

PARTNERS HEALTHCARE CPE CENTER
Massachusetts General Hospital
ANNUAL NOTICE REGARDING STUDENT RECORDS
ACPE Standards 304.4, Appendix 7B

This document is sent to each student enrolled in a CPE program at the MGH site prior to the start of their program. This document is included in the student handbook and is also reviewed during orientation.

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. Each CPE center must publicize Annual Notice of its protocols for proper handling of student records.

A student record is

- any record (paper, electronic, video, audio, biometric etc.) directory related to the student from which the student's identity can be recognized
- any record maintained by the education program/institution or a person acting for the institution. Note: application materials of students admitted and matriculated are part of the student record.

Directory information is student information not generally considered harmful or an invasion of privacy if released. At the MGH site of the Partners CPE Center this information includes students' name, address, e-mail, telephone number(s), and religion. Previous work experiences, educational achievements, and a photograph can also be included in directory information. A student may opt out of having this information released by signing, dating, and returning to the CPE supervisor documentation of such.

Note: before the center releases information, students must have received the *Annual Notice*.

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.

With this notification, the student's name, address, denomination and unit of CPE successfully completed will be sent the ACPE office on the student unit report at the successful completion of each unit of CPE.

ACPE requires that the CPE student record include the face sheet with directory information, the CPE supervisor's evaluation report and the student's own evaluation report.

A copy of the CPE supervisor's final evaluation report will be given to the student. The student will be informed that the center will keep this evaluation for ten years, and it will not be available to anyone else except with written permission from the student. The student's own final self evaluation is included and will be kept with the supervisor's subject to the same provisions. (see for some exceptions below)

Students are responsible for maintaining their own files for future use. The center will not keep a permanent file of evaluation reports. Students will be informed at the time copies are given to them that it is their responsibility to keep copies for future use.

CPE students are required to give written consent if they wish for the center to send copies of the supervisor's evaluation reports (and their own if applicable) to be sent to their theological school and/or denomination.

Supervisory Notes The CPE supervisor may keep process notes on a student. These process notes are for the exclusive use of the writer and are not considered a part of the student's record. They are kept separately from the student record.

Exceptions Certain exceptions concerning the release of information exist 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 releasing material in any of these circumstances, the CPE supervisor will consult with the ACPE executive director or associate director.

In accordance with FERPA, students are able to review their record within 45 days or less of student's request, and may make one Xerox copy of the record at MGH, CPE. Requests must be made in writing, not by phone, fax, email, or conversation. 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.

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.

At the MGH site staff assistants for the CPE program may have access to student records for the purposes of administration only, and a subgroup of the MGH Professional Advisory Group focusing on curriculum improvement may have access to student records acting in their roles as educational officials with a legitimate education interest.

Violations of these protocols may be reported to the chair of the accreditation commission at ACPE Inc., 1549 Clairmont Road, Suite 103, Decatur, GA 30033