



## MAINTENANCE OF COHORT AND CENTER RECORDS

[ACPE Standard 4-1d](#) and [ACPE Guide for Student Records](#) Prior to the beginning of their CPE program, each person will receive an Annual Notice which outlines privacy protocols, and which must be signed and returned prior to the start of the unit. The Annual Notice may be found below and outlines this Center's policy about the maintenance of student and center records.

### Annual Notice

*This Annual Notice will be provided to each CPE cohort prior to the start of the unit via email and/or mail. The signed acknowledgement must be returned prior to the start of the unit.*

1. Per ACPE policy, **this ACPE CPE center/program guarantees to its cohorts the right to inspect and review education records, to seek to amend them, and to specify control over release of record information. A cohort has the right to object to record content. If not negotiable, the written objection will be kept with and released with the record.**
2. Directory information is cohort 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. All other information is released only with the cohort's written, signed, dated consent specifying which records are being disclosed, to whom, and for what limited purpose. This Center does not generally release directory information. Current cohorts can restrict directory information and/or record access at any time during attendance. Restrictions will be honored even after the cohort's departure. Former cohorts cannot initiate new restrictions after departure
3. A cohort record is: (1) any record (paper, electronic, etc.) directly related to the cohort from which the cohort's identity can be recognized; and (2) maintained by the education program/ institution or a person acting for the institution.
  - a. This center defines the cohort record as the application face sheet, the educator's evaluation(s), and the cohort's self-evaluation(s). For cohorts admitted to the program, the record may include the ACPE application during the time the individual is an active cohort. For cohorts that are not admitted to the program, applications may be held for up to one year from the time of decision of admission to the program, and then destroyed (except for the application face sheet, which is kept on file indefinitely [per ACPE policy](#)).
4. Details of the Center's record management protocols.
  - a. It is the cohort's responsibility to keep copies of evaluations and to maintain a file for future use.
  - b. The official record of the cohort consists of: an application face sheet with identification information; the Use of Clinical Materials Consent form; the CPE educator's evaluation(s); and the cohort's own evaluation(s). Materials written by

cohorts, such as verbatim and case histories which contain information about other persons or other cohorts, are not part of the cohort record.

- c. After ten years, the center will destroy the cohort record except for a face sheet with identification information, and the Use of Clinical Materials Consent form. The records will be shredded, with the exception of the face sheet and the Use of Clinical Materials Consent form. Cohort files for all programs are maintained in the Spiritual Care office at Nationwide Children's Hospital. Access to cohort records is restricted to the education officials, department Administrative Assistant, or Chair of the CPE Advisory Committee within the CPE program at Nationwide Children's Hospital. Cohorts may review their records by scheduling a time for review with the Director of Spiritual Care or the ACPE Certified Educator. Cohorts may not copy their records, but the CPE program will provide a copy at the cohort's written request. The Center will schedule a review within 45 days of the request. The Center will allow access the cohort access to their record even when the cohort has any outstanding financial obligations. If the cohort does not have the ability to come to the site, the Center may note on the copy sent "not available for official use." When a cohort record contains identifiers of another cohort, those must be redacted.
- d. Nationwide Children's Hospital CPE Program cohort records will be kept for a period of ten (10) years. No evaluation reports will be released from the file without the written request of the cohort, with the following exceptions: to protect the health or safety of the cohort or others, and for the purpose of accreditation or complaint review, or as required for legal process. Before release of these records, the center will consult with the ACPE Executive Director or other ACPE official. Process or other notes the CPE educator may keep on a cohort are for the exclusive use of the writer and are not considered a part of the cohort's record. They are kept separate from the cohort's record.
- e. This Center does not send evaluations to Theological Schools, denominational bodies, or other organizations. This is the cohort's responsibility.
- f. Health records (mental and physical) will be kept in locked, limited access files separate from other cohort 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.
- g. Information about the cohort with name, denomination, and unit of CPE successfully completed will be provided to the ACPE office at the completion of each unit of CPE, as required by ACPE, subject to the Annual Notice.
- h. A record will be kept in a separate file listing the dates for each unit and names of cohorts completing the unit. This information will not be available to anyone outside the Nationwide Children's Hospital CPE program.
- i. In the absence of an ACPE Certified Education or ACPE Associate Certified Educator the Administrative Assistant will secure cohort records and is authorized to retrieve cohort records with a cohort's written request and written authorization.
- j. Material written by cohorts, such as verbatims and case histories that contain information about other persons, including other cohorts, will either be destroyed or, if they are part of the cohort's record, will have the identifiable information

about everyone other than the cohort redacted. When peers are referenced in cohort's evaluations, only initials or pseudonyms should be used.

- k. If information in cohort records or in a CPE educator's records is considered of research value, and a CPE center or ACPE desires to collect and use such material for research, a release form shall be made available for the person's signature. No personally identifiable material will be used for research without the person's written permission for its use.
  - l. In the event that Nationwide Children's Hospital Clinical Pastoral Education program closes, all pertinent records will be sent to the National ACPE office.
5. Definition of "education officials" and "legitimate education interest."
- a. **Education officials** within this ACPE center are: ACPE Certified Educators, ACPE Associate Certified Educators, and ACPE Certified Educator Candidates. Though not an educational official, the department Administrative Assistant and the Chair (or designee) of the center's CPE Advisory Committee may have access to cohort records. These persons may have access to cohort records without cohort consent.
  - b. **Legitimate educational interest** includes: processing admissions applications; admissions interviews; supervision, and observation or course assistance of an ACPE unit; handling cohort records in the absence of an ACPE-CE; or at the closure of the center.
6. Violations of Annual Notice protocols may be reported to the Chair of the Accreditation Commission at: 1 Concourse Pkwy, Suite 800, Atlanta, GA 30328

\* Items in bold throughout this document must appear in the Annual Notice as required by ACPE

I acknowledge that prior to the beginning of this CPE program I received the Annual Notice which outlines maintenance of cohort records. A copy of this signed Annual Notice must be returned to the Spiritual Care Department prior to the first day of orientation.

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Cohort's Signature    Date