Hearing Professional Conduct and Complaints Body

Guidance: Practicing without clinical certification

Clinical certification is about public safety, not access to funding. It also supports audiologists and audiometrists to meet the requirements of the Code of Conduct.

The HPCCB has heard some audiologists and audiometrists express the opinion that they do not need to be clinically certified if they are only providing services to clients who are privately funded (i.e. clients with no Hearing Services Program, Medicare, WorkCover, TAC or private insurance funding). This is not the case. Clinical certification is about protecting the public from harm. Clinical certification also supports audiologists and audiometrists to meet the requirements of the Code of Conduct.

Clinical certification by a professional body ensures that practitioners are meeting a range of minimum requirements including training, qualifications, ongoing professional development and recency of practice.

Clinical certification by Audiology Australia is referred to as being an Audiology Australia (AudA) Accredited Audiologist. For the Australian College of Audiology (ACAud) inc. HAASA, it is referred to as being a Diagnostic Rehabilitation Specialist (DRS) or Hearing Rehabilitation Specialist (HRS). The clinical certification standards of AudA and ACAud inc. HAASA are based on the national benchmark standards set by the National Alliance of Self-Regulating Health Professions (NASRHP), which ensures self-regulating professional body standards are equivalent or higher than those set by the Australian Health Practitioner Regulation Agency (Ahpra) Boards.

Practicing (i.e. providing services to clients) without clinical certification is a potential breach of the Code of Conduct for audiologists and audiometrists. A complaint received regarding a professional body member who is/was providing services to clients without clinical certification would be handled by the HPCCB.

Whether or not a person holds current clinical certification is relevant to a number of requirements under the Code of Conduct for audiologists and audiometrists in relation to promoting the safety and quality of hearing services.

When considering a complaint regarding a professional body member who is/was providing services to clients without clinical certification, a number of potential breaches of requirements under the Code of Conduct for audiologists and audiometrists would likely be considered, including the following.

> *Responsibility 1.2 Without limiting subclause 1.1, members must comply with the following: [...]*
> *c. Members must obtain the competencies required to deliver the hearing services they offer and maintain these competencies through continuing education and professional development. This includes meeting the membership and clinical certification requirements of their professional body(ies). [...]*
> *h. Members must be aware of, and only engage in, those aspects of their professions that are within their scope of practice.*
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> *Responsibility 5.1 Members must not engage in any form of misinformation or misrepresentation in relation to the:*
> *a. Hearing services or devices they provide.*
> *b. Qualifications, industry experience, training or professional affiliations they have.*
>
> *Responsibility 5.2 Without limiting subclause 5.1:*
> *a. Members must not use their possession of a particular qualification to mislead or deceive clients as to their competence in a field of practice or ability to provide services.*

b. Members must provide truthful information as to their qualifications, industry experience, training and professional affiliations.

Responsibility 7.3 Members must not misrepresent their qualifications, industry experience, training and professional affiliations in their interaction with the public, other professionals and agencies. This includes:
a. Only using titles, professional affiliations and postnominals/acronyms that honestly and accurately represent their credentials.

In addition, a range of Professional Practitioner Bodies policies of relevance to clinical certification may be considered in the handling of a complaint about a professional body member providing services to clients without clinical certification. These include :

- professional body Position Statements on the use of titles and qualifications
- recency and resumption of practice requirements
- continuing professional development requirements.

The HPCCB would also consider an audiologist's or audiometrist's personal scope of practice and any relevant qualifications, experience and ongoing professional development they had undertaken to ensure they were safe to practice.

If a member was providing clinical services to clients and describing themselves as an audiologist or audiometrist, the HPCCB would also refer the matter to the relevant state/territory health complaints entity for consideration. This is because the National Code of Conduct for health care workers includes requirements that people must not represent themselves as health professionals (e.g. audiologists or audiometrists) without the appropriate qualifications and experience.

Clinical certification by a professional body signals to the public, employers, and funding and regulatory bodies, including the HPCCB, that the audiologist or audiometrist has the qualifications and experience required to practice, is committed to maintaining their professional competency, and is willing to be held accountable for the services they provide.