Disclosure of Sensitive Student Information in Social Work Field Placements[1]

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Abstract
A national survey of Field Directors in MSW programs concerning the disclosure of sensitive student information found that open discussion among students, field agencies, and university faculty concerning serious student difficulties in field does not routinely occur. This lack of communication may create gaps in student learning and may leave field faculty in ethically precarious situations.
Keyterms: sensitive student information; social work field education; ethical dilemmas; Family Education Rights and Privacy Act; informed consent.

In the course of social work education, difficulties occasionally arise around a particular student's ability to function effectively in the practice setting. These difficulties may include inappropriate boundary issues with clients or difficulties in personal functioning, for example, but typically these student difficulties present dilemmas to the educator concerning how to protect student confidentiality while also protecting the student's potential clients. These ethical dilemmas sometimes result in hours of conversation and debates within schools concerning an appropriate resolution. One common method of addressing these dilemmas is to instruct students to disclose their difficulties to the agency field instructor; however, follow-up by the faculty field educator may be spotty and the educational team of field instructor, field liaison, and student may never discuss the difficulty openly. Opportunities for learning are lost in the information gaps, and thus the full opportunity to train a professional social worker may not be realized. This study seeks to explore how Master of Social Work (MSW) programs cope with the dilemma of disclosing

sensitive student information in field placement, especially given the requirements of the Federal Educational Rights and Privacy Act (FERPA) of 1974 (P.L.93-579). Are faculty bound by FERPA regulations or by the National Association of Social Workers' (NASW) Code of Ethics, which states, in general, clients' interests are primary? (NASW Code of Ethics, 1999, p.7)

Literature Review

Despite the regulations governing release of student information, many social work educators have written about the need for open collaboration between university field faculty and community field instructors (Congress, 1997; Forrester, Corliss & Hastings, 2002; Gelman & Wardell, 1988; Rosenblum & Raphael, 1991; Urdang, 1991; Zukutansky & Surles, 1993). Some writers have focused on the ambiguity involving how much social work educators may disclose of sensitive student information (Meier & Long, 1998; Strom- Gottfried, 2000) and others have written about the vulnerability of clients (Levy, 1993). Reeser and Wertkin (1997) note that "student information is defined as sensitive if it entails personal or family problems, illness, or disability (e.g., criminal history, psychiatric diagnosis, or substance abuse)" (p. 347).

Although students with difficulties constitute a very small proportion of the total student body, the challenges they present can take an enormous amount of faculty time and energy (Regehr, Stalker, Jacobs and Pelech, 2001). Social work students are more likely to report problems such as a sexual abuse history, early separation from parents, or alcoholism and mental illness within their families of origin than are students in other programs. Regehr, et al, suggest that professional training needs to help students recognize, acknowledge, and work through their feelings to avoid imposing their issues on clients.

In 1989, Alperin conducted a survey of the 347 accredited Bachelor of Social Work (BSW) programs. She received 140 surveys for a 41% return rate. The Field Directors were given a pair of open-ended questions to answer about their program's general philosophy and rationale for sharing personal student data. She found that about one-third of the schools generally shared as much personal information as possible based on their perceived responsibility to the agency and to the agency's clients. About two-thirds of the programs did not share personal information with field instructors. The Field Directors felt that sharing personal student information would bias the field instructor.

Reeser and Wertkin (1997) sent a survey to faculty liaisons, field instructors, and students at ten universities in the Midwest, Northeast, South, and West at BSW and MSW programs. Completed surveys were returned from 573 field instructors, 232 students, and 63 field liaisons. The primary research question concerned the commonalities and differences in the perspectives of students, liaisons, and field instructors about sharing sensitive student information. Each group was given examples of personal information and asked if field liaisons should share that information with field instructors. Overall, field instructors had the highest number of yes responses, students had the highest no responses, and field liaisons had the highest amount of maybe responses. Strikingly, for most types of student information, the percentage of liaisons that responded yes was closer to that of students than that of field instructor. When these three groups were asked their opinions about whether or not sharing personal information violated the student's right to confidentiality, many did acknowledge that sometimes confidentiality cannot be maintained to serve the greater good (Reeser & Wertkin, 1997, p.354).

Ethical Considerations

The *NASW Code of Ethics* purpose statement explains that reasonable differences of opinion may exist among social workers with respect to how ethical standards should be rank ordered when they conflict. Experts in the field of ethics offer differing theories that inform educators and practitioners on how to prioritize competing ethical considerations. For example, John Rawls (1999) argued that each person's social positioning occurs simply by luck, but luck can be influenced by institutions that are created by human beings. For instance, it is a matter of luck to be born a slave, but the institution of slavery was a human creation. Therefore, Rawls developed a difference principle (Rawls, 1999, p. 65), which protects the least advantaged based on a ranked ordering of priorities. When deciding between a student's right to confidentiality and a client's right to protection by using Rawls' framework of what is just, it seems we would need to rank order the right of the least advantaged (the client) as primary.

Reamer (1995) formulated guidelines to help social workers make decisions in instances when their duties conflict. For instance, he felt that rules against basic harms to the necessary preconditions of human action (such as life itself, health, food, shelter, mental equilibrium) [should] take precedence over rules against harms such as lying or revealing confidential information or threats to additive goods such as recreation, education, and wealth (p.60). This

guideline might resolve many questions about sharing sensitive student information. In many respects, the client is so vulnerable when he presents himself for assistance by a student that his or her very life, health, and mental equilibrium are affected by the interaction with the student. This vulnerability of the client is thus prioritized, much as Rawls might, over the confidentiality and educational needs of the student.

Kidder (1995) provides support for similar decision-making from a different perspective. He felt that one of the central ethical dilemmas in human experience is weighing individual rights against community interests. Kidder values community over the individual. He believed that individual rights have been taken to such an extreme in this country that serious damage has been done to community. He justifies placing the community as the top priority by pointing out that the individual is included in community, but the community is not a concern when the focus is totally upon the individual. Kidder might suggest that disclosing relevant student information would enhance the community by protecting the client and agency and by strengthening the educational team collaboration by creating an open learning environment that contributes to the student's growth as a responsible professional.

Aside from these theories, the ethical implications of the university and community relationship also inform decision makers. In a continuum of community-based education experiences, volunteerism is on one end where the benefits go to the recipient of the service, and field placements are on the other end where the primary benefit is the student educational development with service secondary (Quinn, Gamble, and Denham, 2001). Universities and their faculties maintain a delicate balance between the needs of the students as learners and the needs of the community. This balance is particularly important to consider since the university generally has greater fiscal and political power in a community than the agencies in which students will engage in their practice learning. The goal is to develop a true partnership between the university and the community, acknowledging the power carried by the university and the need for stewardship.

Expecting students to be a part of this true partnership requires their prior knowledge of its importance and agreement to participate fully. Lowenberg, Dolgoff, and Harrington (2000) explained that three issues are involved in informed consent: disclosure of information, voluntariness, and competency. A student who is asked to consent to the disclosure of sensitive

information to the field instructor can only be considered sufficiently informed to give consent if she knows to what she is consenting, what will happen because of the consent, and what will happen if she chooses not to give consent. If consent is to be meaningful, it must be freely given. Students must thoughtfully decide if they are willing to become part of an educational process that includes the university, the community, and themselves, both academically and personally. For consent to be freely given, it would best occur prior to the beginning of the process.

Legal Considerations

The Federal Education Rights and Privacy Act (FERPA) is part of the legal context of higher education and a major contributor to the perceived dilemma in social work field education. FERPA exists both to protect confidentiality and to govern access to student information. For the purposes of this study, the focus is on student confidentiality. This law is not a mandate; rather FERPA requirements are conditions attached to the receipt of federal educational monies. FERPA states that the University may not disclose student education records, and if they do, federal funds can be rescinded, *although this sanction has never been imposed* (Dagget, 1997). On June 20, 2002, overturning years of legal precedent, the Supreme Court ruled that individuals can no longer use FERPA to bring suit (High Court, 2002).

Furthermore, exactly who has access to student records has been clarified. FERPA requires that consent be obtained to release student records to a third party, with certain exceptions contained in the law. One of these exceptions is that an institution may release information without consent to school officials with legitimate educational interests. The definition of a school official has been ambiguous, but the Family Policy Compliance office, the government agency charged to enforce FERPA regulations, suggests that a school official is identified as someone who is employed by the School as an administrator, supervisor, instructor, or support staff member (including health or medical staff and law enforcement unit personnel); a person serving on the School Board; a person or company with whom the School has contracted to perform a special task (such as an attorney, auditor, medical consultant, or therapist); or a parent or student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility (Model Notification of Rights for Elementary and Secondary Schools, 2003).

Based on this explanation, it appears that a field instructor is entitled to sensitive student information, since the faculty field liaison cannot perform the task of co-supervising the field placement without his or her assistance.

Purpose of this Study

Given the perception that has existed of ethical theories competing with legal considerations, the rules about the sharing of sensitive student information regarding students in field placements have not been straightforward. The purpose of this study was to learn how accredited MSW programs have attempted to comply with the ethics and the laws when difficult situations have arisen in field placement. Specifically, Field Directors from accredited MSW programs were asked to respond to student field placement scenarios that highlighted issues that create dilemmas concerning the sharing of sensitive student information. Questions were also asked to determine how programs could be categorized in terms of having written policies, location of policies, frequency that the dilemma arises during an academic year, number of grievances and lawsuits that have arisen from these dilemmas, and which faculty make the decisions about sharing sensitive information.

The findings of this study are primarily addressed to social work educators and agency supervisors who have responsibility for students in field placements, although it may have implications for educators in other helping professions. The information gained about how schools cope will provide an improved foundation to understand what problems are perceived in coping with this dilemma, what is working well, and what might be helpful in the future.

Procedures

The Survey Instrument

Four scenarios of dilemmas were constructed in order to gain information about how social work educators make decisions about sharing sensitive student information with the field agencies. To enhance the validity of the information obtained through the scenarios, they were constructed from categories used by Alperin (1989) and Reeser and Wertkin (1997) in their surveys about this issue. For instance, both surveys inquired about student inpatient hospitalization and whether sensitive student information would be disclosed by the educator to the agency. The following dilemma, then, was constructed for the present study:

> *During the semester a student confides in you about stressful experiences he is suffering secondary to the break-up of a relationship. As liaison you refer your student to several sources*

of help. At the mid-term evaluative meeting held conjointly with the field instructor, the field instructor reports that the student has been disorganized in the necessary documentation of services and in his presentation of cases in their weekly meetings and has not demonstrated any real interest in the work. Two weeks later you receive a call from the student saying everything built up and he decided that he needed to go for inpatient psychiatric treatment. Your student was unable to sleep or concentrate. The student requests that you tell the field instructor that he is too sick to be in for the next week.

Response categories were structured to provide choices among keeping the information within the school (student rights and FERPA related); putting the responsibility on the student to notify the field instructor (satisfies both ethical and legal concerns but does not address co-supervision issues); the educator notifying the field instructor herself (ethics for client protection, gate-keeping, supervision legalities); or requiring the student to set up a meeting for student, field instructor, and field liaison to address all concerns (inclusively satisfies supervisional, ethical, legal concerns and builds an educational partnership among all parties on student's behalf). After choosing among these options, a space was provided for comments to be written in for clarification of the categorical responses (copies of survey are available upon request). For purposes of this discussion, the title of field instructor pertains to the individual in the community agency who is assigned the role of immediate supervisor to the student in placement. The title of field liaison pertains to the social work faculty member (full-time or adjunct) who is responsible for monitoring the placement and providing co-supervision to the student.

The second dilemma was that of a student with a documented psychiatric disability controlled with medication, but the student does not want to share that information with his field instructor. He is currently unable to function adequately in the morning at his field placement and needs reasonable accommodations applied. A third scenario involved a student dismissed from a field placement as a result of boundary problems, and the field liaison has to set up another placement. The final dilemma involved a student who is in recovery from alcoholism. She has a relapse, does not tell her field instructor, and now she has been late to field placement for two weeks without explanation. These dilemmas or similar ones have occurred to most of us who have been in field education for a few years.

The second section of the survey requested specific information about each schools' policies and practices around sharing sensitive student information. Respondents were asked to respond yes/no to a series of questions, such as: in a forced choice situation would your program prioritize ethics for client protections or laws for student rights; does your program have a written

policy concerning the sharing of sensitive student information, and, if so, where is it located and could you provide a copy; intent of written policies; relevant lawsuit involvement; relevant student grievances; student signature obtained for informed consent; faculty decision makers; status of field instructor (paid, and graduate faculty status); in-service training on ethics; and in-service training on FERPA.

An early draft of the survey was sent to six ethical experts for review (see credits after conclusion), identified in collaboration with the co-chair of the CSWE field committee. The feedback received from these experts was used to reconstruct the survey, so the questions and intent were clearer. In general, reviewer comments on the earlier draft related to confusingly worded questions, response choices where more than one would be appropriate, and not enough detail on some of the items to allow a respondent to reply appropriately.

The Statistical Program for the Social Sciences (SPSS) version 10 was used to manipulate the survey data. Many surveys were also returned with additional data volunteered in the comments section included with the dilemmas. A post-hoc analysis was conducted on this qualitative data.

The Sample

The population selected for this study was the 146 accredited MSW programs in the United States as identified by the Council on Social Work Education in April 2002 (Johnson, personal communication, 4/16/02). The unit of analysis was the program. Survey packets (cover letter, paper survey, and self-addressed, postpaid envelope) were sent in care of each program's Field Director in November 2002. The Field Director was selected as the faculty member most likely to be aware of how his or her school copes when legalities and ethics collide around the disclosure of sensitive student information in field placement. The Field Director received this designation because as supervisor of all field faculty the Field Director will generally be made aware of a difficult student situation and assist the field liaison with resolution.

An e-mail reminder to respond went out to the Field Directors in December 2002, followed by a second mailing of the survey (with modified cover letter and self- addressed, postpaid envelope) in January 2003. Eighty surveys (55%) were returned by the date the analyses began. Rubin and Babbie (1997) stated that a 50% rate is usually considered adequate for analysis and reporting. Five surveys arrived after the cutoff date and were unable to be used, and two additional Field Directors wrote specifically to report that they would not be participating in the survey

because the response categories did not fit their experience. All identifying information (such as return address and/or postmark) was separated from the survey upon arrival in the researcher's office, so the data were anonymous.

Despite the 55% return rate, non-responding schools were contacted to examine any effects that might be due to non-response bias. A random sample of six percent (n=4) of the non-responding schools was selected and Field Directors were telephoned. Their responses indicated no particular signs of bias: I didn't receive it, I don't remember it, the subject speaks to me, but I didn't have time to do any surveys in the past few months, and I don't remember receiving it. Based on these remarks, no bias was identified.

Results

Responses to Scenario one: Student inpatient hospitalization, who explains absence and why

Table 1 presents the frequency of responses to each of the choices within the four scenarios. As shown in Table 1, for the first scenario, more of the Field Directors or 44% indicated that the student would be required to notify the field instructor; 34% felt that a three-way meeting with the student, field instructor, and field liaison would be called; 15% felt that the educator should notify the field instructor; 2.5% said that the information would be kept inside the school; and 5% did not respond by completing one of the four forced-choice options.

Provided with space to comment on their choices, field instructors clarified their meaning. Of the 80 respondents, 60 (75%) wrote comments following their choices. Thirteen of the 35 Field Directors who reported that they would require the student to notify the field instructor went on to explain that the next step would be a follow- up call to the field instructor or a three-way meeting, so the explanations made the collaborative intent clearer. In this most popular response category, four comments specified that the student has discretion over what is shared; faculty need to work with the student about what's comfortable to share; to disclose, need a release, thus student must do it, and student must share information that affects learning in the field with field instructor. Two comments noted that the student would be requested rather than required to notify the field instructor.

The comments written in for the three-way meeting included: we would support student by coaching appropriate professional behavior and how to address this sensitive issue with the field instructor, student needs to be involved as a part of learning process; school cant take responsibility

for student, nor allow a triangulation of parties; we see our role as helping students learn to deal with professional/personal issues as they would post-graduate.

Three Field Directors explaining their response to have the educator notify the field instructor reported that they would explain that the student was ill, but not the nature of the illness. One Field Director who did not select a response category said that the student would be required to drop field, and three others who had selected the response of having the educator notify the field instructor further explained in their comments that the viability of the field placement was questionable and would be evaluated.

Responses to Scenario two: Documented psychiatric disability impacting a student's functioning

In response to the second scenario, 39, or nearly half, of the field directors thought a three-way meeting among the student, field instructor, and field liaison would be the appropriate action. Another 33% of the field directors felt that the student should notify the field instructor, and of these, 20% commented that the next step would be a three-way meeting, again clarifying the collaborative intent. Only four percent of the Field Directors thought the educator should notify the field instructor, about six percent chose to keep the information inside the school, and almost nine percent did not select a response category. Of the nine percent not selecting a response category, four would refer to the Office on Disability.

In the most popular response category, the three-way meeting, some of the comments included: we work to support student in taking responsibility for education. We provide support to the agency by being present at the meeting and seeking a mutually beneficial solution, responsibility lies in varying degrees with each individual involved. We can't encourage student to hide or be punished for having such issues, this may be an issue in future employment. He needs to learn to advocate for himself. Five of these Field Directors would refer to the Disability Office.

The responses following requiring a student to notify the field instructor ranged from expecting students to handle the situation in two instances to three additional Field Directors referring to the Office on Disability. A total of 12 Field Directors or 15% of all those volunteering comments would refer to the Office on Disability.

Responses to Scenario three: Student dismissed from placement as a result of boundary issues

The biggest response endorsed to scenario three was that of the educator notifying the field instructor. Thirty-seven percent of the Field Directors believed that this was the right response. Fully fifteen of the 23 written comments to this response stressed that the new field instructor would need to work with the student on these boundary issues in the new placement. Eight of the 23 explained that student consent would be gained prior to telling the field instructor about the boundary issues. One Field Director wrote, this was a clearer example of school's duty to warn new field instructor in order to protect clients, and another wrote, this is an educational issue and field instructor is part of educational team.

In contrast, about 13% of the Field Directors wanted to keep the information inside the school. One Field Director explained, the student gets one fresh chance. Another commented, Liaison carefully monitors to see if pattern continues. One explained that the student goes to Practicum Review Committee and student would sit out a semester before returning to field and do remediation.

About seventeen percent of the Field Directors thought the student needed to notify the field instructor, and 20% of the Field Directors thought that a three-way meeting was needed. Comments in these sections included ten Field Directors who would make sure the boundary problems would be addressed in the learning contract: Another one in the group would strongly encourage student to share information, refer to therapy, and three of these Field Directors may not place the student again.

Almost 13% or 10 of the Field Directors did not choose a response category. Five of these schools would evaluate the student and field placement to determine course of action. Three would make sure the new field instructor received some sort of information, but how much was negotiable. Another would require disclosure from student prior to making another placement. A total of five comments explained that one option would be to remove the student from field, at least for the semester.

Responses to Scenario four: substance abuse relapse and student arriving late without explanation

The majority (51%) of Field Directors thought that a three-way meeting was the appropriate response to the fourth scenario. Two who chose this category explained that the student would be suspended from placement until the concerns were addressed. Various referral options noted by Field Directors included: AA, counseling, Professional Review Committee, and Faculty Disciplinary Committee. One Field Director explained, The *Code of Ethics* speaks to our responsibility to impaired professionals, and a remedial learning plan would be developed. The school is responsible to the student, the agency, and client.

Only one Field Director chose to have the educator notify the field instructor and even this person said, First let the student know. Five Field Directors (6%) did not choose a response. Two of these explained that they would remove the student from placement and two others would refer to counseling. One said, meet with the student for a plan, maybe faculty advisor can identify steps are to be taken to protect student from future relapse and protect client from inconsistency.

Twenty percent of the Field Directors said they would have the student notify the field instructor. One person explained, In the 13 years that I have been doing field I have never had a student that was unwilling to share personal problems with a field instructor if they know it is affecting their performance, excluding disabilities. One Field Director explained that the student would be asked to withdraw from the program and return when able to meet program expectations.

Almost the same number, 21%, of Field Directors thought that keeping the information inside the school was the right response. Four of the written comments explained that the student might be removed from field placement. Two Field Directors explained that they would hold the student accountable within the school. Four more Field Directors said the situation would be monitored and if it persisted, then they would move to a three-way meeting. A total of five Field Directors would remove the student, and three more may remove the student, from the field placement.

Characteristics of programs regarding policies

Twenty-one of the 80 (~27%) responding Field Directors reported that their programs have a written policy regarding the sharing of sensitive student information. The survey (see Tables 1 and 2) requested that a copy of the policy be submitted. Nineteen Field Directors included a copy

of the policy with the returned survey. Three of these were almost the same. When the policies were analyzed, it was clear that only 13 programs had policies that spoke to the broad question of sharing sensitive student information with the field instructor. The other six examples submitted pertained selectively to criminal history, disabilities, counseling out, or included a statement about sharing the information that was submitted on the field placement application. An additional question concerned the location of the written policy. Sixteen of the schools placed the policy in the field manual, among other places mentioned. Three placed them in admission materials.

Table 1 Frequency count of responses to scenarios

Response category	Scenario 1 (inpatient hospitalization) n=80		Scenario 2 (documented psychiatric disability) n=80		Scenario 3 (boundary problems get student dismissed) n=79		Scenario 4 (substance abuse relapse) n=80		Totals N=31	
Keep information inside school	n = 2	3%	n = 5	6%	n = 11	13%	n = 17	21%	n = 35	11%
Require student to notify field instructor	n = 35	44%	n = 26	33%	n = 13	17%	n = 16	20%	n = 90	28%
Field liaison notifies field instructor	n = 12	15%	n = 3	4%	n = 29	36%	n = 1	1%	n = 45	14%
Require student to set up a three-way meeting	n = 27	34%	n = 39	49%	n = 39	49%	n = 39	49%	n = 39	49%
No response Missing data	n = 4	5%	n = 7	9%	n = 10	13%	n = 5	6%	n = 27	9%

Respondents were also asked: In the past year how many students did you have to debate over whether or not to share sensitive student information with field instructors? When problems ensue with students, the field liaison is the first to know. The following scenario may occur. The field liaison goes to the advisor or to the Field Director and requests a consult. That meeting results in several options for handling the situation, and often the student may be called in at this point to address the concerns of the faculty. The field liaison may be left with the final judgment call about how to negotiate a successful conclusion with the student and to decide exactly what to tell the agency field instructor. Field Directors reported that debates among faculty concerning problems with students in field in one academic year could range from none at all to eleven times (76 of 80). The mean of the number of debates was 2.72, and the median was 2.00. It is important to note the 31.6% (24 of 76) programs reported that they had no debates.

The survey asked: does your school have students sign for informed consent regarding how their information will be shared with field instructors? Twenty-nine or 36.3% of the schools indicated that they did have student sign for informed consent.

In a related question the survey asked, has your school been involved in a lawsuit with regard to these issues? Six of 80 (7.5%) Field Directors said, Yes. Of these six, only one had a written policy. A similar question asked, "Have any of your students-initiated grievances within

the school regarding how their sensitive information was shared?" Seven schools, or ~9%, had been involved in a grievance. Two schools had one grievance, four had two grievances, and one had four grievances. None of these had a written policy.

One other category must be noted in the results. The survey asked, who makes these decisions regarding when sensitive student information is shared? Forty-seven Field Directors chose the Field Director - field liaison as the team responsible. Some programs use more than one team to resolve these situations. Twelve used the Field Director and the Dean. Three use the field liaison and the advisor, and nine said the decision would be made by faculty consensus.

Table 2 Summary of Program Characteristics in Relation to Sensitive Student Information

1. Does your school have a written policy concerning sharing sensitive student information?	
Yes 21 (~27%)	No 59 (~74%)

2. The written policies that were broad in sensitive student information and not just about disability or criminal background, etc. --- Number of broad policies 13	
Where do you place the written policy? Admission material 15; Field Manual (etc.) 16	

3. Do you have students sign for informed consent in sharing of sensitive student information?	
Yes 29 (36%)	No 51 (64%)

4. How many times does the issue of sharing sensitive student information come up over the year? (n=76)
• 24 MSW programs of these 24 programs, 4 had students sign for informed consent
• 7 programs of these 7 programs, 3 had students sign for informed consent
• 11 programs of these 11 programs, 3 had students sign for informed consent
• 9 programs of these 9 programs, 7 had students sign for informed consent
• 5 programs of these 5 programs, 2 had students sign for informed consent
• 8 programs of these 8 programs, 6 had students sign for informed consent
• 5 programs
• 1 program informed consent
• 3 programs
• 1 program 1 program
• 1 program informed consent
• 0 informed consent this program had students sign for
• 0 informed consent 0 informed consent
• 0 informed consent this program had students sign for

5. Has your school ever been involved in a lawsuit with regard to sensitive student information?	
Yes 6 (only 1 had a written policy) (~8%)	No 74

6. Have any of your students-initiated grievances within the school regarding how their sensitive information was shared?	
Yes 7 (none had written policies) (9%)	No 73

7. How does your faculty make decisions about how to share sensitive information about certain students with field instructors?	
Faculty liaison and Field Director team 47	Field Director and Dean 12
Field Director and Advisor 3	Faculty consensus 9
Most schools used more than one team and included (Ad hoc committee, field liaison only, liaison/advisor)	

Conclusion

One may conclude from analyzing the responses, it is clear that the majority of Field Directors are making efforts to respond to the multi-level responsibilities that present themselves in the field placement to student, school, field instructor, and client. For instance, even some of

the minority of the Field Directors who indicated they would try to keep the sensitive student information within the school also volunteered that they would consider moving to a three-way meeting, if needed. The Field Directors who volunteered comments to the three-way meeting response clearly have the goals of collaboration and an open environment supportive of student learning in mind.

Another conclusion evident from these responses is that many programs stop short of a full educational partnership in which the students have informed consent to the process. Additionally, and critically, many of the educational teams of student, faculty liaison, and field instructor do not have open communication around the student's educational needs when there are serious problems to address. Perhaps more realistic appraisal of the FERPA regulations and more awareness of ethical rank ordering will allow programs to place the need for open communication as a priority. Further research could look at the impact of in-service training in these areas.

The results emphasize the utility and effectiveness of having policies. With policies, students are more likely to have informed consent regarding how their sensitive information is shared. If students do not have informed consent, it is more likely that faculty will engage in time-consuming debates. Therefore, it seems that what is good for the students ethically is also good for the faculty in terms of saving time. Only 21 of the 80 programs (~27%) of the Field Directors reported that their schools had written policies concerning the disclosure of sensitive student information. Only three were placed in the admission materials, so in only three responding programs were the students truly given informed consent. Besides the positive benefits of having a policy, the results begin to suggest that the absence of a policy may be associated with our worst-case scenario. Six or 7.5% of the responding Field Directors reported that their programs had been sued over these issues. Only one of these had a written policy, and the survey did not ask about the chronology of the policy, so it could have been developed prior to or in reaction to legal action. Policies can also serve to protect decision-makers. In the majority of programs, the Field Director and the field liaison team were the faculty members most frequently responsible for these decisions, and thus most vulnerable to a lawsuit.

Although the three-way meeting was the most popular response overall to the different scenarios, there was little agreement overall about what the best response would be to any particular scenario. There was more disagreement among Field Directors concerning the

appropriate response on the last two scenarios—one concerned boundary problems and the other concerned a substance abuse relapse. Perhaps this was due to the perception that these threats were larger to clients. Of the seventeen total written comments from all the scenarios that suggested students be removed from their field placements, eight of these were in response to the substance abuse problems, five in response to boundary problems, and four in response to the in-patient hospitalization. In sharp contrast, one Field Director volunteered the student gets one fresh chance, in response to the boundary problem scenario. Others volunteered that the student would be monitored or that the student would be held accountable within the school. Is this a decision that faculty can ethically make without consulting with the community partners? An area of future clarification could involve the development of a decision tree to provide guidelines for programs concerning how to proceed when students have these types of difficulties in field in order to avoid tunnel vision. A qualitative study of how Field Directors make these decisions, particularly in programs that report no debates over these issues, would also be informative.

The current Education Policy and Accreditation Standards (2002) of the Council on Social Work Education (CSWE) advise that schools administer the field education program through developing policies for the field liaison contact with the agencies. It would be an asset to the profession if CSWE were to require specifically the development of policies concerning the disclosure of sensitive student information. Future research could explore the construction of these policies.

Although social work field education has teams that are operating well overall, there is room for improvement. It is only through developing full educational partnerships that each person and institution involved is protected. As all are protected, both legally and ethically, mutual benefits accrue.

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