

Massachusetts General Hospital CPE Center
Annual Notice Regarding Student Records

Admitted students to the MGH CPE program receive this annual notice upon acceptance. This notice is also published on the MGH CPE website.

Students own information about them and must know what information is being collected and how it is being used. A student's information cannot be shared without their written permission. Every ACPE program publicizes an **Annual Notice**, outlining its protocols for the handling of student records.

ACPE requires that:

1. The center retain the following items indefinitely:
 - a. The application face sheet
 - b. The Use of Clinical Materials Consent Form
2. The program retain the following items from the student record for ten (10) years: Certified Educator's end-of-unit evaluation, the student's response to the end-of-unit evaluation (if submitted), and the student's self-evaluation.

The above materials constitute the student's record at the MGH CPE Center.

MGH CPE guarantees its students the right to inspect and review education records, to seek to amend them, and to specify control over release of record information.

Directory Information does not require a release of record information and may be shared without approval, if not restricted by the student. Directory Information is student information not generally considered harmful or an invasion of privacy if released. Common directory information includes: name, address, email, telephone, date of birth, religion, previous education, and photograph. Current students can restrict directory information and/or record access at anytime during attendance. Restrictions must be honored even after the student's departure. Former students cannot initiate new restrictions after departure. 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 student has the right to object to record content. If not negotiable, the written objection will be kept with and released with the record.

Within the MGH CPE program, only MGH's Certified Educator (CE), Rabbi Shulamit Izen, consistently has access to students' educational records. If the CE has employed administrative support, that employee may have access to the students' records as well, as instructed by the CE. If the CE is unavailable throughout the window of a record request, the Director of Spiritual Care may access the requested documents.

Violations of Annual Notice protocols may be reported to the Chair of the Accreditation Commission at:

ACPE, Inc.
1 Concourse Parkway
Suite 800
Atlanta, GA 30328

Or via email: accreditation@acpe.edu

Evaluations and Process Notes

A copy of the ACPE Certified Educator's end-of-unit evaluation report will be given to the student. The student will be informed that the program will keep this evaluation for ten years and it will not be available to anyone else except with written permission from the student. If the student submits a written response, it will be kept with the educator's evaluation and subject to the same provisions.

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 expected to give written consent for copies of the educator's end-of-unit evaluation reports (and their own if applicable) to be sent to any outside party.

Supervisory Notes: The ACPE Certified Educator 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 must be kept separately from the student record.

Records Management

When an ACPE program closes, the program's Certified Educator or the Director of Spiritual Care, in the CE's absence, retrieve all student records and ship the records to the ACPE office, c/o Accreditation.

In the absence of the Certified Educator, only the Director of Spiritual Care is authorized to retrieve student records with a student's written request and written authorization.

Health records (mental and physical) must 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 are to be kept separately.

Material written by students, such as verbatims 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. When peers are referenced in student's evaluations, only initials should be used.

Students are allowed to review their record within 45 days of a written 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 program 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.

The MGH CPE Center is accredited by the Association of Clinical Pastoral Education, Inc.

ACPE: The Standard for Spiritual Care and Education, 1 Concourse Pkwy, Suite 800, Atlanta, GA 30328

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