

Mercy Health – St. Vincent Medical Center CPE Program

2024 Annual Notice

This ACPE CPE program guarantees to its students the right to inspect and review education records, to seek to amend them, and to specify control over release of record information. All students receive this Annual Notice at the beginning of the CPE unit.

A student record is defined as any record (paper, electronic, video, audio, biometric etc.) directly related to the student from which the student's identity can be recognized and which is maintained by Mercy Health – St. Vincent Medical Center's CPE program or a person acting for the institution.

All official student records are kept in a locked location at the CPE office of Mercy Health - St. Vincent Medical Center (2213 Cherry St, Toledo, OH 43608). Records are maintained in a manner that is consistent with federal and state laws and ACPE Standards.

Release of Record

Directory information may be released without prior student consent. Directory Information is student information generally not considered harmful or an invasion of privacy if released. At this CPE Program, directory information consists of: student name, address, telephone number, email address, religious affiliation, along with the unit dates and level of CPE completed.

All student information beyond directory information is released only with the student's written consent (signed and dated) specifying which records are to be disclosed, to whom, and for what limited purpose. This includes when the educator's end of unit evaluation is to be sent to any outside party. When a student record contains identifiers of another student, those identifiers will be redacted before the record is released.

Current students can restrict directory information and/or record access at any time during attendance. Restrictions will be honored even after the student's departure. Former students cannot initiate new restrictions after departure.

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.

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 Program will consult with the ACPE Executive Director or ACPE Associate Executive Director.

Management Protocols

The CPE Program retains two documents indefinitely in accordance with ACPE standards: (i) the student CPE application face sheet and (ii) the Use of Clinical Materials consent form.

The CPE Program retains the following items from the student record for ten (10) years: (i) Certified Educator's end of unit evaluation; (ii) The student's response to the end of unit evaluation, if submitted; (iii) The student's self-evaluation.

After ten years, the student's file may be reduced to the application face sheet and use of clinical materials consent form. Students are responsible for maintaining their own files for future use. Students will be informed of their responsibility to maintain personal copies of evaluation reports at the time that the educator evaluation is finalized with the educator.

In the absence of an ACPE Certified Educator, only the MH-SVMC Director of Spiritual Care or the Academic Program Coordinator, with the approval of the MH-SVMC Director of Spiritual Care, is authorized to retrieve student records with a student's written request and authorization.

In the event the MH-SVMC CPE program closes, the CPE Program's CPE Program Supervisor/ACPE Certified Educator will secure all student records and ship them to the ACPE office, c/o ACPE Accreditation. In the absence of an ACPE Certified Educator, the Director of Spiritual Care for MH-SVMC will secure student records.

The ACPE Certified Educator may keep educational / supervisory process notes on a student. These process notes are not considered a part of the student's record and are for the exclusive use of the writer. If such notes exist, they are kept by the Certified Educator separately from the student record.

Mental and physical health records are kept in a locked, confidential manner separate from the student record. These records are maintained by the MHSVMC Employee Health Department. They are kept for one year and then are archived in a secure location.

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 identifiable information about everyone other than the student redacted.

Legitimate Educational Interests

MH-SVMC education officials who have a legitimate educational interest may have access to student records. Education officials include: the MH-SVMC CPE Program Supervisor, ACPE Certified Educators or Certified Educator Candidates who are employed or contracted by MH-SVMC or who are consulting with MH-SVMC in the educational process and need to access the student's records for educational or administrative purposes, the MH-SVMC Director of Spiritual Care, the CPE Academic Program Coordinator, members of the Professional Advisory Group or MH-SVMC staff chaplains participating in the interview process, a member of a complaint review process, and members of an ACPE accreditation team assigned to review the MH-SVMC CPE Program.

The following are considered legitimate educational interests: all educational and administrative activities related to the student's training in the MH-SVMC CPE program; activities outlined in the Use of Clinical Materials Consent form; when a complaint/grievance is filed against the MH-SVMC CPE Program; participation by MH-SVMC staff in the admissions process (i.e. screening applications and participating in interviews); and administrative functions in support of the CPE program.

The use of clinical materials consent form allows for use of materials related to activities that are pertinent to the certification processes for Certified Educator Candidates, that are pertinent to the peer review process for ACPE Certified Educators, that are pertinent to a CPE Program's accreditation process, or that are pertinent to ACPE approved research studies.

During a student complaint process, designated MH-SVMC staff and PAG members will have access to all relevant student records for the purpose of investigating the complaint and trying to mediate a resolution.

During the interview process, PAG members and staff chaplains may have temporary access to application materials in addition to the ACPE Certified Educator. Access is discontinued once their admission related activities are completed, and all material that was distributed is destroyed.

The CPE Academic Program Coordinator may be involved in typing evaluations and reports, typing correspondence, filing records, and submitting registration and unit completion reports to ACPE.

Record Review

Students have the right to review their record. In order to review the record, a student must submit a written request to the MH-SVMC CPE Program Supervisor or Academic Program Coordinator. Students will be granted access to their record within 45 days of submitting the written request. If a student cannot come to the CPE office of MH-SVMC to review the record, the CPE Program will provide copies of the requested portions of the student's record either by (i) emailing a scanned copy to the student (if feasible) or by (ii) photocopying the documents and mailing them to the address specified by the student. If the student has outstanding financial obligations to MH-SVMC, the scanned or photocopied records will be stamped "NOT AVAILABLE FOR OFFICIAL USE." Students may copy their records. All identifying information of any other persons must first be redacted.

Violations

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