

**Family Education Rights and Privacy Act (FERPA) Annual Notice**  
Annual Privacy Notice Pertaining to the Center's Management and Distribution of  
Student Records and Directory Information

The Family Education Rights and Privacy Act (FERPA) applies to all ACPE Accredited CPE programs. FERPA addresses privacy, not confidentiality issues. This means students own the information about them and must know what is being collected and how it is being used. Their information cannot be shared without their permission to do so.

Baptist Health South Florida will respect and protect the privacy and confidentiality of each student's directory information and educational records through confidential record-keeping. The following paragraphs define the Center's responsibility to privacy and confidentiality from the time of application, through educational process and post-completion of the student's training process.

### **I. Definitions and Explanation**

A Student Record is: *Any record (paper, electronic, video, audio, biometric, etc.) directly related to the student from which the student's identity can be recognized and maintained by the education program/institution or a person acting for the institution.* This could include the Director of Clinical Pastoral Education, ACPE Certified Educator faculty members or the Business Operations Coordinator for CPE.

Directory information is: *student information that is not generally considered harmful or an invasion of privacy if released.* Common Directory information may include name, address, email, telephone, date of birth, religious background, previous education, and photograph – and can be released without specific consent unless the student “opts out”.

Baptist Health South Florida considers the following as “Directory Information: Name, Faith Affiliation, Previous ministry position, Previous education, Photo, Gender, Exact level and type of unit in which the student/certificate learner/resident is enrolled.

Upon successful completion of a unit (or half unit) of training, the ACPE Certified Educator at BHSF will complete an electronic “student unit report”. Students will be registered under Baptist Health South Florida with “Rev. Misti Johnson-Arce” or “Rev. Biju Chacko” as the ACPE Educator. The information is linked with that national ACPE office with a restricted access website that includes names, addresses, faith backgrounds, gender and level of training. This information is required for the registration to be successful. Accreditation reviewers will cross reference the student unit registration reports with the face sheets on file.

Students participating in training at the Baptist Health South Florida will have all current student records stored in the ACPE Certified Educator's office or electronically on secure and backed up systems.

### **II. Distribution of Directory Information**

“Directory Information” is NOT considered private or confidential and may be released to institutional sources (internal communications) or to public media (websites or newsletters).

Students desiring to prevent or restrict the distribution of their directory information are required to submit the Directory Information Authorization Form to the Director of Clinical Pastoral Education no later than one week after the start date of the Residency year or the training unit for which they are accepted. ([See Directory Information Authorization Form following.](#))

Students have the right to restrict the use of their directory information at any time.

Students who completed units of CPE more than ten years ago will have the following retained in their file: the ACPE application form face sheet, a record of unit(s) completed at Baptist Health South Florida with dates of the unit(s) and name(s) of the ACPE Certified Educator(s); and the student's last known address.

### **III. Student rights pertaining to their educational records:**

- Students have the right to inspect and review their educational records at any time. Students will be able to review their student record within 45 days of student's written request to do so. Record

inspection cannot be denied based on outstanding financial obligations. When a student record contains identifiers of another student, those will be redacted prior to review.



- Students have the right to seek amendment to those records.
- Students have the right to specify control of the release of this record information, this must be done in writing.
- Students have the right to file a complaint against Baptist Health South Florida for alleged violations of these Family Education and Privacy Act (FERPA) rights.
- Students have the right to object to the content of their student record. If the Center finds the record content to be non-negotiable, a written copy of the student's objection will be kept and released with the record.

### **Records Management Protocol**

All student records are reviewed annually in July and edited according to the maintenance procedures noted. All materials not kept in the permanent student record are shredded and destroyed.

Students desiring a copy of their permanent student record may submit their request to the Center's Registrar/Administrative office at the Boca Raton Regional hospital entity. Photo ID verifying the student's identity is required before the CPE Center will release the student's record.

The Baptist Health South Florida CPE Center will ensure that the student is provided the requested copy within forty-five (45) days of the request and verification of identity.

The Baptist Health South Florida CPE Center is responsible for ensuring that all identifiers of any student or individual other than the person requesting the file are redacted prior to its release.

Once released, those copies are the property of the student for use in whatever way they may choose.

ACPE Certified Educator's evaluation report will be available to the student within 21 days of the end of the unit for which it is written.

Persons having access to student educational records held in the CPE Center are restricted to the Director of the Clinical Pastoral Education programs, certified ACPE Educator faculty members, and the CPE Business Operations Coordinator. Any of these persons may review a student's record without the student's permission so long as that review is for a "legitimate educational interest." A "legitimate educational interest" is considered any reason or interest that is related to the student's educational and supervisory process.

In the event that Baptist Health South Florida Center closes, the Director will work with the Area Accreditation Representative of ACPE, Inc. for the secure disposition and storage of all educational records. The national ACPE office and the Accreditation Commission Chair will be notified of the location of these records. In so far as it is possible, the CPE Center will notify all persons whose record is on file of the location and disposition of their educational record.

Any violation of these protocols may be reported to the Chair of the Accreditation Commission of ACPE, Inc., We Work, Floor 4, 120 W Trinity Place, Decatur GA 30030. Ph 404-320-1472 • [www.acpe.edu](http://www.acpe.edu)

These protocols are in compliance Standards of the Association for Clinical Pastoral Education, Inc., all of which are written to meet the requirements of the Family Education Rights and Privacy Act (FERPA).

**I have received and read this Annual Notice of FERPA addressing privacy of student record information for CPE at the Baptist Health South Florida Center.**

Student Signature \_\_\_\_\_ Date \_\_\_\_\_

Student Printed Name \_\_\_\_\_

**Directory Information Authorization Form**  
Family Education Rights and Privacy Act (FERPA) ACPE

Student Name (Print) \_\_\_\_\_

Check the CPE program in which you are enrolled:

Residency        part time        Summer intensive        Mixed mode  
Extended

**Choose ONLY one please:**

Option 1:

\_\_\_\_\_ (initial)    **I authorize** Baptist Health South Florida to release my directory information per the definitions and procedures stated in the Centers FERPA Notice and student handbook.

If you wish to RESTRICT any content, please mark below what you wish to RESTRICT ONLY:

- \_\_\_\_\_ faith affiliation
- \_\_\_\_\_ previous ministry experience
- \_\_\_\_\_ photo
- \_\_\_\_\_ gender identification
- \_\_\_\_\_ exact level and type of training unit in which I am enrolled

Option 2:

\_\_\_\_\_ (initial)    **I do NOT authorize** Baptist Health South Florida to release my directory information under any circumstance.

\_\_\_\_\_  
Student signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Student printed name