

EPA CONSULTATION FORM FOR ST0773 OPTOMETRIST L7 EPA

This survey invites you to comment on the ST0773 Optometrist L7 EPA assessment plan. You can read the assessment plan from the consultations page.

EPA Questions

Do you think the Assessment Plan is easy to understand, contains all the key information, and would be suitable for a wide audience range?

No

Comment here

The assessment plan is not easy to understand. There is a lack of clarity about whether the plan conforms to current requirements for EPAs for regulated professions and contains insufficient explanation of its format for readers who are unfamiliar with these requirements.

In particular, the following make the plan difficult to understand:

- The reference to there being an EPA period of a month; this appears to imply a period of apprentice assessment within which the GOC-approved education provider would hold an examination board and share a pass list with the GOC, and apprentices successfully completing an integrated Master's degree/apprenticeship would be eligible to seek registration with the GOC.
- The different sections of the plan vary in how they set out the expected one-month duration of the EPA; the introduction/overview and EPA summary table appear to indicate that the overall process (from examination board to a success apprentice seeking GOC registration) would be a month, whereas the gateway explanation seems to indicate that it starts and finishes with the examination and the approved provider making a pass/fail decision (this ambiguity may be due to the unclear formatting of the document).
- The document uses terms that are not the same as those used by the GOC, while apparently referring to the requirements and processes of the GOC; in particular, this relates to 'standards of proficiency', 'knowledge, skills and behaviours', and 'occupational standard'. The lack of consistency and shared terms means the EPA is not easy to understand.
- In tandem, the document appears to refer to the draft apprenticeship standard's component elements and apprenticeship requirements as though they are the requirements of the GOC when they are not; rather, any delivery under the EPA would need to meet GOC-set requirements.
- The document contains incomplete statements; e.g. point 2 on page 2 and the statement in the EPA summary table that "The apprentice is not required to carry out any additional (sic)".

training and its quality assurance and enhancement method, as well as to the GOC outcomes for registration.

- It is also essential that the reference to the latter is clearly linked to the outcomes for registration as an optometrist.

Do you think the Assessment Plan sets out how each of the skills, knowledge and behaviours in the Standard are going to be assessed? If 'No', what additional detail should be included?

No

Please provide additional detail of what should be included in the comment box below

Comment here

It is not possible to validate the assessment plan without a direct mapping of the knowledge, skills and behaviours (KSBs) set out in the apprenticeship standard against the GOC outcomes for registration (and the indicative guidance currently being developed). It also needs to be clear how the KSBs would be assessed; i.e. how an education provider, in seeking GOC approval, should demonstrate its approach to assessment would both meet the requirements of the GOC's education approval process and align with the degree apprenticeship standard.

It also needs to be made clear in the grading section that the potential outcomes of pass or fail would be determined via a GOC-approved education provider's assessment processes. Whilst the award of an apprenticeship is inextricably linked to the award of the regulated qualification, to meet the apprenticeship requirements provider assessments must be determined by GOC to achieve full coverage of the KSBs in the standard in addition to the GOC outcomes (with the testing of both appropriately melded within the education provider's programme design, delivery and assessment strategy).

It needs to be made clear in the explanation of the grading descriptors that the GOC undertakes approval of qualifications and providers, and will not directly assess individual apprentices.

Do you think the Assessment Plan clearly sets out the methods by which the apprentice will be assessed?

- The employer would “determine when the apprentice ... has met all apprenticeship requirements, taking account of the advice of the GOC Approved Education Provider”.
- The GOC-approved education provider would “confirm to the employer that gateway requirements had been met”.
- The GOC-approved education provider would make “a decision on pass and fail”.

The GOC has stringent requirements set out in their standards and methods for quality assurance that must be met for a qualification provider to receive approval for award of the regulated qualification. These statements do not reflect the formal nature of the relationships required, the nature of the responsibility vested by GOC in the approved education provider, and the levels of oversight required for any collaborative delivery or delegated assessment. These relationships go much beyond simple "advice".

Do you think breadth of proposed assessment methods will allow the apprentice to demonstrate full competence?

No

Please provide additional detail of what should be included in the comment box below

Comment here

It is difficult to comment on this, given that the EPA is very unclear. In addition, the GOC's new education approval arrangements have not yet been applied to any type of education provision, so it is not possible to assess whether the suggested methods are appropriate.

On a more specific point, it seems odd for the gateway criteria to refer specifically to apprentices' required completion of a logbook. This is not a requirement of the GOC's new education approval arrangements and has connotations (i.e. inputs and a simple record of activity) that are not in keeping with the critical thinking, reflection on learning and development and outcomes of learning that is required of contemporary healthcare education and the demands of level 7 learning. It is also not concordant with a fully integrated EPA model.

descriptor states, As a minimum an external examiner There need to be clear definitions.

- It is not clear which bodies are referred to by the reference to “external quality assurance (EQA) providers”.

Do you think the Assessment Plan sets out enough detail to produce consistent and reliable results (e.g. between different employers, different locations, over time)?

No

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Comment here

It is clear that the assessment plan would need to meet and adhere to the requirements of the GOC-approved education provider. While this should ensure consistent and reliable results, because each provider would need to meet and maintain fulfilment of the GOC’s education approval requirements, the uncertainty around how quality assurance of the assessment process for apprentices is to be undertaken and overseen may undermine a provider's ability to meet the GOC standards. It also undermines confidence about consistent and reliable results.

Do you agree that the assessment methodology is feasible, and the estimated assessment costs will not prove inhibitive to employers?

No

apprenticeship standard and assessment plan particularly given the extent of our comments on the draft standard. We would expect these to be addressed before consideration moves to progressing the assessment plan. The draft EPA is based on assumptions made about the standard, which we hope will be significantly changed after consultation. In addition, we would expect the GOC to have the opportunity to comment on whether the draft standard meets its outcomes for registration before the assessment plan is developed.

All our comments on the draft assessment plan should be seen in the context of our comments and concerns about the draft standard and the imperative of there being the opportunity for full discussion within the sector on the apprenticeship and its full implications for all stakeholders.

Specifically, we highlighted that the optometry degree apprenticeship proposal should not be progressed until the concerns raised about its development, particularly regarding the quality of education and resulting patient care, undue commercial pressures on workforce development, changing workforce needs and the impact on perceptions of optometric education and professional standards, have been effectively addressed. We do not feel this standard has addressed these.

As raised in 2019 and early in 2020, it is essential that there is the opportunity for open, collaborative stakeholder discussion (including the profession, optometry education providers and all types of employers) on the standard's development and progression. Without this, it is unclear how it could be implemented feasibly, safely and effectively.