

# Disclosures



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# Disclosures

## ACGC Accreditation Statement

The Master of Science in Human Genetics and Genetic Counseling program at Keck Graduate Institute is accredited by the Accreditation Council for Genetic Counseling (ACGC):

### Accreditation Council for Genetic Counseling

4400 College Boulevard, Ste. 220  
Overland Park, KS 66211  
913.222.8668  
[gceducation.org](http://gceducation.org)

## Complaints Related to ACGC Standards

Any person concerned about the quality of a Genetic Counseling Program accredited by the Accreditation Council for Genetic Counseling (ACGC) may contact the ACGC Executive Office. Complaints regarding a program should be made in writing to the ACGC Executive Office. The ACGC Board will consider and investigate those complaints containing allegations which, if substantiated, may indicate noncompliance with accreditation standards. For more specific information on these policies and procedures for filing a complaint, please visit the [website](#).

## ACPE Accreditation Disclosure Statement

Keck Graduate Institute's School of Pharmacy and Health Sciences Doctor of Pharmacy (PharmD) program is accredited by the Accreditation Council for Pharmacy Education..

### Accreditation Council for Pharmacy Education

135 South LaSalle Street, Suite 4100  
Chicago, Illinois 60603  
312.664.3575 | FAX 312.664.4652  
[acpe-accredit.org](http://acpe-accredit.org)

## Complaints Related to ACPE Standards

KGI School of Pharmacy and Health Sciences has an obligation to respond to any written complaints by students lodged against the School that are related to the standards of the accrediting body. At any time, the student pharmacist or prospective student pharmacist can contact ACPE directly through the website to access the standards and the procedures for filing a complaint. [Click here](#).

If the student pharmacist or prospective student pharmacist prefers to discuss the complaint locally with the School's administration, the student is encouraged to present the complaint (in writing) to the Office of the Dean. These complaints will be recorded and provided to ACPE upon request.

## MSPA Accreditation Statement

The ARC-PA has granted Accreditation-Provisional status to the Keck Graduate Institute Physician Assistant Program sponsored by Keck Graduate Institute.

Accreditation-Provisional is an accreditation status granted when the plans and resource allocation, if fully implemented as planned, of a proposed program that has not yet enrolled students appear to demonstrate the program's ability to meet the ARC-PA Standards or when a program holding Accreditation-Provisional status appears to demonstrate continued progress in complying with the Standards as it prepares for the graduation of the first class (cohort) of students.

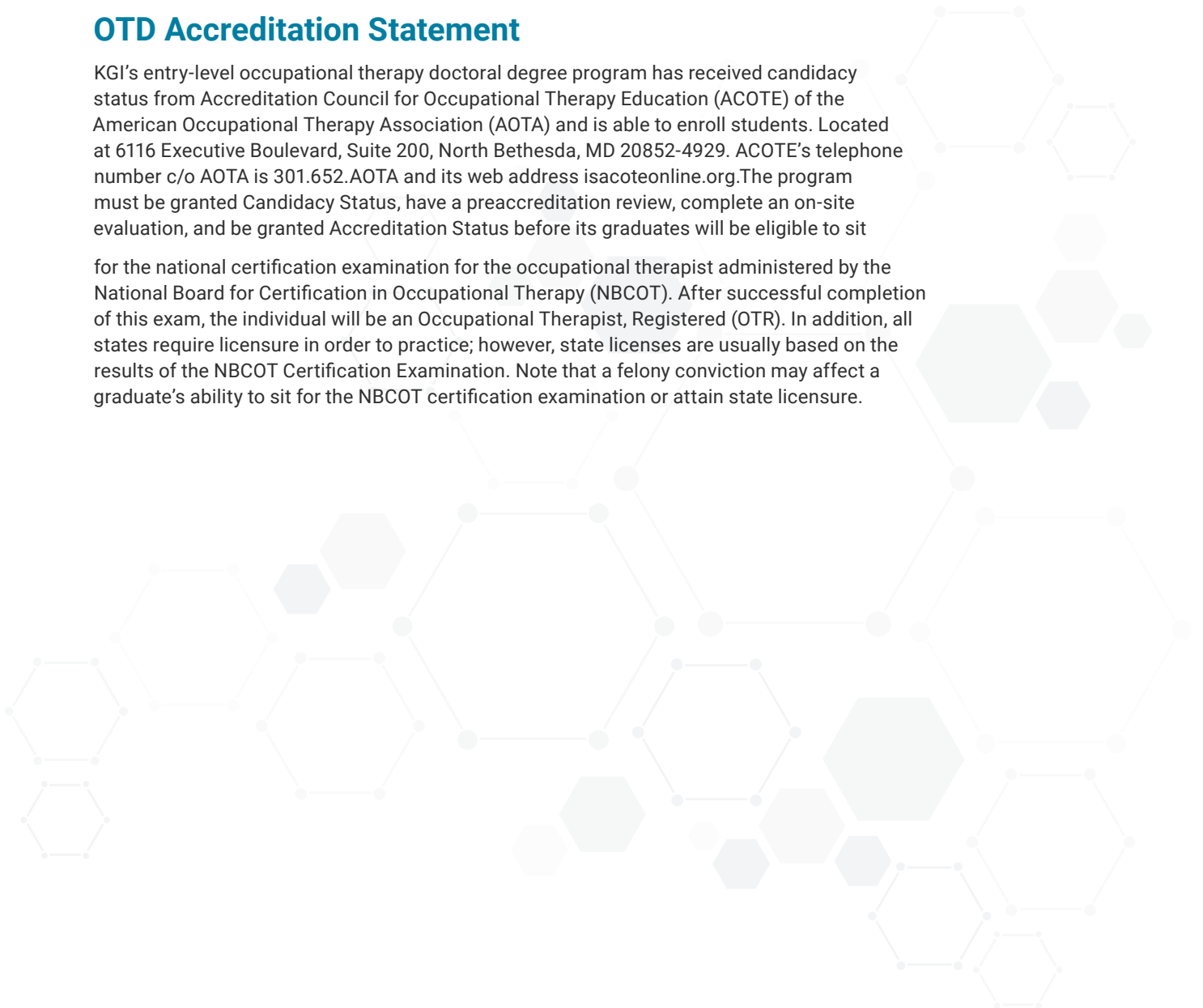
Accreditation-Provisional does not ensure any subsequent accreditation status. It is limited to no more than five years from matriculation of the first class.

The program's accreditation history can be viewed on the ARC-PA website at <http://www.arc-pa.org/accreditation-history-keck-graduate-institute/>.

## OTD Accreditation Statement

KGI's entry-level occupational therapy doctoral degree program has received candidacy status from Accreditation Council for Occupational Therapy Education (ACOTE) of the American Occupational Therapy Association (AOTA) and is able to enroll students. Located at 6116 Executive Boulevard, Suite 200, North Bethesda, MD 20852-4929. ACOTE's telephone number c/o AOTA is 301.652.AOTA and its web address is [acoteonline.org](http://acoteonline.org). The program must be granted Candidacy Status, have a preaccreditation review, complete an on-site evaluation, and be granted Accreditation Status before its graduates will be eligible to sit

for the national certification examination for the occupational therapist administered by the National Board for Certification in Occupational Therapy (NBCOT). After successful completion of this exam, the individual will be an Occupational Therapist, Registered (OTR). In addition, all states require licensure in order to practice; however, state licenses are usually based on the results of the NBCOT Certification Examination. Note that a felony conviction may affect a graduate's ability to sit for the NBCOT certification examination or attain state licensure.



## WASC Accreditation Statement

Keck Graduate Institute (KGI) is accredited by the Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges:

### Western Association of Schools and Colleges

985 Atlantic Avenue, #100  
Alameda, CA 94501

510.748.9001  
[wscuc.org](http://wscuc.org)

## Complaints Related to WASC Standards

KGI has an obligation to respond to any written complaints by students lodged against the Institute that are related to the standards of the accrediting body. At any time, a student or prospective student can contact WASC directly through the [website](#) to access the standards and the procedures for filing a complaint. If the student or prospective student prefers to discuss the complaint locally with the School's Administration, the student is encouraged to present the complaint (in writing) to the Office of the Dean. These complaints will be recorded and provided to WASC upon request.

## State of California Complaint Process

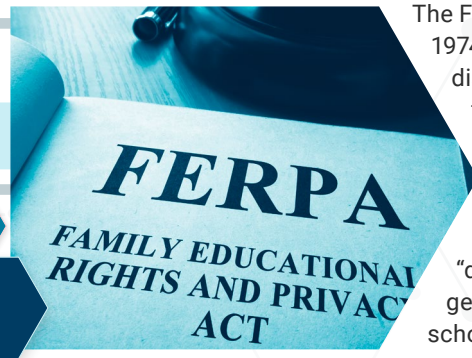
An individual may contact the Bureau for Postsecondary Education for review of a complaint. The bureau may be contacted at:

### Bureau for Postsecondary Education

2535 Capital Oaks Drive, Suite 400  
Sacramento, CA 95833

916.431.6924 | FAX: 916.263.1897  
[bppe.ca.gov](http://bppe.ca.gov)

## Family Educational Rights and Privacy Act of 1974 (FERPA)



The Family Educational Rights and Privacy Act of 1974, as amended, (FERPA) prohibits a school from disclosing personally identifiable information from students' education records without the consent of a parent or eligible student, unless an exception to FERPA's general consent rule applies. In some emergency situations, schools may only need to disclose properly designated "directory information" on students that provide general contact information. In other scenarios, school officials may believe that a health or safety emergency exists and more specific information on

students should be disclosed to appropriate parties. Understanding the options available under FERPA empowers school officials to act quickly and decisively when concerns arise.

FERPA is not intended to be an obstacle in addressing emergencies and protecting the safety of students.

## Privacy Rights and Responsibilities

In compliance with the federal Family Educational Rights and Privacy Act of 1974 (FERPA) and the California Public Information Act, students at KGI are assigned the following four rights in regard to maintained education records:

- Students have the right to inspect and review education records. Education records are defined as records in any format that directly identify the student and are maintained by the various offices of KGI. Some records may be administered by additional privacy laws and regulations that supersede FERPA, and, therefore, may not be available under this policy. Requests for the inspection and review of education records must be submitted directly to the custodian of the record, following policy and procedure of the office in whose custody the record is maintained.
- Students have the right to seek to amend education records. In compliance with KGI's policy, individual offices have established procedures for challenging the content of education records. Students may also submit a written request for review of a particular education record to the appropriate office. Under FERPA, grades are exempted from this provision. Students with concerns about individual grades should contact the Dean of Students.
- Students have the right to have some control over the disclosure of information from education records. Students may request that KGI restrict the release of directory information by submitting a written request to the Registrar's Office. Such restrictions remain in effect until cancelled in writing by the student. Students may declare themselves to be tax dependents of their parents and authorize KGI to release non-directory information to parents. Such authorizations remain in effect until cancelled in writing by the student.
- Students have the right to file a complaint with the Federal Policy Compliance Office, a division of the US Department of Education, for any alleged violation of their rights under FERPA. Complaints must be submitted in writing to:

**Family Policy Compliance Office, US Department of Education**

400 Maryland Avenue SW  
Washington DC 20202-5920

## Annual Notice

Keck Graduate Institute will notify all registered students annually of their FERPA rights through the publication of the student handbook which is available online at the KGI website and in this handbook.

In compliance with FERPA, KGI has designated the following items of information as directory information: name and student user name; local and permanent address; local, cellular, and permanent phone number; e-mail address; date and place of birth; major field of study; dates of attendance; enrollment status; degrees and awards received; most recent previous institution attended; photographs; participation in officially recognized activities. Directory information is defined as information that would not generally be considered harmful or an invasion of privacy if released. Unless restricted by the written request of a student, KGI may release directory information without the prior consent of a student. Directory information required for course or classroom participation in courses may not be withheld from faculty and students connected with the particular course. Information that is not directory information is non-directory information and, unless accepted by FERPA, requires the prior written consent of the student for release.

As permitted by FERPA, KGI allows access to student directory and non-directory information by education officials when a legitimate educational interest exists for specific education records. A legitimate educational interest exists when an education official demonstrates a need to know specific information to accomplish instructional, advisory, administrative, research, supervisory, or other administrative responsibilities assigned by KGI. Education officials may include employees,

faculty, and staff, designated representatives of KGI, and contracted agents and agencies of KGI. KGI may outsource some operations requiring the disclosure of information from education records. Providers of such services include the National Student Clearinghouse. Education officials, including contracted providers, who receive education records must comply with all FERPA regulations regarding re-disclosure and the privacy of such education records.

Under FERPA, and in compliance with other federal and local regulations, privacy rights in the post-secondary environment are reassigned from parents to students. Nevertheless, FERPA permits institutions to disclose information from education records to parents and to other third-party entities in specific situations and under certain conditions. Among these situations are the following: to schools where the student seeks, intends, or has enrolled; in connection with financial aid; to certain government authorities, including US military recruiters; to certain entities conducting studies or audits on behalf of KGI, by federal, state, or local education authorities, or by professional and other educational organizations; in compliance with court orders and subpoena where health and safety are at risk or in the event of student status changes; when violations to federal, state, or local regulations have occurred and violations to institutional policy have been determined in regard to crimes of violence or non-forcible sex acts and, for students under the age of 21, the use or possession of alcohol or other controlled substances; and per additional contingencies set forth in FERPA.

For further information from the United States Department of Education, please visit their [website](#).

You can find detailed FERPA information [here](#).

## Health Insurance Portability and Accountability Act (HIPAA)

### HIPAA Privacy Rule and Compliance



The HIPAA Privacy Rule (45 CFR Part 160 and Part 164) establishes national standards to protect individual's medical records and other personal health information.

The Privacy Rule applies to health plans, health care clearinghouses, and health care providers that conduct health care transactions electronically.

The HIPAA Privacy Rule requires appropriate safeguards to protect the privacy of personal health information, and sets limits and conditions on the uses and disclosures that may be made of such information without patient authorization.

The Privacy Rule also gives patient's rights over their health information, including rights to examine and obtain a copy of their health records, and to request corrections.

Students are required to adhere to the Health Insurance Portability and Accountability Act (HIPAA) during all rotations, volunteer experience, and research. Violations of HIPAA and patient confidentiality will result in removal from rotation, a failing grade for that rotation, and may result in civil or criminal penalties as prescribed by current HIPAA Privacy Rule regulations. Additionally, California law provides for severe civil and criminal penalties for violating patient confidentiality.

### What patient information must we protect?

All information about an individual who is a patient of a health care service is private or confidential. The information may be written on paper, saved on a computer or spoken. HIPAA refers to this information as **Protected Health Information (PHI)**.

PHI includes:

- A person's name, address, phone numbers, e-mail address, age, birth date, social security number
- Medical records including the reason for seeking health care, diagnosis, prescribed treatment and medications, x-rays, lab work, test results
- Billing records including claim information, referral authorizations, benefits explanations research records

If you have access to any of this information—including the simplest fact that a person received health services—and reveal it to someone who does not need to know it, you have broken the law and compromised a person's confidentiality.

### What is not considered PHI?

Health information is not protected health information if it is de-identified. De-identified information may be used without restriction and without patient authorization. The de-identification standard provides two methods for which health information can be designated as de-identified. The first method requires the removal of all 18 identifying data elements listed in the regulations. If the resulting information cannot be used to identify the individual, then it is no longer PHI. The second method requires an expert to document their determination that the information is not individually identifiable ("Expert Determination").

How does HIPAA affect you while on internships, clinical rotations, volunteer experiences, and research?

As part of your experiences with access to patient data you must protect the privacy of PHI.

### When can you use PHI?

You can only access and use PHI to fulfill your educational responsibilities while performing your internship, IPPE/APPE, volunteer, clinical rotation experience, or research. You should, at all times, protect a person's information as if it were your own information. You may look at a person's PHI only if you need it as part of your internship, clinical rotation, volunteer experience, or research; use a person's PHI only if you need it to complete your responsibilities on your internship, clinical rotation, or pharmacy practice experience(s), give a person's PHI to others when it is necessary for them to do their jobs, and/or talk to others about a person's PHI only if it is necessary to the internship, clinical rotation, volunteer experience, or research.

### Need to Know?

Use common sense in making decisions about whether you need to see or share PHI to perform your task. Ask yourself, "Do I need to know this to be effective in the pharmacy practice experience, volunteer experience, clinical rotation, or research I am doing?" If you do not, do not access the information. It is none of your business! But if it is your business, you have nothing to worry about.



#### WHAT ELSE SHOULD I BE THINKING ABOUT TO PROTECT PRIVACY OF PHI?

- Strong computer security practices are protective of private information. These are some best practices to implement:
- Use common sense when receiving attachments from strangers. Don't open a file unless you have reason to have expected to receive one.
- Pay attention to "cries for help" from your computer. If hackers have gained access, you might notice the disk drives chattering when you aren't asking the computer to do anything. Subtle changes to your desktop might suggest someone is running "remote control" software against you.
- Clear off disk drives before disposal of computers. Use a "disk wipe" program or a low level format.
- Use a screen saver that locks your desktop when you are away from your desk.

For more information and resources regarding HIPAA, please [click here](#).

