

Australian Psychology
Accreditation Council



Submission to the Psychology
Board of Australia

Consultation Paper 9:
National Psychology Examination

May 2011

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Introduction

The Australian Psychology Accreditation Council (APAC) is the Accreditation Authority for the Psychology profession appointed under the Health Practitioner Regulation National Law 2009 (the National Law) and responsible for the development of education and training standards. APAC commenced operation in 2003, and now accredits over 400 courses across some 40 higher education providers including courses in Malaysia and Singapore. APAC is a member of the Forum of Australian Health Professions Councils and the International Network of Quality Assurance Agencies in Higher Education, with links to accreditation bodies in a number of other countries.

It is therefore disappointing and concerning that the Psychology Board of Australia (PBA) did not consult with APAC before releasing *Consultation Paper 9 – National Psychology Examination* (the Paper). The introduction of a national examination as proposed in the Paper is tantamount to establishing an educational standard, since the examination will define a set of learning outcomes to be assessed at the end point of accredited education and training pathways for the profession. The introduction of such an assessment hurdle for graduates of APAC accredited degrees is unprecedented in the Australian psychology education landscape and has significant implications for the curricula of higher education courses and the accreditation Standards under which those programs operate. For this reason the creation of the examination requires a careful and considered process of planning and consultation, including, at a minimum, working closely with the accrediting authority and with educators in the higher education sector. As the key educational quality and standards development organisation for the psychology discipline, appointed under the National Law, APAC requests that the PBA recognise APAC's expertise and experience as the Board undertakes the process of developing the national examination.

The professional postgraduate education and training pathway

Although not explicitly stated by the PBA in the Paper, it is assumed that the PBA's intention in proposing the introduction of a national examination is based on a perceived need for more consistent assurance that provisional psychologists reaching the end of their six year training pathway meet a minimum standard of competence in each of the four domains listed in Section 2 of the Paper.

In 2009 APAC completed a major review which concluded that there was a strong need for greater emphasis on the assessment of education and training outcomes among psychology graduates, and APAC is therefore particularly supportive of better strategies to assess competency among those graduates seeking registration as psychology practitioners. APAC acknowledges the crucial importance of the assessment of professional competence in protecting the public, fostering learning, testing progress, and its role in assisting to determine the effectiveness of curricula and the programs of education in which they are imbedded (Kaslow, 2004).

This position is reflected in APAC's recent reform of its Accreditation Standards, completed in June 2010, which saw the introduction of a set of core capabilities and attributes which must be attained by all graduates of accredited professional postgraduate courses in Australia. APAC Standards 5.1.12 – 5.1.16 (APAC, 2010) now require that a student must not be permitted to graduate from an APAC accredited professional postgraduate program without undergoing formal documented assessment of his/her competence, proficiency and

professionalism in each and every one of the core capabilities and attributes now set out in the Standards. These capabilities and attributes were developed in consultation with the Council of Psychologists Registration Boards Australasia (CPRB) and strongly reflected the views of the State and Territory registration boards as to the appropriate core competencies which should be required for all registrants.

APAC Standards also now require that higher education providers provide clear documented evidence of the assessment procedures used to assess the competence of each student in each listed capability and be able to show the recorded outcomes of those assessment procedures. APAC conducts monitoring and auditing of compliance with these Standards.

Since the APAC competency-related Standards described above and the related APAC monitoring processes were approved by the PBA in 2010 under Section 47(2) the National Law, the PBA has in effect approved a competency standard and quality assurance system for the postgraduate (Masters and Doctoral level) training pathway. It is APAC's contention, therefore, that provisionally registered psychologists graduating from APAC accredited and PBA approved professional postgraduate Masters and Doctoral degrees have already undergone competency examinations and should not be required to undergo (and incur the expense of) any further examination of their professional competence before registration. In fact APAC is of the view that to do so may be in direct contradiction of the guiding principles set out in Section 3(3) of the National Law.

Other pathways

The PBA recognises three other pathways to general registration, the 4+2, 5+1 and equivalent qualification pathways. APAC believes these pathways need to be held to the same standard of competency as the professional postgraduate pathway, but that each requires a tailored approach to its assessment.

4+2 Internship Program

Although the first 4 years of this pathway are accredited by APAC, the PBA-approved two year internship that makes up the fifth and sixth years of the 4+2 pathway are not currently subject to adequate quality assurance or accreditation processes. Although APAC acknowledges that the PBA has in place a set of requirements and reporting obligations which guide the work experiences and supervision of provisional psychologists during the final two years of this pathway, the supervision and work experience are not subject to any form of quality control. The quality of the training provided relies on each individual supervisor's suitability, skills, diligence, and on the nature of the training opportunities and work environment(s) available to the trainee and supervisor, without involving any direct independent external scrutiny of the quality of supervision and other training undertaken. This arrangement leaves open the possibility that there is a high degree of variability in the quality of the supervision and training received, as well as in the level and breadth of competency candidates attain, despite the requirements and reporting measures set down by the PBA for this training.

An additional problem with any system which relies so heavily on a primary supervisor as both the mentor and competency assessor is the conflict between these roles. While this conflict can be managed by good supervisor training, there is a danger that the conflict is not well managed in a system which does not involve close externally moderated quality control, peer review and support for best supervision practices. The problem is made more acute by

the fact that so much of provisional psychologists' applied training is concentrated into the final two years of the pathway.

These supervision arrangements for the +2 component of this pathway thus do not meet the fundamental quality, transparency, fairness and trust requirements of widely accepted international training accreditation guidelines (World Health Organisation, 2005, International Standards Organisation, 2005). The right kind of national examination at the point of registration would be one possible solution to reducing this variability and ensuring that training during the final two years of this pathway meets a consistent benchmark of competence and proficiency like that in place for the professional postgraduate pathway. It should however be complemented by other processes during the training that address issues of transparency, fairness and trust.

5+1 Internship Program

The PBA's recent introduction of the so-called "5+1" pathway to general registration, which involves completion of a four year APAC accredited program of study, followed by an APAC accredited Graduate Diploma of Professional Psychology (5th year), and final a year of supervised internship under the direction of the PBA, is at this point untested, although a number of courses are starting and/or in development. The pathway has the advantage over the 4+2 pathway of an additional year of higher education aimed at foundational applied training in preparation for the final year of supervised practice, but since the final year of supervision will suffer from the same lack of an accreditation process described for the 4+2 pathway above, it therefore would also benefit from an *appropriate* form of final competency examination. It is important to point out here that APAC Standards require Graduate Diploma of Professional Psychology 5th year programs to meet similar requirements for training in, and assessment of, the APAC core capabilities and attributes listed in Standards 5.1.12 – 5.1.16 (although not to the same level of competency) as for Masters programs. This means that graduates of Graduate Diploma of Professional Psychology courses will have been examined across the core capabilities at a foundational competency level before graduation and APAC contends that the design of a national examination should acknowledge this fact, recognising the competency examinations passed during their 5th year course.

Equivalent qualification pathway (including overseas trained practitioners)

The PBA general registration standard allows for an additional pathway for individuals with a qualification that in the PBA's opinion is "substantially equivalent" to the pathways described above. Notably this pathway includes overseas trained psychologists. Given the lack of mutual recognition arrangements between Australia and other countries regarding the qualifications and training of psychology practitioners, the right kind of national examination would in APAC's view be an appropriate way of assessing the competency of overseas-trained psychologists coming to Australia. Many professions use such examinations to assess overseas trained practitioners before licensing them and a comprehensive form of examination should be employed for this purpose depending on any relevant recognition arrangements which might be in place. Such arrangements (and the examination itself) would need to take account of the skilled migration assessment requirements set down by the Department of Education, Employment and Workplace Relations and of the Department of Immigration and Citizenship's Skilled Occupations and Employer Nominated Skilled Occupation Lists. It is worthy of consideration as to whether or not it is appropriate for overseas trained applicants to have general competencies assessed leading simply to

general registration, or specific competencies assessed, leading to registration and endorsement. A failure to assess specific competencies may lead to discriminations.

The arguments made in the foregoing sections of this Submission highlight the importance of ensuring that the national examination assesses to the same standard that the PBA has approved for the professional postgraduate training pathway. To achieve this imperative while also being tailored to the particular needs of each pathway to which it is applied, the examination will need careful design. The Paper does not however canvass the issue of designing for specific assessment purposes, rather, it implies that one examination will simply be applied to a variety of purposes. Such an approach will not result in highly valid assessments and will therefore not serve the public well.

Examining competence

The assessment of professional competence in psychology is an emerging field. It has been noted in the literature that challenges arise because of its developmental, impermanent and context specific nature (Greenberg and Smith, 2008). There is however an empirical base for the assessment of competence in training psychologists, and in particular the work of the American Psychological Association's (APA's) Task Force on Assessment of Competence in Professional Psychology (Kaslow et al, 2006), and the subsequent development of a competency assessment toolkit for professional psychology (Kaslow et al, 2009), have done much to advance an evidence-based approach to assessing practitioner competence. APAC is aware of assessment processes in other countries such as the Academy of Psychological Clinical Science, which places strong emphasis on training in evidence-based practice and the American Academy of Clinical Psychology, which has a rigorous examination process that includes an oral exam component.

The design of the national examination must be based on this published evidence base, including published guiding key principles for competence assessment in psychology (Kaslow et al, 2007), in order to achieve valid and reliable assessment outcomes.

A key principle is that assessment approaches should as far as possible measure multiple competency domains, using multiple methods and employing multiple sources. While well constructed "paper and pencil" examinations including multiple choice approaches such as that suggested in the Paper are of value, the Paper's suggested strategy of relying solely on a written multiple choice examination is counter to the published evidence which shows that many skills cannot be adequately measured by multiple choice questions alone (Veloski et al, 1999). Additionally, multiple choice approaches are particularly vulnerable to problems such as coaching of applicants. Best practice dictates that assessment methods should integrate summative and formative evaluations, which are mutually informative processes, and are commonly used by educators in professional postgraduate courses for this reason. There are many methods available which when combined are better suited to a skills assessment and that could be added to a multiple choice knowledge and reasoning test to provide a more complete picture of competence (Kaslow et al, 2009). A national examination is insufficient as a sole means for establishing competence, and it is important that accredited and approved qualifications continue to be a necessary component of achieving registration.

APAC believes that the important task of developing the type of national examination proposed in this Paper is more appropriately the task of the profession's accrediting

authority. As the discipline's quality and standards organisation, APAC has extensive expertise in advanced assessment of the knowledge and skills of practitioners trained at the 5th year and beyond, and expertise in systems of quality control, having access to trained assessors who are senior representatives of the discipline and profession with years of experience assessing institutions and evaluating against standards. APAC is hence in the best position to design an examination which is equivalent in nature to the assessments conducted by higher education providers at the same point of trainee progress in the other (postgraduate professional) pathway. APAC is also in the best position to ensure that a national competency examination is benchmarked at the same level of achievement as that required by APAC's Standards for assessment of core competencies.

Most other professions commission their accrediting body to develop and administer competency examinations. This approach has the important advantage of establishing a high level of independence of the examination process from the boards' registration decisions, supporting the principles of separation and transparency of processes. Since the PBA controls the setting of accreditation standards through the process of Approval under the National Law, there is no danger that the PBA would lose control over competency standards by commissioning an expert body to develop and administer examinations built to its specifications.

Recommendations

1. Since provisionally registered psychologists graduating from APAC accredited and PBA approved professional postgraduate Masters and Doctoral degrees have already undergone extensive assessment of core competencies including practical and written examinations to PBA approved standards, APAC strongly recommends that they are not required to undergo (and incur the expense of) further examination of their professional competence before registration.
2. APAC strongly recommends that the national examination is designed to ensure that the minimum required standard of performance is consistent with that required by accredited postgraduate professional Master and Doctoral level courses for the core skills and knowledge which are common to all pathways.
3. APAC strongly recommends that the establishment of a national competency examination process is based on the published empirical literature on the assessment of professional knowledge and competency.
4. APAC recommends that the examination is designed in such a way to allow tailoring of the assessment process to meet the specific needs of each pathway without losing consistency of standards or coverage across pathways.
5. APAC recommends that the development and subsequent administration of the national examination should be undertaken by APAC (to PBA specifications) so as to ensure consistency of standards, best practice in assessment design and administration, strong quality control, strong consultation with educators and other experts and maximum independence of the competency assessment of candidates from PBA assessment and decision-making processes concerning registration.

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