

ANNUAL NOTICE FOR MAINTENANCE OF STUDENT RECORDS

Clinical Pastoral Education

POLICY:

The ACPE CPE Center shall retain student records (files) in accordance with ACPE, Inc. Standards and the Family Education Rights and Privacy Act (FERPA) regarding the collecting/gathering, sharing, storing, and release of student information. This written policy and procedure serves as the Center's written Annual Notice as required by ACPE and FERPA.

PURPOSES:

1. To secure care, privacy, confidentiality, program accountability, and appropriate accessibility.
2. To ensure the ACPE CPE Center of Lakeland Regional Medical Center adherence to FERPA, which means students own the information about them, will be informed what is being collected about them, and understand how the information is being used. Student information cannot be shared without their written permission.
3. This ACPE CPE center/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.

PROCEDURE:

I. This ACPE CPE Center 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 FERPA rights.

- A. The Center's Annual Notice is renewed annually.
- B. The Annual Notice is published in the Pastoral Services section of the Lakeland Regional Health CPE Program website and in the CPE Student Handbook.
- C. During orientation the Annual Notice is reviewed orally with students.

II. This ACPE CPE center understands and communicates to students that directory information is student information not generally considered harmful or an invasion of privacy if released. Directory information includes: name, address, email, telephone, date of birth, religion, previous education, and photograph - and can be released without specific consent unless a student "opts out."

- A. The Center utilizes some directory information, as needed (i.e. to register students with ACPE for unit credit, for intranet promotion of staff within Lakeland Regional Medical Center, etc.) 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. (See Exceptions, Section IV.,B. of this policy).
 - 1. Prior to the beginning of each unit the student registers to the www.acpe.edu to be enrolled to Lakeland Regional Medical Center CPE program, and pays the required fee to the CPE center, where the following directory information given: student's name, address, denomination, and level of unit. Within 21 days of the end of each unit the certified educator shall electronically register the student's completion using the same directory information.
 - 2. A unit report form is placed in the Lakeland Regional Medical Center Pastoral Services and CPE office in front of the files for the relevant unit or year.
- B. Before releasing directory information, students will have received the center's Annual Notice.
- C. Students are allowed to restrict directory information and/or record access at any time during attendance. Restrictions are honored even after the student's departure. Former students cannot initiate new restrictions after departure.
- D. In order to initiate restrictions, students are required to send a written, signed, dated request to Lakeland Regional Medical Center of Pastoral Services and Clinical Pastoral Education.

III. This ACPE Center understands and communicates to students that 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. Contents of student records vary as follows:

A. New Applicants: Pre-and Post-Interview files contain a face sheet and CPE application materials (autobiography, verbatim, religious developmental history, work history description, verbatim, goals and impression of CPE, any previous CPE student and certified educator evaluations, and any letters of recommendation). Records of applicants denied admission and who wish to be retained for a future unit may also include a copy of the letter of denial and a written interview summary. Otherwise applications are returned to the applicant or destroyed after decisions have been made.

B. Active Students: During review of the Annual Notice at orientation, students are made aware that application materials of students admitted and

matriculated are part of the student record. In addition to the aforementioned application materials (section A.), an active student record includes but is not limited to; authorizations to visit patients, parishioners, or clients; access to appropriate clinical records and informed consent with regard to use of student materials; training agreement regarding center's policies and procedures protecting confidentiality and the rights of clients/patients; clinical site contracts; material written by students (verbatim, case histories, reflections, etc.), audio and/or videotape recordings, and any materials relevant to the educational process. (CPE Certified Educators may keep process notes on students. These notes are for the exclusive use of the writer, not considered part of the student's record, and are kept separately from the student record).

1. Files of extended or summer units and students taking additional units will be filed in the latest training year section.
2. Files of Residents completing several units will contain a Certified Educator's and student's evaluation for each training unit. Resident units end every 4 months - December 31, April 30, and August 31.
3. Certified Educators and students will refrain from using names and identifiable information of others in the evaluation. Pseudonyms, initials, or general references are acceptable with encouragement to focus on self-dynamics and reactions.

D. Inactive Students: At the end of a training unit, files of students who have completed a unit are diminished to include only the ACPE application face sheet with additions of updated directory information, the certified educator's final evaluations, and the student's evaluations. Student's self-evaluations are due by the end of the training unit. The supervisors' evaluation is due by at least 21 days after the end of the unit.

Important Note: 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. Students may also add an addendum to any evaluation or document, indicating a disagreement.

IV. This ACPE CPE Center's records management protocols are as follows:

A. Storage/Disposal

1. All student files are kept in locked cabinets in the main Pastoral Services office on the separate room located next to the CPE classroom. Student files are stored for a minimum of 10 years, after which student records may be destroyed, except for a face sheet

with identifying information. Privacy documents are destroyed at this Center via a Secured Shredder Company.

2. Current student files and student files of completed units over the last two years are kept in the reception area, and are key accessed by only the Pastoral Services Director, Manager of CPE and the Pastoral Services and CPE Coordinator. Files dating over two years are kept in a locked file cabinet in the Manager's private office.

B. Accessibility and Release

1. The Pastoral Services Director, Manager of CPE and CPE Coordinator shall have confidential management of CPE files as part of the basic job description. Other ACPE Certified Educators at this center may access files, but only via the director, manager, or coordinator. Files must be kept confidential and returned to locked storage by the end of the workday. Should staff changes occur, the current senior management responsible for Pastoral Services would manage monitoring of files.
2. In the event that the center should cease to be without a certified educator and/or accreditation, student records will be transferred to the custody of whomever the ACPE Accreditation Commissioner shall designate in the absence of an ACPE policy directing centers to do otherwise.
3. Active students have a right to access their records at any time via the Pastoral Services Director, Manager of CPE and Certified Educator. Inactive Students will be able to review their records within 21 days of a student's request. Record inspection cannot be denied based on the student's inability to come to the site or outstanding financial obligations. In the latter case, the center will note on the copy sent, "not available for official use." When a student record contains identifiers of another student, those will be redacted. 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.
4. Each student is responsible for retaining their own records to preserve certified educators' and self-evaluations, levels of units completed, committee reports, and any application or learning process materials.
5. Students may request the center to forward evaluations to schools, denominations, or other CPE centers. (A copy of the CPE Certified Educator's evaluation will be given to students within 21 days after the unit has ended). Requests for grades or special reports must be made at the beginning of each unit, and will be deemed attachments to seminaries to the student or certified educator's evaluation. All

requests must be in writing, signed and specific. Students are responsible for retaining their own files for personal use. LRMC CPE program also keep an electronic backup copy located at the hospital system S: // Drive of which only the CPE Coordinator, and Manager of CPE have an access.

6. When student information is considered to be of research value for this center of ACPE, a release form will 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.
7. Student records will be handled within the guidelines of federal and state confidentiality laws. Safety, employment and health records (mental and physical) will be kept in locked, limited access files separate from other student records. Their use and release is subject to ADA and HIPPA. Certain safety and employment records are also subject to other federal regulations and state laws and are also kept separately.

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, this Center will consult with the ACPE Executive Director or Associate Executive Director.

V. Lakeland Regional Medical Center ACPE CPE Center defines an "education official" as all CPE Certified Educators employed and contracted by LRMC, as well as the Pastoral Services Director, Manager of CPE and CPE Coordinator. Those persons have "legitimate educational interest," which is defined as information regarding the student that is necessary for employees to carry out their responsibilities in support of the LRMC CPE educational program.

A. A person who demonstrates legitimate educational interest will use student records only in the context of official business in conjunction with the educational success of the student. Within Lakeland Regional Medical Center of Pastoral Services, persons with legitimate educational interest may have access to student records without student consent.

B. Approved members of the Professional Advisory Group, Human Resources Personnel, and staff chaplains (while not education officials) may be given temporary access to portions of student records for the purpose of admission interviews, consultation committees, and grievance/complaint processes.

C. Periodically, educational officials may seek consultation from other ACPE certified educators and appropriate professionals from other disciplines for the purpose of providing a better quality educational experience for students. On these occasions the program certified educators may share selected student

information with the consultant. Information will be limit to that which is necessary for the purpose of the consultation and steps will be taken to obscure the identity of the student.

D. Access by all the aforementioned officials and other persons is restricted where practical, and only to that portion of the student record necessary for the discharge of assigned duties. All application materials are to be kept in strict confidence.

VI. Protocols for Certified Educator Candidate/Student

A. Education officials, including Certified Educator Candidate may make audio visual recordings of their CEC practice with students for the purpose of critiquing and improving their supervisory practice, and for the purpose of ACPE certification requirements. Any recordings will be destroyed within one year unless the student(s) recorded give written permission for the center to keep the recordings for an extended time.

B. Following the action of a Certification Commission Reviewer and National Faculty Member; and when the time limit for appeal has lapsed, all materials submitted about students will be destroyed.

VII. Violations of these protocols may be reported to the Chair of the Accreditation Commission at: ACPE: The Standards for Spiritual Care and Education. 55 Ivan Allen Jr. Boulevard, Suite 835, Atlanta, GA 30308. Students also have the right to file a complaint with the Pastoral Services and Clinical Pastoral Education of Lakeland Regional Medical Center or the local Professional Advisory Group if they believe their FERPA rights have been violated.