

ACPE Required Policy

Annual Notice Regarding Student Records

This document is posted on the HSL CPE website, referred to on the information sheet about each unit of CPE, included in the Student Handbook, and is reviewed during Orientation.

The *Family Education Rights and Privacy Act (FERPA)* applies to all ACPE CPE programs. *FERPA* addresses *privacy* not *confidentiality* issues. This means students own the information about them and must know what is being collected and how it is being used. Their information cannot be shared without their written permission.

A student record is: any record (paper, electronic, video, audio, biometric etc.) (1) 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.

Note: Application materials of students admitted and matriculated are part of the student record.

Directory Information is student information not generally considered harmful or an invasion of privacy if released. At HSL this information includes name, address, email, telephone numbers, religion, and summary of previous education and work history. A student may opt out of having this information released by signing, dating, and returning to the CPE Educator documentation of such.

Before the center releases information, students must have received the *Annual Notice*.

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.

With this notification, the student's name, address, denomination, and unit of CPE successfully completed will be sent to the ACPE office on the student unit report at the successful completion of each full or half unit of CPE.

Student Record: ACPE requires that the CPE student record include the face sheet with directory information, the CPE Educator's final evaluation report and the student's own final evaluation report.

A copy of the CPE Educator's final evaluation report will be given to the student. The student will be informed that the center will keep this evaluation for a minimum of ten years, and will release a copy of this document only with written permission from the student. Similarly, the student will be informed that the center will keep the student's final self

evaluation for a minimum of ten years, and will release a copy of this document only with written permission from the student. (Note “Exceptions” below.)

Students are responsible for maintaining their own files for future use. The center will not keep a permanent file of evaluation reports. Students will be informed at the time copies are given to them that it is their responsibility to keep copies for future use.

CPE students are required to give written consent if they wish for the center to send copies of the Educator’s evaluation reports (and their own, if applicable) to their theological school and/or denomination.

After ten years, the final evaluations may be removed from the record, and the Student Record will consist of the application face sheet only.

Supervisory Notes: The CPE 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.

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 will consult with the ACPE Executive Director.

In accordance with FERPA, a student is able to review their record within 45 days or less of their request, and may make one Xerox copy of the record at HSL. Requests must be made in writing, not by phone, fax, email, or conversation. Record inspection will not be denied based on the student’s inability to come to the site or on outstanding financial obligations. In such cases, 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. Grades are exempted from this right.

At HSL, support staff for the CPE program may have access to student records for the purposes of administration only, and subgroups of the Professional Advisory Committee focusing on curriculum and program improvement may have access to student records acting in their roles as educational officials with a legitimate education interest.

Records Management: Students’ health records are kept in locked files separate from other student records. Signed Agreements for Training, Receipts of Policies and Procedures, and Enrollment and Exit Data forms are kept for 6 years or until the next accreditation site

review. Health records; application essays;; and all other documents held by the CPE office during a student's CPE program related to institutional onboarding and CPE program orientation are disposed of/deleted six months after the conclusion of the student's program at HSL. Signed permissions for an educator to film their work with a student or students are destroyed only when the educator has completed the peer review consultation(s) involving the film.

Beyond that kept in the Student Record, or in Supervisory Notes, or released with permission by the student to the educator for educational purposes, all other written or digital work relating to a student is disposed of/deleted six months after the completion of the unit about which the material is related.

Should the CPE center be temporarily without an ACPE certified educator, the director of Spiritual Care Services is responsible for securing CPE student records and is the only person authorized to retrieve student records in response to a student's written request.

Should the CPE center close, its certified educator or appointed designee will secure all student records and ship them to the national ACPE office, c/o Accreditation.

Digital Records: HSL is moving from paper to digital record keeping, a process expected to be completed during 2022.

Compliance with ACPE Standards and this policy apply to records stored in both media. HSL's IT system has a weekly back-up.

Violations of these protocols may be reported to the Chair of the Accreditation Commission at: *ACPE, 55 Ivan Allen Jr. Blvd., Suite 835, Atlanta GA 30308.*

Date last reviewed: 12/21 Hb 22 Annual Notice and Student Records