



CLINICAL PASTORAL EDUCATION A Satellite of HealthCare Chaplaincy Network

ANNUAL NOTICE – Published January, 2018 Guide for Student Records

Association for Clinical Pastoral Education, Inc.
Standard 304.4, *Standards Manual*
Appendix 7B, *ACPE Accreditation Manual*

The *Family Education Rights and Privacy Act* (FERPA) applies to all ACPE CPE programs. FERPA addresses privacy issues. This means each CPE student owns the information about oneself and all students must know what is being collected and how it is being used. Student information cannot be shared without the student's written permission.

This ACPE CPE center guarantees to its students the rights to inspect and review education records, to seek to amend them, to specify 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.

I. Directory Information

- The Spiritual Care Departments of NYU Langone Health – Tisch, and NYU Langone Hospital – Brooklyn maintain staff, student and volunteer information in its posted directory and in the CPE student handbook.
- Directory Information is student information not generally considered harmful or an invasion of privacy if released.
- Common directory information includes: the student's name, address, email, telephone number, date of birth, religious preference and/or denomination, previous education, and photography. **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*.
- The student's name, address, denomination and unit of CPE will be sent to the ACPE office on the ACPE Student Unit Report at the completion of each unit of CPE.
- If a student wishes to "opt out" of some or all directory information, they must do so in writing, including a signature and date, in a letter to their ACPE Certified Educator as to what information specifically they want to opt out of for the directory.
- 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 restriction after departure.

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.

II. Student Record

Guidelines: A student record as any 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. Our student records are maintained by our ACPE Certified Educator or a person acting on behalf of NYU Langone Health CPE program.

ACPE requires that the CPE student record include the face sheet with directory information, the CPE Certified Educator's evaluation report and the student's own evaluation report, if submitted.

NYU Langone's records management protocols:

- Education officials maintain these files. Education officials are ACPE Certified Clinical Pastoral Educators – Certified Educator Candidates, Associate Certified Educators and CPE Certified Educators. Other education officials are the Department Secretary. The Secretary has access to student information during the application process and when keeping records according to ACPE standards. Clinical Pastoral Educators have access to student information during the educational unit as specified by ACPE standards and agreed upon by students.
- Application materials other than directory information are reviewed and discussed with Certified Educators on staff and members of the admissions committee only.
- After the candidate has been accepted, their applications and any material added during educational process are kept in locked files in the offices of the CPE Certified Educator during the course of the program. A student has the right to object to record content. If not negotiable, the written objection will be kept with the released with the record. Grades are exempted from this right.
- After the student's departure, folders are transferred to locked files kept in the office.
- The face sheet for all students enrolled and completing orientation must be kept for ten years regardless whether the student completes the unit or not
- A copy of the CPE Certified Educator's evaluation report will be given to the student. The student will be informed that the center will keep this evaluation for 10 years in the System Chaplaincy Services department, 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 Certified Educator's subject to the same provision.
- The CPE students are responsible for maintaining their own files for future use. The student records shall be kept in the office for 10 years. These records shall not be open to anyone outside of the CPE center except with the student's written request. After ten years, the center will destroy (Shredded) the student record except for a face sheet with identification information for all students completing the program.
- The CPE students are expected to give written consent for copies of the Certified Educator's evaluation reports (and their own if applicable) to be sent to their theological school, or other denomination or judicatory bodies.
- 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 material can be released in any of these circumstances, consultation must be made with the ACPE Executive Director.

- The CPE 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 should be kept separately from the student record.
- Material written by students, such as verbatims and case studies that contain information about other persons, including other students, will either be shredded or, if they are part of the student's record, will have the identifiable information about everyone other than the student redacted.
- Health records (mental and physical) must be kept in locked, limited access files separate from other student records. Their use and release is also subject to ADA and HIPPA. Certain safety and employment records are also subject to other federal regulations and state laws and are kept separately.

FERPA requires students be able to review their record within 45 days of 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, 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.

**Violation of these protocols may be reported to the Chair of the Accreditation Commission at:
ACPE, One West Court Square, Suite 325, Decatur, GA 30033.**

The center publishes *Annual Notice* annually and send to students prior to program start.