

Each comment represents an individual response to the top 5 standards of the survey.

Top 5 Standards

Std12. Faculty Qualifications (8 responses)

The qualifications of each faculty member must include professional preparation and experience, competence in assigned teaching areas, effectiveness in teaching, and scholarly productivity consistent with their faculty appointment and institutional policy. Faculty must have a degree and/or certification in the assigned teaching area.

Baccalaureate Standards Responses

The faculty qualifications description would benefit by including a minimum requirement of a master’s degree (still not stating what degree) as additional guidance. This would assist the program director in obtaining a more prepared second faculty versus an institution trying to get by with less. This also aligns with HIMR and regional accreditation. “Faculty must have a minimum of a master’s degree, with a degree and/or certification in the assigned teaching areas.”

I do like the broad statement of faculty having a degree and/or certification in the assigned teaching area. This should allow program directors greater flexibility to hire adjunct or PT instructors that have the perfect background to teach a specific course in which they may be a subject matter expert.

Associate Standards Responses

The faculty qualifications description would benefit by including a minimum requirement of a baccalaureate degree (still not stating what degree) as additional guidance. This would help clear up some issues that directors have experienced in obtaining a solid second faculty. This aligns with regional accreditation requirements. “Faculty must have a minimum of a baccalaureate degree, with a degree and/or certificate in the assigned teaching areas.” oThe CEE recommends training for reviewers to question credentials or certifications from unknown organizations.

Faculty (including adjunct faculty) must have background in and current knowledge of Health Information Management as well as a background in educational theory and methodology consistent with teaching assignment e.g., curriculum development, educational psychology, test construction, measurement, evaluation and assessment.

Finding qualified faculty is a challenge, professional and teaching experience are as important as degrees and credentials. I believe the change to this standard creates a potential obstacle for the institution and prevents them from hiring faculty who may be very qualified yet lack a credential or Masters or higher degree.

I feel that an RHIT or RHIA should teach this curriculum. Based on the wording above a JD who specializes in defense law is qualified to teach a healthcare legal course. This simply is not the case. Many universities will place inappropriate persons in courses. The wording should state an AHIMA credential.

The minimum AHIMA or acceptable credentials need to be specifically stated, as they are for the program director. Schools will hire instructional staff based on the requirements stated in the accreditation standards for the program. If AHIMA credentials are preferred to teach in an CAHIIM accredited program, then the standards need to be specific.

I don't necessarily have a suggested change, just a question for clarification. On #11, Faculty Qualifications, the last sentence: "Faculty must have a degree and/or certification in the assigned teaching area." What does that mean? Does that mean if I am teaching a coding course, that an RHIT is sufficient, or does that mean I would need a coding credential? Can you please clarify that statement? If I am teaching at an Associates level, does that mean I should have a higher level degree as a faculty member or is an Associate's degree sufficient? Same standard - what is considered professional preparation and experience? How much is enough? Program Director must hold at least a baccalaureate degree, do other faculty? If not, why not?

Std 24. Professional Practice Experiences (7 responses)

Professional practice experiences (PPE) must be designed and supervised to reinforce didactic instruction and must include program coordinated experience at professional practice site(s). The program must describe how the PPE (clinical practicum, directed practice experience) is designed, supervised and evaluated, and the objectives to be achieved in each PPE course. The PPE is a credit-based course, which applies toward degree completion, and requires tuition, fees and costs as normally occurs according to institutional policy.

Simulation activities designed to replicate PPE are permitted but cannot totally replace an on-site PPE. The program must describe how simulation activities are designed, supervised and evaluated and the objectives to be achieved by using simulation activities. PPE, whether on-site or through simulations must relate to higher level competencies and result in a learning experience for the student and/or a deliverable to a practice site. The PPE must provide the student with the opportunity to reinforce competencies and skill sets. The PPE does not prohibit a paid internship.

PPE onsite preparation The health and safety of patients, students and faculty associated with educational activities must be adequately safeguarded according to the health and safety practices of both the sponsoring educational institution and the professional practice site. The responsibilities of the college, PPE site and student(s) must be documented for externships or professional practice experiences. Either a formal contract or memorandum of understanding (MOU) will suffice, if in accordance with institutional practice. Health, safety and security policies and requirements must be outlined in the agreement or MOU, and students must be informed of these in advance of the PPE.

Paragraph 2. The CEE believes that a minimum allowable PPE via simulation should be designated so there is no confusion and more consistency between programs. CAHIIM MUST consider other types of PPEs beyond on-site and/or simulations, without sacrificing academic rigor or suitable student experiences. In today's digital world, there are many opportunities for students to participate in cloud-based projects, particularly around data analysis, informatics and coding. In addition, students who are full-time employed but able to produce a substantial research product (worthy of White Paper quality) should be afforded this opportunity, particularly as it supports graduate education goals.

Paragraph 2. The CEE believes that a minimum allowable PPE via simulation should be designated so there is no confusion and more consistency between programs. The students should always be exposed to acute facilities during the course of their Professional Practice Experience (PPE)

Include a number of hours (as is done in other programs) or a range.

PPE, whether on-site or through simulations must relate to higher level competencies and result in a learning experience for the student and/or a deliverable to a practice site. The above seems to contradict the first line in which a simulation cannot replace an on-site PPE. This should read, "PPE must relate to higher level competencies and result in a learning experience for the student..." or "An on-site PPE must relate..."

It would be helpful to indicate minimum required hours as a practicum site. Most other programs with practicums include this information.

Std 22. Online Content Access (7 responses)

Academic technologies, software applications and simulations, and online or web-enhanced courses, have a significant role in the online learning environment. To fairly evaluate online content the program must provide CAHIIM with full access to the Learning Management Systems (LMS) in use for all online course content and relevant education applications used to deliver this content.

What does full access mean? Time limited? Do CAHIIM and their reviewers have to provide the information required by institutional security policies (as we teach in our courses)? Having access to course content in “hidden” course shells or master classes is one thing. Having access to courses with student and faculty private data for one year without following institutional security policies is entirely another. Do campus classes have to provide this level of access? How does CAHIIM evaluate student interaction for campus classes? This raises the question of two different levels of evaluation for two different settings.

We recommended written guidelines for standard interpretation for: hybrid, online and webenhanced courses.

Only during on-site visits?

What does full access mean? Time limited? Do CAHIIM and their reviewers have to provide the information required by institutional security policies (as we teach in our courses)? Having access to course content in “hidden” course shells or master classes is one thing. Having access to courses with student and faculty private data for one year without following institutional security policies is entirely another. Do campus classes have to provide this level of access? How does CAHIIM evaluate student interaction for campus classes? This raises the question of two different levels of evaluation for two different settings.

This would be impacted by SUNY and College policy. Programs may be unable to comply.

This is an issue with how FERPA is interpreted. I agree that it is required, but the question is when the LMS is available and if access to master courses will suffice until the onsite review is conducted.

Only during the assessment or accreditation on-site process?

Std 9. Program Leadership—The Program Director (6 responses)

The program must clearly define the roles and responsibilities of the program director that are necessary to fully support and sustain the program. The program director must be certified as a Registered Health Information Administrator (RHIA), and must have at minimum, a master degree. It is expected that only HIM professionals with an RHIA credential and a minimum of a master’s degree would possess the necessary knowledge and background to effectively manage the HIM program. There is no exception to the required credential. The qualifications and responsibilities of the individual(s) responsible for leadership of the health information management program must be documented.

The program director must be a full time position of the sponsoring institution, have full employee status, rights, responsibilities and privileges as defined by institutional policy and be consistent with other similar positions at the institution. (CHANGE IN ASSOCIATE: The program director must be certified as a Registered Health Information Technician (RHIT) or Registered Health Information Administrator (RHIA), and must have at minimum, a baccalaureate degree).

Be more specific as to the role of the program director. Can this person be assigned as program director for other programs? Can they also be filling a department chair role? Should they be dedicated to this program? If so, what does dedicated mean?

Consider adding “master’s preferred” to the program director qualifications. This will incentivize schools to hire directors with master’s degrees and/or directors without master’s degree to seek a master’s degree. This is also consistent with the recommendations in HIM Reimagined.

The Program Director should demonstrate lifetime learning and should make every effort to obtain a “R.H.I.A.”

When I had my site visit, it was stated that I needed an office. That was not stated in these materials and I was not provided one. If the program director needs a home base on campus, even remote directors, this should be stated.

Define “dedicated to the program and discipline”. My fear is that faculty will be used for several roles, even though they are indicated as program director. Institutions, in an effort to save money, will indicate a program director on paper, then assign that individual several different functions.

How can someone be an effective program director if they are also functioning as program director for another program, department chair, etc. I suggest more specific, stronger language here.

I believe that the program director needs to have education higher than a bachelor's degree. Other associate degree programs require this of their director (MLT for example)- I think it is important to hold those responsible for the education of students to a higher standard and I believe a Masters Degree would be a way to do that. Of course current directors could be "grandfathered."

Std16. Learning Resources and Student Access (5 responses)

The sponsoring educational institution must provide appropriate resources to support the learning experiences and achieve the program's goals and outcomes. The methods of demonstrating adequate resources must reflect the types of resources available to support the learning experiences of students and be sufficient enough to accommodate all students enrolled in the program. These include but are not limited to student access to current technology, computers and relevant software, practice resources and other materials.

Require daily technical support services are in place. Ensure technology requirements and skills are made known to students before they begin the course/program. Offer students an orientation before taking an online course.

(Students must have access to technical support services daily.)

Sentence 1. This is a very awkward sentence. The meaning is unclear. o Sentence 2. Having either, one well-rounded orientation that prepares students both for the program and online courses or separate orientations for each piece, would better prepare students for the expectations of online learning and program specific items. "In addition to a program-specific orientation, offer students learning management system orientation before taking an online course."

Require AHIMA resources to be compliant with CAHIIM curriculum.

The following wording is unclear. Require daily technical support services are in place.

Paragraph 2. o Sentence 1. This is a very awkward sentence. The meaning is unclear. o Sentence 2. Having either, one well-rounded orientation that prepares students both for the program and online courses or separate orientations for each piece, would better prepare students for the expectations of online learning and program specific items. "In addition to a program-specific orientation, offer students learning management system orientation before taking an online course."

It is a challenge to give students an orientation before taking an online course if they register for the course close to the beginning of the semester. Could your requirement be changed to mention the online orientation is given the first day of the course to provide students an understanding of the course & technology expectations?

3. Program Effectiveness Measures

Can language be added to clarify how this assessment differs from the APAR reporting please?

Consider changing wording to spell out an expectation, this will assist new directors in implementing a process to track changes. "Documentation of changes made to program are to be maintained and readily available to CAHIIM." -or- "A running document of changes made to program are to be maintained and readily available to CAHIIM."

Is this referring to the APAR or should programs be assessing effectiveness outside of the APAR. We are; however, it is not clear.

3. Program Effectiveness Measures—Curriculum

Add language to allow for curriculum to be of current curriculum versus future curriculum if educational institutions wish to launch early. Also, change the naming convention of curriculum: 2014 curriculum was not live until 2017.

Is the program assessment referring to the APAR?

3. Program Effectiveness Measures—Students and Graduates

What is the minimum # of goals and target outcomes for this Students and Graduates Goal?

educational needs is very broad-based. Move to specifics of intent.

3. Program Effectiveness Measures—Faculty Development

Edit "... to delivery academic components of the program and will maintain continuing competence." to "...to deliver academic components of the program will maintain continuing competence."

1. Do you mean to say, "have and will maintain continuing competence"? 2. Measurable is misspelled in the second paragraph. 3. What is the minimum # of goals and target outcomes for this Faculty Development Goal?

Faculty must have background in and current knowledge of Health information Management as well as a background in educational theory and methodology consistent with teaching assignment e.g., curriculum development, educational psychology, test construction, measurement, evaluation and assessment.

What type of documentation would CAHIIM require for the Faculty Development Goal

4. Communities of Practice Outreach

Define “communities of practice”

Should it be a requirement of an accredited program to provide continued education? We would suggest that it should be optional. We are focused on the goals of preparing our students with entry level competencies, not to provide community education. Providing opportunities for continuing education should be a choice of the college and should not be mandated. We would like to participate in community education but it may not be feasible, especially because there are times with tightening budgeting and staffing that we would not be able to conduct additional education.

Programs should NOT be responsible to provide continued education for the community.

5. Program Planning

It is not clear what the difference is between #3 Program Effectiveness Measures and 5. Program Planning under Systematic Planning. Both talk about the assessment plan and evaluating it. How would the programs respond differently to these two standards?

State how changes will be delivered by CEE.

Are you proposing that programs update their curriculum based on anything other than the current Curriculum Requirements? If so, this are needs to be much more specific such as what type of changes? Also, many program directors are not involved directly with CEE so what would be the official method of communicating those changes to all?

duplicates II.3. Effectiveness and Curriculum. Remove or clarify differences.

6. Annual Assessment for Continuing Accreditation Programs

duplicates II.3. Effectiveness and Curriculum. Remove or clarify differences. Is this simply stating that programs must submit APAR? Then say it.

9. Program Director Responsibilities

Define, “adequate release time”. This is vague and leads to the program director assigned responsibilities in other areas. Even is release time is given, the program director may be assigned responsibilities for other programs, etc.

Can adequate release time be defined? Is there an average courseload that program directors should be teaching?

Adequate release time should be defined. Vague definitions lead to non-program dedicated employees in reality and over-work.

PLEASE define “adequate release time,” different institutions define this differently and programs suffer because of it. A maximum of 12 hours of teaching is a good idea.

10. Faculty

We recommended “must have two full-time faculty members, in addition to a full time Program Director”... We recommended written guideline for the standard interpretation for students/ faculty ratio to justify administrative decisions.

The student/faculty ratio needs to be specific. Other programs include this in their standards (nursing, for instance). Our current student to faculty ratio is approximately 67:1 (it has been higher in the past). This also includes these 3 individuals covering 2 programs as well as other duties. This is insufficient and a specific ratio in the standards would be a very helpful factor (even a range).

13. Advisory Committee

Paragraph 3. Recommend adding the following verbiage: “For health science centers that deliver health care, advisory committee members from the delivery side, who do not teach, are considered external.” o Paragraph 5. Additional clarification is needed regarding the advisory committee “active role.” The CEE agrees that advisory committee input is important; however, the committee members are not university employees and may make recommendations that cannot be implemented for legal or regulatory reasons. The recommended wording is: “Advisory committee input shall play a role in developing program goals and performing program evaluation as reflected in the program’s annual goals.”

Please clarify how this committee may be or is different from the Communities of Practice.

Additional clarification is needed regarding the advisory committee “active role.” The CEE agrees that advisory committee input is important; however, the committee members are not university employees and may make recommendations that cannot be implemented for legal or regulatory reasons. The recommended wording is: “Advisory committee input shall play a role in developing program goals and performing program evaluation as reflected in the program’s annual goals.”

Our faculty and advisory committee reviewed the proposed changes to the CAHIIM standards and we are in full agreement with all proposed revisions.

14. Professional Development

I support the last clause “Ensure professional development is available to online instructors regarding technology and aspects of online teaching/learning.”

Recommend that program directors attend the Assembly on Education (AOE) annually.

17. Student Records

What, specifically, must be maintained related to student work? All student work? For every student?

State “Student records must be retained for three years.”

Define “student records the reflect evident of student evaluation.....” Does this mean that all student work must be kept for every student, every course? If not, what specifically?

18. Curriculum

Paragraph 2. This paragraph is not clear. Does it mean to use rubrics? Have rationale for grading criteria? Allow CAHIIM reviewers into the course? Is this frequent and ongoing collaboration (regular and substantive) between student and faculty?

Clarification is needed for the aspects that were added.

duplicates II.3. Clarify differences or incorporate to II.3 (or here).

19. Syllabi

duplicates II.3. Clarify differences or incorporate to II.3 (or here).

University's generally do not include the course schedule on the syllabus. They are separate documents. If this needs to be one document, it should be clearly stated.

22. Curriculum—Evaluation of Students

Evaluation of Students, last sentence. Does this sentence mean to use rubrics? Have rationale for grading criteria? Is this frequent and ongoing collaboration (regular and substantive) between student and faculty Does this mean that evidence of timely evaluation and feedback must be provided to students? Quizzes are acceptable for reinforcement as per teaching research.(Suskie & Banta, 2009) Suskie, L., & Banta, T. W. (2009). *Assessing Student Learning: A Common Sense Guide* (2 edition). San Francisco, CA: Jossey-Bass.

24. Publications & Disclosures

Recommend CAHIIM set a 5 year completion timeframe for part-time baccalaureate students.

Recommend CAHIIM set a 4 year completion timeframe for part-time associate students. The evaluation of program completion rates can be done from the APAR. o It would be helpful to have a minimum timeframe for the accreditation award or whether or not the award is variable. This information needs to be included in the award letter. o The CEE recommends transparency related to when the CAHIIM HIMAC and board meets and decisions will be made.

The evaluation of program completion rates can be done from the APAR. o It would be helpful to have a minimum timeframe for the accreditation award or whether or not the award is variable.

This information needs to be included in the award. o The CEE recommends transparency related to when the CAHIIM HIMAC and board meets and decisions will be made.

Please clarify. The requirement says one or more of the programs measurable outcomes must be published on the program website. Then, it says it must include program completion rate and student satisfaction rate. Does this mean these two rates must be published on the website in addition to at least one additional measure or just that they must be part of the overall program evaluation plan. We currently publish our certification exam pass rate and job placement rate, but we measure the other outcomes as part of our overall plan.