

INSTITUTE FOR  
INTERCULTURAL AND  
ANTHROPOLOGICAL STUDIES

Department Policy Statement

It is the right, the responsibility, and the privilege of University faculty to participate in the governance of their departments. Fundamentally, what is desirable and intended by the Department Policy Statement is to ensure meaningful participation by department faculty and procedural regularity within departments. It is understood that the ultimate power of decision-making resides with the administration. This Policy Statement is one means by which the faculty of this department make recommendations to Western.

## II. PROGRAM HISTORY AND MISSION

The Institute for Intercultural and Anthropological Studies at Western Michigan University is a multidisciplinary unit that serves as a home for programs focused on anthropology and interdisciplinary intercultural studies. It is home to WMU's existing undergraduate major and minor in Anthropology, as well as the recently reinstated African American and African Studies major and minor. The institute may also serve as an administrative home for future interdisciplinary, intercultural programs in areas such as indigenous peoples studies.

In addition, the institute:

- Fosters collaborative teaching, learning and discovery in the interdisciplinary intercultural studies.
- Provides a community, including co-curricular programming and physical space for its programs.
- Stimulates interdisciplinary collaboration in research and creative activities related to interdisciplinary intercultural studies.

## III. INSTITUTE ORGANIZATION

### Membership and Committees

(1) *Executive Council.* The Executive Council includes the Associate Director of Anthropology, the Associate Director of African American and African Studies, and two or more tenured members of the faculty. The IAS Director serves as an ex-officio member of the Executive Council. The IAS Director is not eligible to vote on matters related to Tenure and Promotion.

(2) *Director.* The Director serves the function of a department chair of the Institute. They are appointed by the Dean of the College of Arts and Sciences, though recommendations for appointments come directly from IAS faculty.

(3) *Faculty voting rights.* All Board of Trustees (BoT) appointed and BoT jointly appointed faculty members in IAS are eligible to vote.

(4) *Tenure and Promotion Committee.* Includes all BoT appointed and BoT jointly appointed tenured faculty members in the unit for all reappointment and tenure evaluations, and all full professors for promotion to full professor. If there are not enough tenured faculty to serve on this committee, IAS will follow the procedures set in Articles 17 and 18 of the WMU AAUP collective bargaining agreement.

(5) *Sabbatical Leave Committee.* The sabbatical leave committee shall include all members of the Executive Council (except for the Director), and one or more tenured faculty members in IAS. The committee shall follow all procedures as identified in Article 26 of the WMU AAUP collective bargaining agreement.

## **B. Director Position**

### (1) Nomination and Selection of Director

The Director of the IAS reports to the Dean of the College of Arts and Sciences. The College Dean serves as the administrative supervisor for the Institute director. The IAS faculty has input in the nomination process and preference for directors will be given to Board-appointed faculty in the unit first. Faculty members may nominate themselves or others who are Board-appointed in the unit. All tenured faculty are eligible to become the Director of IAS. As soon as we have to replace a director, a screening committee is elected by BoT appointed IAS faculty to include one faculty member from each professional rank (both Professors and Faculty Specialists) in the institute.

The tasks of the screening committee are to determine the qualifications necessary in a new director to address the program's needs and goals in the areas of research support, student learning outcomes, and community outreach among the constituencies to whom we are accountable. The selection criteria will be established in consultation with the College Dean, through one or more program meetings, and/or a survey when needed. The committee will also gather and evaluate information about the kind of candidate needed from the criteria which informed previous searches. The screening committee can receive nominations of candidates from the Executive Council, or from an external search before arranging a cycle of on-campus interviews. Once the committee ranks the short list it will be distributed among the Institute faculty one week before the Executive Council meets to select a candidate that will be recommended to the College Dean. Faculty on sabbatical or leave are eligible to vote directly or through absentee ballot. The criteria used in the evaluation every two years will also be used to rank order and vote in the selection process [see next section on evaluation].

If the person recommended by the faculty is not approved by the Dean, or the person selected declines, a meeting with the Dean should be requested within a week. The means of recommending other candidates from the short list will be discussed at that meeting.

The senior administration shall determine the responsibilities of the new director in a manner consistent with the Director's evaluation criteria in this policy statement. The program faculty will make recommendations about the kind of evidence needed on planning by short term objectives and long-term goals, recruitment and retention of faculty positions, as well as in the annual written report.

### (2) Evaluation of Director

The Director will be evaluated according to the procedures and policies outlined in Article 19 of the WMU AAUP collective bargaining agreement. The director shall be evaluated in coordination with the AAUP and the Dean's office every second year. The list of duties recommended by the faculty as the goals the Director should strive for and on which the evaluation will be based includes:

- a. provides measurable evidence of executing yearly objectives for the program, and long-term goals agreed upon with the Executive Council.
- b. provides measurable evidence of strengthening democratic processes in the resolution of conflicts in the program

- c. provides measurable evidence of considering program policies pertaining to program objectives, development of course offerings, tenure and promotion, and the creation of supportive conditions for research and teaching
- d. provides measurable evidence of creating the best conditions for maximum cooperation and productivity among support staff and faculty
- e. provides measurable evidence of maintaining constructive rapport with students, faculty and university administrators
- f. provides measurable evidence of exercising intellectual leadership in other ways essential to maintaining the respect the program and the field hold in the academic community, such as supporting; student research, public policy debates, and providing the context for important anniversaries.
- g. provide measurable evidence of pursuing the recruitment, replacement and retention of faculty positions
- h. provide review of the previous year at the first faculty meeting of the Fall semester.

### (3) Acting Director

If the Director is to be absent from the university for sabbatical or disability leave, the Executive Council will nominate an Acting Director. The recommendation will be forwarded to the Dean of the College of Arts and Sciences. The evaluation of the Interim Director shall be carried out after their first 12 months in office, and in alternate years after that using the same procedure described above.

### (4) Reappointment/Removal of Director

The faculty within the Institute for Intercultural and Anthropological Studies recognize that due to changing circumstances in the university, college, program or personal circumstances the director may be unable [or fail] to properly carry out the expectations of the job as specified both in the search/selection process as well as in this Department Policy Statement. Recommendations for removal [because of actions considered detrimental to the unit and its personnel, absence, physical incapacity, or a predominance of negative evaluations] may be initiated by the written request of any one faculty member to the Executive Council which forwards it to the Dean with its recommendations. In such a case, the faculty by majority vote may determine that it is necessary and desirable to recommend to the appropriate university officers their removal from the position of director. In consultation with the WMU/AAUP personnel such a written recommendation will be first forwarded to the current director, with an opportunity for the incumbent to resign prior to the unit making a recommendation for removal. Removal processes will be consistent with Article 23. §2.3 of the agreement.

If the recommendation for removal is approved by senior university officers, the Executive Council will create a new director screening committee and give it a reasonable due date for completing its task. Please, refer to section III.B.1 above.

## **C. Faculty appointment, reappointment, and layoff**

The decision to add faculty to the IIAS is a shared responsibility. The identification of the unit's needs, as well as the recruitment and retention of faculty requires collaboration between the faculty and the director.

The whole faculty will be assigned the task of appraising the staffing needs of the IIAS and making recommendations to the Executive Council, whenever an opportunity to recruit an additional faculty member or replace a departing faculty member is available. In keeping with new urgencies in the constituencies to which the field is accountable, as well as changes in methods and research priorities in the fields of African American and African Studies, Cultural Studies, and Anthropology around the world, the faculty will also review the staffing needs and make appropriate recommendations to the Executive Council.

### (1) Faculty appointment

When hiring for a position is authorized, the Executive Council will recommend hiring priorities by majority vote. The Executive Council will then appoint an ad hoc search committee that will include board appointed faculty and at least two students, one undergraduate from AAAS and one undergraduate from Anthropology. The committee will a) draft a statement announcing the position for circulation in ways consistent with

ethical standards and university policies, b) screen vitas and c) make recommendations to interview the candidates, selecting candidates by ordered rankings from the majority vote of the search committee. The search committee shall use valid and reliable procedures to identify and recruit the best qualified candidates for each position, and make written recommendations regarding the hiring of such candidates to the appropriate university bodies in accordance with university policies about diversity. The pertinent criteria will include all or any of the following: educational achievement, teaching competence, research skills and grant writing, professional recognition and contributions to the field, curriculum development and publications, university and community service, professional consultations, recommendations from recognized authorities in the field, research and teaching abroad, as well as leadership in professional organizations.

All application files will be open and available to the search committee. CVs and biographical information for finalists will be available to all unit faculty. The search committee will follow the procedures outlined in the most recent CAS Hiring Guide. The search committee will collect feedback from faculty on finalists through electronic and/or paper feedback forms within a week of the campus presentations made by finalists. They will then submit recommendations to the Director. The Director will submit their recommendation to the Dean.

#### (2) Faculty reappointment

Faculty on renewable term appointments will be evaluated yearly by the Tenure and Promotion Committee using the criteria and schedule consistent with Article 16.§6 of the WMU AAUP collective bargaining agreement. The Tenure and Promotion Committee may ask term appointments to supply their credentials to the committee who will then recommend to the Director whether or not the incumbent should be reappointed. If the incumbent does not want to be reappointed or is not recommended for reappointment by the Tenure and Promotion Committee, the procedure to be applied should be consistent with Articles 14 and 16.

#### (3) Preference

Equitable summer teaching and WMUx teaching distribution (see Articles 31.§1.3 and 41). Bargaining-unit academic-year faculty members shall be offered preference over non-unit persons, excluding chairs for their regular academic-year appointments. In addition, current bargaining unit faculty members shall be offered preference over part-time instructors for any academic-year appointments for which Western determines that said current faculty are qualified. Bargaining unit faculty members are considered qualified if the course is in the faculty's area of expertise and they have taught it previously.

#### (4) Sabbatical leave

A committee of three faculty members shall be appointed by the Director for the purpose of recommending approval or disapproval of sabbatical leave applications. The recommendations of the Sabbatical Leave Committee shall be made according to the procedure and timetable indicated in the governing WMU-AAUP Agreement article 26.§3. In reviewing applications for sabbatical leave, the Sabbatical Leave Committee shall evaluate whether the proposal is feasible, whether it may reasonably be expected to contribute to the professional competence and/or the professional recognition of the applicant, and whether it makes a contribution to the Institute and University. The Sabbatical Leave Committee will make a recommendation to the Director. In the event several IAS faculty apply for sabbatical, are there considerations the IAS Sabbatical Committee should use in weighing them. The SC is supposed to forward them to the Director in priority order. The priority is determined by evaluating each of the three evaluation criteria: for the individual, for the University, and in its own right, as stated in the Contract. In addition, the IAS Sabbatical Committee will focus more on evaluating the time-sensitive nature of the research (are there other projects or efforts it aligns with that are time-delimited?) and how well the project lays out the research plan, contribution to the discipline, and feasibility. The Director will then consider how to reallocate workload of faculty members granted sabbatical leaves and forward their recommendation and the workload plan to the Dean.

#### (5) Faculty Layoffs

Faculty layoff recommendations shall be in accordance with the provisions in the Layoff and Recall Article 25 of the WMU-AAUP Agreement. The program faculty shall be fully informed about the layoff recommendations for discussion and a vote will be taken before the Executive Council recommendations are forwarded to the Director.

In the event of layoffs, the Executive Council shall make recommendations about the reduction of the faculty to the program faculty. The program faculty will discuss the recommendations of the Executive Council, and vote (by secret ballot) until a majority decision can be passed on to the Director. If the tie can't be broken, then the Director makes the call.

## IV. INSTITUTE OPERATING POLICIES AND PROCEDURES

### A. Statement on Tenure and Promotion Criteria

IIAS is fundamentally about the study of culture, power, and societal inequalities. We embrace anthropological knowledge in our understanding of humanity in all its diversity through our cultural, biological, and archaeological perspectives. Our teaching, mentoring, and research emphasize experiential and real-world learning and we encourage critical thinking skills as students examine their preconceptions and biases. A disproportionate amount of time spent in teaching and service has been identified as a significant obstacle for tenure and promotion, particularly among women of color faculty. One important category of such obstacles is the biases students may bring to their evaluation of their instructors. Cultural, race, and justice studies scholars often face resistance in the classroom; teaching evaluations may reflect students' discomfort with challenges to their thinking. Multiple forms of evaluation, including peer evaluations and classroom observations, help to put student resistance in perspective. The Institute for Intercultural and Anthropological Studies recognizes how its faculty are also involved in institution-building: building alliances with other departments, enlisting affiliated faculty, proposing new courses and curricula, managing cross-listed courses, generating fuller comprehension of the field among key institutional stakeholders. These activities need to be included in promotion reviews.

Four concepts are central to cultural, racial, and justice-based scholarship, teaching, and service:

**Politics of Knowledge Production:** IIAS recognizes that knowledge is not neutral. In questioning and transforming conventional disciplinary approaches, IIAS takes disciplinary, multidisciplinary, transdisciplinary, forms. It develops new modes of inquiry and engagement, asks new questions, creates new knowledge. Fields of study and scholars within IIAS examine how knowers and systems of knowledge are situated in reflexivity about the impact of social location, power asymmetries, and cultural contexts on the knowledge process are central to the field. Critical awareness of inclusions and exclusions in knowledge production is foundational.

**Intersectionality:** The multiple systems of inequality, organized around gender, race, socioeconomic position, heterosexism, and other dimensions of inequality, are fundamentally interdependent. Recognition of this interdependence among systems of inequality and power renders visible how systems of inequality function, and enables transformation of these matrices of power.

**Transnational Analysis:** Transnational analysis considers the continuum of unequal global systems and their impact on structures, cultures, and individuals, resisting binaries such as local/global or U.S./international. "Transnational" is an analytic that enables comprehension of the impact of global processes both across spaces and in distinct locales. This destabilizes "centers" and explores how centers are always multiply constituted through relationships to "peripheries."

Social Justice: Fields of studies in IAS, with roots in the social movements of the 1960s and 1970s, analyze the social construction and material realities of power and trace the workings of systems of oppression and privilege. These fields study the persistence and tenacity of inequalities, as well as strategies of resistance. With the goal of always furthering social justice, IAS faculty often collaborate with community partners—local, national, and global—in transformational action research.

## **B. Tenure and Promotion Committee**

Effectively evaluating candidates for tenure and promotion requires that evaluators understand the candidate's field(s) as heterogeneous and account for the consequent variability, interdisciplinarity, scholarly forms, methods, and contributions. The Tenure and Promotion Committee will consist of tenured faculty members of IAS and can include tenured faculty from other units if their expertise is needed to evaluate a particular person's scholarship and teaching.

The receipt of a terminal degree, typically the doctorate or MFA, is normally a prerequisite for tenure, though any faculty member on a tenure-track appointment shall be eligible for tenure and promotion. Professional competence, recognition and service are equally important to the granting of tenure given our commitment to education and problem solving in the racialized areas where poverty is concentrated. In the case of faculty specialists, competence and service are evaluated for tenure (17.§3, 17.§3.7.) and competence may include grant applications, conference presentations, and publications (20.§2.2).

For tenure, there are several levels of positive recommendations in these areas of professional competence, professional recognition and service: *acceptable* in each area, *above average* in each area, *high accomplishment* in each area, and *exceptional* levels of performance by the standards of the program and the field.

Assessing cultural, justice, and/or race-based scholarship, teaching, and service, Tenure and Promotion Committees for IAS Candidates must be prepared to broaden the scope. This expansion of domains of scholarship is central to the interdisciplinarity of IAS:

- A. Account for plural forms of research, teaching, and service that occur in multiple locations.
- B. Recognize that collaborative work is often more challenging than solitary scholarly production.
- C. Recognize the multiple forms of scholarship, from traditional written products to artistic and creative expressions such as film, performance, digital media, collaborative editorial work, archival research.
- D. Understand that increasingly, scholarship is produced in online journals, blogs, op-eds, policy reports, social media, community action projects.
- E. Recognize that many IAS faculty are also involved in institution-building: building alliances with other departments, enlisting affiliated faculty, proposing new courses and curricula, managing cross-listed courses, generating fuller comprehension of the field among key institutional stakeholders. This needs to be included in promotion reviews.

## **C. Criteria**

### 1) Professional Competence Criteria:

Teaching ability/competence is to be evaluated by faculty colleagues and students. Faculty should submit WMU course evaluations as well as other appropriate evaluation tools, which should be interpreted in the context of the pedagogical strategies explained in the faculty member's self-evaluation.

The first form that evidence of professional competence may take is self-evaluations. These are clearly presented statements [supported by documents such as syllabi, videos of class sessions, attendance certificates from teaching workshops, or course innovations, according to agreement] about ways in which expertise in subject matter and learning theory have been put into practice both in design and implementation of courses. Such self-evaluations are necessary to provide a context for student and peer evaluations, and to demonstrate how the applicant has taken into account issues raised in the comments of students and colleagues.

The second form that evidence of professional competence may take is peer evaluations providing insights on pedagogical expertise and effort based on requested and recurring in classroom /online teaching observations. Sustained interactions based on frequent observations and discussion are likely to provide greater insight than a single visit every two years. Per Article 16 of the WMU AAUP agreement, pre-tenured faculty should have at least one observation per year. While tenured faculty are not required to have regular observations, IIAS supports and encourages tenured faculty to have regular peer observations.

Opportunities for team teaching and faculty seminars where the faculty teach each other are opportunities that should be available to all faculty in the program as a primary source of peer evaluations.

Evidence of professional competence will include:

- A. Development, implementation and assessment of innovative student learning experiences.
- B. Alignment and integration of multiple courses around single themes or coordinated learning outcomes.
- C. Adoption and implementation, and assessment of discipline-related and advocated best practices.
- D. Supervision of doctoral thesis, honor's theses, or independent studies;
- E. Academic advising;
- F. Receipt of awards for teaching excellence and/or instructional development grants;
- G. Development of new curriculum and new instructional materials, teaching courses presenting special pedagogical difficulties [such as large sections or hybrid format].

## 2) Professional Recognition Criteria:

Professional recognition is to be evaluated by faculty colleagues on the basis of evidence that applicants for tenure can build on research or construct a broader research agenda that will produce results consistent with performance between doctoral or terminal degree work and final tenure review. Professional recommendation may take on a wide range or combination of forms. While no specific number for the amount of artifacts is provided, IIAS recommends a consistent and comprehensive record of multiple artifacts. IIAS does not privilege one artifact over another, but does acknowledge a wide range of artifacts that may count for professional recognition.

Evidence of professional recognition includes:

- A. Publication in refereed print or electronic journals and book chapters,
- B. Coauthored, edited, or coedited work in academic or field relevant publications (e.g. chapters, anthologies, manuscripts),
- C. Papers read at professional state, national or international meetings,

- D. Invited publications,
- E. Published book reviews,
- F. Final reports of (funded or unfunded) research projects or policy papers,
- G. Office in professional association,
- H. Reviewer or staff member in professional publication,
- I. Research evaluations,
- J. Consultation or member of community board based on area of professional expertise,
- K. Invited participation in workshops organized by public schools in the area, foundations, non-profit organizations, or [state, national, international] public agencies,
- L. Invited presentations within the university, or guest lecturing in other educational institutions
- M. Funded grant proposals or the favorable reviews of unfunded proposals,
- N. Awards of merit for scholarly and research activities, and
- O. Invitation to serve in an expert capacity [such as court witness, consultant, or reviewer for publishing house].
- P. Creative expressions such as film, performance, digital media, collaborative editorial work, archival and museum/collections research.

Below is a more exhaustive list of things that count as professional recognition:

1. Single-authored or co-authored works published by academic or professional press (including creative writing: novels, creative nonfiction, etc.)
2. Edited or co-edited autobiographies published by academic or professional press (with the expectation that the (co)editor contributed an original essay to the collection, as well as writing or co-writing the introduction)
3. Forthcoming works whether they are under contract or not.
4. Peer-reviewed essays published in, or under contract to, academic or professional journals, including online venues.
5. Chapters in academic or professional books
6. Peer-reviewed papers accepted to academic or professional conferences
7. Published book-review essays in academic or professional journals
8. Entries for academic or professional encyclopedias or other reference works
9. Essays that have been provisionally accepted for publication, pending “revise and resubmit.”
10. Essays, articles, performances, and book projects in progress
11. Completed book-length manuscripts under initial review by academic or professional presses.
12. Articles or op-ed pieces in non-academic journals, including online (i.e., Salon, New Yorker, Huffington Post, etc.)
13. Maintenance of and regular posting to a professionally-related blog
14. Written contributions to museums or exhibitions, including online (e.g., curatorial essays, etc.)
15. Written contributions to online academic projects/collections
16. Invited lectures in academic or professional institutions
17. Frequent or substantial editorial work for academic or professional journals, including the regular vetting of essays submitted for publication, and/or serving on editorial boards.
18. Invited “talking head” appearances in public interviews, broadcasts, or documentaries
19. Winning awards, grants, or prizes from academic or professional institutions
20. Work done as a result of professional awards, grants, or fellowships
21. Professional field research that may result in reports such as those produced as part of Cultural Resource Management activities and/or analytical services for research projects, for example biochemical and osteological analysis, ceramic/lithic analysis, translation, digital media, database creation, and ethnographic field reports



22. Professional field research in ethnography, linguistics, archaeology, or biological anthropology, including scientific studies of materials and bone
23. Organization of academic or professional conferences or panels
24. Short entries for academic or professional reference works
25. Service as chair, moderator, or commentator of sessions at academic or professional conferences
26. Short book reviews
27. Completed essays under initial review in an academic or professional venue
28. Evidence of candidate's work assigned in other academics' syllabi
29. Evidence of candidate's work cited in other writers' publications

### 3) Professional Service Criteria:

The Institute for Intercultural and Anthropological Studies especially acknowledges and values work done in service to underrepresented, especially vulnerable, campus and community populations. Moreover, IIAS acknowledges the disproportionate service demands made upon faculty from underrepresented groups, especially faculty of color, at a predominantly white institution such as WMU.

Professional service is to be evaluated through competence demonstrated in serving the goals and needs of the Institute, the university, applicants' disciplines, as well as the surrounding non-academic community.

New faculty during the first two years should be protected from being as heavily involved in service activities in comparison to senior faculty but will still be expected to perform a proportional share of such professional services. Evidence of professional service includes:

- A. Participation in the Executive Council and committee work of the program and/or the university [such as Faculty Senate, WMUx, Curriculum, etc.],
- B. Holding office(s) contributing both to the professional organizations in the applicant's field and to the faculty union chapter,
- C. Regular meetings with student organizations [as advisor] and faculty groups,
- D. Supervision of doctoral thesis, master's thesis, honor's theses, or independent studies
- E. Preparing committee reports for department, college or university committees,
- F. Participation in community development activities,
- G. Documenting need for new courses,
- H. Grant writing,
- I. Program evaluation [such as the Academic Program Review],
- J. Involvement in problem solving and social justice issues,
- K. Developing collaborative relations with other institutions,
- L. Exercising conceptual leadership

### **D. EXTERNAL REVIEW PROCESS**

External review in the area of professional recognition for traditionally ranked faculty may be initiated by the candidate, the DPC, or the Institute Director, for a candidate's promotion review. Reviewers external to the faculty of Western Michigan University shall be appropriate to the promotion candidate's specialty area. By mutual agreement of the candidate and the chair of the DPC, one reviewer may be from Western Michigan University, but external to the department.

General Process. If the external review process is initiated, procedures in the Department Policy Statement shall be followed and consistent with Articles 17 and 18 of the WMU AAUP collective bargaining agreement. The candidate and the Director shall identify the names of the recommended number of mutually acceptable external reviewers. If they are unable to reach agreement on the recommended reviewers, each will be responsible for identifying an equal number of external reviewers until the recommended number has been obtained. Materials sent to the external reviewers should include a vita and other items that demonstrate professional recognition. The candidate and Director should attempt to

reach mutual agreement as to these materials The Director will be responsible for sending the materials to the external reviewers. A letter clearly indicating the purpose of the external review and who shall have access to the letters of recommendation shall be sent by the department chair, with a copy to the candidate, to any potential external reviewer selected by the promotion candidate and the chair of the DPC to participate in the external review process.

The Director's request to an external referee must include Western's statement on confidentiality: "Your letter of evaluation, as part of an official review file, will be held in confidence and will not be disclosed to the faculty member under consideration or to the public except as required by law or University policy. In all such instances, the information made available will be provided in a form that seeks to protect the identity, privacy, and confidentiality of evaluators." Nothing in the above is intended to prevent a candidate from soliciting external letters. External letters of recommendation shall be made part of the adjunctive promotion file, but shall not be placed in the promotion candidate's permanent personnel file. Upon conclusion of the promotion review, the adjunctive file containing all existing copies of the external letters of recommendation shall be returned to the promotion candidate, with removal of institution identifiers and name of reviewer. [Copies of edited letters shall be made available to promotion candidates if a formal appeal is made at any stage in the promotion review process.] Western shall not release the external letters of reference to the public except as Western deems necessary to comply with law, court order, subpoena, or pursuant to any legal, administrative, or arbitration proceeding.

See timetable in Article 18. §11 for specific dates for external reviews.