



## **Our Lady of the Lake Health Clinical Pastoral Education (CPE) Program**

### **Annual Notice**

**I. 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.**

### **II. FMOLHS Directory information and how to opt out:**

**Directory information is student information not generally considered harmful or an invasion of privacy if released.** OLOL Health CPE directory information includes name, address, email, telephone, religion, previous education, and photograph. This information is sometimes published in the hospital newsletter at the beginning of a CPE program. Students may opt out completely from having directory information disclosed. Students may also choose to review and select directory information that is acceptable to the student for release. 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 this 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.

### **III. 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.**

### **IV. Our Lady of the Lake Health record's management protocols.**

ACPE requires that:

1. The center retains the following items indefinitely:
  - The application face sheet
  - The Use of Clinical Materials Consent Form
2. The center retains the following items from the student record for 10 years:
  - a. The Certified Educator's end of unit evaluation.

- b. The student's response to the end of unit evaluation, if submitted
- c. The student's self-evaluation.

Note: Application face sheets for students who are not accepted into the CPE program are kept indefinitely by the center. The written materials are destroyed per the HIPAA Guidelines of Our Lady of the Lake Health

**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.**

The ACPE educator will give each student the opportunity to write an addendum to the Educator's evaluation. This addendum is attached to the evaluation and is released with the evaluation when a proper release request has been received.

A copy of the ACPE educator's evaluation report will be given to the student within 21 days of completion of CPE unit. The student will be informed that the center will keep this evaluation for a minimum of ten years, 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 educator's subject to the same provisions.

Time Extension for Educator's Evaluation per ACPE Standards. Educator's evaluation will be available to the student within 21 calendar days of the completion of the unit. To extend this deadline in rare, unusual circumstances, the educator may negotiate with the student and receive approval from the regional accreditation chair to extend this deadline. The educator's evaluation will document this process, and such instances must be reported on the next annual report.

#### **V. Education Officials and Legitimate Education Interest.**

Only Educational Officials (ACPE Certified Educator/ACPE Certified Associate Educator) will have access to student files for educational purposes without student consent. An example of a legitimate educational interest includes a ACPE educator accessing the application/biographical information of a student who is being supervised at the time by the ACPE educator. In addition, the CPE administrative registrar, secretary or assistant, charged with assisting with the custodial care of the CPE student records will also have access to the student files without student consent.

#### **VI. Violations of Annual Notice protocols may be reported to the Chair of the Accreditation Commission at: [ACPE Inc., 1 Concourse Parkway, Suite 800 Atlanta, GA 30328 Telephone: \(404\) 320-1472](#)**

*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 for its use.

A directory of student information will be provided within the department. Directory information will include your name, address, email, telephone, date of birth, and photograph. Other information could include religion and previous education. *All other information is released only with your written, signed, dated consent specifying which records are being disclosed, to whom, and for what limited purpose.*

- You have the option to restrict directory information and/or record access at any time during attendance.
- At the completion of each unit, your name, address, denomination and unit of CPE successfully completed will be sent to the ACPE office on the student unit report.
- “Opt Out” – If you do not wish to share the above directory information, you have the option to “opt out.” If you wish to “opt out” your information, please sign and return the bottom portion of this form to the Pastoral Care Executive Assistant.

## 1. Student Record Guidelines:

*(The student record is defined as: Any record (paper, electronic, video, audio, biometric etc.) directly related to the student from which the student’s identity can be recognized; and maintained by the education program/institution or a person acting for the institution.)*

*See ACPE 2020 Accreditation Manual, Appendix 7B Requirements for Student Records.*

- Application materials of students admitted, matriculated and completing orientation are part of the student record.
- The student record kept at this center will include a face sheet with directory information, the educator’s evaluation report(s) and the student’s own evaluation(s) report, if submitted.
- CPE students are expected to give written consent for copies of the educator’s evaluation reports (and their own if applicable) to be sent to their theological school.
- A copy of the CPE educator’s evaluation report will be given to the student and will not be available to anyone else except with written permission from the student.
- Students are responsible for maintaining their own files for future use. This center will not keep a permanent file or evaluation reports. Student records will be kept at this center for ten (10) years. After ten (10) years, this center will only keep the student’s face sheet.
- In the circumstance that this center had to close, the area accreditation chair would arrange the secure storage of all student records. The Accreditation Commission Chair and the ACPE office will be informed of the records’ location.
- **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 exempt from this right.**

### Records Management:

- Student records will be kept in a locked filing cabinet within the department and will be accessible to those deemed as “educational officials” at this center. These individuals may have access to student records without student consent for \**“legitimate education interests.”* This includes the following people:
  - 1) Clinical Pastoral Education Director
  - 2) CPE Educator(s)

- 3) Administrative Assistant of the Pastoral Care Department/CPE has access to student records for record management purposes and submitting student unit reports.

**\*Note** – “legitimate education interests” include accessing student record information for the enhancement of the student’s education and for the purpose of writing student evaluation reports.

- 2. Violations of these protocols may be reported to the Chair of the Accreditation Commission at: *ACPE Inc., 1 Concourse Parkway, Suite 800 Atlanta, GA 30328 Telephone: (404) 320-1472.***

*Please sign and date the below acknowledgement form and return to the CPE Educator or the Administrative Assistant*

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**Student Acknowledgement of the Annual Notice / Consent to “Opt Out”**

**I have been given a copy of the *Annual Notice*, have read, and understand the contents within the document.**

\_\_\_\_\_ I give consent to publish my directory information.

\_\_\_\_\_ I **DO NOT** give consent to publish my directory information.

\_\_\_\_\_ I give consent for **LIMITED** access to my directory information.  
*(Please provide in the space below the information you wish included.)*

Student Name \_\_\_\_\_

Student Signature \_\_\_\_\_ Date \_\_\_\_\_