITIES

Accreditation Records Retention Officer
The President shall appoint the WSCUC Accreditation Records Retention Officer, who shall have responsibility for overseeing and ensuring compliance with this policy. The WSCUC Accreditation Records Retention Officer will be responsible for maintaining a list of all record types maintained by WSCUC, detailing whether the record is subject to 34 CFR 602.15(b)(i) or to 34 CFR 602.15(b)(ii) of the HEA, and the applicable retention schedule for each record type.

Questions regarding this policy should be directed to the Accreditation Records Retention Officer, including but not limited to questions regarding use and storage, and for help in determining whether documents come within the scope of accreditation records in accordance with this policy.

Commissioners/Team Members/Committee Members/Volunteers

Commissioners, team members, committee members, and other WSCUC 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 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 WSCUC decision through which an accreditation record is created and must be compiled and preserved, the Commissioners, team members, committee members, and other volunteers that come into possession of such accreditation records shall act as follows:

1. Ensure the secure destruction or purge of all accreditation records held in duplicate by WSCUC in a manner consistent with WSCUC’s applicable commitments of confidentiality to its affiliated institutions.
2. Upon request, return or otherwise deliver all accreditation records to WSCUC staff that are necessary to complete WSCUC’s accreditation record.

Commissioners, team members, 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.

LITIGATION HOLDS

From time to time, the President of WSCUC 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 must be retained for the periods of time proscribed by 34 CFR 602.15(b) of the HEA.
Please note that failure to follow this policy can result in possible civil and criminal sanctions against WSCUC and its officers, directors and employees, and possible disciplinary action against responsible individuals, up to and including termination of employment.

Approved by the Commission, June 2015
Revised, November 2015