Carilion Clinic

ACPE Annual Notice

The Carilion Medical Center Department of Chaplaincy Services and Clinical Pastoral Education guarantee the right for all residents and students to inspect and review education records, and to seek to amend them in a timely manner. The Department of Chaplaincy Services and Clinical Pastoral Education also guarantee specified control over release of educational record information. Residents and students may file complaints against the CPE programs for alleged violations of these Family Education Rights and Privacy Act (FERPA) rights.

 DEFINITIONS:

1. 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.
2. Family Education Rights and Privacy Act - Annual Notice (Standard 304.4)

The Family Education Rights and Privacy Act (FERPA) applies to all ACPE CPE programs. FERPA addresses privacy not confidentiality issues. This means students own the information about them and must know what is being collected and how it is being used. Their information cannot be shared without their written permission.

1. This ACPE CPE center/program 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 complaint against the program for alleged violations of these Family Education and Privacy Act (FERPA) rights.
2. Directory Information is student information not generally considered harmful or an invasion of privacy if released.Note:
* Each Center defines directory information that will be released without specific consent unless a student “opts out.”
* Common directory information, as defined by the Federal Family Educational Rights and Privacy Act (20 U.S.C. § 1232g) which may include a student's name, sex, address, telephone listing, date and place of birth, major field of study, participation in officially recognized activities and sports, dates of attendance, degrees and awards received, and other similar information. *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.*
* Before releasing information, students must have received the *Annual Notice.* A copy of the Maintenance of Student Records Policy (CPE\_001) and the Authorization to Disclose and Use Information (FERPA) form will be sent to the student at acceptance into a program of CPE at the Carilion Medical Center.
* Current students can restrict directory information and/or record access at any time during attendance. Restrictions must be honored even after the student’s departure. Former students cannot initiate new restrictions after departure. To initiate restrictions, students should send a written, signed, dated Authorization to Disclose and Use Information request to the ACPE Educator of Record of the Carilion Medical Center.
* Subject to notification, the student’s unit of CPE successfully completed will be recorded at the ACPE office on the student unit report at the completion of each unit of CPE.

PROCEDURE – Student Education Records

* The Director of Chaplaincy Services and Clinical Pastoral Education will exercise general oversight for the keeping of all CPE records.
* The following materials will be kept in each resident and student master file: (a) application face sheet; (b) all Certified Educator and student evaluations, including student response the Certified Educator’s final evaluation; (c) Use of Clinical Materials Consent Form (d) all committee action reports; (e) any applicable complaint documentation.
* Resident and student records as indicated above will be maintained for a minimum of 10 years in accordance with ACPE standards. After 10 years, the only records kept will be hard copy or digital face sheets and the Use of Clinical Materials Consent Form.
* All residents and students are encouraged to keep copies of their Certified Educatory and student evaluations.
* The CPE Certified Educator or designee is responsible for placing appropriate materials in each resident or student’s electronic and/or hard copy master file and for checking periodically to assure that records are up to date.
* Carilion Medical Center ACPE Certified Educators and Carilion administrative support will have access to all resident and student records in the Carilion Medical Center CPE programs. Certified Educators certified at candidacy level have access to records of residents and students they directly supervise.
* A student/resident’s record may be released to an outside source but only with the written consent of the student/resident to the student/resident’s direct Certified Educator or center ACPE Administrator.
* If this center should be without an ACPE Certified Educator, the VP who has responsibility for the program can authorize the release of student’s records with the students’ written permission.
* If the center ceases to be an accredited CPE center, all master files and digital student records will be transferred to the national offices.
* ACPE program unit reports will be submitted online to the National ACPE office at the end of each CPE unit.
* Students and residents have the right to inspect, review, object, and seek to amend their student record content. A student or resident may negotiate content with his or her Certified Educator during the written Certified Educatory evaluation process. If there is a disagreement about possible changes, the student or resident has the right to write an objection, which will be kept with the Certified Educator’s evaluation and released with the record.
* In the case of complaints, grievances, and appeals, students and residents should be aware that their records may become available to those processing the complaint, including Carilion legal counsel.

Violations of these protocols may be reported to the Chair of the Accreditation Commission at: ACPE, ACPE: 55 Ivan Allen Jr. Blvd., Suite 835, Atlanta, Georgia 30308.

Student and resident information will not be used in any material developed and publicized by the Carilion Medical Center Department of Chaplaincy Services and Clinical Pastoral Education without the student/resident’s written permission. This includes any internet-based material as well as any marketing or public relations material developed for Chaplaincy Services or other Department of Chaplaincy Services and Clinical Pastoral Education initiatives. Students and residents may not use any such material for any personal or professional reasons without the written permission of the Director of the Department of Chaplaincy Services and Clinical Pastoral Education.

A copy of this policy will be sent to each student and resident upon acceptance into the CPE program. This shall constitute “Annual Notice” of Carilion Medical Center protocols for CPE students and residents. A copy shall also be included in each CPE handbook.

 PROCEDURE – Student Health Records

The Director of Chaplaincy Services and Clinical Pastoral Education will exercise general oversight for the keeping of all health records.

Each student will have a health record maintained in Departmental offices. This record will contain the required health and immunization forms. (PPD and proof of insurance.)

* 1. All students will be required to submit the results of a drug screen as required by Carilion Visiting Student Services. (See policy CPE\_014: Drug Screen & Background Check)
	2. Student health records are completely confidential.
	3. Student health records will be stored during the duration of the unit and destroyed at the conclusion of the unit.
	4. Health records will not be released to any persons within or outside of Carilion without specific written authorization from the student. (Students with unusual medical conditions are encouraged to share this information with their Program Director and instructors if it would be in their best interest. This might include for example, a seizure disorder or poorly controlled diabetes.)

Students’ Healthcare Responsibilities

 Any student diagnosed by any physician as having a communicable disease is required to report the diagnosis to his or her Certified Educator at least 24 hours prior to any patient contact. Any student sustaining a “high-risk exposure” during a clinical experience must notify his or her Certified Educator and the program Director as soon as possible for instructions.