

## **Annual Notice for Family Education Rights and Privacy Act (FERPA)**

This ACPE-accredited CPE Center at Lankenau Medical Center (LMC), Main Line Health (MLH) 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.

Directory information: It is not the practice of the Spiritual Health and Education Department at LMC MLH to maintain a published student directory. Addresses, phone numbers, or email addresses are not shared without permission with the exception of ACPE when registering Student units, which the Student participates in entering that data. Directory Information is student information not generally considered harmful or an invasion of privacy if released.

The definition of student records: 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.

Application materials are subject to particular state privacy laws for their retention, use and destruction.

The CPE Program must retain the following items from the student record for ten (10) years: Educator's evaluation report; the student's self-evaluation report; the ACPE clinical consent form, and the application face sheet must be retained indefinitely.

The CPE Program shall keep student records in locked drawers in the ACPE Certified Educator's office or in password protected electronic files accessed only by the ACPE Educators. These records will be under the custody of the ACPE Certified Educator for at least 10 years. These records shall not be open to anyone outside the CPE Program except with the student's written request. After 10 years, the CPE Program may shred the student record except for a face sheet with identification 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.

Students have responsibility to maintain their own files for future use; the CPE Program will not be expected to keep a permanent file or evaluation reports. Students are informed at the time copies are given to them that it is their responsibility to keep copies for future use.

Onboarding Health records (mental and physical) must 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. These records are kept within the Human Resources (HR) Department for employee clearances required for students to be engaged in clinical visits.

As long as student records are kept they must be handled in keeping with Federal and State laws, being available only to the CPE student, the CPE Program and HR Representatives, and others on written request of the student.

Material written by students, such as verbatims and case histories which contain information about other persons or other students will either be destroyed or, if they are part of the student's record during the unit, will have the identifiable information about everyone other than the student redacted.

FERPA requires students be able to review their record within 45 days of student's request (may be less). Record inspection will not be denied based on the student's inability to come to the site or outstanding financial obligations. In the latter case, the center will note on the copy sent, "not available for official use." When a student record contains identifiers of another student, those must be redacted. Students are only able to photocopy their records using the Spiritual Health and Education Department's copier in the office areas.

If the CPE Program was to close and no longer function, the Certified Educator or appointed designee secures all student records of the closed program and arrange with the ACPE national office, c/o Accreditation, for records to be stored.

The ACPE Certified Educator may keep process notes on a student. These process notes are for the exclusive use of the writer for research and study, and are not considered a part of the student's record. They should be kept separately from the student record.

The education officials with access to the student records include only the ACPE Certified Educator, the administrative assistant supporting the CPE Program, and Spiritual Care Coordinator,

for purposes of legitimate interests such as use during the admissions process or sending out written evaluations with the written permission of the student or for purposes of writing recommendations for future study. These people within this CPE Center have unlimited access to the student records without student consent.

Violations of these protocols may be reported to the Chair of the Accreditation Commission at: ACPE Inc., 1 Concourse Pkwy, Suite 800, Atlanta, GA 30328.

Currently there is not a CEC engaged in the certification process with the Lankenau Medical Center program. However, as a CEC-accredited ACPE Program, Students in the Lankenau Medical Center CPE program must give written permission to the use of their clinical material as well as recorded and/ or live observation media pertinent to the supervisor's process toward certification as an ACPE Certified Educator by signing Appendix 5 Consent Form, ACPE 2020 Certification Manual. Only the Appendix 5 Consent Form 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 Appendix 5 Consent Form prior to formal admission to a Clinical Pastoral Education Program or a unit facilitated by an ACPE Certified Candidate. See ACPE 2020 Certification Manual, General Certification Policies. Following the action of a certification committee or the Certification Commission, and when the time limit for appeal has lapsed, all materials submitted about students will be destroyed. A certification committee and the Certification Commission may keep on file a face sheet of the person seeking certification, copies of the Presenters' Reports, and copies of all Action Reports on the person seeking certification. Other materials should be returned to the person seeking certification. ACPE may keep on file a copy of the face sheet and certification committee Action Reports, copies of all Certification Commission Presenters' Reports, and copies of all Certification Commission Action Reports. Research: If information in student records or in a CPE Educator's records is considered 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 person's signature. No personally identifiable material will be used for research without the person's written permission its use.