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The Chair,

Psychology Board of Australia

Dear Professor Grenyer,

Re: Submission in response to the Psychology Board of Australia Consultation Paper 9:

Guidelines for the national Psychology Examination

The Australian Clinical Psychology Association (ACPA) fully supports the Board's determination to ensure a satisfactory standard of knowledge and practice across the profession nationally. We do, however, have some serious concerns about several areas of the proposal and appreciate the opportunity to comment upon them here.

The 4 + 2 pathway

There are enormous advantages to the public in the Board seeking to ensure every registrant attains a basic standard of knowledge, skills and professionalism prior to entry to the profession as a fully registered psychologist. This is particularly relevant where application for general registration is made on the basis of the Board approved Internship or Supervision program for the 4 +2 pathway to general registration. This pathway currently has limited formal evaluation of the learning, knowledge and skills of the practitioner and relies substantially on the appraisal of a small number of supervisors for each individual, who may be in a paid or other working relationship with the applicant. In this pathway, while clear goals for learning, knowledge and skills development have been established, there is no oversight of the outcomes in these areas by an accreditation body, and no review by experts across a wide range of areas.

The post-graduate pathway

We wish to make the case that post-graduate students completing accredited programs should be exempted from the national examination when they apply for general registration.

Programs in psychology in Australia that are accredited by the Australian Psychology Accreditation Council (APAC) are rigorously reviewed every five years. Within such programs, every student's knowledge is examined by multiple academics who are senior members of the profession and trained in the areas of endorsement for which they are teaching and/or researching. Furthermore, the professional practice of students is reviewed and evaluated by multiple accredited and endorsed supervisors with whom the student works when they are on placement. Students' work is constantly examined over a two to three year period, which is a far more rigorous assessment than any single examination conducted by a national body, such as the Psychology Board of Australia. As such, the imposition of a national examination on students undertaking the postgraduate pathway when applying for general registration is redundant and places on them an unnecessary and additional burden.

The requirement that post-graduate students undertake a National Examination implies that the Psychology Board of Australia believes that accreditation standards and assessment processes currently undertaken by the Australian Psychology Accreditation Council are not robust, and this undermines confidence in standards of teaching and training in psychology more generally.

In some countries, such as the United States, there are multiple jurisdictions in which practice laws vary, as well as numerous education providers with varying standards, and various accrediting bodies. In such countries jurisdictional and knowledge-based examinations are conducted at the completion of post-graduate training in lieu of a national accrediting body. In Australia, this is not the case.

Concerns about the content of the Examination:

Any examination should be highly relevant, related to core skills, and based on the most recent research findings. While the domains of competency being examined in the proposed National Examination are appropriate and fundamental, it is essential that the Examination utilises and supports the most recent research findings in all areas and that due consideration is given to the relevance of the material being examined. For example, in Domain 3 emotional regulation is not included, yet substantial weight is given to controlled breathing techniques. The relevance of this approach to the treatment of Panic Disorder, for example, has narrowed considerably with research findings that it is not, in fact, helpful (Lamplugh et al., 2008; Schmidt et al., 2000) in the treatment of this disorder for which it was once widely applied. These techniques could no longer be considered essential core skills for practitioners and their inclusion in a National Examination may have the undesirable effect of reducing best practice when they are applied too broadly. It is essential that any Examination is reviewed by academics at the forefront of research in the areas being examined.

Yours sincerely,

Judy Hyde

President, the Australian Clinical Psychology Association

References:

Lamplugh, C. Berle, D, Milicevic, D., Starcevic, V (2008). Pilot study of cognitive behaviour therapy for panic disorder augmented by panic surfing. *Clinical Psychology & Psychotherapy*, 15, 440-445.

Schmidt, N. B., Woolaway-Bickel, K., Trakowski, J., Santiago, H., Storey, J., Koselka, M., Cook, J.

(2000). Dismantling cognitive-behavioral treatment for panic disorder: Questioning the utility of breathing retraining. *Journal of Consulting and Clinical Psychology*. 68, 417-424.