

## **OVERLOOK MEDICAL CENTER CPE PROGRAM ANNUAL NOTICE**

Overlook Medical Center CPE Program maintains chaplain intern records (digital or on paper) and provides Annual Notice of the policy prior to the program start, in compliance with ACPE standards and the center's policy for student records management. Digital and electronic student records have the same storage requirements as paper records. This message is to notify you about the policy, which can be found in the Student Handbook under:

### Maintenance of Student Records.

1. This ACPE CPE center/program guarantees to its students the right to inspect and review education records, to seek to amend them, to specify control over release of record information.
2. Directory Information consists of the *CPE student's name, address, email, and telephone number, date of birth, religion, previous education, and photograph*. Because this is not considered harmful or an invasion of privacy if released for professional utility this information will be released without specific consent unless a student "opts out". The CPE student may opt out by notifying the CPE Certified Educator to complete documentation related to Directory Information. If the information is too restricted to effectively participate in CPE, the student may need to withdraw from the CPE unit. No information will be released until the student has received, read and signed this Annual Notice before or on the first day of class.
3. 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.
4. Current students can restrict directory information and/or record access at any time during participation in CPE. Restrictions must be honored even after the student's departure. Former students cannot initiate new restrictions after departure.
5. The CPE Student Record consists of (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) any record about the student maintained by the education program/institution or a person acting for the institution.

The ACPE requires that:

- a. The application face sheet be retained indefinitely.
- b. The center must retain the following items from the student record for ten (10) years:
  - Certified Educator's End of Unit Evaluation
  - Student's End of Unit Evaluation
  - Student's response to the End of Unit Evaluation, if submitted.

6. 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. When peers are referenced in student's evaluations, only initials or an unidentifiable metaphor, etc. should be used.
7. Health records (mental and physical) must be kept in locked, limited access files, **separate** from other student records. Their use and release are subject to ADA and HIPAA. Certain safety and employment records are also subject to other federal regulations and state laws and are to be kept separately.
8. 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.
9. Access to the student files are restricted to the ACPE Certified Educator, and Certified Educator Candidates (CECs). Occasionally members of the CPE Professional Advisory Group participate in applicant interviews. They will have temporary access to the applicant's materials in preparation for their interview, and the applicant will be notified. Each of these individuals' functions either as an "educational official" (ACPE Certified Educator, Certified Educator Candidate) or have a "legitimate education interest" (the members of the CPE Professional Advisory Group).

The Spiritual Care Manager is authorized as the "appointed designee" in the event the Certified Educator is unavailable, to authorized to retrieve student records with a student's written request and written authorization.

**Records Management:** The protocols for student record retention and destruction for the Overlook Medical Center CPE Program is, as follows:

1. The Overlook Medical Center CPE Program manages Student Records carefully. Student Paper Records prior to 2020 are in locked files in the CPE Coordinator's/ Certified Educator's Office. As of 2020, all new records and files are preserved electronically. All records and files are confidentially maintained on the Certified Educator's secure computer system and confidential backup. We are converting all paper records to electronic formats.
2. The Student Record is kept for ten years. These Student Records shall not be open to anyone outside the CPE center except with the students' written request. CPE students are expected to provide the educator's end of unit evaluation reports (and their own if applicable) to any outside party.
3. The entire contents of the paper Student Record will be shredded in the hospital shredder/confidential disposal after ten years except for the ACPE Face Sheet. Electronic records are not deleted after ten years.
4. A CPE Student is allowed to review their record within 45 days of a written request (see FERPA). 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.

5. When an ACPE program closes the center's Certified Educator or appointed designee (Spiritual Care Manager) secures all student records and sends them to the ACPE office, c/o Accreditation.

Violations of these Annual Notice protocols may be reported to the Chair of the Accreditation Commission at: *ACPE, 55 Ivan Allen Jr. Boulevard, Suite 835, Atlanta, GA 30308.*  
[https://www.acpe.edu/ACPE/Accreditation/Accreditation\\_Commissioners/ACPE/Directory/2017/Committees/Accreditation\\_Commission.aspx?hkey=20e9d633-c309-4157-8ca1-6e3e19a87df0](https://www.acpe.edu/ACPE/Accreditation/Accreditation_Commissioners/ACPE/Directory/2017/Committees/Accreditation_Commission.aspx?hkey=20e9d633-c309-4157-8ca1-6e3e19a87df0)

\_\_\_\_\_ has received and read this Annual Notice and  
Student Name and Signature

\_\_\_\_\_  
Agree with the above

\_\_\_\_\_  
Disagree with the above, Please identify section and discuss with Certified Educator as soon as possible.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Certified Educator Name and Signature

\_\_\_\_\_  
Date

5/2020