



Clinical Pastoral Education Program
Annual Notice Concerning Student Records
Revised February 12, 2024

In accordance with ACPE 2020 *Standards*, the Clinical Pastoral Education program at Baylor Scott & White Health All Saints Medical Center—Fort Worth (BSWH All Saints) hereby publicizes an Annual Notice that it maintains students records in a manner that addresses privacy, access, content, and custody of student records should the center be without an ACPE Certified Educator and/or ACPE accreditation.

Policy

The BSWH All Saints CPE program is a component site of Baylor Scott and White Health, North Texas, and maintains ACPE student records in compliance with the ACPE Standards.

The BSWH All Saints CPE program guarantees its students the right to inspect and review educational records, to seek to amend them and to specify control over the release of their information. 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.

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

ACPE
1 Concourse Pkwy,
Suite 800
Atlanta, GA 30328;
or via email: accreditation@acpe.edu.

Definitions

- **Student Record**: a student record is any record (paper, electronic, video, audio, biometric, etc.) directly related to the student from which their identity can be recognized and maintained by the BSWH All Saints' CPE Program Manager or a person acting as a representative of the BSWH All Saints program.
- **Directory Information**: the BSWH All Saints CPE program considers the following items to be directory information, which can be released without specific consent (unless a current student chooses to restrict or "opt-out" in writing): the student's **name, date of birth, photograph, address, e-mail, telephone number, religious affiliation, previous education, and units of CPE successfully completed**. All other information is released only with the student's written, signed, and 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.

- ACPE Certified Educator Faculty: At this center, the term for “education official” includes all ACPE Certified Educators/Associate Certified Educators and CPE Program Manager who are employed by or serving under contract to the BSWH All Saints CPE program, as well as Certified Educator Candidates or students who are enrolled in the BSWH All Saints CPE program.

Evaluation 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. (*Note “Exceptions” below*)

***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, consult with the ACPE Executive Director or ACPE Associate Executive Director.*

- 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

- If BSWH All Saints CPE program closes, the program’s Director, ACPE certified educator, or appointed designee secures all student records and ships the records to the ACPE office, c/o Accreditation.
- The program’s policy and procedure regarding student record management must indicate the name or role of the appointed designee within the program’s institution who is responsible for securing student records in the absence of an ACPE Certified Educator or Associate ACPE Certified Educator.
- In the absence of an ACPE Certified Educator or Associate ACPE Certified Educator, only the appointed designee indicated in the program’s policy for student record management is authorized to retrieve student records with a student’s written request and written authorization.
- **ACPE requires that** the BSWH All Saints CPE Program shall keep ACPE certified educators’ evaluations and students’ written responses, if submitted, for at least ten years. These records shall not be open to anyone outside the CPE program except with the student’s written request. (*Note “Exceptions” above*). After ten years, the program must keep the face sheet with identification information but may destroy the educator’s evaluation report and the student’s written response (if submitted).
- Any BSWH ALL SAINTS’s CPE student health records (mental and physical) must be kept in locked, limited-access files, **separate** from other student records. Their use and

release are 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 records within 45 days of a written request from the BSWH All Saints CPE Program Manager. 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.

Digital and Electronic Student Records

- BSWH All Saints CPE program maintains student records, digitally, in compliance with ACPE Standards and the program's policy for student records management.
- Digital and Electronic student records have the same storage requirements as paper records.
- Digital records must have at least one backup separate from the original hardware location. Backups should be dated and updated at least monthly or in accordance with institutional guidelines.