Dear Australian Health Practitioner Regulation Agency (AHPRA),

My name is Andrew Wong and I am currently studying a Master of Psychology (Forensic) at the University of New South Wales. I am writing to provide my opinion about the recent plan to remove exceptions from the National Psychology Examination for higher degree students.

I would like to firstly draw your attention to the fact that the Australian Psychology Accreditation Council (APAC) is already regulating psychology degrees on the basis of stringent standards for the education and training of psychologists, as appointed under the Heath Practitioner Regulation National Law Act 2009. Making the national examination a requirement after the completion of a higher degree places an unnecessary and redundant level of regulation to the graduates because the degrees are previously accredited to providing quality education for the practice of psychology.

This requirement not only undermines the strict standards of APAC because it implies the inadequacy of the accreditation process by APAC, but it also undermines the significance of higher degrees in professional psychology. This includes the encouragement of higher degree programs to unduly focus on "teaching to the test" rather than teaching students to becoming competent practicing psychologists. Further, the fact that APAC and AHPRA are fundamentally different regulating bodies runs the risk that the regulation standards of APAC being discrepant to the contents covered in AHPRA's national exam. This further places unwarranted pressure on universities to selecting the relevant content covered in their two year Masters Programs to both satisfy APAC requirements and the content covered in the national exam. Making universities “teach to the test” rather than competency therefore undermines the importance of higher degree programs because psychology students would graduate from their professional training programs not with the relevant knowledge and skills around becoming a professional and ethical psychologist, but a professional test taker.

Undermining the importance of higher degree programs therefore contraries the fundamental cultural value of education in Australian society. A society that discourages higher education for psychologists would place the public in danger as it would lower the general standard of practice in all areas of psychology.
Removing the exemptions from the national psychology examination for higher degree programs therefore, according to the reasons above, would not effectively regulate the standards of practicing psychologists. On the contrary, it would substantially lower the competency of psychologists with postgraduate education and even discourage students from taking the higher degree pathway. I strongly urge AHPRA to reconsider the plans to removing this exemption.

Yours sincerely,

Andrew