

I am writing in relation to the consultation on the proposed national exam for psychology, its rationale, who it will affect, and its curriculum and content.

I am a registered psychologist, and registered supervisor for student placements, and my work is principally as an academic. I am a current member of the Society for Personality and Social Psychology, I am an International Affiliate of the Society for Industrial and Organizational Psychology, and I have previously (but not currently) held full membership of the APS and academic membership of the APS's College of Organisational Psychologists.

I have written a submission on one of the two previous consultations about the national exam for psychology and I had been reticent to write another submission on this round of consultation because I was so disheartened by how little the board seems to have taken account of the common-sense points that had been made in a number of previous submissions. Nonetheless, I'm writing again, to put on record a number of serious concerns I have with the proposed examination curriculum, and with the rationale for the exam per se. I very much share the concerns of the College of Organisational Psychologists who said in their submission on the second consultation concerning the national exam: "The College of Organisational Psychologists (COP) is very disappointed with the Exposure Draft of the National Psychology Examination (NPE). None of the central concerns expressed by the College in response to the Board's Consultation Paper 9 has been addressed. Only minor (and in some respects unhelpful) changes have been made, and none of substance so far as adequate recognition of the diverse character of our profession is concerned." It is deeply worrying that the Board is not listening to the diversity of voices in the profession and is taking a particularly narrow view of profession of psychology, which has been reflected in a number of decisions of late, where the national exam is a particularly striking example. It appears that the Board has been caught up in GroupThink on the issue of the exam, and a serious need to take clear heed of outside dissenting opinions is overdue.

Rationale

Under the heading "The purpose of National Psychology Examination", the justifications given for the implementation of the exam are weak.

1. The exam is justified as ensuring that psychologists have competencies and a general skill set. This justification incompatible with the format of the exam, which is multiple-choice. Multiple-choice exams, by their very nature, test knowledge and recognition of information rather than skills or competencies. Appropriately designed questions can test analysis and synthesis of information, but these are not the same as applied skills or competencies.
2. The exam is justified as being put in place for better protection of the public. There are two reasons why this approach is questionable. First, numerous studies in psychology indicate that factors such as attitudes and personality, rather than knowledge, are often better predictors of whether people act ethically. As the exam tests knowledge rather than attitudes or personality it is unlikely to serve its intended purpose. Second, as a general approach, having a detailed curriculum, and a lengthy and expensive exam, is a particularly onerous imposition on both the time and resources of the board, supervisors, and people seeking registration as psychologists. This appears to be a misguided attempt at eliminating risks to the public. A basic principle of good risk management is that risks should be identified and, where possible, reasonably minimised but that attempts to eliminate risk will usually result in people being tied up in so much red tape that they cannot do anything. That seems to be what is occurring here. Good risk management principles are being ignored and risk elimination is being attempted.
3. The exam is justified as giving practitioners a general set of skills that can be applied across a range of workplaces. However, this is completely at odds with the curriculum, which seems to be almost entirely focused on clinical/health/counselling psychology knowledge, and would not ensure that practitioners have the appropriate skill sets to work in a number of areas of psychology such as organisational

psychology and sport psychology settings. Although there is very minor lip service paid to some other areas of psychology application (for example, one or two of the many many psychological tests that are included in the curriculum are related to organisational psychology) the curriculum clearly principally tests knowledge in one major domain of psychology practice. This exam clearly does not test whether a psychologist is prepared to conduct job analysis, devise a leadership development training program, understand ergonomic risks in occupational safety and health, or devise and advise on the design and implementation of a performance management system. If someone who completes the exam undertakes these tasks (just to name a few things psychologists might deal with in an organisational context) they will be a risk to the public.

4. An effective system currently exists for protection of public from psychologists practising outside their area of competence. The APS code of ethics, which the Board uses as a standard for ethical practice, states that psychologists should not practice outside their area professional competence. If psychologists practice outside their area of professional competence they can be reported to the Board and action can be taken against them. This, over and above existing training standards, is sufficient risk management for protection of the public from psychologists practising outside their area of competence. There is no need beyond the systems that are already in place for the training of psychologists to add an extra check on their skills. Postgraduate courses are already regularly assessed for their quality by APAC, and the requirements for students to complete a 4 + 2 or 5 + 1 path to registration are sufficiently onerous that the Board can be confident that these applicants for registration have a sound foundation of psychology knowledge and skills.

Temporary (?) Exemption of students in Masters Program

I am deeply concerned by the Board's proposal to revisit the exemption for completing the exam for psychology Masters (or equivalent) graduates in 2016. If graduates from psychology Masters programmes are to be subject to the exam, then it will be incumbent upon higher education providers to teach to the exam curriculum to ensure that their students can pass it on graduation. This is incompatible with the position of the Board that the curriculum should follow the guidelines of the accrediting agency, which is currently APAC. The Board should follow its own directive to approve an agency to accredit psychology degrees and trust them to do so. The defacto influence of the exam on the curriculum that the accrediting agency will have to enforce renders this whole system futile.

For Masters programmes in clinical, counselling, and health psychology, given the proposed curriculum of the exam, there would be very little change needed to their courses. In contrast, teaching to the exam would require significant changes to the content of clinical neuropsychology, forensic, educational, and sports psychology masters degrees. And, teaching to the exam is completely incompatible with organisational psychology Masters degrees. As it is, organisational psychology Masters programmes have a full two-year curriculum based on the APAC and COP standards for these degrees. Were the providers of organisational psychology Masters programmes required to teach to the exam curriculum in order for their students to pass the exam on graduation from the degree, either: 1. the Masters programme would have to be extended by up to one year to cover all the clinical, counselling, and health content of the exam, making these programmes economically unviable and unattractive to students, and therefore certain to be closed in the current financially-strained university sector, or 2. The programs would fail to prepare students properly for a career in organisational psychology because they would have to omit most of the organisational psychology content to allow room for the exam content!

As the College of Organisational Psychology implied in its submission on the previous consultation, graduates from organisational psychology Masters degrees will fail the exam as it currently stands. If the Board decides in 2016 to require that Masters graduates to complete the exam, students who complete Masters degrees in organisational psychology will not pass. As noted above, the curriculum of organisational psychology Masters degrees

would have to be radically overhauled in order for students who complete these degrees to pass the exam. If the exemption is changed without warning we may have students who enter Masters degrees in organisational psychology under the belief that they will be able to register as psychologists on completion finding that they are unable to do so. If this occurs, the Board, and higher education providers, may find themselves subject of legal action by students who have been affected by this decision. Moreover, now that you have been warned of this problem, and if you choose to ignore it, future students who do take legal action will have a stronger case. The warning that Masters graduates will need to sit the exam would be need to be at least 10 years in advance of that change because 8 years is the maximum period of part-time enrolment and at least 2 years would be needed for most university providers to radically change their curricula.

Content of the Exam

The proposed exam content is biased to a narrow view of what constitutes applied psychology practice. As above, and in my previous submission, and in submissions of many others, serious problems have been noted with the content of the exam. It should not have to be stated again that the content of the exam is, despite some minor tinkering, still grossly and seriously biased towards clinical, counselling, and health psychology and completely fails to recognise the diversity of psychology as an applied profession. COP have told you this in both of their previous submissions. I stated this in my previous submission. Others have stated this in their submissions. Please listen to the feedback you are getting and abandon this curriculum or radically change the approach taken thus far to the exam – for example, by modularising the exam so that various areas of competence can be assessed separately rather than in one catch-all exam.

Beyond the clear biased focus of the exam, I would like to further point out that there are serious problems with having a section of the exam dedicated to “communication”. For a start, assessing communication based on selection of correct answers from multiple-choice questions does not align with basic principles of educational measurement. In addition, it is already the case that English competency requirements exist for entry to degrees that are accredited for psychology registration, and English testing is required for international applicants for registration. Undergraduate and Masters students are required to write various types of psychology documents and APAC checks that this occurs, beyond this TESQA also assess whether courses are appropriately training students in communication and other graduate attributes. Again, including this in the exam seems to be an attempt to duplicate perfectly adequate checks on the communication skills of applicants for registration that already exist.

I note that the sample exam question on the Board’s website for communication is a question of ethics/confidentiality rather than a question that in any way tests competence in communication. If this sample question reflects the tenor of the “communication” section, it does not appear to adequately distinguish communication skills from knowledge of the ethics of communication with clients.

Sincerely,

Guy Curtis

Guy Curtis | Senior Lecturer | School of Psychology and Exercise Science | Murdoch University