



ABHES BULLETIN

To: ABHES-Accredited Institutions and Programs
From: India Y. Tips, Executive Director
Date: April 15, 2020
Subject: COVID-19 - Clinical Experiences

ABHES continues to monitor and assess the circumstances and impact of the Coronavirus (COVID-19) on our institutions and accreditation operations. Institutions should be executing their emergency preparedness protocols and continuity education/operation plans. ABHES remains open to a range of flexible and creative solutions that support students enrolled in our accredited institutions and programs, including efforts made to ensure students meet required professional program competencies in compliance with applicable federal, state and credentialing requirements for entry level employment.

The burden remains on the institution to document that qualified program personnel employed by the institution who meet the minimum qualifications of program faculty, ensures that students demonstrate required competencies for entry level employment as a basis for program completion.

Unless otherwise specifically stated in this guidance document, the emergency flexibilities set forth below remain effective until and through June 30, 2020, which aligns with the U.S. Department of Education's April 3, 2020, guidance concerning interruptions of study related to COVID-19. Please note that at the discretion of the ABHES Commission, the June 30 deadline may be altered in consideration of any updated guidance released by the Department.

ABHES acknowledges that the need for flexibility will vary depending upon the professional field and the community need for services. ABHES continues to advise that institutions must maintain documentation of any temporary waivers of regulations received from federal, state or other regulatory bodies governing the operation of the institution and/or program(s). Recognition of the challenges facing various allied health program areas will be taken into consideration when assessing compliance with accreditation standards provided documentation is maintained to demonstrate the institution's efforts to safeguard students and maintain the integrity of the educational process.

Clinical Experiences

ABHES is aware that many of its accredited institutions and programs will be unable to provide formal clinical education experiences for enrolled students as many clinical (externship) opportunities are now closed due to National State of Emergency orders and directives from the Departments of Health. It is further noted that in several states, because of the serious shortage of healthcare providers, students currently enrolled in allied health programs are temporarily being allowed to obtain employment in healthcare facilities in those states prior to program completion.

Simulation

In the absence of any federal, state, and or credentialing regulations prohibiting alternative methods, including capstone field internship and simulation, for students to achieve entry level competence, ABHES will allow programs the flexibility to use a broader array of approaches, including simulation through June 30, 2020.

Please note that ABHES defines simulation as a technique for practice and learning that imitates and replaces real experiences with guided ones that replicate aspects of the real world in a fully interactive fashion. Simulation and other methods may be permissible provided that each student's competency is evaluated by qualified program personnel employed by the institution. The institution must also document and substantiate the appropriateness of its methods by in-field program specialists, current in the applicable specialty, that may be serving on the program's advisory board.

It has not been ABHES' process to allow for simulation in place of a clinical experience with the exception of Medical Laboratory Technology (MLT) programs where standard, MLT.A.2 of Chapter VII of the *Accreditation Manual* currently permits simulations to be substituted for clinical experiences not to exceed 20 percent of the total required clinical hours in the areas of immunohematology and/or microbiology. Therefore, this requirement is not being waived for MLT programs at this time.

Similarly, Surgical Technology programs must continue to comply with standard, ST.A.2. of Chapter VII of the *Accreditation Manual*, where competencies required for successful completion are aligned with the current Core Curriculum for Surgical Technology, produced by the Association of Surgical Technologists (www.ast.org). Programs that make a determination to graduate students with fewer clinical cases than the required minimum in the core curricula recognizing that simulation, for example, may not be permissible nor a viable alternative, will be considered out of compliance. Programs that proceed in graduating such students must maintain documentation demonstrating graduate competency and the need for early graduation, as well as how the program incorporated the administrative team, program advisory committee, employers and community partners into its decision-making process. ABHES may request this documentation at any time.

Temporary Waiver of Compensation Restrictions

ABHES has also received a number of inquiries from institutions seeking a waiver of the compensation restrictions specified in some of the program areas in Chapters VII and VIII of the *Accreditation Manual* to allow institutions the flexibility to utilize current/existing in-field employment for students who need to complete externship hours or to receive compensation during clinical experiences in such program areas where it is currently prohibited. Therefore, given the lack of available externship sites and the high demand for allied healthcare workers in certain communities, the Commission is issuing a temporary waiver of the restricted compensation requirements. This may also allow programs to use clinical exposure through employment as an alternative means for students to complete required clinical competencies through June 30, 2020.

Questions

Please contact ABHES staff with specific questions concerning your institution or program's compliance or accreditation. Please visit the [Our Staff](#) page on the ABHES website for specific staff member contact information. If you are unsure of where to direct your questions, please contact India Tips, Executive Director, at itips@abhес.org or Amy Rowe, Associate Executive Director of Membership Services, at arowe@abhес.org.