

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

This ACPE-accredited CPE Center at Lankenau Medical Center in Wynnewood, PA - a hospital of the Main Line Health (MLH) system near Philadelphia, PA - 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 to other bodies (such as seminaries, ordination committees, other ACPE-accredited centers, etc.), and to file a complaint against the program for alleged violations of these Family Education and Privacy Act (FERPA) rights. As such:

- Directory information: It is not the practice of the Spiritual Health and Education Department at Lankenau Medical Center or any of its clinical placement sites that are hospitals of Main Line Health to maintain a published student directory. Directory information would include addresses, phone numbers, and/or email addresses, and this information is not shared without permission.
- Each student gives permission during the Orientation period of the CPE Unit to share contact information with CPE peers and ACPE Preceptors who are staff chaplains at Lankenau and MLH hospitals.
- 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 Center must retain the following items from the student record for ten (10) years (per ACPE Standards) in a locked student file in the CPE office at Lankenau Medical Center, located in the "Green House": Educator's evaluation report; the student's self-evaluation report; the ACPE clinical consent form, and as of 2024, a copy of the student's certificate of completion for Level IA-IIB;
- The ACPE application face sheet must be retained indefinitely in the locked student file as part of the ongoing student roster. The above other documents, which make up the "student file" will all be shredded after 10 years.
- The ACPE Certified Educator is the custodian of these records, and the administrative assistant has access to the files to help keep them maintained, by permission of the ACPE Certified Educator.
- Student records on file in password protected emails when emailed directly for application for the CPE Unit will be deleted after the materials are printed and placed in the locked files once the CPE Unit has commenced.
- 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.
- Students have responsibility to maintain their own files for future use; the CPE Center will not be expected to keep a permanent file or evaluation reports beyond the 10-year requirement. Students are informed at the time copies are given to them that it is their responsibility to keep copies for future use.
- Onboarding records containing health and background check clearances for clinical visiting are kept in locked, limited access files separate from other CPE student records, maintained by the Lankenau Human Resources Department and the Spiritual Health and Education Department Administrative Assistant. Their use and release is subject to ADA and HIPPA and current Federal regulations. Safety and employment records are also subject to Federal regulations and state laws and are kept separately. These student onboarding records are kept private for the duration of the CPE unit and then shredded/destroyed after the student has completed the CPE Unit and all clinical visits at Lankenau or an MLH hospital.
- Material written by students, such as application essays, verbatims or other written assignments besides the End-of-Unit Student Final Evaluation will be shredded/destroyed after the CPE Unit is completed and must not be part of the student record.
- FERPA requires that students be able to review their record within 45 days or less of a student's request. 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 (such as comments written in the student's End-of-Unit evaluation), 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 ACPE CPE Center were to close and no longer function as an ACPE-CPE Center, the center

Certified Educator or administrative appointed designee secures all student records of the closed center and contacts the national office of ACPE for consultation and direction.

- The CPE Educator may keep process notes in a separate locked file in the Educator's office for the exclusive use of the Educator's continuing education and consultation with colleagues. These are not considered part of the student's record, per ACPE Standards and permission for clinical materials (see bullet point below).
- As Lankenau is accredited for Certified Educator Education, and as the ACPE Certified Educator(s) have continuing education requirements, students 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, "Use of Clinical Materials Consent Form." 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. See ACPE 2020 Certification Manual, General Certification Policies.
- 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.
- Following the action of a CEC 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 an ACPE Certified Educator's records is considered of research value and potential publication in professional journals, and a CPE center or ACPE Educator 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.

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