Annual Notice Concerning Student Records Revised February 2024

In accordance with ACPE 2020 *Standards*, the Clinical Pastoral Education program at the Riverside Regional CPE Center (RRCPE) hereby publicize an Annual Notice that it maintains students records in a manner that addresses privacy, access, content, and custody of student records should the center be without an ACPE Certified Educator and/or ACPE accreditation.

Policy

The RRCPE maintains ACPE student records in compliance with the ACPE Standards. The RRCPE guarantees to its students the right to inspect and review educational records, to seek to amend them, to specify control over the release of their information. 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. Violations of Annual Notice protocols may be reported to the Chair of the ACPE Accreditation Commission at: ACPE, Inc. 1 Concourse Pkwy, Suite 800, Atlanta, GA 30328 T: (404) 320-1472, www.acpe.edu

Definitions

- <u>Student Record</u>: a student record is any record (paper, electronic, video, audio, biometric etc.) directly related to the student from which their identity can be recognized and maintained by the RRCPE or a person acting as a representative of the RRCPE program.
- <u>Directory Information</u>: the RRCPE considers the following items to be directory information, which can be released without specific consent (unless a current student chooses to restrict or "opt out" in writing): the student's **name**, **photograph**, **address**, **e-mail**, **telephone number**, **religious affiliation**, **previous education**, **and units of CPE successfully completed**. 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. Before releasing information, students must have received the Annual Notice.
- ACPE Certified Educator Faculty: At this center, this term for "education official" includes all ACPE Certified Educators or Administrative Assistant of the Department of Spiritual Care who are employed by or serving under contract.

Procedures

- 1. Students who are currently enrolled in ACPE training at this center may restrict directory information or record access at any time during their attendance. To "opt out," the student can restrict directory information, and/or record access, by submitting specific restrictions in writing to the ACPE Certified Educator. Restrictions will be honored even after the student's departure. Former students cannot initiate new restrictions after departure.
- 2. At the conclusion of a unit of CPE training with the RRCPE, a student unit report is registered with the ACPE office, which gives the student's name, gender, religious affiliation, ministry category and the successful completion of a whole or half unit program of CPE. The following materials are retained in the RRCPE file for the ACPE program:
 - (a) A copy of the ACPE Certified Educator's Final Evaluation with coversheet, for 10 years
 - (b) A copy of the student's Final Evaluation, for 10 years
 - (c) ACPE Application Face Sheet, indefinitely
 - (d) The Use of Clinical Materials Consent Form, indefinitely.

- 3. Other than the student's self-evaluation, a student's written materials, such as verbatim reports and case studies, will be destroyed at the conclusion of the CPE program, unless the student authorizes an exception in writing.
- 4. Students shall be notified that they are responsible for maintaining their own files for future use. The CPE program shall maintain records either digitally or on paper, in compliance with ACPE Standards and the center's policy in a locked file, or in a secure electronic format, for a period of ten (10) years and after that date the records may be destroyed except for the ACPE application face sheet and the Use of Clinical Materials Consent Form. Digital and Electronic student records have the same protocol as paper records for storage requirements. Because of their involvement in administering the CPE program, the ACPE Certified Educators on the faculty, a CPE program administrative assistant, and current members of the Professional Advisory Group are the only personnel who have access to the locked/secure student files.
- 5. The law provides for certain exceptions concerning the release of information to protect the health or safety of the student, for the purpose of accreditation review or a complaint or appeal involving that student or as otherwise permitted and required for legal processes. Before releasing material in any of these circumstances, ACPE Certified Educator staff will consult with the ACPE, Inc. Executive Director or Program Director.
- 6. Material written by students, such as verbatims 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. When peers are referenced in student's evaluations, only initials should be used.
- 7. If a component site of the RRCPE closes or a component site Certified Educator leaves, records will continue to be maintained by the System Center office, under the supervision of the other ACPE Certified Educators in the System Center. If the System Center closes, or loses its accreditation, the national ACPE Office will secure all student records of the closed program.
- 8. Students will be able to review their record within 45 days of their request. Records 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 can note on the copy sent, "not available for official use." When a student record contains identifiers of another student, those must be redacted.
- 9. If a student believes that these protocols have been violated, a written and signed complaint may be submitted to the Chairperson of the ACPE Accreditation Commission:

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10. Questions about this policy may be directed to any RRCPE ACPE Certified Educator.