



**Health Information Management Association of Australia (HIMAA)**

**Policy on Skilled Migration to Australia in the Occupational  
Categories of Health Information Manager (HIM) and Clinical Coder**

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## Document Information

This policy is a strategic document of the Board of Directors, Health Information Management Association of Australia (HIMAA) Pty Ltd and is controlled by the Chair of the Board, HIMAA's National President.

Version History:

The following outlines the high level changes that have been made to each version of this document and who made them:

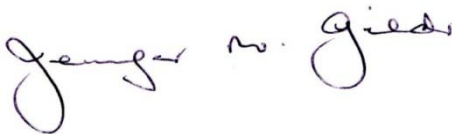
1. This document was first viewed by the HIMAA Board at meeting 343 on the 27 January 2016.
2. Initial Draft Richard Lawrance January 2016
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SIGN OFF:

APPROVED: Jennifer Gilder

President

Health Information Management Association of Australia



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REVIEW DATE

This document will be reviewed every two years from the date of approval or as required by changes in HIMAA's strategic environment.

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## **HIMAA Policy on Skilled Migration to Australia in the Occupational Categories of HIM and Clinical Coder**

### **I. SCOPE OF THE POLICY**

#### **A. Authority of the commissioning organisation (HIMAA)**

The Health Information Management Association of Australia Ltd (HIMAA) is the peak professional body for health information management (HIM) professionals in Australia. It has been serving the health information management profession since 1949. HIMAA is committed to improving the health of all Australians through professional information management.

Health information management professionals contribute to the health outcomes and delivery of the healthcare system through best practice health information management. Recognised occupations include Health Information Managers (HIMs) and Clinical Coders.

As the profession's peak organisation, HIMAA provides national advocacy on issues of strategic importance, and national standards for practice quality and safety. The Association strives to promote and support our members as the universally recognised specialists in information management at all levels of the healthcare system.

HIMAA also provides competency standards for the delivery of education and training across the learning life of the HIM practitioner. At the tertiary level, HIMAA has been accrediting university degrees in health information management against its Entry Level HIM Competency Standard since 1992.

At the VET level HIMAA delivers education and training in Clinical Coding through distance learning in Australia and overseas, and Continuing Professional Development activity for graduates at VET and degree levels nationally through online activity and its internationally recognised annual conference, and locally through its regional branches, networks and special interest groups.

HIMAA's Professional Credentialing Scheme offers quality assurance to the profession and to employers on individual currency of credentials through continuing professional development and quality improvement activity. Participants in this scheme are eligible to bear the post-nominals CHIM (Certified Health Information Manager) or CHIP (Certified Health Information Practitioner) depending on their level of HIMAA membership.

HIMAA is a member of the International Federation of HIM Associations (IFHIMA), and is in negotiation with two IFHIMA member associations in Canada and the United States of America to agree upon reciprocal recognition of professional certification based on the accreditation of HIM degrees and Clinical Coder qualifications based on Association academic and professional standards.

It is on the strength of this authority that HIMAA presents this policy document.

#### **B. Based on authority, what is in scope for policy**

1. The quality assurance value of HIMAA to the health information workforce in Australia in providing competency based professional accreditation of HIM degrees alongside universities' own academic accreditation.
2. The role of health information management in the success of eHealth reform in Australia, in terms of improved quality of care outcomes at the same time as

amelioration of the national health cost burden.

3. The workforce challenges facing the health information management profession in Australia currently.
4. The Australian Government practice of qualifications and skills assessment of aspirants in the skilled migration categories of Health Information Manager and Clinical Coder
5. The disregard of the current authorised National Assessor in these two occupational categories for HIMAA's national industry competency standards, in preference for the Assessor's own determination of employer benchmarks based on research of unknown calibre, quality, validity, reliability or ethical approval.
6. The consequences of the alignment of the Australian Government's Department of Education, based on the current National Assessor's research (5), with the Assessor's ongoing provision of positive assessments in these two skilled migration categories both for the migrants themselves and for the health information management profession in Australia (and overseas).

### **C. What does HIMAA exclude from scope**

1. HIMAA comment or position on any other aspect of Australian Government immigration policy or practice
2. HIMAA comment or position on any other National Assessor authorised by the Minister for Immigration on advice from the Minister for Education.
3. HIMAA comment on any other Australian Government Department of Education policy or practice except the practice of undermining the standard expected of Australian graduates in Health Information Management by accepting different standards for overseas graduates in disciplines other than Health Information Management for the purposes of skilled migration in Health Information Management.
4. HIMAA comment or position on the negative impact of the injection of ill-qualified and marginally experienced workforce from overseas on the professional standing of a local workforce already under duress of labour shortage and role substitution for any profession other than health information management.
5. HIMAA comment or position pertaining to this policy on behalf of any other affiliated or associated stakeholder.

## **II. THE POLICY PROBLEM**

### **A. Problem Statement**

Australian Government practice is supporting the granting of migration status to skilled labour in two occupational categories, HIM and Clinical Coder, to individuals with qualifications and experience not at all commensurate with industry standards, with two potential adverse outcomes:

- The skilled migrants' qualifications and experience will not meet employer expectations in the target occupation, and they will experience duress and difficulty in finding appropriate employment in their actual areas of qualification and skill because their positive National Assessor assessment is in either HIM or Clinical Coder categories.
- Migrants in these categories who succeed in gaining employment in either occupational category, despite gaining a positive National Assessor

assessment for qualifications and experience that are not commensurate with local professional standards, will contribute to a growing prevalence of role substitution that is contributing to the increasing workforce crisis currently confronting the health information workforce profession

There is already an appropriate framework and mechanism for recognition of overseas HIM or Clinical Coder qualifications of equivalence to HIMAA competency standards, and that is the International Federation of HIM Associations, of which HIMAA is a member. HIMAA is currently in negotiation with two fellow members of IFHIMA for reciprocal recognition of professional certification through the accreditation of qualifications against Association standards.

## **B. Major Stakeholders**

Individuals or organisations expected to have a stakeholding in this policy include:

- Health Information Management professionals with HIMAA-accredited or HIMAA-approved qualifications in the occupational categories of HIM and Clinical Coder as recognised by the Australian Qualifications Framework
- Employers of HIMs and Clinical Coders whose commitment to quality in the health information management profession leads them to support employment of HIW staff to HIM and Clinical Coder positions with HIMAA-accredited or HIMAA-approved qualifications
- Employers of HIMs and Clinical Coders who have insufficient understanding of the value of health information management professionals to their health information workforce to be able to understand the differential value of HIMAA-accredited or HIMAA-approved qualifications from partially relevant degrees or experience in marginal aspects of HIM.
- Australian health consumers, whose current and future health is placed under threat by the erosion of the quality and safety capability of an academically robust health information management workforce by the importation of sub-standard workforce from overseas.
- Australian electors whose expectation from eHealth reform is improvement in quality of healthcare at the same time as cost efficiencies which will arrest burgeoning health budget blow-out through the integrated flow of health information between separate healthcare providers in the patient's health journey.
- Countries of origin for skilled migrant applicants in receipt of positive but ill-founded National Assessor assessments in the occupational categories of HIM and Clinical Coders, which can ill afford to lose their own locally educated graduates in their actual employment of qualification.
- Other professional associations and organisations involved in the health information workforce.
- State and Territory Governments offering jurisdictional sponsorship of HIMs and Clinical Coders for skilled migration.
- Members associations of the International Federation of Health Information Management Associations (IFHIMA).

## **C. Goals and Objectives**

- To bring an end to an Australian Government practice that disadvantages:

- The migrants to Australia to which it is in this instance applied;
  - Professionals in the Australian health information workforce whose standing is undermined by employer uptake of immigrants with qualifications and experience which are not commensurate with the Australian (HIMAA) standard;
  - An Australian health system that is in need of the quality improvements in health services delivery and cost efficiencies in a burgeoning health budgets that eHealth will fail to provide without effective, high quality management of health information to Australian standards;
  - Australian health consumers who expect the right health information to be in the right place at the right time to support their journey through the health system; and
  - Australian electors who will be disappointed in their eHealth expectation of quality improvement in health care at the same time as reduction in the burgeoning cost of health care due to erosion of the professional standards in the management of the information at the heart of eHealth success.
- To institute HIMAA's Entry Level HIM Competency Standards as the Australian Government's benchmark for assessment of the qualifications and skills of aspirants to skilled migration to Australia in the HIM or Clinical Coder occupational categories.
  - To institute, as the mechanism for assessment of overseas qualifications for aspirants to the skilled migration occupations of HIM and Clinical Coder in Australia, the reciprocal recognition of HIM degrees and Clinical Coder qualifications by HIMAA with fellow member associations of IFHIMA.

### **III. POLICY AND POSITION**

HIMAA believes that Australians have a right to security in the knowledge that information gathered in confidence about their health, in the process of their engagement with our nation's system of health services, is managed with regard to quality, integrity, accuracy, security, accessibility, reliability, intelligibility, privacy and confidentiality so that it can be available in the right place at the right time to the right health professionals along their journey through the health system not just today, but throughout their lifetime.

HIMAA also believes that eHealth reform provides a key to the quality improvements and cost efficiencies in health care integration throughout that patient journey that are possible from the effective management of patient and other health information. And health information management professionals are amongst the custodians of that key.

#### **Professional Accreditation**

The professional standing of health information management in Australia has developed over more than 65 years of careful curation by members of the profession, fostering the development of strong education and training in core occupational roles such as the Health Information Manager (HIM) and Clinical Coder. HIMAA has been accrediting university degree courses in HIM based on entry-level HIM competency standards developed by the profession since 1992. HIMAA has been delivering national distance education for Clinical Coders since 1990, based on HIMAA Clinical Coding Competency Standards since 1996.

This relationship with universities, of professional accreditation alongside academic

accreditation universities exercise, has encouraged Australian employers to trust the relevance and rigor of graduates in HIM from HIMAA-accredited courses and in Clinical Coding from HIMAA-approved courses. HIMAA itself is the largest provider of the latter in Australia.

Developed and maintained by those very senior HIMs who constitute the main employers of HIMs and Clinical Coders, HIMAA competency standards are the employers' and industry's standard.

In 2016, **Professions Australia** – a national association of NFP professional associations of which HIMAA is a member – has signed with **Universities Australia** an historic *Joint Statement of Principles for Professional Accreditation*. The role of professional accreditation in facilitating admission to a profession alongside academic accreditation's conferral of the professional's qualification is coming of age.

HIMAA is not alone in the world in supporting professional entry through the accreditation of qualifications. The Association is a member of the International Federation of Health Information Management Associations (IFHIMA), some of whom adopt an equivalent process. HIMAA is currently in negotiation with two fellow members of IFHIMA for reciprocal recognition of professional certification through the accreditation of qualifications against Association standards.

### **Skilled Migration and Role Substitution.**

At a time in eHealth reform when health information management professionals are most needed for reform success, their workforce is experiencing acute shortages. Education supply is unable to meet demand. And practices such as role substitution by less informed employers is exacerbating the workforce shortage.

Role substitution also undermines professional standing built up over half a century and more.

HIMAA is thus unable to condone a government practice that contributes to that role substitution by the importation of candidates for the Australian health information workforce with inappropriate qualifications and marginal experience, seemingly under Australian Government auspice in the form of a "positive assessment" by a government authorised National Assessor.

The impact of this government practice, by reducing the standard of locally accredited professional qualifications to the retro-fitting of non-equivalent and ill-matched qualifications from overseas for skilled migrants, in combination with skills gained through experience of marginal relevance, is undermining the professional standing of local graduates in HIM.

An Australian Government practice that is actively lowering the standard of the Health Information Management profession in Australia threatens the vital role HIM plays in eHealth. The quality, integrity, accuracy, privacy, confidentiality, security of health data capture so that it is available as information to those involved in the delivery or health care, and its financing, and to the patient themselves, at the point of delivery or decision-making, not just now but for the remainder of the patient's life and beyond, depends upon the capability of health information management professionals.

This negative practice is counterintuitive in any government committed to the quality of care and cost efficiency improvements expected of eHealth in the interests of the health of Australians, and it should cease immediately.

### **New HIMAA National Policy**

It is HIMAA **policy** that HIMAA's role as the peak organisation for the health information management profession in delivering professional accreditation of Health Information Management qualifications based on HIMAA's industry-based HIM competency standards be recognised by government as the required benchmarking instrumentality for the



admission of skilled migrants to Australia in the occupational categories of HIM and Clinical Coder.

HIMAA advocates the reciprocal international recognition of HIM and Clinical Coder qualifications through agreement with fellow members of the International Federation of Health Information Management Associations (IFHIMA), of which HIMAA is a member, rather than the practice currently accepted by the Australian Government. A default process of post-hoc accreditation of overseas degrees that are not HIM-accredited by any member association of IFHIMA, nor even HIM degrees, undermines the accepted Australian practice of prospective accreditation of the HIM degree provider.

This practice is not limited only to Australian education providers. HIMAA currently accredits a HIM degree provided by the United Arab Emirates Higher Colleges of Technology. The Australian Government practice is thus also undermining the standing of professional accreditation against Australian standards overseas.

HIMAA's **policy position** is that the Association's Entry Level HIM Competency Standards should be adopted by the Australian Government as the benchmark for assessment of the qualifications of aspirants to skilled migration in the HIM or Clinical Coder occupational categories, and that qualifications should be the entry-level benchmark for skilled migration in these two categories, rather than a combination of qualifications and skills based on experience.

**Skilled migration should not be allowed to undermine the qualifications of Australian graduates that meet Australian standards. The current Australian Government practice of supporting one standard for skilled migrants in the HIM and Clinical Coder occupational categories at the expense of professional and academic standards for local (and overseas) HIM and Clinical Coder graduates cannot be supported.**

**The Australian community has a right to expect protection of the privacy and confidentiality of their health information, as well as the quality of its documentation, accuracy, security, accessibility and longevity, at the highest level of standards relevant to the Australian context. Australian Government practice that demonstrably undermines such standards should cease, and cease immediately.**

As a result of this policy and policy position, HIMAA makes the six general policy recommendations below.

## GENERAL POLICY RECOMMENDATIONS

1. HIMAA's **Entry Level HIM Competency Standards** should be adopted by the Australian Government as the benchmark for assessment of the qualifications of aspirants to skilled migration in the HIM or Clinical Coder occupational categories.
2. The professional entry criteria for aspirants to skilled migration to Australia in the occupational categories of HIM and Clinical Coder **should be of the same standard** as that expected of local graduates of HIMAA-accredited degrees – attainment of degree level qualification issued by an institution that has achieved **professional accreditation** of that degree course against HIMAA Entry Level HIM Competency Standards.
3. **Employers should require** HIMAA-accredited or HIMAA-approved qualifications of successful applicants for positions in the ANZSCO occupations of HIM (ANZSCO Code 224213) and Clinical Coder (ANZSCO Code 599915) respectively, **and advertise this requirement** in position vacancy information and position descriptions.
4. The Australian Government's Department of Education and Minister for Immigration should **require a National Assessor** of qualifications and skills for skilled migration in the occupations of Clinical Coder and Health Information Manager **to assess qualifications against HIMAA's Entry Level HIM Competency Standards**. Skills gained through experience should not be assessed **as these are not required of Australian graduates in HIM or Clinical Coding**.
5. The Australian Government's Department of Education and Minister for Immigration should recognise the **existing standard for reciprocal international recognition** of HIM and Clinical Coding qualifications by agreement between fellow member associations of the International Federation of Health Information Management Associations, such as HIMAA.
6. The Australian Government's Department of Education should review its potential **threat to the standing of professions in Australia** by, in condoning for migrants a mix'n'match retro-fitting of ill-fitting overseas degrees in combination with skills gained through often marginal experience, **allowing a double standard** to undermine the value of professional accreditation of degrees for local graduates.