Dear Professor Grenyer and Board members,

Re: Consultation Paper 9: National Examination Consultation Paper

Thank you for the opportunity to comment on the 9th consultation paper regarding the proposed National Examination. We, PERC (Psychologists Endorsing the Registrar Community) would like to express our appreciation of the PBA’s responsiveness to many of our concerns previously raised. PERC is a newly formed community developed to support registrars and recent graduates of postgraduate psychology transition into the workforce under the new PBA guidelines.

We would like to outline two considerations in response to the consultation paper. Firstly, we would like to express our support for the PBA’s proposal that postgraduate psychology students will be exempt from completing the national examination to gain approval for generalist registration as a psychologist. Secondly, we would like to seek clarification on who will be responsible for administering the proposed examination.

1. Exemption of postgraduate students from completing the exam

We appreciate that the recent consultation paper proposed by the PBA allowed for the exemption of postgraduate students from having to complete the proposed exam.
We would like to support this exemption as we believe that the postgraduate courses, under the regulatory guidance of the Australian Postgraduate Accreditation Council (APAC), already assess the general knowledge base covered in the proposed examination. Therefore, providing exemption for postgraduates will reduce redundancies in the examination process.

It is also expected that exempting postgraduates will avoid additional financial responsibilities in a group of people who are already burdened by the costs of their postgraduate training.

Further, as postgraduate students rarely complete their degrees at specified times of the year, unless regular examination dates are proposed each year (e.g. monthly), delays in registration will be inevitable. Having extra delays will not only place further financial burden on recent graduates, but it will also result in slower graduate intake into the workforce, as well as substantial de-skilling during a time when skills gained through specialist training are still being consolidated.

In sum, in order to avoid redundancies in the examination process as well as extra financial burden and delays in being able practice, we support the PBA’s determination to exclude postgraduate students from the examination process.

2. Clarification of bodies involved in preparing and administering the proposed examination

We would like to seek clarification on which official body (or bodies) would be responsible for preparing and administering the examination. We would also like to recommend that in order for there to be uniformity amongst generalist psychologists, it would be logical that the same independent body that approves the postgraduate programs and their assessment requirements also be responsible for setting the content and format of the National Examination; in this case, APAC. This would ensure that continuity of standards across the two pathways to generalist registration are maintained.

Thank you once again for the opportunity to provide comment. We look forward to the outcome of the consultation paper.

Yours Sincerely,

PERC committee
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