

**Bronson Healthcare Group, Inc.**  
**Clinical Pastoral Education**  
**2010 Annual Notice Regarding Student Information and Records**

**Purpose:**

To assure that the Clinical Pastoral Education program maintains student information and records in a manner that addresses privacy, access, content, custody of student records, and custody of student records should the center be without a supervisor and/or accreditation.

**Policy:**

*Bronson Healthcare Group Inc.* shall maintain records in a manner consistent with the *Guide for Student Records* as appears in Appendix 7 B, ACPE *Accreditation Manual* (2010) "Annual Notice":

I. 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.

II. Directory information about a student is exempt. Directory information is student information not generally considered harmful or an invasion of privacy if released. Directory information includes: name, address, e-mail, telephone, date of birth, religion, previous education, and photograph. 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. The student may opt out of sharing any or all of this directory information by written request to the Pastoral Education Coordinator.

III. A student record shall consist of any record (paper, electronic, video, audio, biometric etc.) directly related to the student from which the student's identity can be recognized; and is maintained by the education program/institution or a person acting for the institution. Certain exemptions 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.

IV. Protocols:

- Bronson Healthcare Group Inc. student files will be maintained for a period of 10 years. After that period the file will be thinned and only a face sheet will be held in the files. The student has a responsibility to maintain his/her own file for future use.
- The student record consists of: application face sheet, supervisory evaluations and student self-evaluations, committee action reports and presenter's reports from consultations. 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.

- Bronson Healthcare Group Inc. will not keep a permanent file with evaluation reports past the 10-year limit. All records will be kept in a locked file cabinet in the Pastoral Education Department. Only center Supervisors will have keys to the Cabinet. At the end of the ten year period the materials will be incinerated. The student will be informed that it is his/her responsibility to keep copies of evaluations for future use. No evaluation reports will be released from the file without the written request of the student.
- Student files are maintained in the Center of the Supervisor who provides the primary supervision of the student. Access to student records is restricted to educational officials with a legitimate educational interest.
- In the event that Clinical Pastoral Education should cease to exist, the regional accreditation chair arranges the secure storage of all student records of the center. The Accreditation Commission Chair and ACPE office will be informed of the record's location.

V. Access to student records will be restricted to the CPE supervisors at the center, supervisory students in training, and members of the Professional Consultation Committee. "Legitimate educational interests" include review of materials following a complaint, review for the sake of student consultation, and preparation for admissions interviews.

VI. Violations of these protocols may be reported to the Chair of the Accreditation Commission at: ACPE, 1549 Clairmont Road, Suite 103, Decatur, GA 30033

