

Annual Notice

Guidelines for Student Records

Association for Clinical Pastoral Education, Inc., Standard 304.4, *Standards Manual*
See also 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. Under FERPA:

NewYork-Presbyterian Department of Pastoral Care and Education, as an accredited ACPE 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 Family Education and Privacy Act (FERPA) rights.

I. Directory Information:

The NYP Department of Pastoral Care and Education maintains Staff, Student and Volunteer information in its posted directories in each campus office and in the CPE Student Handbook, Section V, Site-Specific Procedures and Directories.

Directory Information is student information not generally considered harmful or an invasion of privacy if released. Note:

A. Common directory information includes: name, address, email, telephone, date of birth, religion, previous education, and photograph. 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.

B. 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 supervisor as to what information specifically they want to opt out of for the directory.

Under FERPA, 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.

C. 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.

D. Subject to 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 completion of each unit of CPE.

II. NYP Department of Pastoral Care and Education Student Records Management Protocols:

Violations of these protocols may be reported to the Chair of the Accreditation Commission at: ACPE, 1549 Clairmont Road, Suite 103, Decatur, GA 30033.

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

Guidelines: 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. Note:

A. A copy of the CPE supervisor'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 Department of Pastoral Care and Education office at the Columbia University Medical Center, 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 supervisor's subject to the same provisions. 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.

NYP Department of Pastoral Care and Education educational officials maintain these files. Educational officials are Pastoral Educators – ACPE Certified Clinical Pastoral Educators – candidates, associates and CPE supervisors. Other education officials are the clinical pastoral education registrars. Registrars have access to student information during the application process and when keeping records according to ACPE standards. Pastoral Educators have access to student information during the educational unit as specified by ACPE standards and agreed upon by students.

B. Students are responsible for maintaining their own files for future use. The center will not keep a permanent file. All face sheets and evaluations are destroyed (shredded) after 10 years. It is the student's responsibility to keep copies for future use.

C. CPE students are expected to give written consent for copies of the supervisor's evaluation reports (and their own if applicable) to be sent to their theological school, or other denominational or judicatory bodies.

Exceptions for release of information: 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 or Associate Director.

D. The CPE Supervisor 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.

E. 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.

F. Health records (mental and physical) will 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.

G. 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.

Thank you for your attention to this important notice.
The NYP Department of Pastoral Care and Education