## **Maintenance of Student Records**

#### **PURPOSE**

To assure that the Clinical Pastoral Education program maintains student records in a manner which addresses confidentiality, access, content, custody of student records, and custody of student records should the center be without a supervisor and/or accreditation. The center prominently publishes its *Annual Notice* before the beginning of each unit.

#### **STANDARD**

The SRH Pastoral Services Department shall maintain records in a manner consistent with the Guidelines for Student Records in accordance with ACPE standards. This includes the student records being secured in a locked file cabinet. Student records will not be released without the written consent of the student. The official record will consist of the application face sheet, the CPE supervisor's written evaluation report and the student's own written evaluation report. Material written by students such as verbatims and case histories that contain information about other persons will be destroyed unless used for pastoral research, with written permission from the student. Supervisory notes are not a part of the official record and are the property of the supervisor.

#### **PROCEDURE**

#### Student Records

- 1. The SRH Pastoral Services Department student files will be maintained for a period of at least ten years.
- 2. After ten years, the file may be thinned and only a face sheet will be held in the files.
- 3. The student has the responsibility to maintain his/her personal file for future use. The student will be informed that it is his/her responsibility to keep copies of evaluations for future use.
- 4. No evaluation reports will be released from the file without the written request of the student.
- 5. Student files are maintained in the SRH Pastoral Services Department.
- 6. Access to student records is restricted to the CE Supervisor and the Coordinator of CPE. Access to an individual's student record may be permitted for the purpose of research, accreditation review, or in the event that a complaint is filed.
- 7. In the event that the CPE program should cease to exist or in the absence of an ACPE Supervisor, student records will be sent to the national ACPE office in Decatur, Georgia and maintained for ten years.
- 8. Student records will be filed within 21 days of completion of a unit in accordance with ACPE Standards.
- 9. To receive a copy of a student record application must be made in writing to the SRH Pastoral Services Department by the student. Response of a verification letter and/or copies will be made within two weeks of request.

### Self Regional Healthcare Annual Notice

ACPE requires that an Annual Notice be published annually prior to the start of any CPE program start and appear in the student and center handbooks in addition to other sources at the center's discretion.

Items must appear in the Annual Notice as stated here.

The Annual Notice contains:

- A. The rights of students:
  - i. to inspect and review education records
  - ii. to seek to amend them
  - iii. to specified control over release of record information
- B. What constitutes directory information and how to opt out
- C. The definition of student records
- D. Details of the center's record's management protocols
  - i. the right to object to record content
  - ii. if not negotiable, written objection will be kept with and released with record
- E. Definitions of persons having access to student records
  - i. Education Official
  - ii. Legitimate Education Interest
- F. Report violations of these protocols to:

Chair of the Accreditation Commission ACPE 55 Ivan Allen Jr. Boulevard, Suite 835 Atlanta, GA 30308 (404) 320-1472

#### SRH Directory information and how to opt out;

Directory information is student information not generally considered harmful or an invasion of privacy if released. SRH directory information includes: name, address, email, telephone, date of birth, religion, previous education, and photograph. This information is sometimes published in the hospital newsletter at the beginning of a CPE program. Students may opt out completely from having directory information disclosed. Students may also choose to review and select directory information that is acceptable to the student for release. All other information is released only with the student's written, signed, dated consent specifying which records are being disclosed, to whom, and for what limited purpose.

Before releasing information, students must have received this 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.

#### III. The definition of student records;

A student record is: (1) any record (paper, electronic, video, audio, biometric etc.) directly related to the student from which the student's identity can be recognized; and (2) maintained by the education program/institution or a person acting for the institution.

#### IV. SRH record's management protocols.

The following materials are included in the CPE student record as required by ACPE for 10 years following the student's CPE experience:

- The face sheet with directory information,
- The CE evaluation report and the student's own evaluation report, if submitted.
- Note: Application materials for students who are not accepted into the CPE program are not kept by the center. The applicant is given the choice of having the materials returned or destroyed.

# 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. Grades are exempted from this right.

The CE will give each student the opportunity to write an addendum to the Supervisor's evaluation. This addendum is attached to the evaluation and is released with the evaluation when a proper release request has been received.

A copy of the ACPE Certified Educator's evaluation report will be given to the student within 21 days of completion of CPE unit. The student will be informed that the center will keep this evaluation for a minimum of ten years, and it will not be available to anyone else except with written permission from the student. If the student's own evaluation is included, it will be kept with the supervisor's subject to the same provisions.

#### V. Education Officials and Legitimate Education Interest.

Only Educational Officials (ACPE Certified Educators) will have access to student files for educational purposes without student consent. An example of a legitimate educational interest includes a certified educator accessing the application/biographical information of a student who is being supervised. In addition, the Coordinator of CPE, charged with assisting with the custodial care of the CPE student records will also have access to the student files without student consent. The Coordinator of CPE is not allowed to read the files.

#### VI. Violations of these protocols may be reported to the Chair of the Accreditation Commission at:

ACPE, 55 Ivan Allen Jr. Boulevard, Suite 835 Atlanta, GA (404) 320-1472

<u>*Research*</u>: If information in student records or in the ACPE Certified Educator's records is considered of research value, and a CPE center or ACPE desires to collect and use such material for research, a release form shall be made available for the person's signature. No personally identifiable material will be used for research without the person's written permission for its use.