



Records Retention Policy

The New England Commission of Higher Education (NECHE) retains and maintains appropriate Accreditation Records and Business Records as required by law, applicable regulations, and this policy to support its mission, business, and operational needs. Records include all documents, both tangible and electronic, that NECHE generates or receives in the regular course of its business and the performance of its mission. Correspondence includes all tangible and electronic communication. Decisions to discard documents in accordance with United States Department of Education (USDOE) regulations and guidelines can be made only by the NECHE President.

Accreditation Records means, but is not limited to:

1. Documents created by NECHE, or by member, candidate, or applicant institutions that are in the possession of NECHE, associated with an institution's application and subsequent evaluations; this includes materials related to an institution's eligibility, candidacy, and initial accreditation evaluations, reaffirmation of accreditation or candidacy, other monitoring activities (e.g., interim, progress, or financial monitoring reports; focused evaluation reports; show-cause reports), and substantive changes;
2. NECHE's evaluation of institutions, including committee reviews, visiting team/evaluator reports and recommendations, institutional responses to the visiting team report, agenda for and minutes of Commission meetings, NECHE decisions, and institutional appeals;
3. Complaints against and public comments about member institutions, complaints against NECHE, and NECHE's evaluation of decisions in connection with such complaints and public comments;
4. Correspondence between NECHE and member, candidate, or applicant institutions;
5. Correspondence between NECHE and federal, state, and local governments agencies, as well as other accreditors; and
6. Unsolicited information received by NECHE that relates to a member institution.

Business Records means, but not limited to:

1. Agenda for and minutes of Commission and committee meetings that relate to NECHE operations including budgets, audits, tax filings, insurance policies, contracts, and employee records as well as NECHE minutes, decisions, and approvals related to such operations.

Accreditation Records and Business Records do not include:

1. Voicemail and text messages which are not routinely retained and are generally erased the same day received or shortly thereafter;
2. Non-essential or informal documents such as internal emails and communications, including drafts, informal notes, calendars, and other documents that do not require further response or formal action; and
3. Duplicate copies or materials and miscellaneous correspondence and memoranda such as confirming dates for staff visits, invitations to attend workshops or conferences, and other incidental business.

Litigation Holds

In the event the President of NECHE declares a “litigation hold” due to pending, threatened, or reasonably foreseeable litigation, audits, government investigations, or similar proceedings, the destruction of records shall be suspended. Upon issuance of a “litigation hold,” documents relevant to the subject matter of the lawsuit, investigation, or proceeding will not be discarded.

Process Used to Store, Retain and Secure Records

NECHE uses Box.com, a leading cloud service provider, as its document storage repository. Box.com employs industry-standard security practices when it comes to document storage, file access, collaboration, and sharing of documents. Box.com is a scalable platform with unlimited capacity for documents, which allows NECHE to meet all the needs of the document retention schedule outlined below.

Record Retention Schedule

Type of Record	Retention Schedule
INSTITUTIONAL DOCUMENTS: All institutional reports, site visit review materials (i.e., visiting team/evaluator reports and recommendations, institutional responses to the team report), substantive change proposals, complaints against and public comments about member institutions. and other correspondence/emails from agencies to include federal, state, and local government entities and other accreditors related to an institution’s accreditation status.	At least two accreditation cycles of ten years each
COMMISSION’S INSTITUTIONAL ACTIONS: All notification letters regarding Commission decisions made about an institution’s accreditation status throughout an institution’s affiliation withNECHE.	Permanent
OTHER COMMISSION DOCUMENTS: Agenda for and minutes of meetings of the Commission and its committees, corporate records and by-laws, audited financial statements, income tax returns, other required federal and state filings.	Permanent
USDOE CORRESPONDENCE/EMAILS: All USDOE recognition reviews and decisions, complaints against NECHE.	Permanent
EMPLOYEE RECORDS: Personnel files, Personnel Policies Handbook (including prior editions).	Permanent
BUSINESS RECORDS: Leases and contracts; software licenses; insurance coverage; employee benefit plans documents.	Term plus 3 years
ACCOUNTING RECORDS: Banking and checking records, invoices, ledgers, budgets.	7 years
LITIGATION HOLD NOTICES.	One year following disposition of claim