

Education and Training Committee – 15 November 2012

Review of the process of approval of hearing aid dispenser pre-registration education and training programmes.

Executive summary and recommendations

Introduction

This paper is intended to provide the Committee with an update on reviewing pre-registration hearing aid dispenser education and training programmes against the standards of education and training. It has been produced following the completion of visits to programmes transferred from the Hearing Aid Council (HAC).

The paper is structured to:

- consider the transfer of data from the HAC to the HCPC, looking at the work undertaken by the department once the Register had opened to ensure the hearing aid dispenser approved programme lists are correct;
- draw conclusions about the transfer of programmes now approval visits have been completed; and
- review and analyse trends of the details of the visitors reports produced for each programme visited in terms of the conditions and recommendations given.

Throughout the report, conclusions are drawn identifying key trends noted from the analysis. Considerations for the executive and all education providers are presented in this report. There are also actions that can be considered during future transfers of new professions to HCPC regulation.

Information from this report will also be useful for education providers in preparing for their first visit from HCPC.

Decision

The Committee is requested to note the document. No decision is required.

Background information

- Education and Training Committee paper - 'Hearing Aid Dispensers – list of approved programmes'(10 March 2010)
- Education and Training Committee paper - 'Hearing aid dispensers – approval and monitoring processes'(10 March 2010)
- Education and Training Committee paper – 'Hearing aid dispensers – approval prioritisation day 21 May 2010' (8 June 2010)
- Education and Training Committee paper - 'Hearing Aid Dispensers – list of approved programmes update'(8 June 2010)

- Education and Training Committee paper - 'Hearing aid dispenser approval process review 2010–11' (8 September 2011)

Resource implications

Distribution of the paper will be done electronically in the January 2013 edition of education update so no additional resources are required.

Financial implications

None

Appendices

None

Date of paper

15 November 2012

Hearing aid dispenser approval process review 2011–12

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1.0 Introduction

1.1 About this document

This report focuses on the transfer of the hearing aid dispenser profession to the Health and Care Professions Council (HCPC) Register on 1 April 2010. It concentrates in particular on three aspects of this transfer:

- the transfer of educational programme data for hearing aid dispenser programmes;
- the hearing aid dispenser approval visits conducted in the academic year 2011-12 and the outcomes of those visits; and
- the hearing aid dispenser approval visits we conducted as a whole over the academic years 2010-11 and 2011-12 and the outcome of the transfer.

At the time this report was written, all hearing aid dispenser programmes had been visited but one final decision was pending with the Education and Training Committee. The report draws together findings from the last two years of HAD visits. The analysis provides useful information for existing HAD programme providers and those wishing to seek approval for new programmes. There are also learning points which the Executive will use in preparation for any future transfers of new professions to the Register. Education providers who wish to deliver hearing aid dispenser programmes can use the findings when preparing for an HCPC visit. This report will also be a useful resource for education providers delivering programmes for new professions to the HCPC.

The evidence base for this report includes:

- quantitative and qualitative reviews of Education department records of the profession transfer and the ongoing work to maintain our records; and
- quantitative and qualitative reviews of visitors' reports produced after the hearing aid dispenser visits.

1.2 Overview of the approval process

We visit the programmes we approve to make sure:

- the education programme meets or continues to meet our standards of education and training (SETs);
- those who complete the programme are able to meet or continue to meet our standards of proficiency (SOPs) for their part of the Register; and
- all programmes and education providers are assessed fairly and consistently.

When we carry out an approval visit, we are represented by an HCPC Panel. The HCPC Panel is normally made up of two visitors. At least one visitor will be from the same part of the Register as the profession with which the programme is concerned. An education executive will accompany the visitors. The education executive's role is to support both the visitors and the education provider through the approval process. At the visit, we meet with staff, students, senior managers and placement provider

representatives. All discussion is directly related to our standards. At the end of the approval visit, the visitors make a judgement about whether, or to what extent, the programme meets or continues to meet our SETs.

The visitors' report records this decision and details any conditions and recommendations the programme has been given. Conditions and recommendations are directly linked to particular SETs and will have reasons explaining why there is a condition or recommendation.

Conditions are requirements that must be met by the education provider before the programme can be recommended for approval or ongoing approval. Conditions are given when certain SETs have not been met or there is insufficient evidence of the standard being met.

Recommendations are observations on the programme or education provider, which do not need to be met before the programme is recommended for approval or ongoing approval. Recommendations are given normally to encourage further enhancements to programme. They are given normally when it is felt the particular standard has been met at, or just above, the threshold level.

The 2010-11 report contained information about commendations. The HCPC no longer gives commendations to programmes, so we have been unable to analyse and compare data about commendations in this report. Further information about the removal of commendations from visitors' reports can be found on our website.

After the approval visit, if conditions are set, the education provider will submit documentation in response to the conditions in the report. This response is sent to the visitors for them to review. The visitors must be satisfied with the education provider's response to the conditions before they can recommend approval or reconfirmation of approval to the Committee. Education providers have two attempts to meet conditions on approval. The Committee will make their final decision for the programme based on the recommendation of the visitors.

More information about our approval process is available on our website and in our publication *Approval process - supplementary information for education providers*.

2.0 Hearing aid dispenser data transfer

On 10 March 2010, the Committee received a paper outlining the list of currently approved hearing aid dispenser programmes and a list of programmes that were approved historically for specific periods. The recommended lists were based on approval information provided by the Hearing Aid Council (HAC). The Committee accepted the approval of these programmes based on the robust quality assurance procedures of the HAC.

The HAC held lists of approved higher education programmes that led to eligibility to apply to their register. The HAC also held ownership over two examination routes that led to eligibility to apply for their register. These were:

- the company or trainee route; and
- the aptitude route.

In the lead up to the transfer of regulatory functions to HCPC, the HAC decided to close these examination routes and approve two higher education providers to deliver the examinations. The HAC owned examination routes were accepted by the Committee as historical qualifications and the two higher education provider examinations (known as 'aptitude tests') were accepted as currently approved programmes.

The Committee set a timeframe of two academic years following the transfer for the executive to complete visits to transferred hearing aid dispenser programmes. The HCPC successfully completed visits to transferred programmes within this timeframe.

2.1 Hearing aid dispenser list of approved programmes

Table 1 illustrates 16 approved hearing aid dispenser programmes transferred to HCPC in April 2010, all of which were subject to an approval visit. We also received approval requests for eight new programmes, which made up just less than one quarter of all hearing aid dispenser programmes visited over the past two years. At the 8 June 2010 meeting of the Committee, further evidence was produced regarding two programmes to be added to the list of approved hearing aid dispenser programmes. In total, 18 currently approved programmes transferred across from the HAC to the HCPC programme list.

Table 1 - Hearing aid dispenser programmes on record 2011-12

	Number of programmes on record 2010-11	Number of programmes on record 2011-12	% of programmes on record
Approved 10 March 2010 ETC	16	16	69%
Approved 08 June 2010 ETC	2	2	9%
Not approved (new programmes seeking approval)	3	5	22%

22% of programmes visited were new programmes that sought approval after the transfer of regulation to HCPC. This statistic further supports the view highlighted past annual reports, that the SETs provide flexibility for any education provider to seek approval of new programme provision. This is a consistent trend evident for HADs and is reflected across all our professions.

2.2 Changes to the list of currently approved hearing aid dispenser programmes

Table 2 explores the 18 programmes that transferred from the HAC to the HCPC in relation to subsequent changes to the programme data provided by the HAC.

Table 2 - Hearing aid dispenser programmes transferred from HAC and amendments made to data

	Number of programmes 2010-11	% programmes on record, 2010-11	Number of programmes 2011-12	% programmes on record, 2011-12
Number of programmes transferred	18	100%	0	0%
First intake dates changed	12	66%	0	0%
Programme title changed	1	5%	1	100%
Programmes never ran	3	16%	0	0%
Programmes with no changes made	6	33%	0	0%

In 2011-12, there was only one change to the list of approved programmes transferred from the HAC on 10 March and 8 June 2010. One programme changed its title, but there were no other changes to the list. As stated in the 2010–11 report, the most significant area where changes were made was to programmes' first intake dates (66 per cent). The high proportion of programmes that needed changes to first intake dates is reflective of the different interpretations made by the HAC relating to key information that the HCPC required as part of the transfer of approved programme data. Overall, the number of changes remained lower than we have previously experienced such as the transfer of practitioner psychologist programmes.

2.3 Conclusions from the hearing aid dispenser data transfer

The data and information collated in this report supports the conclusion set out in the 2010-11 report.

The approved programme lists we receive prior to the Register opening should be as accurate and as complete as possible. In order to ensure this, we need to continue to identify all the data we require for each programme and request it in a format we can most easily use. We need to continue to look closely at the processes of the previous regulatory body to ensure we understand aspects such as retrospective approval and the graduating cohorts' eligibility to apply for registration.

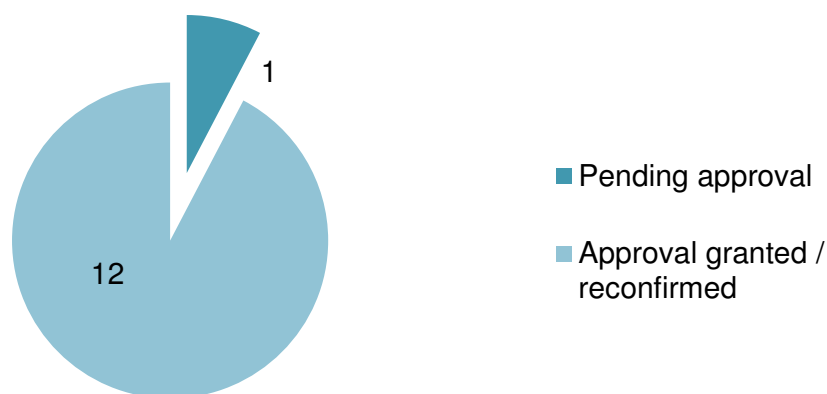
The work undertaken by the Department to correct inaccurate data, once the Register has opened, is a significant amount of work. We should continue to consider this when looking at the Department work plan in future years.

3.0 Analysis of hearing aid dispenser visit outcomes

3.1 The hearing aid dispenser programmes visited 2011–12

Once an approval visit has been undertaken, a report is written and agreed by the visitors detailing any conditions and recommendations, and recommending a final outcome. This report is then passed to the Committee who make a final decision about the programme. If conditions have been placed on approval these need to be met before the visitors can recommend a final outcome of approval to the Committee. Once the Committee have agreed the outcome for a programme, the report is published on our website.

Graph 1 - Hearing aid dispenser programmes visited during 2011–12



Graph 1 illustrates the progress of those hearing aid dispenser visits conducted during 2011–12. Twelve out of the thirteen programmes recommended for approval or ongoing approval after a visit in 2011-12 have had approval granted or reconfirmed. One programme that was visited in 2011-12 is pending approval at the time of writing. All programmes recommended for approval or ongoing approval after a visit in 2010-11 have had approval granted or reconfirmed.

3.2 Conditions

Table 3 – Total number of conditions set on hearing aid dispenser programmes and all visited programmes in 2010–11

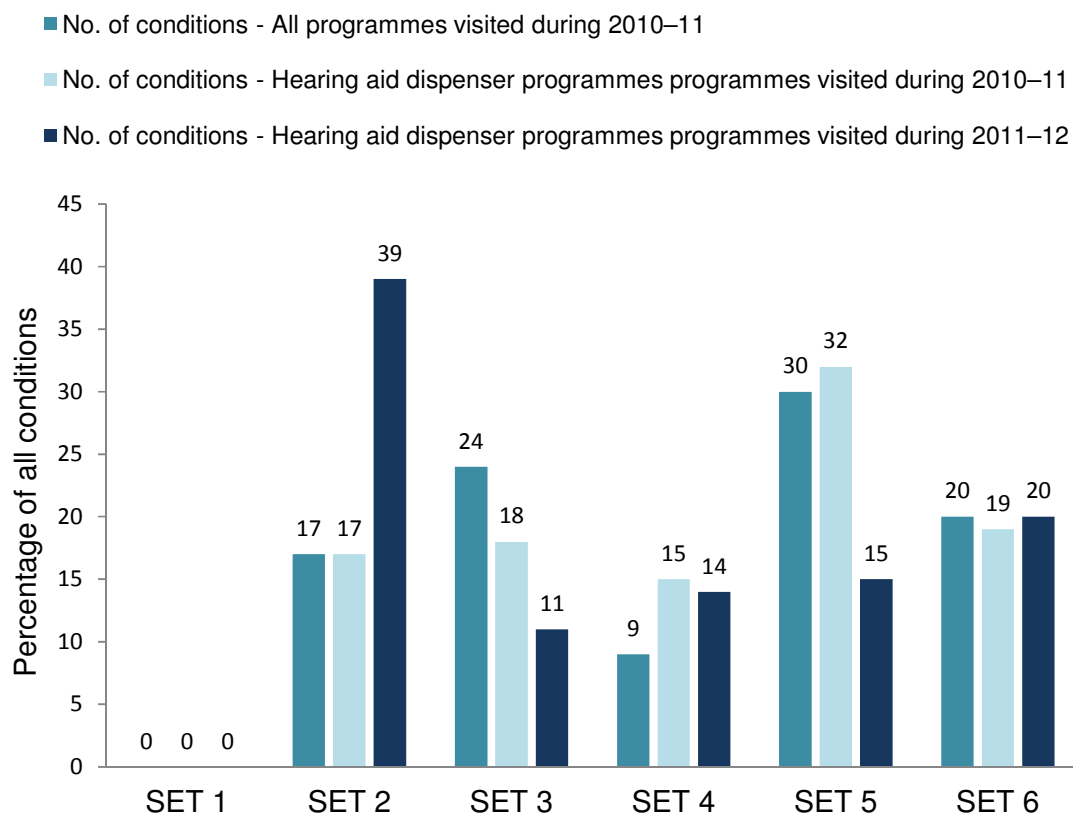
	Number of programmes visited	Total number of conditions set	Average number of conditions set per programme
All programmes visited during 2010–11	86	676	8
Hearing aid dispenser programmes visited during 2010–11	7	101	14
Hearing aid dispenser programmes visited during 2011–12	13	79	9

Table 3 compares the conditions data of the hearing aid dispenser programmes to that of all programmes visited in 2010–11. Compared to all of the programmes visited, the number of hearing aid dispenser programmes we visited is low. During 2010 -11, the average number of conditions set per hearing aid dispenser programme is almost double that of the average number of conditions set for all programmes visited. During 2011-12, the average number of conditions set per hearing aid dispenser programme reduced significantly, and is only marginally higher than that of all programmes visited.

There are several reasons that could account for the reduction of conditions from 2010-11 to 2011-12. Firstly, this was the second year that hearing aid dispensers were regulated by the HCPC. This means education providers had more time to familiarise themselves with the HCPC and our standards, making it easier for them to map their programmes against the SETs and SOPs. Clearer, more relevant information prior to the visit means that the visitors have a better idea of how the programme runs before the visit takes place. This means that they can direct their questions more effectively at the visit and have discussions that are more relevant. Therefore, more of their concerns may be addressed in the visit setting.

Secondly, we held a seminar aimed at hearing aid dispenser education providers in November 2010. This seminar introduced the HCPC Education Department and our processes. We also gave delegates advice about how to complete a SETs mapping document and what to expect at an approval visit. In 2011-12, the 13 programmes we visited were delivered by six different education providers. Five out of the six education providers that we visited in 2011-12 had at least one representative present at this seminar.

Graph 2 – Percentage of conditions against SETs



Graph 2 illustrates how conditions were applied to hearing aid dispenser programmes in 2010-11 and 2011-12 compared to all other programmes in 2010-11. Please note, that at the time of writing this report, data concerning all programmes visited in 2011-12 had not yet been finalised, so this data has not been included.

The highest percentage of conditions across hearing aid dispenser programmes visited in 2011-12 relate to SET 2 (programme admissions). This is significantly higher than the hearing aid dispenser programmes visited in 2010-11 and all programmes visited in 2010-11. In the transfer of approved programmes from the Hearing Aid Council to HCPC, we accepted two ‘aptitude tests’, which are designed to enable individuals with prior experience and education in audiology to be eligible for registration as a hearing aid dispenser. This unusual situation occurs for this profession because statutory regulation only applies to hearing aid dispensers in the private sector and not to audiologists working in the NHS (who do not use the protected title, but perform a similar role).

We did not visit any aptitude tests in 2010-11, but we visited two in 2011-12. Aptitude tests rely on the previous qualifications and practical experience of applicants. These programmes generally apply entry criteria that require individuals to hold qualifications and experience required to work as an audiologist in the NHS. At visits to these programmes, we observed that certain admissions requirements under our SETs were not adhered to, such as evidence of a good command of reading, writing

and spoken English (SET 2.2), criminal convictions checks (SET 2.3) and health checks (SET 2.4). This was due to education providers deeming employment within the NHS as assurance alone that applicants met these requirements. As we require the education provider to own processes around entry requirements, there were a number of conditions placed on standards in SET 2 for aptitude tests.

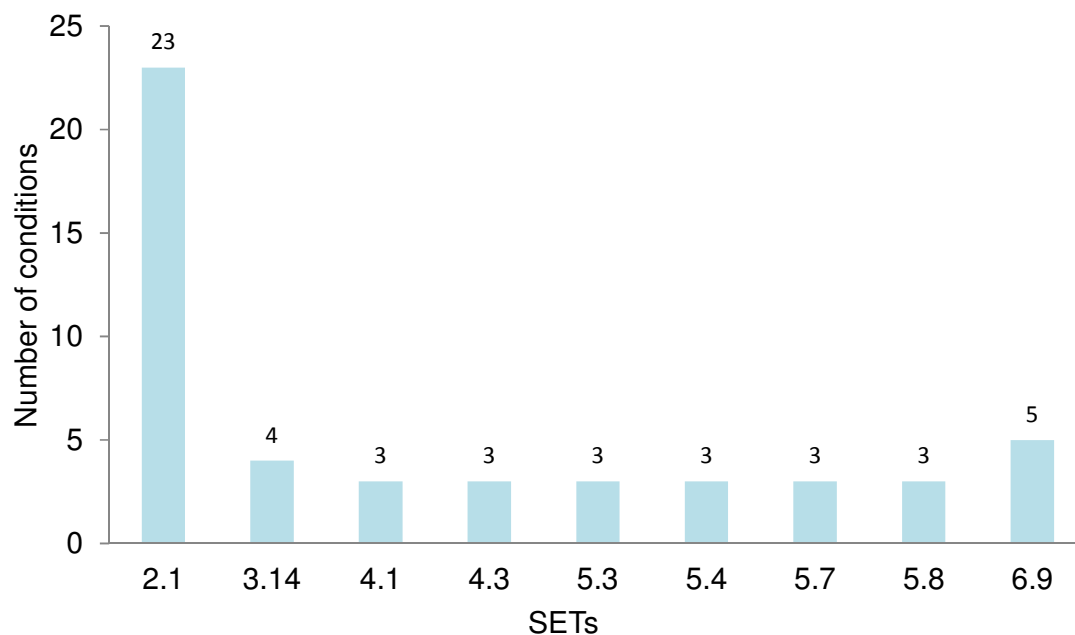
Conditions set against SET 4 are slightly higher for hearing aid dispenser programmes. This could be because conditions relating to SET 4 are commonly applied to new profession programmes, as it is the first opportunity that education providers have to demonstrate how the programme maps against the HCPC standards of proficiency for the profession.

There was a reduction in the number of conditions placed against SET 5 in 2011-12. A reason for this could be that education providers delivering hearing aid dispenser programmes became more familiar with our standards, and our requirements to meet the standards in SET 5. This was not the case for the second year or practitioner psychologist visits; conditions against SET 5 remained consistently high throughout the practitioner psychologist visit schedule.

Visitors are able to assess whether SET 5 is applicable to an aptitude test programme. Their decision depends on how the entry requirements for the programme consider prior qualifications and experience. Therefore, these programmes will often have no practice placements, and therefore no conditions placed against SET 5. The two aptitude tests that we visited in 2011-12 were exempted from having to meet the standards in SET 5. Aptitude tests only accounted for 15 per cent of the visits that took place in 2011-12 however, so the exception of SET 5 for aptitude tests does not fully explain the 50 per cent reduction in conditions against SET 5 from 2010-11.

When the profession was transferred, we based our visit prioritisation on how recently the HAC had revalidated each programme. Therefore, programmes that were revalidated just before the transfer were more likely to have considered the HCPC's SETs at the point of transfer. These programmes also had longer to develop and implement systems to meet SET 5.

Graph 3 – The nine SETs with the highest number of conditions set against them



Graph 3 illustrates the nine SETs that had the highest number of conditions against them. Nine SETs have been included in this graph because six different standards had the same values.

SET 2.1 has the highest number of conditions across the hearing aid dispenser visits in 2011–12, 23 in total. This standard looks at the advertising materials produced and information available for potential applicants to the programme. This SET also had the highest number of conditions against it when looking at all programmes visited in 2010–11. For SET 2.1 the hearing aid dispenser programmes had conditions that were very similar in both years and across different professions.

SET 3.14 (gaining appropriate consent) and 6.9 (clearly specify that aegrotat awards do not lead to eligibility to apply for registration) are standards with specific requirements. There are often conditions against these standards due to the specific requirements for these SETs. Looking at data from hearing aid dispenser visits in 2010-11, this SET also had a high number of conditions against it.

SET 4.1 and 4.3 are standards that directly link with the SOPs for hearing aid dispensers, ensuring students are appropriately taught and assessed. For programmes with conditions against these SETs, visitors were unable to determine where the skills and knowledge specific to hearing aid dispensing are covered and how theory and practice was integrated.

SETs 5.3, 5.4, 5.7 and 5.8 relate to practice placements. SET 5 continues to be the area in which the most conditions are applied across all programmes. It is unremarkable that these four standards feature here as practice placements often get a high number of conditions. This is because placement components require

collaboration across multiple external bodies and takes place in the higher risk live practice environment. We expect education providers to keep overall responsibility for placements and there must be suitable systems in place to support them. Our SETs lay out these requirements. It is worth reiterating the findings above regarding SET 5 however, as there was a reduction in for conditions set against SET 5 in 2011-12 compared to 2010-11.

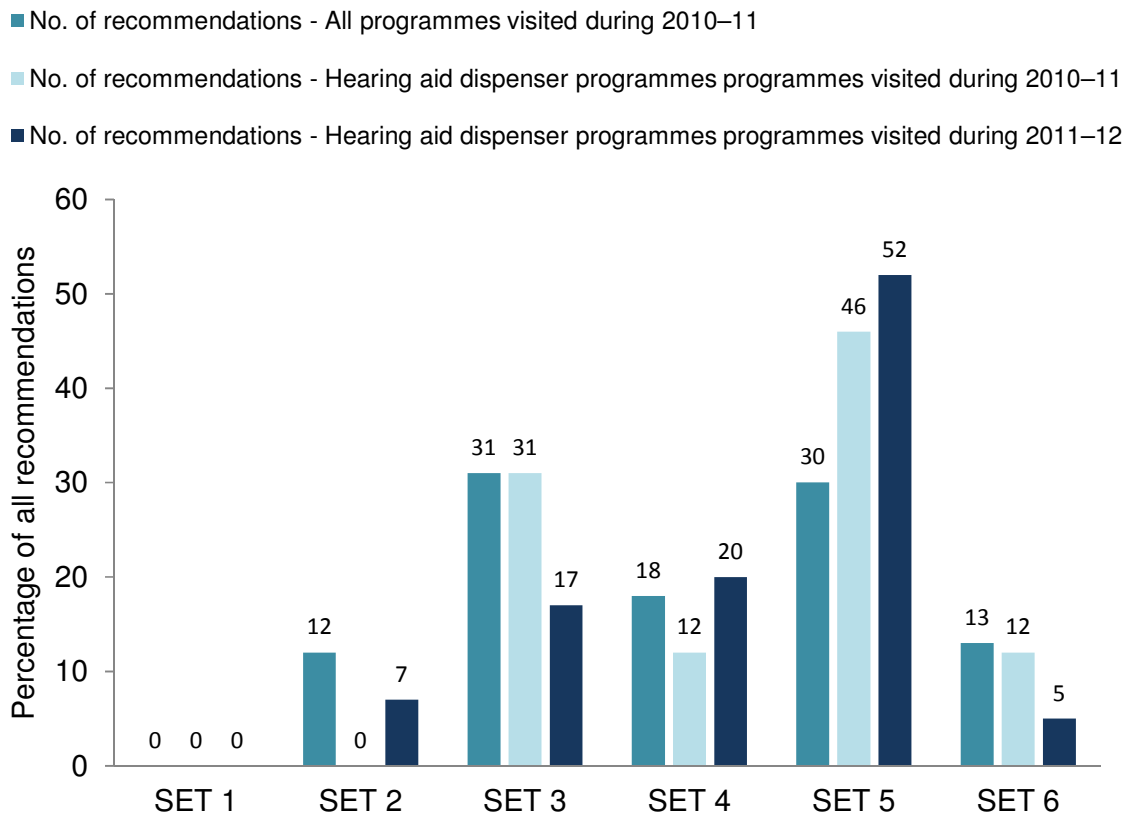
3.3 Recommendations

Table 4 – Total number of recommendations set on hearing aid dispenser programmes and all visited programmes in 2010–11

	Number of programmes visited	Total number of recommendations set	Average number of recommendations set per programme
All programmes visited during 2010–11	86	209	2
Hearing aid dispenser programmes visited during 2010–11	7	26	4
Hearing aid dispenser programmes visited during 2011–12	13	60	5

Table 4 compares the recommendations data of the hearing aid dispenser programme visits in 2011-12 to that of hearing aid dispenser programme visits in 2010-11 and all programmes visited in 2010–11. The average number of recommendations given per hearing aid dispenser programme visited remains almost double that for all programmes visited 2010–11. This can be explained when we look into the detail of the recommendations given to the hearing aid dispenser programmes. Graph 4 illustrates where recommendations have been applied to hearing aid dispenser programmes and compares it against recommendations applied to all programmes visited in 2010–11.

Graph 4 – Recommendations for hearing aid dispenser programmes visited and all programmes visited 2010–11



Despite the reduction in the number of conditions set for SET 5 for hearing aid dispenser programmes in 2011-12 compared to 2010-11, SET 5 was the area where the most recommendations were applied. This was also the case for all programmes visited in 2010-11.

This data supports the comments made in the 2010–11 report. When the programme has just managed to meet the threshold level of the SET, we are more likely to set recommendations in relation to then SET. In these instances, the visitors give recommendations in order for the programme can raise the level at which it meets the standard.

One reason for the increase number of recommendations against SET 5 could be that there was a reduction in conditions set against SET 5. The visitors were satisfied that programmes were meeting particular SETs under SET 5 at threshold level, but they placed recommendations against these SETs to ensure that they would continue to be met or to improve how the programme was meeting these standards.

4.0 Conclusions from the hearing aid dispenser visits

4.1 Overall conclusion

The HCPC visited 20 hearing aid dispenser programmes in 2010-11 and 2011-12. The findings in this report and the 2010-11 report are useful for new programmes and new professions that have joined the HCPC Register. The report highlights common shortfalls of new profession programmes, such as misunderstanding of HCPC's expectations about the quality assurance of practice placement environments, which lead to conditions being applied to a programme.

The findings in this report are also useful for the executive as it highlights the need to continue to ensure education providers are aware of our processes for arranging visits, and of our standards. The seminars and other publications produced to help new professions understand the HCPC and our standards have been beneficial. This is shown in the reduction of conditions placed on hearing aid dispenser programmes in the second year of visits in 11-12. To ensure that future transfers to the Register are successful and new professions are prepared for their approval visits, the HCPC must continue its strategy to engage with its new professions.

4.2 Transfer

All programmes that were transferred from the HAC to the HCPC have had approval reconfirmed, with the exception of one programme that, at the time of writing, has not had a final decision agreed by the Committee. The Department forward planned effectively in order to complete the approval visits for hearing aid dispensers within the Committee's timeframe.

4.3 Conditions

From looking at the analysis of the conditions data, education providers running hearing aid dispenser programmes received conditions in areas that commonly receive a number of conditions across all professions. This was also the case for the new profession, Practitioner psychologists, who were regulated from 1 July 2009. Education providers should exploit the analysis in this report and ensure that the areas discussed have been considered and evidenced in the best possible way when engaging with our approval and monitoring processes. It seems discussion with education providers has, in part influenced the reduction in the average number of conditions placed on hearing aid dispenser programmes in 2011-12 compared to 2010-11.

SET 5 (practice placements) was an area highlighted as receiving many conditions, which is normal across all professions, this is also reflected in the Education department's annual report 2011. It is important education providers understand requirements for them to effectively manage their own placements and to have formal systems in place to demonstrate to visitors that SET 5 is met.

SET 2 (programme admissions) was also an area highlighted as receiving a number of conditions. Again, this is normal for any new profession and was also the case for the new profession, Practitioner psychology, as reflected in the Education

department's annual report 2011. Along with the noted reduced impact of conditions set against SET 5, aptitude tests will have had the opposite impact on SET 2. Due to the nature of the programmes, entry criteria is often strict, and therefore it is especially important for the education provider to give clear advice to applications regarding admissions. Across all programmes however, it is important for education providers to give potential applicants accurate information about the programme, and to have admission policies and procedures in place that are effective and fair.

SET 4 (curriculum) was another area where hearing aid dispenser programmes commonly received conditions. We need to be sure that by the end of the programme, successful graduates will be able to meet the SOPs for their part of the Register. Clearly identifying and mapping how SOPs are delivered will aid the visitors' assessment of this.

Education providers should consider the importance of clearly identifying the regulatory role of the HCPC in terms of individuals being eligible to apply for registration upon completion of the approved programme (SETs 2.1 and 6.8). This is an area where education providers commonly receive conditions but owing the broader field of audiology will require additional clarification for our visitors.

Some of the 57 SETs are very specific in their function of ensuring individuals completing programmes will be able to meet the standards required for safe and effective practice. When evidencing the SETs we advise education providers to use the standards of education and training guidance document to inform them of the particular nature of each SET.

4.4 Recommendations

From looking at the analysis of the recommendations data, the number of recommendations and the areas where recommendations are given varies.

It can be noted that recommendations are useful when considering how to enhance the programme and raise the level at which the standards are met. When receiving a report with conditions, recommendations can be a place to highlight enhancement themes in programme design and delivery.