

Methodist Healthcare Memphis Hospitals

2022 Annual Notice

This ACPE CPE center takes seriously the care, privacy, and confidentiality of all student records as matters of ethical practice. ACPE: The Standard for Spiritual Care & Education is recognized by the Federal Department of Education as a provider of higher education. With that recognition is the responsibility to handle student records in ways compliant with stipulations of the Family Education Rights and Privacy Act (FERPA). This ACPE CPE center/program guarantees to its students the right to inspect and review education records, to seek to amend them, and to specify control over release of record information. This ACPE Center guarantees students the right to file a complaint against the program for alleged violations of these FERPA rights. A student in our CPE program owns the information we keep about him/her. It will not be shared without a student's written permission.

Some information on the Face Sheet of an ACPE Student Application Form kept on file constitutes "<u>Directory Information</u>." Directory Information is not generally considered harmful or an invasion of privacy if released. In this Center Directory Information includes: student name, address, phone number, email, previous education, gender, unit type, unit completion date, and denomination and faith group. All other information is released only with a student's written, signed, dated consent that specifies which records are being disclosed, to whom, and for what limited purpose. At MHMH, our "directory" is for internal use only. We do not provide a "public" directory.

A <u>Student Record</u> in this center is any record we collect from which a student's identity can be recognized whether paper, electronic, video, audio, biometric, etc. All official student records <u>must</u> include: An ACPE Face Sheet giving directory information, the Use of Clinical Materials Consent Form, a copy of the written Educator Final Evaluation given within 21 days of the end of a unit, and a corresponding copy of the written Student Final Evaluation for every unit completed.

A Level 1/Level 2 Student Record may also include a copy of the following: our signed Confidentiality Statement and Training Agreement, signed Disclosure Form, copies of consultation documents like presenter and/or consult summary report(s). Further, for a Certified Educator Candidate, the student record <u>may</u> include a copy of the following: Educator Abstract, Confidential Best Practice Verbatim, Current ACPE Certification Commission Face Sheet, presenter and consultation and/or certification action reports, and theory papers. Application materials of admitted and matriculated students are part of the student record.

Information on record is used by education officials to enhance process education, to verify students' status or achievement, and to aid students who need documentation listed that is

traditionally used for pastoral, educational, and/or professional advancement or transfer of training context. 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. Mandatory content is not negotiable. Inclusion of items that may be included is the prerogative of a faculty Educator. The Director of CPE has the right of final say. Any student objection should be written. It will be kept and released with the record. Grades are exempted from this right per FERPA.

A student may review his/her record by making written request to the Director of CPE. Access will occur within 45 days. Students unable to be present may request and be sent a copy. Students with outstanding financial obligations may receive a copy. However, each page will include the qualification, "not available for official use." Students who view their record at the Center and wish to make one copy may use the department's copy machine.

Student records are kept in the main office of CPE at MHMH. The Director of CPE is primary contact person for record access and accreditation issues. "Educational Officials" with access to Student Records without student consent include: The Director of CPE, his/her administrative assistant, ACPE Certified Educators, faculty members, and Certified Educator Candidate (s) authorized with a specific purpose by an Educational Official. Access may occur where there is "legitimate education interest." This includes, but is not limited to, the following: 1) Processing application for further CPE; 2) Gain perspective on performance or learning; 3) Check reference information; 4) Add changes of Education; 5) Clarify education themes or concerns; 6) Establish facts, 7) Audits for complaint or qualified surveys, 8) Research; 9) Determining program demographics, 10) Annual Report completion; 11) Validate compliance with regulations or standards, 12. Death(s); 13) CEC certification preparation; and 14) Help with developing vitae.

Students in this CPE Center are responsible to maintain their own files for future use. This Center keeps student records for ten years. After ten years, the Center may empty the student record except for the face sheet with identification information and the Use of Clinical Materials Consent Form. We use a secure document shredding service to destroy all confidential material. When you received from an ACPE Certified Educator his/her written evaluation, s/he will clarify the Center does not keep a permanent file. When students request that copies of the educator's evaluation reports and/or their own evaluations be sent to their theological school, they are responsible for requesting this of the ACPE Center and for giving written consent for the Center to send this information. These records shall not be open to anyone outside the CPE center except with a student's written request.

There are some exceptions that exist which override the requirement not to release information within a student record. Release may occur: to protect the health or safety of the student or others; for the purpose of accreditation or complaint review; and as required for legal processes. It is the practice of this CPE Center that before releasing material in any of these circumstances, a consult will occur with the ACPE Executive Director. A final access exception is the circumstance in which a Center vacates its accreditation, and/or, if a Center is without an Educator. In both cases, the executive to whom the program reports may access student files to abet transfer and/or ensure guardianship. Educators may keep process notes on students. These notes are for the exclusive use of the Educator; they are not part of a student's record.

Prior to any program's commencement, we publicize our Annual Notice of protocols for proper handling of student records during the mandatory Center orientation. A copy is kept in the Master Student Handbook located in the CPE classroom at the main CPE Educational Site. The location is at a faculty member's discretion.

Violations of Annual Notice protocols may be reported to the Chair of the Accreditation Commission at: ACPE, 55 Ivan Allen Jr. Boulevard, Atlanta, GA 30308.