

STUDENT RECORD POLICY

A. PURPOSE

VA Northeast Ohio Healthcare System (VANEOHS) CPE Center shall maintain records in a manner consistent with the [ACPE Guide for Student Records](#). These guidelines are given to the students during the orientation phase of their CPE learning experience.

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. Every ACPE center must publicize an **Annual Notice** (see below,) outlining its protocols for the handling of student records. Written protocols must include how long records are kept, where they are kept, who is the custodian; how are they destroyed, as well as a process for a student review of their own record. Protocols must be followed consistently.

B. DEFINITIONS

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.

C. POLICY

In accordance with ACPE requirements the following policy is adhered to at VANEOHS.

- a. VANEOHS' CPE Center retains the following items indefinitely
 - i. The application face sheet
 - ii. The Use of Clinical Materials Consent Form
- b. VANEOHS' CPE Program retains the following items from the student record for ten (10) years
 - i. Certified Educator's end of unit evaluation
 - ii. The student's response to the end of unit evaluation, if submitted
 - iii. The student's self-evaluation
- c. If a file is incomplete, the ACPE Certified Educator shall document the efforts undertaken to make the file complete, noting what is missing and requests for documents from the student

D. ANNUAL NOTICE PROCEDURES

- a. Directory Information
 - i. VANEOHS CPE Program considers "directory information" to be student information not generally considered harmful or an invasion of privacy if released.

- ii. VANEOHS CPE Program defines directory information as follows: name, address, email, telephone, date of birth, religion, previous education, and photograph. VANEOHS CPE Program considers directory information able to be released without specific consent unless a student “opts out.”
- iii. All other information is released only with the student’s written, signed, and dated consent specifying which records are being disclosed, to whom, and for what limited purpose.
- iv. Before releasing information, students will receive the VANEOHS CPE Program's Annual Notice.
- v. 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.

b. Evaluations and Process Notes

- i. The VANEOHS CPE Program 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.
- ii. A copy of the CPE certified educator’s end of unit evaluation report will be given to the student. The student will be informed that the VANEOHS CPE Program 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 evaluation will be kept with the certified educator’s evaluation and subject to the same provisions. (* Note “Exceptions” below)
- iii. Students are responsible for maintaining their own files for future use. The VANEOHS CPE Program will not be responsible for keeping a permanent file of evaluation reports beyond ten years. Students will be informed at the time copies are given to them that it is their responsibility to keep copies for future use.
- iv. 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.
- v. CPE Educator Notes: The ACPE 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 in a locked filing cabinet location within the CPE Educator’s office.
- vi. *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(s) will consult with the ACPE Executive Director or ACPE Associate Executive Director.

c. Records Management

- i. 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.
- ii. VANEOHS CPE Program has written protocols for student record retention and destruction (how long records are kept, where, custodian; how destroyed), and for student review of records. These protocols are followed consistently.
- iii. If for some reason the VANEOHS CPE Program closes, the VANEOHS CPE Program's ACPE Certified Educator(s) will secure all student records of the closed program and ship the records to ACPE, c/o Accreditation. In the absence of an ACPE Certified Educator, the VANEOHS's Chaplain Service Administrative Officer will be the appointed designee responsible for securing student records.
- iv. In the absence of an ACPE Certified Educator, only the appointed designee, VANEOHS's Chaplain Service Administrative Officer, is authorized to retrieve student records with a student's written request and written authorization.
- v. The VANEOHS CPE Program shall keep educator's evaluations and student's written responses, if submitted, for at least ten years. These records shall not be open to anyone outside the CPE program except with the student's written request. (Note "Exceptions" above). After ten years, the VANEOHS CPE Program will keep the face sheet with identification information but may destroy the educator's evaluation report and the student's written response (if submitted).
- vi. Health records (mental and physical) are kept in locked, limited access files, separate from other student records. Their use and release is subject to ADA and HIPAA. Certain safety and employment records are also subject to other federal regulations and state laws and are kept separately.
- vii. Material written by students, such as verbatim and case histories that contain information about other persons, including other students, will be destroyed or, if they are part of the student's record, will have the identifiable information about everyone other than the student redacted.

- When peers are referenced in student's evaluations, only initials will be used.
- viii. Students are allowed to review their record within 45 days of a written request. Record inspection will not 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. The Annual Notice details protocols on records maintenance and should include whether/how students may copy their records.
 - ix. 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.
 - x. Students must give written permission to the use of their clinical material as well as recorded and/or live observation media pertinent to an ACPE Certified Educator Candidate's (CEC) educator's process toward certification as an ACPE Certified Educator or for an ACPE Certified Educator's Peer Review Process by signing the Use of Clinical Materials Consent Form.
 - xi. A student may revoke their authorization, in writing, to their ACPE Certified Educator, but doing so will require that they withdraw from the unit.
- d. Digital and Electronic Student Records
- i. VANEOHS CPE Program maintains student records either digitally and/or on paper, in compliance with ACPE Standards and this policy for student records management.
 - ii. Digital and Electronic student records will abide by the same storage requirements as paper records. If only digital records are kept, they will have at least one backup separate from the original hardware location. Backups will be dated and updated at least monthly or in accordance with institutional guidelines of VANEOHS.
- e. Use of Materials in Certified Educator Training
- i. Following the action of the Certification Commission, and when the time limit for appeal has lapsed, all materials submitted about students will be destroyed.
 - ii. The Certification Commission may keep on file a face sheet of the person seeking certification, copies of the Presenters' Reports, and copies of all Action Reports on the person seeking certification. Other materials should be returned to the person seeking certification.

- iii. ACPE may keep on file a copy of the face sheet, copies of all Certification Commission Presenters' Reports, and copies of all Certification Commission Action Reports.

- f. Accreditation and Research
The Use of Clinical Materials Consent Form also gives permission for a student's clinical materials to be used as data in a center's accreditation portfolio or for ACPE approved research studies without further notification to the student. All personal information in written documents will be redacted.

- g. Designation of Education Officials and Legitimate Education Interest
 - i. The education official(s) allowed to access student records are limited to the CPE Educator(s) on staff at VANEOHS. In the case of the CPE Center being without a CPE Educator, the Chaplain Administrative Officer would be given the authority to access student records for approved purposes listed below.
 - ii. The legitimate education interest for which student files can be accessed include at the written request of a CPE student (can only access her/his own file, and must state in writing to whom the education official should send the materials). For purposes of CPE Program reviews, the student records will be made accessible for the ACPE Accreditation Site Team and/or Commission upon request for limited purposes (i.e. face sheets for verification of student records).

- h. Violations of Annual Notice Protocols
Violations of Annual Notice protocols may be reported to the Chair of the Accreditation Commission at:
ACPE, Inc.
1 Concourse Parkway
Suite 800
Atlanta, GA 30328

or via email: accreditation@acpe.edu

E. REFERENCES

[Guide for Student Records - ACPE Manuals - 2020 \(manula.com\)](#)

F. RECISSION

All previous versions of VANEOHS CPE Student Record Policy are rescinded. The next review date of this policy is September 30, 2025.

G. FOLLOW-UP RESPONSIBILITY

VANEOHS Clinical Pastoral Education Certified Educator(s)

**VA NORTHEAST OHIO
HEALTHCARE SYSTEM
10701 East Boulevard
Cleveland, OH 44106**

**VANEOHS CPE 006
January 16, 2024**

/s/

Amanda Nagy
Chaplain Service Chief