

**OHIOHEALTH
CLINICAL PASTORAL EDUCATION PROGRAM**

ANNUAL NOTICE ON THE MANAGEMENT OF STUDENT RECORDS

I. POLICY

The OhioHealth CPE Program, accredited by the Association for Clinical Pastoral Education, wants to assure our students that all student records will be managed in a professionally responsible manner with sensitivity to student rights to privacy. We are committed to helping our students understand the terminology pertaining to their privacy rights and the details of our record management protocols. We will respect the right of our students to access, review, correct, and object to information in their student record. We will respect the right of our students to request restrictions on the release of information, and their right to be informed about our procedures for the disposition of records. For these reasons this ACPE, CPE center/program guarantees to our students the right to inspect and review educational 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 Rights and Privacy ACT (FERPA) rights.

II. DIRECTORY INFORMATION

Directory information is student information not generally considered to be harmful or an invasion of privacy if released. Unless the student has submitted a written notice opting out, directory information which this center may release without the student's prior consent includes the following:

- Name
- Religious Affiliation
- Previous Education
- Dates of Application and Enrollment
- Photographs

III. STUDENT RECORD

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. Student records at this center include the following:

- Application Face Sheet
- All other materials submitted as a part of the student's application
- Student designated restrictions on the release of directory information (if any)
- Supervisory Evaluations
- Student Self Evaluations
- Written student objections to information contained in their student record
- Formal complaints filed by the student
- Formal complaints made against the student

Student requests for records to be released
Release forms giving permission to use student material (if any)
A signed acknowledgment of receiving the Annual Notice

IV. EDUCATION OFFICIALS AND OTHER PERSONNEL WITH ACCESS TO STUDENT RECORDS

A. Education officials within this ACPE center are the ACPE Certified Educators and the ACPE Certified Educator Candidates who are members of the Center's CPE faculty. These persons shall have access to student records without student consent for the purpose of supporting the student's educational process. (See "V. Legitimate Educational Interests" for an elaboration of what it means to support a student's educational process.)

B. Although they are not education officials, members of the Professional Advisory Group (PAG), or other qualified persons invited by a faculty member to participate in an application and admission process may participate by screening applications and by participating in interviews. Such persons will have temporary access to application material. Some examples of qualified persons who might be granted temporary access to student records include, but are not limited to the following: a designated representative of the ACPE Certification Commission (as required by the ACPE for applicants to certified educator CPE programs); an OhioHealth Pastoral Care Site Manager or designee from a site where a student may be placed for clinical work; or a person with expertise in an area relevant to a student's application. When serving those functions, such persons may have temporary access to application materials. Their access will be terminated once their application related duties are completed.

C. Staff chaplains may participate in admission interviews and have the same time-limited access to application materials.

D. If an official complaint/grievance is filed against the CPE Program or one of its education officials, PAG members will have access to all relevant student records for the purpose of investigating the complaint and attempting to mediate a resolution. This same access will be granted to other persons who may become involved in the complaint resolution process in accordance with the Center's policies and procedures on complaints and grievances. For example, an issue expert may be consulted, or, in accordance with ACPE Standards, a complaint may be processed by a commission of the ACPE.

E. From time to time our educational officials may seek consultation from other ACPE Certified Educators and appropriate professionals from other disciplines for the purpose of providing a better educational experience for students. On these occasions our education officials may share selected student information with the consultant. They will limit the information shared to that which is necessary for the purpose of the consultation and, whenever possible, take steps to obscure the identity of the student, unless doing so would endanger the student or others.

F. Support personnel for the CPE Program are the Administrative Assistants supporting the work of the Center's faculty and students. In that support capacity they may be involved in typing evaluations and reports, typing correspondence, filing, and submitting registration and unit completion reports to the ACPE. They may also have other access to student records when necessary to perform clerical duties in support of the CPE Center.

V. LEGITIMATE EDUCATIONAL INTERESTS

Legitimate educational interests include: processing applications; participating in admissions interviews; providing educational or clinical supervision and assisting in supervision; seeking professional consultation regarding student learning issues and educational/supervisory practices; and attempting to resolve grievances. These are examples of activities that support a student's educational process.

VI. MATERIALS WHICH ARE THE EXCLUSIVE PROPERTY OF STUDENTS AND CENTER FACULTY

A. Material written by students-- such as verbatims and case histories which contain information about other persons or other students-- are not part of the student record. They belong to the student and he or she is responsible for managing that material in a professionally responsible manner. This includes taking steps to obscure the identity of all other parties discussed in the material.

B. Any notes on students and their peer group processes that are kept by a faculty member, a Certified Educator Candidate, or a student mentor are for the exclusive use of the writer and are not considered a part of the student's record. They are kept separate from the student's record and the writer is responsible for managing that material in a professionally appropriate manner.

VII. DETAILS OF OUR RECORD MANAGEMENT PROTOCOLS

A. 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.

B. Information about the student including name, gender, faith group affiliation, type and level of CPE unit, and the beginning and ending dates of the unit will be collected from students by the ACPE when students enroll in their units with the ACPE. When the unit is successfully completed, credit for the unit will be recorded with the ACPE by the student's certified educator.

C. The permanent storage of student (hard copy) information is restricted to the OhioHealth CPE offices within the host center on the Riverside Methodist Hospital campus. Additionally, electronic copies may be kept on a secure, password-protected OhioHealth data storage site. Faculty members including ACPE Certified Educators and Certified Educator Candidates may keep records of their current students in their own offices during the period of time in which they are providing supervision for the student.

D. The security of hard copy student records is maintained by keeping them under lock and key. Only the Center's faculty and Administrative Assistant have access to the key.

E. The security of electronic student information files and student records is maintained by keeping them on an OhioHealth secure password-protected data storage site. Only the CPE faculty and Administrative Assistant have access to the password.

F. If the OhioHealth CPE Center closes, the Chair of the Accreditation Committee for our area will arrange for the secure storage of all student records of the closed center. The Chair of the ACPE Accreditation Commission and the ACPE office will be informed of the records' location.

G. The OhioHealth CPE Center will honor restrictions on releasing directory information, as designated in writing by the student. These will be honored even after the student's departure with the following exceptions:

- To protect the health or safety of the student or others
- For purposes of accreditation or compliance review
- As required for legal processes

Note: Prior to releasing information in any of the aforementioned circumstances, the center will consult with the ACPE Executive Director.

H. Former students cannot initiate new restrictions after their departure from the CPE Center.

VIII. RIGHTS TO ACCESS AND REVIEW RECORDS AND REGISTER OBJECTIONS OR MAKE CORRECTIONS

A. Access to student records is restricted to students, education officials and support personnel within the CPE Center for the purpose of supporting the Center and the student's educational process. Limited access may be granted to educational consultants, and to PAG members involved in the resolution of a student grievance.

B. Students may request an appointment with the CPE Program Manager, or with their individual certified educator to review their records. Such requests will be honored within 45 days of receiving the request.

C. Students will have access to their records regardless of their ability to be on site, and without regard to any outstanding financial obligations that may exist.

D. Students may not copy their records, but the CPE program will provide a copy at the student's written request.

E. A student has a right to object to the content of their records. If not negotiable, the written objection will be kept with and released with the record. Grades are exempt from this right. If errors are found in student records they will be corrected.

IX. DISPOSITION OF RECORDS

A. The application material of students not accepted into a CPE program will be destroyed and/or permanently deleted from electronic storage within 60 days of the beginning of the program to which they applied.

B. It is the responsibility of students to keep copies of their own records (including and especially copies of evaluations) for their own future use.

C. A student's written request to release his or her records must give explicit consent for the release. It must specify which records are to be released and to whom, and for what limited purposes. The request must also be signed and dated.

D. When the student's record contains identifiers of another student, those will be redacted.

E. After ten years, the center may destroy and/or permanently delete the student record. However, the center will retain the face sheet with identifying information and documentation of any special restrictions to the release of directory information designated by the student.

F. This Center does not send evaluations to potential employers. Students may send their evaluations to any party they choose.

G. With the written consent of students this center will send copies of their supervisory and self evaluations directly to their theological schools.

H. If anything in student records, or in an ACPE Certified Educator's records is considered to be of research value, and a CPE center or ACPE desires to collect and use such material for research, a release form shall be made available for the student's signature. No personally identifiable material will be used for research without the person's written permission for its use.

X. ADDITIONAL PROTOCOLS FOR STUDENT RECORDS RELATED TO THE CPE EDUCATOR CERTIFICATION PROCESS AND/OR PEER REVIEW

A. Education officials, (see IV, A.) may make audio-visual recordings of their supervisory practice with students for the purpose of critiquing and improving their supervisory practice, and for the purposes of certification and peer review requirements as established by the ACPE.

B. Certified Educator Candidates must have written permission from their students to use their clinical material as well as recorded and/or live observation media pertinent to their certification process. Only the consent form required by the ACPE will be acceptable for this purpose. When OhioHealth is accepting an applicant into a CPE program or unit, a copy of the required consent form will be sent to them along with a training agreement. To be formally accepted into the program/unit, both documents must be signed and returned by the designated date.

C. The ACPE requires certified educator students to maintain a portfolio that includes some records of their work with level IA-IIB students, including audio-visual recordings. This Portfolio is required to be kept electronically on a secure password-protected site approved by the ACPE. The portfolio belongs to the certified educator student and he or she is responsible for protecting that information.

D. Certified Educators in the ACPE are required to undergo periodic peer reviews for the purpose of maintaining and developing professional competency. When a peer review occurs the certified educator will upload relevant material and student records (including audio-visual recordings) to their ACPE portfolio. Once the review has been completed, audio-visual recordings and other student materials will be deleted before their next peer review.

E. Following the action of a regional certification committee or the Certification Commission, and when the time limit for appeal has lapsed, all materials submitted to the Committee/Commission about students will be destroyed.

F. Exceptions to the guidelines in C. and D. above will not be made without the written consent of all students referred to in a particular student record.

G. The Certification Commission of the ACPE may keep face sheets, presenter reports, and committee action reports regarding students in the certified educator process.

XI. VIOLATIONS OF THESE PROTOCOLS MAY BE REPORTED TO THE CHAIR OF THE ACCREDITATION COMMISSION AT:

ACPE, Inc.
1 Concourse Parkway, Suite 800
Atlanta, GA 30328