



**Clinical Pastoral Education  
ACPE, Inc.  
Annual Notice of Privacy Rights  
For CPE Students**

This letter accompanies an initial offer letter to enroll in a unit of CPE at West Virginia University Hospitals (WVUH) or one of its affiliate institutions with formal placement agreement. Thereafter, this letter serves as an Annual Notice to current or former students regarding the privacy of their personal information maintained at the CPE center. The U.S. Department of Education's Family Education Rights and Privacy Act (FERPA) require that all CPE centers address privacy issues for students' protection. Students own the information about them and must know what is being collected and how it is being used. Student information cannot be shared without their written permission.

The **Student Record** is defined as:

- 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.
  - Your application materials are considered part of the student record and cannot be shared with anyone without legitimate educational interest to do so. Permission will be requested to share this information, when necessary.
  - The use, retention, and destruction of application materials are prescribed in the CPE policies and procedures of this center.

**Directory Information** is defined as:

Directory Information is student information not generally considered harmful or an invasion of privacy if released. It includes:

- Name
- Address
- Telephone/E-Mail
- Date of Birth
- Religion
- Previous Education

This information may be released without specific consent unless the student "opts out." All other information can be released only with the students written, signed, and dated consent specifying

which records are being disclosed, to whom, and for what limited purpose. Current students can restrict directory information and/or record access at any time during a unit, as long as this restriction does not breach institutional policy and procedure. Such restrictions must be honored, even after the student's departure. Former students cannot initiate new restrictions on student information after departure.

WVUH CPE Center guarantees students the right to inspect and review their educational records within 45 days of such a request, to seek to amend them, to specify control over release of record information, and to file a complaint against the program for alleged violations of these FERPA rights.

- This center maintains a policy and procedure for maintaining student records that is reviewed by all students during orientation.
- 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.
- Student records within the center may be released to persons, within the center, with legitimate educational interests for purposes of interviews, consultations, and for the education and training of ACPE Supervisory Education Students, if applicable.
- Student information related to health records will be kept in a separate locked file from student records. Their use and release are also subject to ADA and HIPPA regulations and state laws.

#### **Exceptions exist:**

Certain exceptions concerning the release of information exists to protect the health and safety of the students and others, and for the purpose of accreditation or complaint review, or as required by legal processes. Before releasing student records or materials in any of these circumstances, consultation will be sought with the ACPE Executive Director or Assistant Director.

#### **Records Management:**

WVUH follows the following written protocols for student record retention and destruction and for student review of records.

This center keeps student records for at least ten (10) years. These records are not open to anyone outside the CPE center except with the student's written request. (Note "Exceptions" above). After ten (10) years, the center may destroy the student record, except for a face sheet with identification information.

Health records (mental and physical) must be kept in locked, limited access files separate from other student records. Their use and release is also subject to ADA and HIPPA. Certain safety and employment records are also subject to other federal regulations and state laws and are kept separately.

Material written by students, such as verbatim 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.

FERPA requires students be able to review their record within 45 days of student's request. 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. The Annual Notice details records maintenance protocols and should include whether/how students may copy their records.

Violations of these protocols may be reported to the Chair of the Accreditation Commission at: ACPE, 55 Ivan Allen Jr. Boulevard, Atlanta, GA 30308. Students also have the right to file a complaint with the Director of Spiritual Care and Education of West Virginia University Medicine, or the WVU Hospitals Professional Advisory Committee if they believe their FERPA rights have been violated.

My signature below acknowledges receipt of this information prior to acceptance into this unit of CPE, or before granting permission for releasing student records from the center where a CPE unit was completed.

Name: \_\_\_\_\_ Date: \_\_\_\_\_

I may be contacted at (phone/e-mail): \_\_\_\_\_