#### **University of Cincinnati**

# Response to Open Comments to Proposed 2020 Classification of Instructional Programs (CIP) February, 2019

Dear NCES:

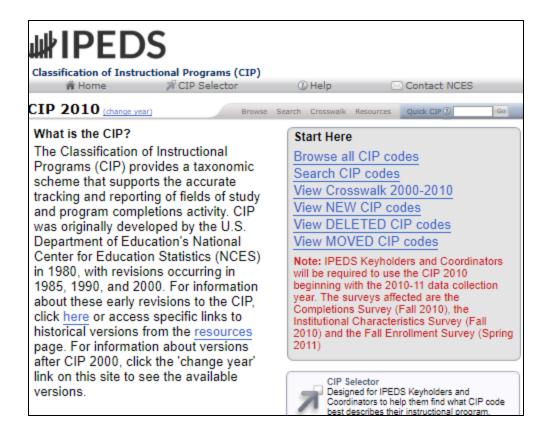
Please accept the following items for your consideration, on behalf of the University of Cincinnati:

#### **STEM Attribute**

While CIP codes historically have not included attributes, we wish to recommend creating a particular attribute for CIP codes. This would specifically permit identification of STEM disciplines (science, technology, engineering and mathematics). Currently, various agencies including the NSF and U.S. Department of Homeland Security are creating lists of CIP codes considered to fall into STEM based on broad NCES definitions. These lists conflict with each other, are inconsistent in accurately identifying STEM activity, and are creating perverse incentives related to Homeland Security determinations. Most notably, programs having CIP codes identified by such agencies as STEM have a greater appeal to some students (notably international students who have enhanced visa options if they are in STEM programs). This Economist article on CIP codes highlights the issues universities have been facing. The major concern is that the agencies' lists arbitrarily exclude several science, technology, engineering and mathematics concentrations which fall within disciplines that are not universally STEM, such as business, psychology, economics, etc. If NCES flagged six-level programs as STEM, and established a single authoritative list that could be used by other agencies, CIP codes could be used more accurately.

#### Preliminary list of new, deleted and revised codes

It will be helpful if the U.S. Department of Education provides a preliminary list of new, deleted, moved (and revised) 2020 CIP codes so that it is easier to review, in advance of the official rollout, to allow institutions to recode programs accordingly. The screenshot below of the NCES website was very helpful during the 2010 change.



#### **Proposed New CIP Codes:**

- 1. Healthcare Privacy & Security. The current list doesn't include anything specific to healthcare information security, and this is a growing area in higher education. AHIMA and UCCC certificate websites were used to develop the draft definition below.
  - o Proposed Definition: A program that prepares individuals for careers in designing, implementing and administering comprehensive privacy and security protection programs in all types of healthcare organizations. Includes instruction in health information ethics, healthcare information privacy and security, healthcare compliance, healthcare information security and disaster recovery, and issues in privacy and security healthcare law.
  - o Offering Institutions: Many institutions embed this coursework in the Medical Informatics (51.2706) or Health Information (51.0705/51.0707) degree programs. Specific Healthcare Privacy & Security/Health Information Security/Medical Information Security and Privacy programs are offered as undergraduate or graduate certificates at postsecondary institutions including Boston University, Indiana University/IUPUI, Northeastern University Charlotte and University of

Cincinnati-Clermont College, as well as healthcare training organizations such as TransformEd (transfedu.com).

#### 2. Pre-Athletic Training Studies (New)

- o Justification: Profession moving to a master's degree required.
- o Similar codes: 51.1101-51.1111
- Description: A program that prepares individuals for admission to a professional program in athletic training.

### 3. Pre-Medical Dietetics (New)

- o Justification: Profession moving to a master's degree required.
- o Similar codes: 51.1101-51.1111
- Description: A program that prepares individuals for admission to a professional program in Dietetics.

## Recommended improved language

The language in the programs below is outdated. The University recommends changes in the title and description in the following programs:

• 13.1005 Education/Teaching of Individuals with Emotional Disturbances. (No substantive changes)

A program that focuses on the design of educational services for children or adults with emotional conditions which adversely affect their educational performance and that may prepare individuals to teach such students. Includes instruction in identifying students with emotional disturbances, developing individual education plans, teaching and supervising emotionally disturbed students individuals with emotional disturbances, counseling, and applicable laws and policies.

Recommendation: Use "person first" language: teaching and supervising individuals with emotional disturbances rather than emotionally disturbed.

• 13.1006 Education/Teaching of Individuals with Mental Retardation with Intellectual Disabilities (No substantive changes)

A program that focuses on the design of educational services for children or adults with mental—intellectual disabilities which adversely affect their educational performance and that may prepare individuals to teach such students. Includes instruction in identifying students with mental retardation, developing individual education plans, teaching and supervising mentally handicapped students, counseling, and applicable laws and policies.

Please note that these are recommended changes consistent with the following article:

# Final regulations replace phrase 'mental retardation' with 'intellectual disability'

By the Office of Special Education and Rehabilitative Services

WASHINGTON (July 12, 2017)—The U.S. Department of Education released final regulations that amend multiple department acts by removing the phrase "mental retardation" and replacing it with the words "intellectual disability" or "intellectual disabilities" July 11.

• <a href="https://sites.ed.gov/idea/final-regulations-replace-phrase-mental-retardation-with-intellectual-disability/">https://sites.ed.gov/idea/final-regulations-replace-phrase-mental-retardation-with-intellectual-disability/</a>