

**Beverly Hospital Clinical Pastoral Education
ACPE Required Policy**

ANNUAL NOTICE REGARDING STUDENT RECORDS

This document is mailed to every student before the program begins with the other orientation materials. Students are asked to return this notice with their registration materials for the hospital orientation. This annual notice is also included in the Student Handbook and reviewed with the peer group during orientation.

The Family Education Rights and Privacy Act (FERPA) applies to all ACPE CPE programs. FERPA addresses *privacy* not *confidentiality* issues. This means students own the information about them and must know what is being collected and how it is being used. Their information cannot be shared without their written permission. Each CPE center must publicize Annual Notice of its protocols for proper handling of student records.

The ACPE CPE center/ program at Beverly Hospital guarantees to its students the right to inspect and review education records, to seek to amend them, and to specify control over the release of record information.

A student record is defined as:

Any record (paper, electronic, video, audio, biometric, etc.) directly related to the student from which the student's identity can be recognized and maintained by the education program / institution or a person acting for the institution and is maintained by the education program/institution or a person acting for the institution. ACPE requires that the CPE student record include the face sheet with directory information, the CPE educator's evaluation report, and the student's own evaluation report. Application materials of students admitted and matriculated are considered part of the student record. **A student has the right to object to record content. If not negotiable, the written objection will be kept with and released with the record.**

Directory information is student information not generally considered harmful or an invasion of privacy if released. At the Beverly Hospital CPE Center this information includes students' name, address, e-mail, telephone number(s), and religion. Previous work experiences, educational achievements, and a photograph can also be included in directory information. A student may opt out of having this information released by signing, dating, and returning to the CPE Certified Educator documentation of such. **Before the center releases information, students must have received the *Annual Notice*.**

Current students can restrict directory information and/or record access at any time during attendance. Restrictions must be honored even after the student's departure. Former students cannot initiate new restrictions after departure.

Subject to notification, the student's name, address, denomination and unit of CPE successfully completed will be sent to the ACPE office on the student unit report at the successful completion of each full or half unit of CPE.

A copy of the CPE Certified Educator's final evaluation report will be given to the student. The student will be informed that the center will keep this evaluation for ten years, and it will not be available to anyone

else, except with written permission from the student. The student's own final self-evaluation is included and will be kept with the certified educator's subject to the same provisions.

After ten years the final evaluations will be removed from the record, and the Student Record will consist of the application face sheet only. Students are responsible for maintaining their own files for future use. Students will be informed, at the time copies are given to them, that it is their responsibility to keep copies for future use.

Certified Educator Notes: The CPE certified educator may keep process notes on a student. These process notes are for the exclusive use of the writer and are not considered a part of the student's record. They are kept separately from the student record.

Exceptions: Certain exceptions concerning the release of information exist to protect the health or safety of the student or others, and for the purpose of accreditation or complaint review, or as required for legal processes. Before releasing material in any of these circumstances, the CPE educator will consult with the ACPE Executive Director or Associate Director.

In accordance with FERPA, students are able to review their record within 45 days or less of student's request, and may make one Xerox copy of the record at Beverly Hospital, CPE. Requests must be made in writing, not by phone, fax, or conversation. Record inspection cannot be denied based on the student's inability to come to the site or outstanding financial obligations. In the latter case, a center can note on the copy sent, "not available for official use." When a student record contains identifiers of another student, those must be redacted.

Records Management:

Student health records are kept in locked files separate from other student records. Signed Agreements for Training, Use of Clinical Materials Consent form, Receipt of Policies and Procedures, and Enrollment and Exit Interview data are kept for 6 years or until the next accreditation site review. Health records, application materials, and all other documents related to onboarding and the CPE Program Orientation are disposed of six months after the conclusion of the program.

At the Beverly Hospital site the administrative assistant for the CPE program may have access to student records for the purposes of administration only, and a subgroup of the Beverly Hospital Professional Advisory Group focusing on curriculum improvement may have access to student records acting in their roles as educational officials with a legitimate education interest.

Should Beverly Hospital CPE Program be without an ACPE Certified Educator, the director of Spiritual Care and Education will be responsible for securing CPE student records and is the only person authorized to retrieve student records in response to a student's written request. Should the Beverly Hospital CPE center close, its ACPE Certified Educator or appointed designee will secure all student records and ship them to the ACPE office, c/o Accreditation.

Violations of these protocols may be reported to the Chair of the Accreditation Commission at ACPE Inc., We Work, Floor 4, 120 West Trinity Place, Decatur GA 30030

Beverly Hospital CPE Center is accredited for Level I and Level II CPE Programs by the Association for Clinical Pastoral Education, Inc.

Date last reviewed: 01/2023