

## ANNUAL NOTICE/STUDENT RECORD POLICY

**CVHCS**

**CHAP SER/CPE 208  
December 2021**

**SUBJECT:** Student educational records policy

**PURPOSE:**

To assure that the CPE center maintains student records in compliance with ACPE Standards and in a manner which addresses confidentiality, access, content and custody of student records that complies with the Family Education Rights and Privacy Act (FERPA).

**POLICY:**

Students own information about them and must know what information is being collected and how it is being used. A student's information cannot be shared without their written permission. CVHCS guarantees to its students the rights 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. CVHCS shall maintain records in a manner consistent with the Guide for Student Records as appears in the ACPE *Accreditation Manual*. This ANNUAL NOTICE/STUDENT RECORD POLICY is posted on the CVHCS CPE website: <https://www.va.gov/richmond-health-care/work-with-us/internships-and-fellowships/>

**PROCEDURES:**

I. Directory Information

Directory information is student information not generally considered harmful or an invasion of privacy if released. It includes the student's name, address, email, telephone number, date of birth, previous education, religious preference and/or denomination and may include a photo. 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 the Annual Notice. Current students can restrict or opt out of the release of directory information and/or record access at any time during attendance by giving a written and signed memo to the ACPE Educator. Students are informed of their right to restrict or opt out of the release of directory information and/or record access by receiving the following in their acceptance letter: "You may choose to restrict or opt out of release of directory information and/or record by giving a written and signed memo to me. For more information on how to do this, go to <https://www.va.gov/richmond-health-care/work-with-us/internships-and-fellowships/> and read the student record policy." Restrictions will be honored even after the student's departure; however, former students cannot initiate new restrictions after departure. The student's name, address, denomination and unit of CPE successfully completed will be sent to the ACPE office on the ACPE Student Unit Report at the completion of each unit of CPE. 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.

## II. Student Record

ACPE defines a student record 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. At the end of the unit, the student record is thinned to hold only the face sheet, the signed Use of Clinical Materials Consent Form, certified educator's final evaluation, the student's response to the end of unit evaluation (if submitted), the student's self-evaluation and sometimes the student's application. If a file is incomplete, the certified educator shall document the efforts undertaken to make the file complete, noting what is missing and requests for documents from the student. A copy of the certified educator's final evaluation will be given to the student. 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. The student's record cannot contain identifiers of another student (e.g. only initials of other students are to be used in students' final evaluations).

## III. Records Management

This ACPE CPE center guarantees to its students the right to inspect and review education records, to seek to amend them and to specify control over release of record information. The student record will be kept in a locked cabinet in the CVHCS Chaplain Service Office for ten years after the end of the unit. CPE students are expected to give written consent for copies of the educator's end of unit evaluation reports (and their own if applicable) to be sent to any outside party. At the ten-year mark, the evaluations will be destroyed and only the face sheet with identification information and the signed Use of Clinical Materials Consent Form will be kept. This means that after ten years, students are responsible for maintaining their own files for future use. These records shall not be open to anyone outside the ACPE center except with the student's written request. 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 ACPE Certified Educator will consult with the ACPE Executive Director or ACPE Associate Executive Director. If the CVHCS ACPE program closes or loses its accreditation, the center certified educator or appointed designee will secure all student records and ship the records to the national office of ACPE, c/o Accreditation.

The chief of Chaplain Service is responsible to secure student records in the absence of a certified educator. Only the chief of Chaplain Service is authorized to retrieve student records with a student's written request and written authorization.

Students will be able to review their record within 45 days of their request. Record inspection cannot be denied based on the student's inability to come to our center or outstanding financial obligations. In the latter case, we will note on the copy sent, "not available for official use." Students may copy their records if given permission by the certified educator or appointed designee.

Health records (mental and physical) will be kept in locked, limited access files separate from other student records. Their use and release is also subject to ADA and HIPPA regulations. Certain safety and employment records are also subject to other federal regulations and state laws and are kept separately.

Material written by students, such as verbatim and case histories that contain information about other persons, including other students, will either be destroyed or, if they are part of the student's record, will have the identifiable information about everyone other than the student redacted.

Supervisory notes are process notes kept by the certified educator. These process notes are for the exclusive use of the Educator and are not considered a part of the student's record. They are kept separately from the student record.

#### IV. ACCESS TO STUDENT RECORD

All CPE Student Records will be kept in a locked file cabinet at CVHCS. Only education officials have access to the student records based on their role in the center. The education officials are the certified educator(s) of the CPE CVHCS center, certified educator candidates at CVHCS and the CVHCS chief of Chaplain Service. Within the center, these people may have access to student records without student consent.

Information in student records or in the certified educator's records may be considered of research value based on legitimate educational interest for selection, assessment, and evaluation of students. In this case, if another certified educator wishes to access the student file, he/she must obtain a release form signed and dated by the student. No personally identifiable material will be used for research without the student's written permission for its use.

#### V. VIOLATIONS

Violations of these protocols will be reported to the Chair of the Accreditation Commission at the following address: ACPE: The Standard for Spiritual Care and Education, We Work, Floor 4, 120 West Trinity Place, Decatur, GA 30030 (404) 320-1472