

STUDENT RECORDS
SCHOOL OF CLINICAL PASTORAL EDUCATION, SENTARA HOSPITALS

CATEGORY	STUDENT POLICIES/PROCEDURES
ACPE STANDARD	§304.4; §302.1c (2010)
APPROVED BY	CPE Professional Advisory Group; Chaplaincy Services
DATE APPROVED	August 22, 2001
REVISED	2005; 2008; 2010
PURPOSE	To state the School of Clinical Pastoral Education’s policies and procedures regarding student records.

POLICY

Student records of this School shall be kept in a manner in accordance with current ACPE *Standards* and with federal laws such as the Family, Educational and Privacy Rights Act as well as relevant laws of the Commonwealth of Virginia. The student’s official record is open to the student and is not available to others outside the CPE center except by written permission of the student or as noted below (see “Exceptions”).

PROCEDURES

- The Official Student Record will be maintained at this School. Beginning in 2010, the Official Student Record will include the following: (1) The ACPE Application and Sentara Supplemental Application of students admitted and matriculated; (2) The ACPE and Sentara application face sheets; (3) the end-of-unit evaluation(s) written by the CPE Supervisor, (4) the final copy(ies) of the end-of-unit evaluation written by student, if submitted. The definition of the Student Record prior to 2010 is found in the Student Record policies of prior years.
- The School’s official student record will be maintained for 10 years from the completion of the unit. At the end of 10 years, the records may be destroyed with the exception of the face sheet with identification information.

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- Inspection. This center 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 complain against the program for alleged violations of these Family Education and Privacy Act (FERPA) rights. Violations of these protocols may also be reported to the Chair of the ACPE Accreditation Commission, 1549 Clairmont Road, Suite 103, Decatur GA 30033.
- Student Inspection of Records Procedure. The procedure for inspection is that a student submits a request in writing. Within 45 days of that request, the CPE Supervisor or designee will make available the record to the student, who may review the record in the School's office. Except for the Health Record, other records (Admission record and Supervisor's notes), are not available for inspection.
- Objection. A student has a right to object to record content. If a solution to the student's objection is not reached, the student may provide a written objection, which will be kept with and released with the record in accordance with the Center's release policy. Grades are exempted from this right of objection.
- Amendment of Records. Students have a right to request amendment of their official record and health record. The student may request a written amendment to the end-of-unit evaluation(s) written by the CPE Supervisor. The end-of-unit evaluation by the CPE Supervisor contains the following: "I am aware of my right, should I so elect, to provide a written response to be included as a permanent part of my student record and to be attached to this evaluation." The student may also request, in writing, amendment of information contained in the Health Record and amendment of directory information
- Closure. Should the School's CPE program close, the School's copy of the official student record will be made available to the ACPE regional accreditation chair who will be responsible for providing for the storage of the materials in accordance with the provisions of the ACPE Accreditation Manual.

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- Privacy and Disclosure
 - Unless otherwise specified, the prior written consent of a student or former student is required for disclosure of any student records except for directory information. (See also the Agreement for Training.)
 - The School's official student record will be kept in a locked file cabinet in an office that is locked, usually in the CPE Supervisor's office.
 - The Supervisor's end-of-unit evaluation report will be given to the student and will not be made available to anyone else without the student's written request except in cases where required by the complaint process, the disciplinary action appeal process, or in instances in which the CPE Supervisor seeks professional consultation.
 - Students are encouraged to keep a copy of the Supervisor's and their own end-of-unit CPE evaluation for future use.
 - The student or former student must provide a written request to receive additional copies of the Supervisor's evaluation or to request a copy be sent to anyone else, including a theological school, other academic institution, or faith group. The written request must include the name of record to be disclosed, the identity of the party(s) to whom disclosures is to be made, and must be signed and dated by the student or former student.
 - A "working copy" of the student's end-of-unit evaluation report will be shared with members of the peer group at the time of the unit evaluation. After the evaluation, the student will collect all copies outstanding except that given to the CPE Supervisor.
 - The CPE Supervisor will retain a the "working copy" of the evaluation written by the student for six months beyond the end of the student's enrollment in the School, or in the case of a grievance, will be retained in accordance with the Grievance procedures of the School and the ACPE,
 - Unless the student provides the supervisor with a final copy of the end-of-unit evaluation to be placed in the official record, the "working copy" of the evaluation written by the student will not be a part of the official

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record, and will not be retained beyond the period specified. The evaluation will not be made available to anyone beside the CPE Supervisor without the student's written request and except in cases where required by the complaint process, the disciplinary action appeal process, or in instances in which the CPE Supervisor seeks professional consultation.

- Exceptions: The law provides for certain exceptions concerning the release of information to protect the health or safety of the student and for the purpose of accreditation review or a complaint or appeal involving that student or as otherwise permitted and required for legal processes. Before releasing material in a legal process, the CPE Supervisor will consult with the ACPE Executive Director, and may consult with others professionals.
- Satellite of VCU (2001-2006). From 2001 – 2006, during the time that the School operated as a Satellite of the Department of Patient Counseling, Virginia Commonwealth University, the Policy on Student Records of Virginia Commonwealth University, served as the Policy on Student Records for the School. The School's official Student Record (as defined in the VCU policy), was sent to Virginia Commonwealth University at the end of a successfully completed unit of CPE. Any requests for copies of the official CPE record during its operation as a Satellite must be directed to the Department of Patient Counseling, Virginia Commonwealth University, PO BOX 980664, Richmond VA 23298-0664. The School maintained a copy of the student record which was governed by our earlier Student Record Policy as a satellite. This earlier policy is on file with the School.
- Other Records. In addition to the official student record, the School may keep other records.
 - Directory Information. Directory information is intended for public distribution. Directory information includes name, address, email, telephone number(s), and dates of attendance at the School, enrollment status, CPE program matriculation, photo, activity participation, and religion. Current students can restrict the distribution of directory information at any time during attendance by providing written notice to the CPE Supervisor. The restriction on directory information does not include provision of the directory information required for the Student Unit Report to the ACPE. Restrictions will be honored after the student's departure. Former students cannot initiate new restrictions after departure.

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- Registration of Student Units. Information about the student with name, address, category of ministry, faith group or denomination and type of unit of CPE successfully completed will be provided to the ACPE office on a student unit report after the completion of each unit of CPE. Copies of the student unit reports will be maintained at the Center for Center use only.
- Application Materials. During the admission process, the student's application, including ACPE and Sentara face sheets, as well as the essays, transcripts, letters of reference and CPE evaluations that are a part of the application may be shared with members of the School's admissions pool and interview committee members. Any copies that are made of the student's application materials will be returned to the CPE Supervisor after the admission interview. Within federal law, application information (such as transcripts and recommendations in connection with a student's application) is considered to have served its purpose upon a student's acceptance. Once an admission decision has been made the following actions will take place as regards application materials.
 - If an applicant is denied all application materials submitted will be destroyed after six months from the start of the program for which the applicant applied, with the exception of the ACPE and Sentara face sheets. These will be sealed off and only available to the CPE Supervisor. These records may be destroyed at any time that their value to the School has been served and will be kept no longer than ten years. The purpose of the record is for the CPE Supervisor to have a point of reference should the applicant file a complaint or should the applicant reapply at a later date. This application folder will be available only for internal purposes and for accreditation review, and will not be available to the applicant.
 - If the applicant is accepted and matriculates:
 - The ACPE application and the Sentara Supplemental Application will become a part of the Official Student Record.
 - An Admission Folder may be maintained and may include the School's letter of acceptance and the applicant's response thereto, the School's application checklist (showing materials received), a copy of any payments received, a record of dates and names of interviewers and interview notes, signed copies of the Agreement for Training and

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Sentara's Confidentiality Agreement, and any other documents or correspondence deemed relevant. This application folder will be available only for internal purposes and for accreditation review, and will not be available to the student. Those parts of the admission folder relevant to accreditation will be destroyed after it has served its accreditation review purposes. Those parts of the admission folder not serving accreditation review purposes will be destroyed six months after the student has left the School. Transcripts and recommendations will be destroyed.

- Supervisory Notes. The CPE Supervisor may keep process notes on a student as well as copies of educational materials submitted by the student including the student's end-of-unit evaluation. These materials are for the exclusive use of the CPE Supervisor and are not considered a part of the student's official record. These materials are not available for inspection by the student and will be destroyed six months after the Student has left the School.
- Information about Other Persons. Material written by students -- and submitted to the School (such as clinical reports, learning reflection journals, and case histories) -- which contain identifiable information about other persons or other students, will either be destroyed or become a part of the other student's official record, thus coming under the School's policy and procedures for handling records. The School's guideline for the student's end-of-unit evaluation is that other students mentioned therein not be identified by name. The School's guidelines for clinical reports is that pseudonyms be used and not the actual names of persons to whom ministry is provided.
- Health Record. Prior to 2005, in keeping with Sentara policy, students who matriculate, and who are not Sentara employees, must submit certain health records. (See Admission Policy for details). These Health Records must be maintained for a period of 30 years, and then destroyed. After 2005, CPE students will have their health records maintained by Occupational Health. Should this School close before the 30-year maintenance period has expired, the health records will be transferred to Sentara's Occupational Health. The Health Record is maintained separately from the Official Student Record.
- Research. If information in student records or in a CPE Supervisor's records is considered of research value, and a CPE center desires to collect and use such material for research, a release form shall be made available for the person's

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signature. No personally identifiable material will be used for research without the person's written permission for its use.

- Photocopies of Official Record. The student may not photocopy the record, but may submit a request in writing for the School to provide a photocopy. The School will make available a copy within 45 days of the request for photocopying. Make available means that the student will be sent written notification (by mail or email, or facsimile) that the copy is available. An administrative fee of \$15.00 may be charged, plus the cost of postage (if sent by mail) or telephone charges (if sent by facsimile).
- Student Rights. Students are entitled to the following: (1) To inspect and review their official educational record; (2) To seek to amend their student records; (3) To have control over the disclosure of information from their official record (see section on Privacy and Disclosure, above); and (4) To file a complaint against the School for the alleged violation of these rights (according to the School's Complaint Policy).
- Annual Notification of Student Rights. Students will be notified annually of their student rights regarding educational records through the distribution of this policy on Student Records as a part of their Student Handbook. A copy of the Student Handbook is provided to each student during orientation. The Annual Notice (in the form of the policy on Student Records) is also published on the Center's website and is available to all persons prior to application and/or matriculation.
- Destruction of Records. Records, or parts thereof that are discarded in accordance with this policy, will be shredded. The current practice is to place records to be destroyed in the commercial Cintas Document Service locked box – an outsourced confidential shredding service under contract with Sentara.