MAINTENANCE OF STUDENT RECORDS

I. PURPOSE
To assure that the CPE Program maintains student records in a manner consistent with the Family Education Rights and Privacy Act (FERPA) and ACPE Standards and which addresses confidentiality, access, content, and custody of student records should the center be without an Educator and/or accreditation.

II. 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, this center will consult with the ACPE Executive Director or ACPE Program Manager.

III. POLICY STATEMENTS
IU Health CPE Program shall maintain records in a manner consistent with the “Guidelines for Student Records” as appears in Appendix 7B, ACPE Accreditation Manual.

ANNUAL NOTICE
1. This ACPE CPE center/program 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.

2. Directory Information is student information not generally considered harmful or an invasion of privacy if released. At IU Health directory information includes name, address, email, telephone number, 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.

- Before releasing information, students must have received the Annual Notice. At IU Health, the Annual Notice is published on the IU Health webpage at http://iuhealth.org/education/clinical-pastoral-education/.
- 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.

3. 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. The Center must retain the Certified Educator’s evaluation of the student and the student’s self-evaluation for 10 years. The Application Face Sheet of students admitted to the program are part of the student record and must be kept indefinitely. At the ten-year review, site visitors will reconcile the report of student units with the face sheets.

4. 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.

5. Certified ACPE Educators, Associate Educators, Certified Candidates, and Students in Certified Education are considered education officials and the only authorized personnel who have access to student records without student consent.

- At the time of receipt of an application for a CPE program at IU Health, there is a “legitimate Education interest” for the CPE Professional Advisory Group member and/or staff chaplain participating in an individual’s admissions interview to have access to any application materials, including any CPE Evaluations included in the application materials without student consent.
- For those students applying but not accepted, the application materials will be shredded with the exception of the face sheet.

6. Violations of these protocols may be reported to the ACPE Program Manager and Chair of the Accreditation Commission at: ACPE, 55 Ivan Allen Jr. Boulevard, Suite 835, Atlanta, GA 30308, Decatur, Georgia 30030

7. IU Health is a teaching hospital, and ACPE is an educational program which takes seriously an on-going process of quality improvement. As such, IU Health Clinical Pastoral Education Students must give written permission for the use of their clinical material and recorded and/or live observation media pertinent to the CEC’s, Associate Educators, and Certified Educator’s process toward certification as a Certified ACPE Educator or for maintaining current certification by certified educators. A signature on the document, Use of Clinical
Materials Consent Form, is required prior to accepting a position in the ACPE program at IU Health. Only the official form from the ACPE website (www.acpe.edu) is acceptable for obtaining students’ written permission to use personally identifiable material. Students being accepted into a unit of CPE are to review and sign the Consent Form prior to formal admission to a Clinical Pastoral Education Program or a unit of CPE Level I/Level II and prior to each subsequent unit.

IV. PROCEDURES
A. Student files for all IU Health CPE Programs will be maintained in the system administrative office of the IU Health CPE Program. Student files are kept in a secure location and are kept in locked file cabinets.

B. The official record of the student consists of a face sheet with identification information, the CPE Educator’s and student’s evaluation report, ACPE Final Evaluation Coversheet, and any response to the evaluation that the student wishes to submit to become part of the official evaluation.

C. A copy of the CPE Educator’s evaluation report will be given to the student. The student will be informed that the center will keep this evaluation for a specified period of time, and it will not be available to anyone else except with written permission from the student. The student’s self-evaluation and any written response to the final evaluation will be included with the Educator’s evaluation and the ACPE Final Evaluation Coversheet. All will be kept with the Educator’s evaluation as one document and subject to the same provisions.

D. In keeping with FERPA guidelines, CPE students are required to give written consent for copies of the evaluation reports to be sent to their theological school or denominational officials in addition to any other requests for submission of evaluations.

E. Students are responsible for maintaining their own files for future use. The center will not keep a permanent file or evaluation reports beyond 10 years. Students will be informed at the time copies are given to them that it is their responsibility to keep copies for future use.

F. Certified Notes: The ACPE 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.

G. At the beginning of each unit of CPE, each student will enroll with the ACPE office through the ACPE website, https://www.acpe.edu/ACPE/My_ACPE/For_Students/Enroll_in_CPE_Unit/AC
Within one week of the beginning of the unit. Information requested includes:

1. The Area where the unit was conducted
2. Name of the accredited CPE center
3. Name of the Educator
4. The student’s name
5. Level of CPE program (Level I, Level II, or Certified CPE)
6. The student’s gender
7. Category of the student (e.g., seminary student)
8. The student’s denomination and/or faith group
9. The beginning and end dates of the unit

H. Within 21 days of the conclusion of the unit, the CPE Educator will register the student unit on the ACPE website. At that time the Educator will identify the following:
   ○ Type of unit (Standard or Extended)
   ○ Credit earned (0 credit, 1 unit, ½ unit)
   ○ Unit end date

This is a permanent record certifying that the CPE Unit was conducted and successfully completed; in the case of individuals who withdraw from the program without completion of required clinical and educational hours for one unit or one half unit, zero credit will be given.

I. Records Management:
   1. In the event that the Clinical Pastoral Education program should cease to exist, the center Educator or appointed designee secures all student records of the closed center and ships the records to ACPE, c/o Accreditation.
   2. IU Health CPE Program student files will be maintained for a period of ten (10) years. After ten years, the center will destroy the student record except for a face sheet with identification information and the Use of Clinical Materials Consent Form which will be maintained in perpetuity. These records shall not be open to anyone outside the CPE center except with the student’s written request. (Note “II. Exceptions” above).
   3. Health records (mental and physical) are kept in locked, limited access files separate from other student records. Their use and release is also subject to ADA and HIPAA. Certain safety and employment records are also subject to other federal regulations and state laws and are kept separately.
   4. Materials written by students, such as verbatim 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.
J. FERPA requires students be able to review their record within 45 days of student’s request (may be less). 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 identities of another student, those must be redacted.

V. REFERENCES/CITATIONS
   ACPE Standards

VI. APPROVAL BODY
   The IU Health CPE Faculty

VII. APPROVAL SIGNATURES

___________________________________  ___________
Chair of the Professional Advisory Committee  Date

___________________________________  ___________
Jay D. Foster  Date
Vice President of Spiritual Care, Chaplaincy, and Congregational Partnerships

___________________________________  ___________
Anastasia, Holman  Date
Manager of Clinical Pastoral Education for IU Health System Center

VIII. DATES
   Approval Date:  June 8, 2011
   Effective Date:  July 1, 2011
   Revision Dates:  February 23, 2016, April 2017, September, 2018; June 1, 2019