



Institute for International Medicine Records Retention Policy

I. Introduction

A. The Institute for International Medicine (INMED) 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 INMED 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 INMED President.

II. "Accreditation Records" means, but is not limited to:

- A. Documents created by INMED, associated with its application and subsequent evaluations; this includes materials related to INMED'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;
- B. NECHE's evaluation of INMED, 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 INMED appeals;
- C. Complaints against and public comments about INMED;
- D. Correspondence between NECHE and INMED; and
- E. Correspondence between INMED and federal, state, and local governments agencies, as well as other accreditors.

III. "Business Records" means, but is not limited to:

- A. Agendas for and minutes of Board meetings that relate to INMED operations including budgets, audits, tax filings, insurance policies, contracts, and employee records
- B. Agendas and minutes for Strategic Planning retreats and monthly staff meetings.

IV. "Accreditation Records" and "Business Records" do not include:



- A. Voicemail and text messages which are not routinely retained and are generally erased the same day received or shortly thereafter;
- B. 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
- C. 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.

V. Litigation Holds

- A. In the event the President of INMED 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.

VI. Process Used to Store, Retain and Secure Records

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

VII. Record Retention Schedule:

Type of Record	Retention Schedule	Authority
INSTITUTIONAL DOCUMENTS: All institutional reports, site visit review materials (i.e., visiting team/evaluator reports and recommendations, INMED responses to the team report), substantive change proposals, complaints against and public comments about INMED. and other correspondence/emails from agencies to include federal, state, and local government entities and other	At least two accreditation cycles of ten years each	Senior Admin



<p>accreditors related to an INMED's accreditation status.</p>		
<p>COMMISSION'S INSTITUTIONAL ACTIONS: All notification letters regarding Commission decisions made about INMED's accreditation status throughout INMED's affiliation with NECHE.</p>	Permanent	Senior Admin
<p>USDOE CORRESPONDENCE/EMAILS: All USDOE recognition reviews and decisions, complaints against INMED.</p>	Permanent	Senior Admin
<p>BOARD DOCUMENTS: Agenda for and minutes of meetings of the Board and its committees, corporate records and by-laws, audited financial statements, income tax returns, other required federal and state filings.</p>	Permanent	Board/Senior Admin
<p>EMPLOYEE RECORDS: Personnel files, Personnel Policies, Staff Handbook (including prior editions).</p>	Permanent	Operations
<p>FACULTY RECORDS: Agenda for and minutes of meetings of the Faculty Council, Personnel files, Faculty Policies, Faculty Handbook (including prior editions).</p>	Permanent	Academics
<p>STUDENT RECORDS: Personnel files, Personnel Database Records, Student Policies, Student Handbook (including prior editions), Academic Catalog (including prior editions).</p>	Permanent	Student Engagement/ FERPA/GDRPR
<p>BUSINESS RECORDS: Leases and contracts; software licenses; insurance coverage; employee benefit plans documents.</p>	Term plus 3 years	Operations/IT



ACCOUNTING RECORDS: Banking and checking records, invoices, ledgers, budgets.	7 years	Finance/IRS
LITIGATION HOLD NOTICES.	One year following disposition of claim	Legal/Senior Admin
EMAILS	Default retention: 3 years	Senior Admin/IT
CONTINUING MEDICAL EDUCATION RECORDS: Personnel Disclosures, CME Database Transcripts	Permanent for disclosures, CME Database 7 years	CME/ Kentucky Medical Association