



Policy Category:	Policy Title:	Policy #:
Registration	Substantially Equivalent Practice Competency	POL-R-15
Regulation Bylaw Reference:		HPA Reference:
Bylaws 82 and 85		Section 20
Authorization:	Date Approved:	Last Revised:
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DEFINITIONS

“Knowledge, skills, and abilities” means the traits or features of an applicant that combine to constitute the applicant’s “practice competence”, which has the meaning as set out in College’s Standard of Practice, *Attaining & Maintaining Practice Competence* (SOP-PROF-02).

“Practice Competence” means a combination of knowledge, skills, abilities, and judgments that are necessary to practice a profession, within a defined scope of practice. Practice competence is based on the core competencies of the profession and the application of the competencies is transferable across diverse practice settings and for various clinical populations.

“Competence varies with a registrant’s level of experience as well as the complexity of the clinical work (e.g., just qualified, entry level practice, and certified practice). A registrant’s competence may be at risk in certain situations (e.g., practice transition to a new area of practice, long absences from practice). It is recognized that safe, competent, and ethical practice requires the integration and performance of many competencies at the same time.”

“Practice” means any professional role, whether remunerated or not, in which the registrant uses their knowledge, skills, and abilities as an audiologist, hearing instrument practitioner, and/or speech-language pathologist, and has the same meaning as set out in *Attaining & Maintaining Practice Competence* (SOP-PROF-02). Practice includes the provision of clinical care as well as working in management, administration, education, research, advisory, regulatory, and policy development roles and any other roles that impact on safe, effective delivery of services in the profession and/or use of professional skills.

Regulated jurisdiction: The College’s Policy, *Practice Hours Requirement for Applicants* (POL-R-13) gives meaning to the phrase, “regulated jurisdiction” by setting out five indicia by which the Committee may accept that an applicant’s practice of a profession was “regulated”:

1. There is law or governmental statute establishing the regulation of the profession in that jurisdiction.
2. There is a dedicated body or department that regulates the profession.
3. The body or department sets and enforces requirements for entry to the profession.
4. The body or department sets standards of practice for its registrants.
5. The body or department has a mechanism for enforcing standards.

PURPOSE

All speech and hearing health professionals must register with the College to practice in British Columbia. The College ensures that only competent and ethical practitioners are granted registration and certification for practice in British Columbia.

The Registration Committee (“Committee”) may grant registration only if satisfied an applicant meets the conditions or requirements for registration as set out in Bylaw section 82 (for the profession of hearing instrument dispensing (HID)) or section 85 (for the professions of audiology and (AUD) and speech-language pathology (SLP)).

Recency of practice or substantially equivalent practice competency | Hearing instrument dispensing

Where an applicant for registration as a Registered Hearing Instrument Practitioner (RHIP) does not meet the requirements set out in s. 82(1)(a) of the Bylaws, which requires completion of one of specified education programs within three (3) years of the application for registration, the applicant may still qualify under s. 82(2), even though completing their education program more than three (3) years before their application, if

- the applicant has practiced in a specified manner during the three (3) year period immediately before the application, *or*
- the Committee is satisfied the applicant’s knowledge, skills, and abilities are “substantially equivalent” to someone who has recently practiced in the specified manner.

Recency of practice or substantially equivalent practice competency | Audiology and speech-language pathology

Where an applicant for registration as an Registered Audiologist (RAUD) or Registered Speech-Language Pathologist (RSLP) does not meet the requirements set out in s. 85(1)(a) of the Bylaws, which requires completion of one of specified education programs within three (3) years of the application for registration, the applicant may still qualify under s. 85(2), even though completing their education program more than three (3) years before their application, if

- the applicant has practiced in a specified manner during the three (3) year period immediately before the application, *or*
- the Committee is satisfied the applicant’s knowledge, skills, and abilities are “substantially equivalent” to someone who has recently practiced in the specified manner.

This policy clarifies how the Committee may decide if an applicant otherwise has the knowledge, skills, and abilities of someone who has maintained their practice abilities through recent practice in the specified manner.

This policy complements the College’s Policy, *Practice Hours Requirement for Applicants* (POL-R-13), which addresses how the Committee may decide if an applicant’s practice within three (3) years of their application for registration accords with the specified manner of practice.

BACKGROUND

Education requirements: RHIP

Bylaw s. 82(1)(a) provides that the conditions and requirement for registration as a full registrant in the profession of hearing instrument dispensing includes the applicant successfully completing a specified education program within three years of the date of the application for registration.

Bylaw s. 82(2) provides for the following exception:

[82] (2) Despite subsection (1), if an applicant successfully completed the academic requirement specified in subsection (1)(a) 3 years or more prior to submitting an application for registration under subsection (1)(f)(i), the applicant may be granted registration under this section provided the applicant

(a) meets the conditions and requirements established in subsection (1)(b), subsections (1)(c) or (3), and subsections (1)(d) to (f), and
(b) satisfies the registration committee that

(i) during the 3 years immediately preceding the submission of an application for registration under subsection (1)(f)(i), the applicant has engaged in the practice of hearing instrument dispensing

(A) for a minimum of 750 hours,
(B) in one regulated jurisdiction or more, and
(C) in accordance with criteria established by the board, or

(ii) the applicant's knowledge, skills and abilities are substantially equivalent to the competencies or other qualifications established in subparagraph (i).

Education requirements: RAUD & RSLP

Bylaw s. 85(1)(a) provides that the conditions and requirement for registration as a full registrant in the professions of audiology or speech language pathology includes the applicant successfully completing a specified education program within three years of the date of the application for registration.

Bylaw s. 85(2) provides for the following exception:

(2) Despite subsection (1), if an applicant successfully completed the academic requirement specified in subsection (1)(a) 3 years or more prior to submitting an application for registration under subsection (1)(e)(i), the applicant may be granted registration under this section provided the applicant

(a) meets the conditions and requirements established in subsection (1)(b) to (e) and
(b) satisfies the registration committee that

(i) during the 3 years immediately preceding the submission of an application for registration under subsection (1)(e)(i), the applicant has engaged in the practice of the applicant's profession

- (A) for a minimum of 750 hours,
- (B) in one regulated jurisdiction or more, and
- (C) in accordance with criteria established by the board, or

(ii) the applicant's knowledge, skills and abilities are substantially equivalent to the competencies or other qualifications established in subparagraph (i).

NOTE: Neither Bylaw section 82(2) nor Bylaw section 85(2) allows an applicant to satisfy program requirements under s. 82(1)(a) or s. 85(1)(a) by means of substantial equivalence:

- Section 82(2) only relates to an applicant who has *already* "successfully completed the academic requirement specified in subsection [82] (1)(a)", but such completion is not sufficiently recent, i.e., less than three years before they applied for registration.
- Section 85(2) only relates to an applicant who has *already* "successfully completed the academic requirement specified in subsection [85] (1)(a)", but such completion is not sufficiently recent, i.e., less than three years before they applied for registration.

POLICY

The "substantial equivalence" provision, in each of sections 82(2)(b)(ii) and 85(2)(b)(ii), allows the Committee to accept, in appropriate circumstances, that an applicant has *practice competency*, despite a lack of sufficient, recent, and regulated practice that the College has determined is necessary for an applicant to have maintained practice competency over time.

The Committee may and should consider all the information an applicant provides in support of them establishing their practice competency. However, the Committee may and should rely primarily on information and documentation that is objective and independently verifiable.

The Bylaws require a minimum level of practice competency equivalent to someone who completed academic requirements within three years of their application, or who practiced to a degree that would have maintained at least that minimum level of practice competency. An applicant's past practice competence will, however, vary with the applicant's level of experience, as well as the complexity of their professional work. An applicant may demonstrate a degree of education, training, or experience that indicates an historic level of practice competency exceeding minimum or "entry" levels of practice competency, which may be relevant to the impact of periods of non-practice.

The Committee should therefore weigh an applicant's historic levels of practice competency, e.g., based on their initial or continuing education and their work experience, against any degradation of practice competency the Committee may infer from a period of non-practice.

Weighing past demonstrated competencies against degradation of practice will be specific to each applicant's case. However, the Committee generally has considered an applicant's past period of full-

time, full-scope practice to establish a range of risk¹ in respect of degradation of practice competency. This may or may not be outweighed by the length of time that an applicant has been non-practicing. The Committee generally has considered applicants who have not practiced for 5 or more years to be at a high risk of degradation² of practice competency regardless of the number of past practice years. This is because of the highly technical nature of hearing health services, the advancement of methodologies, tools, and techniques, and changing practice environments.

The Committee may consider such factors as the following:

1. information relevant to an applicant's historic practice competency, including
 - a. supplementary education or training;
 - b. history of specialty certifications or equivalent;
 - c. factors relating to work experience, including
 - length of time or success in each practice position;
 - practice settings;
 - competencies required for and developed while in each position;
 - level of responsibility;
 - level of support;
 - research and publications;
2. factors or assessments demonstrating an applicant's levels of competency, including how these competencies were assessed, when, and by whom;
3. the extent of the applicant's practice activities (e.g., the extent to which the applicant engaged in practice, even though short of the threshold amount of 750 hours over three years);
4. the nature and extent of the applicant's unregulated practice activities (e.g., the type and nature of practice in a non-regulated jurisdiction, or as a non-regulated practitioner in a regulated jurisdiction, including the standards required by employers or responsible organizations); and
5. factors relevant to the extent to which applicant's practice competency may have degraded, and the level or nature of the practice competency required for safe re-entry into practice in BC, including

¹Low risk of competency degradation: 5 or more years of practice before break in practice.
Mid risk of competency degradation: 3-5 years of practice before break in practice.
High risk of competency degradation: less than 3 years of practice before break in practice.

²Low risk of competency degradation: 3-4 years away from practice.
Mid risk of competency degradation: 4-5 years away from practice.
High risk of competency degradation: 5 or more years away from practice.

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- a. the duration of the period of the applicant's non-practice (e.g., 3 years, 6 years, 20 years); and
 - b. the intended nature and scope of the applicant's practice, including any factors the Committee may consider relevant, such as
 - the applicant's intended practice setting(s);
 - the applicant's intended level of responsibility; or
 - the level of support the applicant will have available, e.g., teaching facility, a community setting.

The Committee may consider the nature of an applicant's non-practice activities, if they have any bearing on an applicant's practice competency. However, the Committee should remain aware of the broad nature of activities that may constitute "practice".

The College has advised registrants that the following classes of activity are "practice" for purposes of the "practice hours requirement" under Bylaw section 161(1):

1. "Client services provided in person or virtually. Each hour of service may be counted, including time spent with clients as well as hours in related services such as documentation, report writing, or making referrals;
2. "Providing in-person or virtual education and training to other registrants, communication health assistants (CHAs), students, and other health professionals;
3. "Supervising or managing registrants, CHAs, or students in the applicable profession(s). This may include hours as a Quality Assurance & Professional Practice (QAPP) Practice Review assessor or supervisor;
4. "Providing profession-specific consulting, advisory, educational, or profession-specific counselling services to clients, families, and caregivers;
5. "Managing or administering profession-specific programs or services;
6. "Leading or participating in profession-specific research or academic writing;
7. "Leading or participating in professional activities that impact the practice of the profession (e.g., committee work);
8. "Performing regulatory, professional association, or policy development work (this is intended for practice or clinically related work – not clerical or administrative work);
9. "Teaching profession-specific courses;
10. "Other professional activities that impact the practice of the profession."

(see CSHBC website, "Practice Hours" page)

RELATED CSHBC DOCUMENTS

Attaining & Maintaining Practice Competence (SOP-PROF-02)

Practice Hours Requirement for Applicants (POL-R-13)