

# GEISINGER HEALTH SYSTEM

Geisinger School of Spiritual Care

Clinical Pastoral Education

100 N. Academy Avenue

Danville, PA 17822-2801

Annual Notice

- I. **This ACPE CPE center/program guarantees to its students the rights to inspect and review educational records, to seek to amend them, to specify control over release of record information, and file a complaint against the program for alleged violations of these Family Educational Rights and Privacy ACT (FERPA).**

- II. **Directory information is student information not generally considered harmful or an invasion of privacy if released. Examples include name, address, email, telephone, date of birth, religion, previous education, and photograph.**

This center does not provide directory information.

- III. **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.**

This center defines the student record as the application face sheet, the supervisor's evaluation(s) and may include the student's self-evaluation(s) if submitted. Applications are destroyed, after 10 years. For students that are not admitted to the program, the entire application is immediately destroyed.

- IV. **Details of the Center's record management protocols.**

- A. It is the student's responsibility to keep copies of evaluations and to maintain a file for future use. The center will only keep a file for 10 years.
- B. The official record of the student consists of a face sheet with identification information and the CPE supervisor's evaluation report and may include the student's own evaluation report if submitted.
- C. After ten years, the center will destroy the student record except for a face sheet with identification information. The records will be shredded, with the exception of the face sheet. Student files for all Geisinger CPE Programs, including satellites, will be maintained in the central office of the Geisinger CPE Program. Access to student records is restricted to the Director of Spiritual Care, the ACPE Program Manager, the ACPE Supervisory Candidate(s) and support staff. Students may review their records by scheduling a time for review with the ACPE manager or ACPE Supervisor. Students may not copy their records, but the CPE program will provide a copy at the students' request

and written permission (see exceptions above). The Center will schedule the review within 45 days of the request. If the student is not able to travel to the center, the center may send a copy of the record with a note on the record. The center will allow access to the student record even when the student has any outstanding financial obligations. When the student's record contains identifiers of another student, those must be redacted.

- D. The Geisinger Health System ACPE Program student files will be maintained for a period of ten (10) years. No evaluation reports will be released from the file without the written request of the student, with the following exceptions: to protect the health or safety of the student or others, and for the purpose of accreditation or complaint review, or as required for legal processes. Before release of these records, the center will consult with the Executive Director or Associate Director of the ACPE. The notes the CPE supervisor may keep on a student are for the exclusive use of the writer and are not considered a part of the student's record. They should be kept separate from the student's record.
- E. Health records (mental and physical) will be kept in locked, limited access files separate from other student records. Their use and release is subject to ADA and HIPAA. Certain safety and employment records are also subject to other federal regulations and state laws and kept separately.

Information about the student with name, denomination, and unit of CPE successfully completed will be sent to the ACPE office on a student unit report at the completion of each unit of CPE, subject to the annual notice.

- F. If information in student records or in a CPE supervisor's records is considered of research value, and a CPE center of ACPE desires to collect and use such material for research, a release form shall be made available for the person's written permission for its use.
- G. In the event that the Geisinger CPE program closes the regional chair of Accreditation for the Eastern Region of ACPE will arrange for the secure storage of all student records of the closed program. The Chair of the ACPE Accreditation Commission and the ACPE office will be informed of the records' location.
- H. A student has a right to object to records content. If not negotiable, the written objection will be kept with and released with the record.

#### **V. Definition of "educational officials" and "legitimate education interest."**

Educational officials within the ACPE center are ACPE Supervisory Education Students, ACPE Supervisory Candidates, ACPE Associates Supervisors, ACPE Certified Supervisors and Administrative Assistant. Legitimate educational interest includes processing admissions applications, admissions interviews, supervision and observation or course assistance of an

ACPE unit. These persons may have access to student records without student consent. Though not an education official, members of the center's Professional Consultation Committee may have access to admissions applications in preparation for interviews. The materials sent to these individuals will be destroyed directly after the completion of the admissions process.

**VI. Violations of these protocols may be reported to the Chair of the Accreditation Commission at: ACPE, One West Court Square, Suite 325, Decatur, GA 30030**

This Clinical Pastoral Education Program is accredited by:

**The Association for Clinical Pastoral Education**

**One West Court Square**

**Decatur, GA 30030**

**404-320-1472**

**[www.acpe.edu](http://www.acpe.edu)**