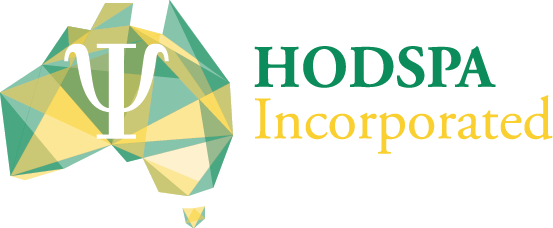
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**Submission re ‘Reducing Regulatory Burden: Retiring the 4+2 internship pathway to general registration’ Consultation No. 31 – Heads of Dept. and Schools of Psychology Association (HODSPA)**

We thank the Psychology Board of Australia (PsyBA) for all the hard work that has been done to present Consultation Paper 31 and we are pleased with the opportunity to contribute to modernizing the training of ‘generalist’ psychologists in Australia.

We would also acknowledge the role played by the 4+2 pathway in the development of the profession of psychology in Australia. The program was innovative for its time and while we support the removal of the pathway, we would note two things. First, as indicated by PsyBA, the removal of the 4+2 pathway has no implications for those who gained registration through that pathway. They are registered psychologists, who will continue to contribute to improving the mental health of Australians. Second, one aspect of the 4+2 pathway will remain, even if we shift training to the 5+1 model of training, namely, the notion that some training in professional psychology should take place ‘on the job’. More on this later.

**Arguments for removing the 4+2 pathway**

A major concern for HODSPA, resulting from the continued existence of the 4+2 pathway, has been that it means greater scrutiny than is necessary of the undergraduate program in psychology. The initial ‘4’ of the 4+2 pathway takes place within an institution, typically a university, and is subject to the quality assurance processes demanded of universities by Tertiary Education Quality Standards Association (TEQSA). However, because these are the only years that can be subject to any formal accreditation process, they have been subject to a scrutiny that is not commensurate with the notion of ‘protecting the public’. Most graduates from the 3-year undergraduate program will not become professional psychologists and almost as many graduates from the 4th year program will become researchers as will become professional psychologists. Hence, the whole edifice of undergraduate accreditation is built upon the small number of students who take the 4+2 pathway.

The argument has always been that this scrutiny is necessary because students who pursue the 4+2 pathway will not take a formally accredited program at the postgraduate level. Hence the need for stringent examination of the undergraduate program. Thus, in addition to the burdens identified by the PsyBA, we would add a very significant burden on universities and other higher education providers in terms of the costs of accrediting their undergraduate programs. A majority of members of HODSPA support accreditation of the undergraduate program, but with a lighter touch than has been the case previously. We trust that the new Australian Psychology Accreditation Council (APAC) Guidelines and the removal of the 4+2 pathway will allow this to happen.

**Replacing the 4+2 with the 5+1**

The PsyBA recommended removal of the 4+2 pathway in 2010. There were two issues mitigating against this proposal. First, at the time there was a shortage of registered psychologists. Second, there was no obvious alternative to the 4+2 pathway. The growth in ‘specialist’ programs would not cover the numbers lost through the removal of the 4+2 pathway. Indeed, in the years since this initial recommendation, numbers in the ‘specialist’ programs have grown by only 13 %, from 1925 EFTSL in 2010 to 2182 EFTSL in 2016. (An EFTSL is Equivalent Full-Time Student Load.)

The first 5+1 program was developed at Macquarie University by Dr. Andrew Baillie and colleagues to provide a program that covered the ‘generalist’ agenda, with a one-year Masters degree followed by a one year internship. As with the 4+2 pathway, the first four years of training comprised a three -year undergraduate degree followed by an Honours year or equivalent. Dr Baillie and the university were encouraged to seek accreditation of the program, which was achieved through the Australian Psychology Accreditation Council (APAC). Since then a number of other institutions have adopted the model. Early in 2018, we asked the members of HODSPA to indicate their intentions re introducing a 5+1 program. Figure 1 shows the responses.

**Figure 1:** Responses to a question about the intention to offer a 5+1

There are currently sixteen 5+1 programs on offer. Subject to institutional requirements and accreditation, there will be an additional 10 programs in 2019. A further 8 institutions are discussing the possibility of a 5+1, and 6 have indicated that they will not be introducing a 5+1 in the near future. Dr. Baillie’s original idea has certainly taken root.

How does the growth in the number of programs support the removal of the 4+2 pathway? The first column in Figure 2 shows the current enrolment in the 4+2 pathway by State and Territory. (This number is taken from Table 2 Page 13, in the Consultation paper, divided by two, the number who enter the pathway each year.) The second column is the enrolment in the 5+1 if each program took approximately 40 students each year. The third column is the number of students admitted into the various 5+1 programs at the beginning of 2018. Finally, the fourth column shows the number of prospective 5+1 students minus the current number of 5+1 students.

If we look at the numbers overall, some 695 students enter the 4+2 pathway annually. If there were twenty-six 5+1 programs taking in 40 students per program, then there would be 1080 places in 5+1 programs each year. However, this 1080 includes the 416 places already available. These latter places cannot be used to offset the reduction in places following the removal of the 4+2 pathway, because they already exist concurrent with the 4+2 pathway. Hence, we must subtract 416 from 1080, which gives 664. This number is comparable to the loss resulting from the removal of the 4+2 pathway and indicates that numbers in the 5+1 program will be sufficient. Importantly, we should note two things. First, a number of 5+1 programs already take in more than 40 students annually. Second, when the 4+2 pathway is removed, there will be no competition for internships and thus institutions can recruit students into their 5+1 programs in the knowledge that there will be internships available to them.

**Figure 2:** 4+2 entrants, possible 5+1 places, current 5+1 enrolments, and ‘new’ places in the 5+1 programs, by State and Territory. The Rest includes the ACT, NT, and Tasmania.

Thus, places in 5+1 programs will offset the loss due to the removal of the 4+2 pathway. However, Figure 2 allows us to drill down a little more and look at matters State-by-State. Let us take New South Wales and Victoria as examples. There are currently some 662 people registered as pursuing the 4+2 in NSW (Table 2 Page 13 of the Consultation Paper.) Again, we can halve this number to get the annual intake, which is 331. There are likely to be eight 5+1 programs on offer in NSW, in the near future. If each program takes in 40 students, this makes for 320 places annually. Again, however, we need to subtract current places from projected places, or 320 minus 159, which equals 161. Thus, there will be a shortfall of places in NSW, comparing 331 to 161. NSW has by far the largest number of people pursuing the 4+2 pathway. However, note that it has also had the strongest uptake in terms of 5+1 programs and students. Indeed, the two largest programs are in NSW.

If we look at Victoria, we find the opposite. There are currently 122 people pursuing the 4+2 pathway, which makes for 61 entrants annually. We project eight 5+1 programs, each taking 40 students in Victoria, or 320 places each year. There are currently 124 places in 5+1 programs in Victoria. If we subtract 124 from 320, we get 196 places, which is three times the number needed to offset the loss of 61 places from the removal of the 4+2 pathway.

Thus, we would argue that any shortfall in NSW is likely to be made up for by Victoria and to a lesser extent, Queensland. After all, the whole point of having a National Board was to allow registrants to move easily between States.

Importantly, the growth in numbers in 5+1 programs is taking place when the 4+2 is still available and in competition with the 5+1. If the 4+2 is retired, then there will be no competition for internships and we expect the numbers in 5+1 programs to grow even further. Consider, if there are 1400 provisional registrants taking the 4+2 pathway, this is the equivalent of 2800 one-year internships. (Each 4+2 entrant requires 2-years of internship.) If these were available to the graduates of the ‘5’, then the numbers that can be catered for would more than offset those lost through the disappearance of the 4+2 pathway.

Indeed, we would argue that the most important project to be undertaken during the transition period is to ensure that those who currently supervise 4+2 provisional registrants will take up the opportunity to supervise the ‘1’ in the 5+1 pathway. HODSPA, the Australian Psychological Society, and the Psychology Board of Australia need to work together to ensure that this happens. Some supervisors may be concerned at working with a large organization such as a university, to them we would point out that HODSPA includes smaller universities and private providers amongst its members. Thus, prospective supervisors should be able to find an organization that they are comfortable with.

**The nature of the 5+1 programs on offer**

It might be assumed that a simple one-year Masters allows little room for innovation. This appears not to be the case. Thus, we asked those who had enrolments in a 5+1 to answer a series of questions about their program. The responses are based upon 13 programs, which were all those available at the time.

**Is your 5+1 full-fee paying or Commonwealth Grants Scheme funded?**

Programs were evenly split between those that offered Commonwealth Supported Places and those that offered full-fee paying places. The latter ranged from $20,000 to $32,768. (These differences reflect other aspects of the program, e.g., see below.)

**Do you run the internal placement in your clinic (assuming you have one)?**

Most programs ran the 300-hour practicum in their internal clinic. Those that did not organised an external clinic for the student.

**Do your 5+1 students share any classes with your specialist Masters students?**

The answers to this question ranged from zero, with an expressed concern about how the Australian Psychology Accreditation Council (APAC) might view this mixing, through to complete overlap. Indeed, it is possible to design a specialist Masters where the first year is devoted to ‘generalist’ training and is de facto the one-year Masters. At the end of this year, some students take out their award and move into an internship. Other students move into the second year of the specialist program, which is devoted to the relevant speciality. Note that this program has APAC accreditation and the blessing of the Clinical College of the Australian Psychological Society (APS). Importantly, these two programs illustrate the range of possibilities available. Most programs shared some subjects.

**There are many ways that the +1 internship might be managed -**

Currently, most institutions require students to find their own internship and leave it to the Psychology Board of Australia to mandate the internship. Some support students through the internship by providing mid-term and end-of-term consultation to ensure that the internship is proceeding/has proceeded as planned. Some are moving towards a situation where they will provide and manage the internship. Again, this illustrates the range of possibilities.

**What proportion of your students pay for their internship, get paid for their internship, neither pay or get paid?**

Most of the programs were new and had little data on this question. However, some institutions reported that their students were paid for the placement, which most of us would regard as the ideal.

In addition to the above, students were able to take programs in part-time mode, access the course material online, attend intensive multi-day on-campus workshops, which some institutions programmed at weekends. Thus, what might seem like a straightforward one-year Masters is offered in a variety of ways, one of which should suit most, if not all, possible students.

In sum, we believe that the time is right to remove the 4+2 pathway to general registration. As set out above, we believe that the numbers lost when the 4+2 pathway is removed will be offset by growth in the numbers of programs and students taking the 5+1 route.

**We support Option two – Retire the 4+2 internship pathway to general registration**