

JACK C. MONTGOMERY VETERANS AFFAIRS MEDICAL CENTER

Subject: CPE Records

Standard 304.4

Purpose: You need to know that information we keep regarding your CPE training will be kept private. Student records kept at the JCMVAMC will follow the requirements of the Association for Clinical Pastoral Education and the *Family Education Rights and Privacy Act (FERPA)*. This policy refers to issues of *privacy*, not *confidentiality*.

1.0 Definitions:

- 1.1 Annual Notice: This CPE Records P&P serves as your Annual Notice which you will receive when we send you an application and/or after you apply to our program. The Annual Notice is also provided in the Student Handbook. No information can be released until the student receives the Annual Notice.
- 1.2 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.** A student record includes the original application materials, a Center Face Sheet, the student's final evaluation(s), their CPE Supervisor's final evaluation(s) and any additional materials mentioned above from which the student's identity can be recognized.
- 1.3 Directory Information: **Directory information is student information not generally considered harmful or an invasion of privacy if released.** This includes the student name, address, e-mail, telephone, date of birth, religious preference, previous education and their photo. The directory information is not part of the student record
- 1.4 Supervisor Notes: Process notes kept on student training are the exclusive property of the CPE Supervisor and will not become part of the official student record. These notes are not available to anyone, including the student, colleagues of the CPE supervisor, education officials or members of Chaplain Services.

2.0 Ownership/Access of Student Information.

- 2.1 Access: **This ACPE CPE Center /Program guarantees to its students the right to inspect and review education records, to seek to amend them, to specified control over release of record information, and to file a complaint against the program for alleged violations of these**

Family Education and Privacy Act (FERPA) rights. Students own the information being kept in their student records. You have access to these records and you can inspect them, amend them and have control over their release. Students may request access to their files in writing and the Center will provide those within 45 days of the request, in line with *FERPA* requirements. After access, students may copy and take the requested records with them. If the student is not able to come to the JCMVAMC to collect the record(s), the Center will send a copy, noting on it "not available for official use". All identifiers of other students in the record will be edited from the document(s) before release.

- 2.2 "Education Officials" access to student records: Persons involved with the student's training are considered "education officials" and have access to records for educational purposes only. These include the CPE Supervisor, the Chief Chaplain, members of the Professional Advisory Group, other professionals involved in mentoring and reviewing student educational goals and the Administrative Assistant who does work on the records.
 - 2.3 Accreditation Site Visits: Records may be viewed by accreditation site team members for purposes of consultation and review.
 - 2.4 Formal Complaint Reviews: If there is a formal complaint, then the files can be viewed in consultation with the ACPE Director or Assistant Director.
 - 2.5 Amending the Record: **A students has the right to object to record content. If not negotiable, the written objection will be kept and released with the record. Grades are exempted from this right.**
- 3.0 Release of Records:
- 3.1 Release of Records: Student records can be released only with the student's written, signed and dated request which includes the name and address of where the record should be sent and for what limited purpose(s). The request should be specific in what materials should be included.
 - 3.2 Student Unit Reports: Within 45 days of completion, CPE Centers will report units of training to the ACPE office. These reports will include the student name, address, denomination and type of unit completed.
 - 3.3 Theological Schools: Students are *expected* to give written consent for copies of their final evaluation(s) to be sent to their theological school.

- 3.4 Health and Safety: Information can be released without permission for the protection of the health and safety of students and others. A consultation with the ACPE Director or Assistant Director is necessary before making this decision.

4.0 Maintenance of Records

- 4.1 Permanent records: The student keeps their own *permanent* record of training, including their final evaluation(s). Chaplain Services will *temporarily* keep the student record for ten (10) years and then destroy all materials except the Face Sheet through the medical center's confidential record shredding and recycling program.
- 4.2 Student written materials: Materials written by students, such as verbatims, theological reflection papers, book reports, case studies, etc., will be destroyed when the student leaves the program. If any of the materials are kept in the student record, all identifiers about anyone other than the student will be removed.
- 4.3 Storage of records: The student record will be kept in a locked file in the CPE Supervisor's office. Access to these records must be in compliance with this policy.
- 4.4 Closure of the CPE Center: If the CPE Center closes, the Chair of the Regional Accreditation Committee will secure and arrange for storage of the records. The Accreditation Commission Chair and ACPE office will be notified of the storage location.

5.0 Directory Information:

- 5.1 Directory information not harmful: Directory information includes student information not generally considered harmful or an invasion of privacy if released.
- 5.2 Option not to be included in the Directory: This CPE Center has a directory of their students and can release this information without consent unless the student "opts out" of the Directory. "Opting Out" remains in effect, even after the student completes training.

6.0 Research:

- 6.1 Consent to use information for research: If a CPE Supervisor's records and/or the student record are of research value and the Center or the

ACPE wishes to use these materials for research, then this can be done when the student signs a release form. A student's personal *identifiable* material can be used in research but only with the student's written permission.

7.0 Complaints about violations of CPE Records P&P:

- 7.1 Filing a complaint: Students can file a complaint against the CPE program for alleged violation of the ACPE policy and the *Family Education and Privacy Act (FERPA)* rights. **Violation of these protocols may be reported to the Chair of the Accreditation Commission at: ACPE, 1549 Clairmont Road, Suite 103, Decatur, GA 30033.**

C:/ Accreditation/feasibility study/P&P: Student Records 4/15/10, Rev: 10/12/10