

## National Psychology Examination

### Rationale for Exemptions

A submission from

### **Cairnmillar Institute School of Psychology, Counselling and Psychotherapy**

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Addressed to  
Chair,  
Psychology Board Examination Consultation  
Australian Health Practitioner Agency  
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#### Extracts from PBA Consultation Paper:

“.. a national psychology examination is a mechanism for measurement of a minimum level of applied professional knowledge of psychology, **regardless of the various training** backgrounds. The examination will contribute one source of evidence to the Board that an applicant meets the minimum standard expected by the public of a generally registered entry-level psychologist.”

“The Board is currently considering applying an **exemption** from sitting the examination to applications for general registration from candidates who have completed professional Australian accredited **Masters and Doctorates** within the past five years from the date of application. The Board welcomes stakeholder submissions regarding a rationale for exemptions.”

## EXECUTIVE SUMMARY

1. PBA plans to introduce an examination for provisional psychologists as a requirement for full registration
2. Current proposal to exempt postgraduate provisional psychologists requires a rationale
3. The evidence is that psychologists from either pathway are equally effective with clients.
4. Therefore, a rationale for exemption based on pathway is discriminatory
5. If the exemption applies to one pathway, it fails to acknowledge that “at risk” provisional psychologists are evident in both pathways.
6. If the proposed exemption is applied, provisional psychologists from only one pathway (internships) would experience duplication in assessment, as they are currently assessed by multiple supervisors and on multiple assessments as well as against the criteria for the competencies.
7. If the proposed exemption applies, it will lead to procedural unfairness for provisional psychologists in the alternate pathway. With current PBA being quite lengthy, the two year internship is in effect at least three years. An examination will increase the period of time to full registration.
8. If the exemption applies, there will be workforce issues. As half the psychology workforce undertakes the alternate pathway, any discrimination will affect the number of provisional psychologists who are interns and also delay their entry into the workforce.
9. Evidence regarding adult learning (and all provisional psychologists are adults) strongly indicates that assessment should be problem-focussed and require active learning strategies. The evidence is contrary to the validity of the one-off examination
10. Conclusion: Any rationale to exempt provisional psychologists from accredited postgraduate courses is flawed and contrary to the best interests of the profession and the public.
11. Suggestion: Maintain examination for applicants for full registration whose progress is in doubt (e.g. poor progress results, regardless of pathway) or capability is unknown (e.g. international applicants)

## Psychologists from both pathways are equally effective with clients

Research has found that psychologists who have undertaken the 4 + 2 pathway are as effective for client outcomes as those who have completed postgraduate clinical psychology training. In some instances the client outcomes are better.

The recently released Medicare Evaluation indicates that 4+2 Pathway Psychologists are operating in the mental health field at a similar or higher standard than clinical psychologists (generalist psychologists offering focused psychological services – was a very heterogeneous group, including 4+2 Pathway psychologists, while clinical psychologists was a homogeneous group)

An exemption based on type of postgraduate training will discriminate against those who will undertake the 4 + 2 or the 5 + 1 pathway. There is no evidence to indicate that postgraduate training results in a “better” psychologist than internships and there is no evidence that length of training is a factor in effectiveness.

## Discrimination

The requirement for only those provisional psychologists undertaking the 4 +2 pathway to take the examination is discriminatory: The underlying assumption is that this pathway currently involves less assessment. Provisional psychologists undertaking the alternate pathway are assessed continuously, with a range of supervisors and types of assessment. Moreover, they have approximately 450 days on placement over two years, whereas a Masters student may only have 100 days on placement.

The new and current PBA monitoring and guidelines for 4+2 provisional psychologists include competencies which are carefully assessed by supervisors and the PBA. An examination would be an unnecessary duplication.

The current PBA requirements for 4+2 Pathway provisional psychologists involves continuous assessment by various psychologists across at least a two year period. The forms and frequency of assessment are commensurate with the assessment requirements of the masters/professional doctorate coursework requirements, with the exception for the completion of a research thesis requirement. In contrast the 4+2 Pathway provisional psychologists undertake a greater period of supervised placement. This research and placement difference is in accord with the difference in academic and practitioner emphases and outcomes of these two pathways.

## Procedural unfairness for provisional psychologists from one pathway

At present the PBA processing of assessments involves lengthy delays. Adding even more hurdles will compound the delays. Provisional psychologists undertaking the 4+2 pathway will need to wait for a scheduled examination, its marking and notification of results, in addition to the examination of the three case studies and the final assessment of competences.

## Impact on workforce

The 4+2 Pathway is a significant contributor to the supply of psychologists in Australia and the addition of a further single (end of period) examination would be a significant disincentive to undertake this pathway. Moreover, the provisional psychologists who opt to undertake the 4 + 2 pathway could progress through all required tasks and assessments, as well as significant expense (including forgone income) to face a single (end of period) hurdle: A dramatic “bottle-neck” would occur as is indicated by current delays in PBA processing attest.

The imminent pathway (5+1 pathway) further complicates the anticipated discrimination between the aforementioned two pathways (Masters and 4+2 Pathway). If a higher education based argument applies, that they have existing regulated and verified assessment processes in place and therefore their graduates (Masters and Doctorates) should not be re-assessed, then postgraduate students who have completed an accredited fifth year of study should also be (partially) exempt.

## Continuous education and assessment: Models of Adult Learning

Currently both pathways benefit by continuous education and assessment processes that involve various forms of assessment, multiple assessors/placement supervisors and external reviews. Continuous assessment can be demonstrated as assuring the coverage and acquisition of the breadth of relevant knowledge and skills and as more effective in promoting professional education

The provision of a single (end of period) examination may result in reliance on this assessment process against existing continuous assessment processes within the PBA supervised placement program. The progression to a single and final examination for 4+2 and 5+1 Pathway Provisional Psychologists can reduce “deep” level learning and detract from an appreciation the benefits of continuous education.

Evidence regarding adult learning (and all provisional psychologists are adults) strongly indicates that assessment should be problem-focussed and require active learning strategies. The evidence is contrary to the validity of the one-off examination

## About Cairnmillar Institute School of Psychology, Counselling and Psychotherapy

The Cairnmillar Institute has been a supplier of training and supervision of psychologists for almost 50 years. In recent years we have developed an “internship” program of study tailored to the 4+2 Pathway toward registration as a psychologist. In 2012 we hope to launch our 5+1 program. The program includes individual supervision, group supervision, workshops and an internal quality review system, with peer review of assessments and an intern progress review panel to identify and manage “at risk” interns.

While some of our interns were unsuccessful in their choice of Masters Programs (usually Clinical or Counselling Psychology) even though their academic achievements were excellent, many report a preference for our “work-based” internship approach to acquiring competencies.

## Conclusions and Summary

There is little justification for the discrimination, in the application of a Psychology Examination, where:

- a) There are existing regulated and continuous assessments in both pathways, 4 + 2 and postgraduate training
- b) Multiple supervisors of workplace experience exists in both systems
- c) Such discrimination creates greater uncertainty in one pathway than the other
- d) Development of psychological competence and effectiveness with clients have been demonstrated in both pathways

In view of: the apparent equivalence in existing assessments between the higher education trained 6 year graduates and the 4+2 Pathway psychologists and the prospective restriction in workforce supply; it is only reasonable and equitable to apply the final examination requirement in the same manner across these alternate pathways.

Seeking an evidence base for justifying a claim of difference in rigour of current assessment might readily be achieved by subjecting “graduates” of BOTH pathways to a final examination over an initial trial (two year) period.

Any rationale to exempt provisional psychologists from accredited postgraduate courses is flawed and contrary to the best interests of the profession and the public.

## Alternative Rationale for Exemptions

All applicants are exempt except those whose performance is in doubt and in those instances when forms of **continuous education and assessment are NOT available or practical**. Examples include:

- Overseas applicants for registration
- Provisional Psychologists whose supervisors note are not up to the standard expected (includes 4+2 pathway and those in postgraduate courses)
- Return to work assessments after lengthy periods without practicing.

Yours sincerely,



**Prof Denise Charman**

Professor Cairnmillar Institute School of Psychology, Counselling and Psychotherapy

A handwritten signature in black ink, appearing to read 'John G. Alder', written in a cursive style.

**John Alder**

Counselling Psychologist and Internship/Placement Co-ordinator