

Education and Training Committee – 10 March 2010

Hearing aid dispensers – approval and monitoring processes

Executive summary and recommendations

This paper follows on from the paper entitled 'Hearing aid dispenser – lists of approved programmes'. It seeks to agree the means by which those programmes granted open-ended approval will have their ongoing approval reconfirmed by the HPC. The Education and Training Committee is asked to agree a long-term schedule of approval visits subject to a system of prioritisation for all currently approved programmes.

Introduction

Paragraph A of Article 15(1) of the Health Professions Order provides that:

"(1) The Council shall from time to time establish –
(a) the standards of education and training necessary to achieve the standards of proficiency it has established under article 5(2);"

In turn, Paragraph B of Article 15(4) of the Health Professions Order provides that:

"(4)The Education and Training Committee shall –(b) take appropriate steps to satisfy itself that those standards and requirements are met."

The standards of proficiency are our threshold standards for safe and effective practice that all registrants must meet. They play a central role in how to gain admission to and remain on the Register and thereby gain the right to use protected title(s). The standards of proficiency for hearing aid dispensers were approved by Council on 11 February 2010 and become effective on the day that the register opens (1 April 2010).

The standards of education and training (SETs) are the standards that an education programme must meet in order to be approved by us. These generic standards ensure that anybody who completes an approved programme meets the standards of proficiency and is therefore eligible for admission to the Register.

Our approval and monitoring processes ensure that programmes and education providers meet the standards of education and training. A programme is normally approved on an open-ended basis, subject to satisfactory monitoring.

Once a hearing aid dispenser programme has been granted open-ended approval, there should be a mechanism for the HPC to ensure that the programmes meet our standards of education and training and that those

students who successfully complete it meet the standards of proficiency for the relevant part of the hearing aid dispenser register.

Therefore, it is necessary for the Committee to consider how those programmes which are granted open-ended approval should have their ongoing approval reconfirmed.

Current approval arrangements with the Hearing Aid Council (HAC)

The HAC currently operates a system of approval for programmes delivered by Higher Education Institutions. The HAC has its own approval criteria which are used to make a judgment on whether a programme is approved. These criteria are linked directly to eligibility to apply to the HAC register.

The HAC have utilised a variety of methodologies in initially approving programmes of study. The variance in methodologies is related to the time at which the programmes were approved and therefore is parallel to the qualification levels that emerged as the profession developed. The table below briefly summarises how initial approval was granted to HAC approved programmes:

Qualification level	HAC initial approval mechanism
Foundation awards	Subject to a site visit from an HAC panel (broadly similar to the approval process)
Bachelors awards (ordinary and honours)	Subject to a documentary means for initial approval (no similar process exists at HPC for initial approval beyond occasional new pathways to programmes becoming approved via major change)
Masters level awards	Subject to a documentary means for initial approval (no similar process exists at HPC for initial approval beyond occasional new pathways to programmes becoming approved via major change)
Aptitude tests	Subject to a documentary means for initial approval (no similar process exists at HPC for initial approval beyond occasional new pathways to programmes becoming approved via major change)

HAC also operated monitoring processes. Education providers were expected to inform HAC when changes were made to programmes. However, in practice, HAC did not receive information in relation to changes to programmes for the period that this process was in operation.

HAC also conducted a monitoring cycle in which education providers were required to submit a mapping exercise and documentation to illustrate how HAC standards continued to be met. This exercise was the only cycle of monitoring conducted on the HPC approved programmes.

Proposed reconfirmation of approval arrangements with the HPC

On the day that the register opens (1 April 2010), it is anticipated that 16 hearing aid dispenser programmes will be granted open-ended approval. The decision to grant open-ended approval will be based entirely on the status of each programmes' approval with the HAC. It is proposed that after this initial decision, the Committee uses the approval process to reconfirm the ongoing approval of each programme.

An approval visit offers the most rigorous and effective means of assuring that each hearing aid dispenser programme meets our standards of education and training. It also gives education providers the opportunity to interact, in person, with representatives from the HPC. The approval process supplementary information publication states that one of the circumstances in which the HPC might require an approval visit is when a new profession comes onto the Register. When previous professions (operating department practitioners and practitioner psychologists) joined the HPC Register a decision was made to put all approved programmes through our approval process. In case of operating department practitioners, there were 28 approved programmes and it took two academic years. In the case of practitioner psychologists there were 71 approved programmes and the schedule of visits is due to take three years to complete (requiring a system of monitoring for programmes not due for scrutiny until year three).

It is proposed that the 16 hearing aid dispenser programmes are visited over a two academic year period. The two academic years would be 2010-2011 and 2011-2012. It is intended that all visits would be held by July 2012, with ongoing approval of all programmes reconfirmed by the 2012-2013 academic year at the latest.

A period of two academic years is recommended for a number of reasons. Primarily, it is recognised that the current HAC approval process is robust and thorough and that these programmes have been producing students who are fit to practice for a number of years. Therefore, there is no evidence to suggest that the visit schedule should be completed within a shorter time frame. Secondly, it is a reasonable and feasible timescale for education providers without being overly-burdensome. Thirdly, it is realistic and achievable given our current resources and commitments to the existing fourteen professions.

It is proposed that that sequence of the two year approval visit schedule is based on a proportionate response to the risks presented by each programme and its status within the HAC approval and monitoring processes. This process is illustrated in appendix 1 to this paper.

HAC approval mechanisms in 2009/2010

On the day that the register opens (1 April 2010), it is anticipated there will be no programmes currently engaged in any of the HAC approval or monitoring processes. However, there are indications that a single programme is currently in the latter stages of the HAC approval process. It is likely that this programme will have a final decision made regarding HAC approval before 1 April 2010. However, the risk exists that this may not be the case and therefore the Education Department may receive a programme part-way through the initial approval process.

There is therefore a need to determine a mechanism for making a final decision in relation to a programme such as this. The HAC approval process will require the generation of a report in relation to the programme. It is proposed that this report constitutes the starting point for the decision making process. It is therefore possible to use the mechanism in appendix 1 to analyse the risks related to the programme. The key distinction for a programme such as this in its interaction with the process shown in appendix 1 is that it would not be granted approval until such time as the Committee determines it is appropriate to do so. This may occur after review of the HAC report related to initial approval, or it may require further documentation from the education provider to be scrutinised by visitors, or potentially even a visit.

Communication to education providers

It is proposed that both the short-term mechanism to review HAC annual monitoring information and the long-term schedule of approval visits are published, with the relevant caveats, ahead of the register opening on 1 April 2010. This would allow education providers to access clear and effective information about what is expected of them after the register opening on 1 April 2010.

Decision

The Committee is asked to agree the following:

- To approve the approval visit schedule taking place across two academic years (2010-2011 and 2011-2012)
- To approve the use of HAC monitoring documentation to prioritise and determine the sequence of visits and to address programmes mid-cycle of HAC approval (as illustrated in appendix 1)
- To agree that the above decisions become effective from the date of the register opening (1 April 2010);
- To agree that the above decisions should be communicated to education providers;
- To ask the Executive to implement the approval visit schedule with a degree of flexibility, ensuring that each visit is confirmed on a case by case basis; and
- To ask the Executive to periodically update the Committee on the progress of work in this area.

Background information

None

Resource implications

Accounted for in five year plan, 2010-2011 Education work plan and budget.

Financial implications

Accounted for in five year plan, 2010-2011 Education work plan and budget.

Appendices

 Appendix 1 – Mechanism for approving mid-cycle programmes and prioritising visits in the two year schedule using HAC monitoring documentation

Date of paper

22 February 2010

Appendix 1 — Mechanism for approving mid-cycle programmes and prioritising visits in the two year schedule using HAC monitoring documentation

The Education and Training Committee grants open-ended approval †

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The Education Department ensures HAC approval and monitoring reports and documents are provided at the handover date (1 April 2010) (i.e. the equivalent of a visitors report or an annual monitoring submission)

The visitors review the HAC approval or monitoring reports:

- review similarity of the HAC initial approval process to HPC; and
- assess the decision and/or any outcomes against our standards of education and training and standards of proficiency *

The visitors make a recommendation to the Education and Training Committee

Visitors recommendation

There is sufficient evidence to show that our standards are met (i.e. no further follow up work is necessary following the HAC report outcomes. The programme is granted /retains its open ended approval, subject to the scheduled visit outcome.)

Visitors recommendation

There is insufficient evidence to show that our standards are met and additional documentary evidence is required.

Visitors recommendation

There is insufficient evidence to show that our standards are met. A visit is required to gather evidence to show how the programme meets our standards and if necessary place conditions on ongoing approval.

The Education and Training Committee make a decision based on the recommendation of the visitors

ETC decision

Open ended approval is granted or reconfirmed.
No further action required until the visit in 2011-12.

ETC decision

Additional documentary evidence requested from education provider. **

ETC decision

Approval process instigated.
This visit takes place in 2010-2011

Education providers are informed of the decision

- † A programme not approved by HAC would not be approved by HPC and therefore skip this step.
- * If appropriate, the visitors can request clarification from the education provider at this stage.
- ** This documentary evidence would be in a similar format to conditions on approval and would include the necessary timescales. Education providers would have two attempts to present sufficient evidence to meet our standards.