NWCCU POLICIES | COMMUNICATION WITH ACCREDITATION CONSTITUENCIES AND TITLE IV OVERSIGHT

The Northwest Commission on Colleges and Universities (NWCCU or Commission) endeavors to ensure transparent and clear communication about the accreditation process with its constituencies (member, candidate, and applicant institutions, government, other quality assurance agencies, the higher education community, and the public). As a member of the regulatory triad, which oversees higher education institutions, NWCCU holds a responsibility to share information with constituencies while ensuring confidentiality of accreditation activities. The Commission will publicly share information about itself and member institutions, provide timely notification of its accreditation actions, and communicate with government and other agencies in accordance with federal regulations including 34 CFR §602.23(a), §602.27(a), and §602.28(e).

Communication between NWCCU and Institutions

- NWCCU staff shall establish clear lines of communication with member (candidate and accredited) and applicant institutions to ensure the institution understands NWCCU's expectations for accreditation activities.
- 2. NWCCU shall communicate with designated individuals, considered authorized representatives ofmember institutions.
- The institution shall designate contacts, including President/Chancellor/Chief Executive Officer (CEO), Provost/Chief Academic Officer (CAO), Chief Financial Officer (CFO), and Accreditation Liaison Officer (ALO).
- 4. The institution's CEO must appoint an ALO to serve as the primary point of contact with NWCCU staff and as a resource to the institution on accreditation issues. The qualifications and duties of the ALO are set forth in the Policy on <u>Accreditation Liaison Officers</u>.
- 5. NWCCU considers the CEO as the official representative of the institution and will therefore direct general communications to the CEO. The Commission considers the ALO the primary point of contact and will copy the ALO on all official communications. In exceptional circumstances, NWCCU has discretion to communicate with the Chair of the institution's governing body.
- 6. The institution must update and communicate accurate contact information to NWCCU for each authorized representative of the institution. NWCCU will not use generic email addresses such as info@, president@, or provost@ for official communications.
- 7. NWCCU will assign a senior vice president, with no known conflicts of interest with the institution, to serve as the primary point of contact/staff liaison with each member and applicant institution. The NWCCU senior vice president will communicate with key contacts and other institutional leaders about accreditation issues, consult with the institution during accreditation activities, conduct visits to the institution, and answer questions about NWCCU policies and procedures.
- 8. The institution must inform the NWCCU staff liaison in a timely manner of any major developments at the institution.

Information about NWCCU

- 1. NWCCU shares information through its <u>website</u>.
- 2. The NWCCU website includes its <u>Standards for Accreditation</u>, <u>Eligibility Requirements</u>, <u>Policies</u>, Handbooks and Manuals, and Federal compliance requirements, and explains the accreditation process used to make accreditation actions. The NWCCU website includes the

- names, academic and professional qualifications, and relevant employment and organizational affiliations of the members of its Board of Commissioners and the NWCCU administrative staff.
- 3. NWCCU publishes news items, issues press releases, and/or shares information regarding the review or major changes in its Standards for Accreditation, Eligibility Requirements, and Policies and Procedures.

Information about Member Institutions

- NWCCU publishes information about member institutions through its website.
- 2. The NWCCU website includes a <u>directory of member institutions</u>. The Directory lists the institution name, address, web address, accreditation phase, accreditation status, scope of accreditation, including most recent action letters, date candidate for accreditation status or accreditation was granted, and when NWCCU will next review the institution.
- 3. The NWCCU website includes a schedule of upcoming reviews to provide an opportunity for the public to submit Third-Party comments about institutions under comprehensive review.
- 4. NWCCU may publish news items, press releases, and information regarding institutions.

Notification of Accreditation Actions

- 1. NWCCU shall notify the institution of accreditation actions no later than thirty (30) calendar days after it takes an action. The Commission shall post a notification of non-compliance or adverse action on its directory of member institutions, summarizing the reasons for NWCCU's action, no later than sixty (60) days after the date of the action. NWCCU shall provide the institution an optional opportunity to make a brief institutional statement regarding the non-compliance or adverse action. The institution may submit a brief institutional statement within sixty (60) calendar days from the date of the action. NWCCU will post the institution's statement on its website. NWCCU is not responsible, however, for public posting of the institution's status by third parties.
- 2. NWCCU shall provide notification of accreditation actions to the U.S. Secretary of Education, appropriate state or other licensing or authorizing agency, institutional oversight bodies, such as Boards, and appropriate accrediting agencies, no later than thirty (30) calendar days after it takes an action. For non-compliance actions (warning, probation, show cause) and adverse actions (denial, withdrawal, suspension, revocation, or termination of accreditation or candidacy (preaccreditation)), NWCCU shall provide notification to these entities at the same time it notifies the institution. 34 CFR § 602.26(b).
- 3. NWCCU shall provide public notification of accreditation actions within one (1) calendar day of notifying the institution. NWCCU shall post accreditation actions and list all non-compliance and adverse actions on its website.
- 4. If an institution voluntarily surrenders its candidate or accreditation status or allows its candidate or accreditation status to lapse, NWCCU shall notify the U.S. Secretary of Education, appropriate State or other licensing or authorizing agency, appropriate USDE recognized accrediting agencies, and the public within ten (10) calendar days of receiving notification from the institution.
- 5. NWCCU may respond to public inquiries about accreditation actions or it will direct them to the institution.

Communication with Government, Other Accrediting Agencies, and Related Entities

1. NWCCU shall establish appropriate and clear lines of communication with government, other

- accrediting agencies, and identified related entities.
- 2. NWCCU shall, upon request, share with other appropriate recognized accrediting agencies, recognized State approval agencies, and institutional oversight boards information about the accreditation or candidate for accreditation status of an institution or program and any adverse actions it has taken against an accredited or candidate institution.
- 3. The NWCCU staff will notify liaisons and representatives from government, systems of higher education, or related entities about upcoming accreditation activities. In consultation with the institution and the agency or related entity, NWCCU will assist with coordinating the liaison's or representative's request to observe on-site visits. Any observer of an accreditation activity must sign a Confidentiality and Non-Disclosure Agreement. The Commission will determine if the liaison or representative will be provided access to accreditation materials.
- 4. In addition to the notification of accreditation actions, NWCCU shall report the following information to the USDE: a list of NWCCU accredited and candidate institutions; a summary of major accrediting activities during the previous year; notification of any proposed change in Policies, Procedures, Eligibility Requirements, or Standards for Accreditation that might alter its scope of recognition or compliance with criteria for recognition; any member institution that NWCCU hasreason to believe is failing to meet its Title IV, Higher Education Act (HEA) program responsibilities or is engaged in fraud or abuse, along with reason for concern about the institution; and if the Secretary requests, information that may bear upon an accredited or candidate institution's compliance with and eligibility to participate in Title IV, HEA programs responsibilities. NWCCU reserves the right to communicate with other accrediting agencies in order to share or obtain information necessary for the accreditation decision-making process, so long as antitrust laws and regulations are followed.
- 5. NWCCU reserves the right to communicate with related entities in order to share or obtain information necessary for the accreditation decision-making process. See NWCCU's Policy on Related Entities. The member institution must provide appropriate contact information for a liaison or representative from the related entity with which NWCCU may communicate. The NWCCU staff will copy the institution on all correspondence of record with the related entity. The NWCCU staff shall retain correspondence of record with a related entity as part of the institutional record.

Procedures for Confidentiality

- NWCCU takes reasonable steps to safeguard the confidentiality of discussions, conversations, accreditation materials, proposals for action, and the institutional record, except as required by NWCCU policies or applicable law. NWCCU will provide access to accreditation materials to NWCCU representatives for the sole purpose of accreditation decision-making. NWCCU will direct all public inquiries to the institution.
- NWCCU shall require its representatives and observers of an accreditation activity to sign the
 <u>Confidentiality and Non-Disclosure Agreement</u>. NWCCU representatives and observers will use
 accreditation materials for the sole purpose of accreditation decision-making. NWCCU
 representatives and observers will observe the appropriate standard of care of accreditation
 materials in their possession.
- NWCCU will take reasonable steps to protect confidential information and the institutional record through agreements with third party service providers who must sign the <u>Confidentiality</u> and Non-Disclosure Agreement.
- 4. NWCCU may only share otherwise confidential information to comply with a subpoena and/or court order.
- 5. NWCCU may only share otherwise confidential information with government or other agencies when requested by authorized officials, including but not limited to the process of renewing its own recognition with the USDE and the Council for Higher Education Accreditation (CHEA).

- Confidentiality is deemed waived by the institution in such circumstances.
- 6. NWCCU may determine that it is necessary to make pertinent information, including accreditation materials or information about the institution's accreditation status, available to the public to correct misleading information. Confidentiality is deemed waived by the institution in such circumstances.
- 7. Accreditation materials belong to the institution and the institution may share or publish its own accreditation materials at any time. However, the institution must protect the confidentiality of personally identifiable information related to the external peer evaluation team and will redact such information if the institution chooses to publish any accreditation materials.
- 8. NWCCU may use an institution's accreditation materials in training events with the prior consent of the institution.

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