

Psychology Board of Australia
Professor Brin Grenyer, Chair

Dear Professor Grenyer,

Re: Consultation Paper 9: Consultation paper on Guidelines for the National Psychology Examination

I am writing on behalf of Neuropsychology postgraduate students from Monash University to express our comments about the national examination. We are in full agreement with the PBA's decision to exempt these students from the exam. We are, however, aware that there is some debate as to whether this should be the case.

1. We are fully supportive of having Masters or Doctoral level graduates exempt from an exam for generalist registration.

Including provisional psychologists who have completed a Masters or Doctorate would contradict the reason we would choose to complete an accredited program rather than do the 4+2 process. We receive training and assessment of our practical skills theoretically and clinically throughout this program. We undergo examinations of our professional practice continuously: theoretically in the first 2 years (coursework) and then clinically every day we set foot at placement and are reviewed throughout these placements by our university.

2. Postgraduate programs already assess standards necessary for general registration.

The government and the universities already engage an independent organisation, APAC, to approve the programs of study as assessing the standards necessary for generalist registration. As such, postgraduate students complete a number of examinable subjects in order to satisfy the requirements of generalist registration. It does not appear that the exam would add to our knowledge or skill, and would only serve the purpose of having a consistent "event" that has to be passed. Postgraduate training assesses all aspects of the boards proposed exam. Postgraduate students are not only assessed on their applied knowledge, but also on how to use relevant literature to guide clinical practice and professional development. The university training therefore goes beyond the proposed examination, and is consequently at least equivalent to the examination. It is therefore unnecessary and excessive to impose any more examinations that also assess generalist registration.

Some have argued that not all APAC degrees are set at the right standard. If our studies are lacking, it's in our level of theoretical training. Our theoretical training outweighs any practical training by an enormous amount, particularly in our undergraduate training. Adding more exams does not change this! Giving more exams on a specific therapy a technique is not going to make us able to actually practice it, what is needed is supervised training in it. Furthermore we should not be practicing as generalist psychologists because we are specialist. If we wish to use these techniques in our careers we would undertake further supervision, as they are not part of our everyday tools.

3. Potential financial burden.

There will obviously be financial costs involved in the examination process, and we doubt the government or universities will bear these costs. Considering the amount students already pay for during their postgraduate degrees, it would be unnecessary and extremely unfair to have postgraduate students take on the costs.

4. Additional unnecessary time latencies between completion of studies and practicing.

If postgraduate students were to sit the exam the extra time between graduating and completing the examination process would add to the latencies between training and practice. There are already huge time lags between graduating and practicing for many students due to having their thesis marked and having the PBA process applications. Adding any further time to this process will result in deskilling as well as workforce shortages. Even if the exam were instead undertaken whilst completing the course, it would provide a major distraction from placement/research activities. Furthermore it has been suggested the universities administer the exam. This is not logistically possible; the universities could only have one exam a year, further increasing time latencies for those who finish many months before the exam.

5. Postgraduate and 4+2 programs are fundamentally different.

It has been suggested we should sit the exam as a token gesture to appoz who are promoting equal standards between 4+2 and postgraduate psychologist. Having postgraduate students sit the exam will imply that our training programs are equivalent, which of course they are not! If they were many of us would take the easier and quicker 4+2 option. If we were to take the exam as a token gesture to aapoz, they are likely to take this and use it against us. This is the first time that the PBA has acknowledged the fundamental differences between postgraduate training and the 4+2 program, and we therefore feel it necessary to support the decision to exempt postgraduate students.

6. We are fully supportive of an examination of provisional psychologists whose competence has not been rigorously assessed.

Having the proposed exam for internationally trained psychologists and 4+2 trained psychologists is applauded as an essential step forward in determining eligibility to practice in Australia. Further, the 4+2 model does not have the same assessment requirements as a postgraduate course in psychology. An examination would ensure those undertaking this pathway are competent in the skills required for psychological practice, as there is currently little formal assessment for this pathway.

We are concerned, however, about the fact applicants can re-sit the exam as many times as they like following three more months of supervision. What is this exam really testing? We are still going to have people who are incompetent in their jobs who for a brief period got the hang of answering multiple choice questions! If the PBA is serious about assessing competence, in addition to a theoretical test they should have a standardised practical examination involving test assessment/rehabilitation interventions and therapy techniques.

7. Promotion of psychological specialisations.

The PBA have stated that the purpose of the examination is for general entry-level knowledge and we hope that that is kept in mind in preparation of the paper (e.g. it would be unfair for Counselling Psychology to have to know about specific cognitive tests). We should, however be promoting psychological specialisations, whilst all retaining a general awareness and ability of general psychological practice. We therefore suggest including a specific module in the exam that is relevant to the applicant's desired specialised area of practice.

Whilst we completely advocate that our governing bodies must ensure our profession is only accepting those with sufficient training/skill we feel we are heading down a path that is making psychology a "peripheral medical degree" without the perks (e.g., exemption from registration fees while still in training, and a poor award wage on completion in

comparison). **We are going to lose potentially great psychologists** because in the time and requirements this course now involves people are going to find equally interesting and better paid professions to enter.

Yours sincerely,
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