

Comments to Psychology Board of Australia
on
Exposure Draft:
Guideline for Supervisors and Supervisor Training Providers

The Exposure Draft: Guideline (*Guideline*) provides considerable flexibility to address the diverse supervision needs of the range of internship and registrar programs. However, it fails to address the impact of market forces on developing and sustaining quality supervision training programs for psychologists. This issue is relevant to numerous of the points raised below.

1. Competencies

The first competency is “Knowledge and understanding of the profession” (p. 9). Training providers must “facilitate learning in each of the core competencies” (p. 15). However, the 8 specific competencies within this first competency are those specified in internship programs to gain full registration (p. 9). Given that all participants in supervision training must already be fully registered, they have been recognised by the Board as having these competencies. Even if there are a few gaps in a particular psychologist’s competencies, supervision training is not the forum to address these. It is not possible within a brief supervision program to retrain or reassess these competencies.

Recommendation 1 (Competencies):

That the 8 core competencies within the first competence “Knowledge and understanding of the profession” be retained as requirements for supervisors, but that it be specified (p. 15) that since they are a pre-requisite for registration, training providers do not need to provide further training or direct assessment of them. However, if there are indications in the supervision assessments that a psychologist is lacking in any of the 8 competencies, then this should be notified to the Board so that the Board can reassess the person (perhaps by requiring them to sit for the new examination).

2. Assessments

I strongly support the emphasis on the necessity for direct assessment of supervision performance. However, the method of direct assessment has been given as an option (p. 14) between one or both of

- (c) supervisory performance to be measured through assessment of an actual supervision session submitted on videotape or equivalent (videotape) and/or
- (d) potential supervisors must receive supervision of their supervision including direct observation and critical feedback (supervision-of-supervision).

Providing an option of a videotape and/or supervision-of-supervision assessment raises numerous issues. Firstly, consumer demand. Most potential supervisors would see supervision-of-supervision as an easier option than a videotape. Furthermore, the cost of the supervision-of-supervision would be much less than the videotape option. Given that, for reasons of ease and cost, most supervisors are likely to choose workshops that only require the supervision-of-supervision option, there would be a very limited market for workshops that included a video assessment. If such workshops were not financially viable, training providers would either drop out of the field or change to the supervision-of-supervision option. Thus, it is probable that the apparent option is not really an option because only the supervision-of-supervision format would endure over time.

Secondly, although the supervision-of-supervision option has considerable advantages (supervisors are likely to be less stressed, providing supervision in their own safe environment with a trusted supervisor and without the intrusion of electronic equipment and they would receive face-to-face feedback on their supervisory performance), it has a major disadvantage. The supervisor of the supervisor might not be sufficiently skilled to provide the necessary assessment and feedback and the *Guideline* does not provide for standardisation of the assessment and feedback. More details need to be provided as to who can provide supervision-of-supervision and the performance standards to be met.

Videotape assessments ensure a standardised assessment and feedback method by suitably trained assessors. They also provide the optimal data for the Board to evaluate training programs (11.2, p. 14). The alternative, checklists or reports from supervisors-of-supervision, could say more about the assessor than about the supervisor being assessed. The standard of the whole supervision training enterprise will be undermined if videotape assessments are not required in all programs.

Requiring both videotape and supervision-of supervision assessment in the initial assessment phase could be regarded as unnecessarily onerous and expensive. A reasonable alternative might be to require a videotape assessment for initial approval as a supervisor and at least one session annually of supervision-of-supervision assessment within CPD hours.

The timing of these assessments is specified as “after a period of time has elapsed following the direct instruction focused on competency attainment” (p. 8). Once the competencies have been attained in training, why can’t a psychologist demonstrate this by completing the assessments within the following few days? If any time limits are imposed it seems more important to impose a maximum time limit (such as 6 months after completion of the training).

Recommendation 2 (Assessments):

- 2a. That videotape assessment of supervisory performance be a requirement for initial approval as a supervisor and that at least one session annually of supervision-of-supervision assessment be required within the supervisor’s CPD hours
- 2b. That standardised assessment and supervisor-of-supervision selection criteria are specified for supervision-of-supervision (whether it is part of the initial assessment or part of ongoing CPD).
- 2c. That the required timing of assessments be clearly specified – such as no minimum time and maximum of 6 months after completion of training.
- 2d. That, if the current requirement of one or both of video assessment and supervision-of-supervision) is retained, then the requirement should be clarified with the following rewording in 11.1 (p. 14):
 - a) *knowledge of supervision principles is to be measured through either multiple choice, short answer examination or interview or exercises prior to the workshops and*
 - b) *decision-making skills in the supervisory context is to be measured through responses to case studies and vignettes and*
 - c) *either one or both of:*
 - i) *supervisory performance is to be measured through assessment of an actual supervision sessions submitted on videotape or equivalent and/or*
 - ii) *potential supervisors must receive supervision of their supervision including direct observation and critical feedback.*

3. Standardisation

The *Guideline* specifies that each training provider must develop and administer their own assessment tools and evaluation forms:

- assessment of preparatory work (relevant Board guidelines and general supervisor readings) prior to face to face instruction (such as a multiple-choice test online) (p. 8)
- systematic assessment of competency attainment (knowledge of supervision principles, decision-making skills in the supervisory context, and supervisory performance in videotape and in supervision-of-supervision) (p.14)
- systematic assessment of 1 day revision training (p. 8)
- outcome data (presumably assessment results and participants' evaluations) to be reported annually (p. 13)

This is a huge task for each training provider and there is a risk that standards will vary widely. The programs that look easiest will be most popular with participants – the tougher ones will not be sustainable because they won't get sufficient participants. Furthermore, standardised assessment tools are needed to ensure a high national standard. Standardised tools could easily be developed by a sub-committee, chaired by a Board member. A small number of approved service providers could be invited as members of the sub-committee, with little or no payment (it is still more cost effective for them than doing the full job alone). If the Board provided travel expenses for two or three meetings, most of the work and negotiation could be done by email.

The *Guideline* states (p. 15) that each training provider should provide both assessment and training. It could be possible to provide higher quality and more cost effective services if the two roles were separated for specialisation – assessment providers and training providers. Some consortiums might choose to apply to provide both services, but some might prefer to focus on training and direct their workshop participants to an assessment provider to complete their pre-and post assessments. Online and videotape assessments are not limited by geographical access, they can be provided to all psychologists from anywhere in Australia. The fewer the number of assessment providers the easier it would be for the Board to ensure quality control of their standards.

Recommendation 3 (Standardisation):

- 3a. That the assessment tools be standardised to ensure a high national standard
- 3b. That the roles of training provider and assessment provider be separated with the option for applicants to apply for one or both roles

4. Hours of training

It is a great idea to divide training into preparatory work and face to face instruction (p. 8). However, 7 hours is not sufficient for participants to complete all the suggested self-study modules of (a) the relevant Board's guidelines, (b) general supervisor readings, (c) reflections on practice, and (d) a multiple choice online test.

The requirement of a minimum of 14 hours of direct face to face instruction is unclear. The previous NSW Psychologists Registration Board specified that there are 6 hours of instruction in a 9am-5pm workshop (allowing for 1 hour for lunch and 2 tea breaks of 30 minutes each). The APS has usually credited 7 hours instruction for a one day workshop. Does the Board intend that the 14 hours be provided in 2 days from 9 to 5 each day (crediting 7 hours per day) or 2 days from 9 to 6 each day (crediting 7 hours per day) or over more than 2 days?

Recommendation 4 (Hours of Training):

- 4a. That the number of hours of preparatory work be increased OR that the wording be changed to “a minimum of seven hours” (p. 8)
- 4b. Either that the requirement for the number of hours of direct face to face instruction be reduced to 12 OR the schedule for the 14 hours be clarified (e.g. a statement that a 9am - 5pm workshop with lunch and tea breaks counts as 7 hours)

5. Refreshers/Revision Training

The term “revision” training is used in the *Guideline*. Follow-on training should be more than revision, it should extend and update. A different term, such as “refresher”, is preferable.

The *Guideline* states that “A revision course must be completed by all Board-approved supervisors within five years of gaining approval” (p. 5) and “evidence of completion of a Board-approved supervision revision course within 5 years of gaining Board-approval” (p. 13). This wording implies that only one revision course is required (during the first 5 years after initial approval) but other policy documents specify refresher training at least every 5 years. Also, when supervisors are renewed from July 2013, will they be renewed for 5 years (not needing to do another refresher until June 2018) or only be renewed until 5 years from the date of their initial or refresher training?

The list of options (p. 16) for gaining supervisor status from July 2013 does not include a refresher/revision course for those who completed the 2 day training prior to 1 July 2008 (approx 2000 psychologists in NSW, Tasmania and Queensland).

The *Guideline* states that revision training is to include “systematic assessment” (p. 8). Is it intended that this assessment meet the requirements for the initial training (11.1, p. 14)?

Recommendation 5 (Refresher/Revision Training):

- 5a. That the term “refresher training” be used instead of “revision training”
- 5b. That it be made clear that a refresher/revision course be required during each 5 year period, not just in the first 5 year period
- 5c. That the timing of renewal of supervisor approval be clarified – is it every 5 years from July 2013 or is it every 5 years from initial training?
- 5d. That the list of options (p. 16) for renewal of supervisor status include a refresher/revision course for those who completed a Board-approved 2 day training prior to 1 July 2008
- 5e. That the requirements for “systematic assessment (p. 8) for refresher/revision course be clarified – at least specifying the minimum requirement (e.g. should further direct assessment of supervisory performance be included either with a videotape or via supervision-of-supervision?)

6. Refreshers for NSW (and Tasmanian?) trained supervisors

This point refers to a specific issue not addressed in the *Guideline*, namely refresher training for supervisors who gained approval after completing the 2 day NSW Psychologists Registration Board’s supervision program or the similar program in Tasmania. I’ll focus on NSW supervisors here because I don’t know whether or not direct assessments are used in Tasmanian workshops.

Around 1400 psychologists completed the NSW training before June 2008. To renew, they need a refresher by June 2013. Around another 800 have completed since July 2008. The training of these supervisors differs from that provided to Queensland supervisors (STAP) in that the STAP program includes a video assessment of

supervisory performance but the NSW program has no assessment of supervisory performance. The Board has approved the STAP one day refresher program for STAP-trained supervisors, but this refresher does not include direct assessment, so if this is delivered to NSW trained supervisors as their refresher then they would be approved for another 5 years without ever having their supervisory performance observed or assessed.

A decision is needed as to what supervisors who were trained in NSW (and Tasmania?) should be required to do in their refresher program. The options appear to be:

- a. that in addition to a standard refresher workshop (such as STAP) they be required to complete a form of direct assessment consistent with the requirement in the new supervision *Guideline* (i.e. a video assessment and/or supervision-of-supervision (point 2 above), whatever the Board decides for the final *Guideline*)
- b. that even if a video assessment is required in the final *Guideline*, they be required only to submit a supervision-of-supervision assessment report in addition to the standard refresher program
- c. that they need only complete the Board-approved STAP refresher (or equivalent) without an assessment of supervisory performance
- d. that they complete a refresher/revision course that meets the new requirements for such courses in the final *Guideline* (point 5e above). This option might turn out to be the same as one of the above 3 options.

The difficulty in establishing special requirements for NSW/Tasmanian trained supervisors is that there will be more administrative work – both for the Board in processing their applications for renewal and for training providers in ensuring that participants do the correct refresher program. However, if some form of direct assessment is required, then eventually all psychology supervisors in Australia will have completed a direct assessment of their supervisory performance, ensuring a national standard.

Recommendation 6 (NSW refreshers):

That a specific decision be made on the assessment requirements for the refresher program for supervisors whose initial training was the NSW (and Tasmanian?) Psychology Registration Board's 2 day supervision program which did not include assessment of supervisory performance.

7. Years of registration of workshop participants

The *Guideline* does not state how long a psychologist must be registered before they can attend a supervisor training program. I've had numerous enquiries on this point.

Recommendation 7 (Years of registration):

That a statement be included either setting a minimum number of years of registration before attending supervisor training (e.g. 18 months) OR specifying that any registered psychologist can complete the supervisor training at any time and can hold their completion certificate for application for approval as a supervisor when they complete 2 (secondary) or 3 (principal) years of registration.

8. Metropolitan and Regional Areas

The *Guideline* identifies two areas for training – Metropolitan and Regional (p. 9). The examples of metropolitan areas include “outer suburban and large regional cities”, while the definition of regional is given as ARIA score > .1 with a reference to Mathews,

Stokes, Crea, & Grenyer (2010). However, in the Mathews et al. (2010) paper, “outer suburban and large regional cities” are given a score of $> .1$ (.1 to .25) and the paper argues that these should not be included as metropolitan areas.

The cost of regional workshops is very high, especially given the limited demand at any one time (many people think about doing training when they receive a request for supervision, not just because there is a training being offered in their area). The NSW Psychologists Registration Board cancelled numerous scheduled regional trainings because of low registrations – and these trainings were free. In late 2008 when the NSW program introduced a fee (then \$340) there were no more than 5 registrations for any of the scheduled regional workshops (except for Newcastle – but I assume it is “metropolitan”). To avoid a massive increase in fees, the NSW Board agreed that all workshops from 2009 would be scheduled in the metropolitan area and a \$100 discount would be given to participants who lived more than 200 km from Sydney CBD. The NSW fee is currently \$440 for Sydney only workshops. I understand that the STAP program has a much higher fee (over \$700) in order to cover the cost of regional workshops. If some training providers commit to providing training in regional areas (which will be “looked upon favourably by the Board” (p. 9)) then their fees are likely to be much higher than training providers who don’t have to budget to cover these expensive workshops. They will then be non-competitive in the metropolitan market place in relation to training providers who don’t service regional areas – and so they’ll go out of business and then there will be no regional workshops. One solution to the problem might seem to be to require all training providers to service regional areas – but if history shows that the regional market is limited for one provider, then how would numerous regional providers be sustained?

Recommendation 8 (Areas):

- 8a. That the definitions of metropolitan and regional areas be clarified – perhaps with some specific examples (e.g. how would Newcastle, Armidale and Cairns be categorised?)
- 8b. That a sustainable method for funding regional workshops be included in the *Guideline* (perhaps a levy on all metropolitan workshops, paid into a Board controlled account, that can be drawn on as a subsidy by regional workshop providers)

9. Numbers and Dollars

The *Guideline* does not address the maximum number of participants in a workshop or the minimum or maximum fee that can be charged for a workshop (or assessment). Numbers need to be limited to ensure quality training and fees need to be within a limited range to prevent the training providers with lower fees from dominating the market.

There are considerable background costs for training providers in preparing a training package - making a submission for approval, developing the workshop and materials, setting up and maintaining a website, training video assessors, etc. These costs are fixed, no matter how many workshops they present. There are then additional costs in presenting a workshop – advertising, registering participants, answering an unbelievable number of questions, conducting online assessments, presenter fees, travel, venue and catering, printing materials, assessor fees, etc. Budgeting to cover both background and presentation costs depends on the predicted number of participants per workshop and per year. These predictions depend on the potential market, the number of other training providers and whether or not regional workshops must also be included in the budget. It is expensive for the provider and inconvenient for participants when a workshop is cancelled due to insufficient numbers.

Assuming that most universities, either singly or in consortiums, will become training providers for their field supervisors (and most supervisors of registrars will be in this

cohort), the remaining market is for supervisors of 4+2 and 5+1 provisional psychologists. There will be a huge demand for these workshops around Australia until June 2013 to train (or refresh) all current supervisors, but after that date the demand will drop to training a trickle of new supervisors. In NSW, the maintenance rate (after the NSW Board had trained 1400 supervisors with no fees for participants) was around 660 over the 2 year period from July 2008 to June 2010. This figure included some university supervisors and was inflated by a rush in June 2010 to gain approval just before registration became national. Thus, the maintenance rate for 4+2/5+1 supervisor training in NSW is likely to be about 250 to 300 participants per year – perhaps less given dissatisfaction with the complexity and demands of the new rules. Assuming a maximum number per workshop of 25-30, there is possibly a market for up to ten 4+2/5+1 supervision workshops per year in NSW. A training consortium would need to present about five workshops per year to keep workshop fees reasonable while covering all the background preparation costs (and would need more workshops or higher fees if some regional workshops were included). Thus the market in the largest state can probably only sustain two 4+2/5+1 training provider consortiums (plus university training providers). If the Board floods the market with many training providers (including numerous in-house providers), then it will not be financially viable to become a training provider.

On the other hand, it is preferable that psychologists have a choice of training provider and they should not be required to travel interstate to gain training, so sufficient training providers need to be appointed to ensure that there are workshops by at least two different providers available in each state each year. This could be achieved by appointing 2 providers per state (but that's probably too many for the market in all but the most populated states) or by appointing providers who commit to travelling interstate to present workshops.

Recommendation 9 (Numbers and Dollars):

- 9a. That the Board specify an upper limit to the number of participants in a workshop (25?; it becomes a lecture when numbers are over 30)
- 9b. That the Board specify the minimum (and maximum?) fee that can be charged for an initial 2 day and refresher 1 day workshop – keeping in mind the challenge of ensuring sufficient funding for regional workshops
- 9c. That the Board limit the number of training providers within the constraints of the potential market
- 9d. That the Board ensure that there is more than one 4+2/5+1 training provider offering workshops in each state
- 9e. That when potential training providers/consortiums are approved, they are notified of all other approved providers, the states in which they will be presenting workshops and the fees they will be charging, so that they can estimate their market and make an informed decision about whether or not to proceed with the expensive background task of developing a supervision program.

10. Demonstrations

The *Guideline* highlights direct observation of supervisors and the provisional psychologist guidelines require supervisors to demonstrate skills to provisional psychologists, but the *Guideline* makes no mention of demonstrations of supervision skills by training providers in workshops. Demonstrating skills is a fundamental training method and, if everyone else's work is open to observation, shouldn't the supervision skills of supervision workshop presenters also be open to observation?

Recommendation 10 (Demonstrations)

That the Board includes a requirement in the *Guideline* (perhaps p. 15) that all trainers include live demonstration of supervision skills in the supervision training (and refresher?) workshops.

11. Wording

Page 3. Scope of Guidelines

Replace :

This guideline applies to individuals who are

- Board-approved, or seeking to become Board-approved, to provide supervision to provisional psychologists undertaking a 4+2 internship program or 5+1 internship program
- provisional (or generally registered) psychologists undertaking a Board-approved APAC accredited higher degree program, and/or
- psychologists undertaking a registrar program leading to endorsement in an approved areas of practice

With

This guideline applies to individuals who are Board-approved, or seeking to become Board-approved, to provide supervision to:

- provisional psychologists undertaking a 4+2 internship program or 5+1 internship program
- provisional (or generally registered) psychologists undertaking a Board-approved APAC accredited higher degree program, and/or
- psychologists undertaking a registrar program leading to endorsement in an approved areas of practice

Page 4, second dot point

Add */peer consultation* so that the sentence reads:

- Supervision in other settings, such as supervision/peer consultation to meet the continuing professional development requirements, does not need to be provided by a Board-approved supervisor, except when directed by the Board.

Page 8, last sentence of first para

Add */peer consultants* so that the sentence reads:

However, as part of the Board's recognition that supervision is an integral part of continuing professional development, all supervisors/peer consultants will be encourage to undertake a Board-approved supervision training program.

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