



THE AUSTRALIAN
CLINICAL PSYCHOLOGY
ASSOCIATION

Submission in response to Consultation Paper 18:
Guidelines for the National Psychology Examination

Prepared by Dr Lesley Bretherton on behalf of the
Australian Clinical Psychology Association

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Professor Brin Grenyer, Chair,
Psychology Board of Australia
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Monday 26th May 2013

Dear Professor Grenyer,

The Australian Clinical Psychology Association (ACPA) thanks the Psychology Board of Australia for the opportunity to comment on the guidelines for the National Psychology Examination.

Our submission is as follows:

1 Overview of the Examination

The purpose of the National Psychology Examination

ACPA agrees with the premise that evidence of consistent professional standards should be required in order to gain general registration, especially if the route to registration is via a 4+2, 5+1 or from an applicant trained overseas (other than New Zealand).

We agree that the examination should assess the level of **applied professional knowledge and competence** as outlined in the guidelines.

Holding general registration means that a practitioner possesses a general skill set in applied psychology that allows psychology practice across a wide range of workplaces. The Board's role is to protect the public by ensuring that any psychologist who offers services to the public possesses this skill set.

While there has been some criticism that the examination is 'clinically based', registration as a generalist psychologist means that a psychologist is able to practice in a mental health setting, regardless of the orientation of their previous internship training. Therefore we agree that to protect the public demonstrated knowledge in the areas outlined in the guidelines is required to ensure that internship training was comprehensive and adequate for general registration.

Requirement to pass the examination

We agree with the 5 categories required to sit the examination before gaining general registration. However, given that the Board requires re-registration for people who have not practiced for more than 5 years - Category 3 – *Registrants applying to return to practice who have not practiced for more than 10 years when applying for general registration as a psychologist* – we submit that the examination should be part of this re-registration procedure and therefore be held after a 5 year absence from practice.

Exemptions from sitting the examination

We agree with the exemption from sitting the examination for graduates of accredited Masters, Doctorate or combined Masters/PhD programmes who apply for general registration until 30 June 2016. We also believe that the rigorous assessment regimen within a structured higher degree is superior to an examination and for this reason hope that there will be a continuation of this system as the preferred path to registration for students in Masters, Doctorates and combined Master/PhD programmes after 2016.

We are in support of the arrangement that applications from New Zealand psychologists applying under the Trans-Tasman Mutual Recognition arrangements will be exempt from passing the examination.

Transition provisions for the examination

The transition arrangements are confusing. While it seems the extension of the transition period for an additional year exempts those registrants who are eligible to apply for general registration prior to July 2014, it is unclear which are the 'groups [that] are able to sit the examination from 1 July 2013, but are not required to show evidence of passing the examination until 1 July 2014 in order to obtain general registration'. We believe that the conditions under which a 4+2 or 5+1 internship is begun should be maintained for the duration of the training period. Can we suggest that a further extension of this exemption could be up to 5 years after the expected end point to allow for certain conditions such as parental leave, illness, or unexpected change of circumstances? It is in the candidates best interest to sit the exam as soon as possible after completion of training; for example the Californian Psychology Board statistics show 'The data provided indicates that the sooner one takes the EPPP after the doctorate degree is awarded, the higher the corresponding score on the EPPP will be' (<http://www.psychboard.ca.gov/exams/mean-eppp-scores.pdf>).

2 Content of the examination

Curriculum for the examination

We agree that the curriculum should not be a test of foundational knowledge of the discipline obtained during the first four years of psychology at university but should examine applied knowledge based on actual case studies and professional issues appropriate for the 5th and 6th year of psychology internship training.

Case studies should focus on examples with a strong evidence base or test knowledge of evidence based interventions.

The scope of the examination is appropriate and supports for provisional psychologists in terms of curriculum and readings are sound.

Pass grade for the examination

We would like to see the pass grade required lifted to 80%. We strongly support that the pass grade should be attained in all sections of the curriculum with consideration of lifting the pass grade to 85% for the ethics section.

3 Sitting the exam

Eligibility to sit the examination

Ten years is a long to time to be out of practice in psychology and therefore we would suggest that a psychologist returning to practice after more than 5 years absence from practice should be required to sit the examination. This would be in line with the 'Policy for Recency of Practice Requirements' which states - *an applicant who has not practised as a registered psychologist for five years or more before the date of application for registration or endorsement or renewal of registration or endorsement is not automatically eligible for registration or renewal of registration, but may be required to undertake remedial action to become eligible for registration or renewal of registration.*

Applications from overseas trained practitioners

This paragraph states that:

Overseas trained practitioners are generally required by the Board to complete at least a 3-month period of provisional registration once in Australia prior to applying for general registration.

But then goes on to state that:

Once an overseas applicant has been accepted into this provisional registration program, they become eligible to sit the examination when they have less than 12 months of provisional registration to complete (i.e. are in the 6th year).

Is the length of a provisional registration program determined by the Board for each overseas applicant and dependent on their previous training? If the period set is less than 12 months, for example 3 months, is the applicant then permitted to sit the exam after 3 months of provisional registration?

On the day

There will be a limited number of questions available for the examination even if the questions are rotated and randomly selected for each exam. Therefore to protect the validity of the exam should candidates be reminded (sign an agreement) that they have a legal/ethical duty to keep confidential the content of the exam questions and not share in any way the contents of the exam questions with other possible candidates?

Notification of results

Will there be an opportunity for a review or feedback of the of the final score?

Can we suggest that if the Board intends to collect information about the results of the examination, then examinees should be informed that their scores could be used in future for research or statistical purposes as part of the pre-examination information?

Special consideration

The process for special consideration is unclear. Does this come in to effect after the 72 hour period prior to the exam has expired? Can the candidate then sit the exam before the next scheduled exam?

Reasons for special consideration - can we suggest that loss or bereavement of a close family member **or friend** also be a valid reason?

Policy for Examination Failure

The Board will allow the provisionally registered psychologist (the registrant) up to three examination failures.

We agree with this proposal but find the following points unclear:

In the event of failing three times, the registrant will not be able to sit another examination until their renewal or re-registration is approved by the Board. At this point the Board may:

- 1. grant renewal or re-registration and allow the registrant to re-sit the examination up to three additional times.*
- 2. grant renewal or re-registration with conditions and on those conditions being met, allowing the registrant to re-sit the examination, or*
- 3. propose to refuse the registrant's renewal.*

Is there a time period for the three examination failures? It is unclear under what conditions the Board would grant renewal or re-registration to either sit the exam another three times or set conditions to allow the applicant to re-sit the exam.

We thank the Board for the opportunity to comment on the National Psychology Examination and applaud the determination of the Board to maintain standards of practice across Australia.