

APS Response to Psychology Board of Australia Consultation Paper 19: Draft *Guidelines for the 5+1 internship program*

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1 Introduction

The Australian Psychological Society (APS) welcomes the opportunity to provide feedback to the Draft *Guidelines for the 5+1 internship program* (Draft Guidelines) released by the Psychology Board of Australia (PsyBA/the Board) in May 2013.

The establishment of the PsyBA in July, 2010 resulted in changes to a range of standards, policies and processes linked to the professional qualifications of psychologists. These included areas of practice endorsement, continuing professional development and changes to training requirements for people completing the internship pathways (revised 4+2 and new 5+1 program) to obtain generalist registration as a psychologist. The internship pathways may be entered after an individual has completed an accredited sequence of study in psychology approved by the Australian Psychology Accreditation Council (APAC). The *Provisional registration standard* for the 5+1 internship program took effect from 1 June 2012. The *Provisional registration standard* (the standard) sets out the competencies that must be achieved over the 5th and 6th years of training in the 5+1 program, including the specific requirements of the 6th year internship. The Draft Guidelines must be consistent with the standard and provide additional guidance for provisional psychologists and their supervisors.

The APS acknowledges the benefits of standardised internship programs and commends the PsyBA for establishing high standards. It shares with the PsyBA a desire to develop experienced and competent registered psychologists. However, APS consultations with members including provisional psychologists, potential provisional psychologists, supervisors and employers continue to identify significant concerns with the 4+2 internship program that are likely to continue in the 5+1 program. As the PsyBA is aware, the internship pathway has historically provided half of the psychology workforce (Mathews et al, 2010). The APS is concerned that the continued pressure on this route to registration will have a long lasting and negative impact on the psychology workforce in Australia. It contends that it is possible to ensure a strong internship program that facilitates the safety of the community while still allowing for more flexibility to achieve these standards.

2 Background to 5+1 pathway to generalist registration

The *Provisional registration standard* for psychologists was approved by the Australian Health Workforce Ministerial Council in April 2012. It sets out the qualifications that lead to registration as a general psychologist in Australia. Specifically, this requires a six-year accredited sequence of study (minimum Masters

degree) or an equivalent four or five-year accredited sequence of study followed by either an approved two or one-year internship, respectively.

In considering APS feedback to the PsyBA on the Draft *Guidelines for the 5+1 internship program*, it is important to flag the initial reasons for developing this additional pathway to registration. The 5+1 pathway was originally posited by the APS in response to a number of challenges confronting the profession including changes in the higher education sector, health workforce reform, and the international standards for the training of psychologists. The 5+1 pathway was viewed as a significant step towards uniform nationally consistent high standards for practising Australian psychologists. One of the major perceived advantages of the 5+1 pathway was that it would include more structured professional practice content. It was thought that this would expose students to more applied knowledge and skills within a regulated environment, in turn fostering the delivery of safe and competent care to the community, increasing the workplace readiness of provisional psychologists, and making internships more attractive to organisations.

The need for internships to become an attractive option to industry has become increasingly evident given the changes to the 4+2 pathway implemented by the PsyBA as part of the national registration scheme. In an earlier submission to the PsyBA in response to the *Guidelines for the 4+2 internship program* (January, 2012), the APS reported that these changes have caused considerable stress and difficulties for psychology graduates, as well as onerous obligations for supervisors and serious concerns for employers seeking to support a psychology workforce. The APS continues to consult with potential and current provisional psychologists, supervisors and organisations, and it is apparent that the 4+2 internship program has limited viability in terms of being able to train provisional psychologists within a reasonable timeframe and cost. Many organisations and supervisors are no longer prepared to support the 4+2 program and it is increasingly difficult for psychology graduates to find an internship.

With the 4+2 pathway struggling to survive, particularly in the health and education sectors, the 5+1 pathway offers what should be seen as an attractive option for students, the higher education sector and industry. With regard to the latter, under the 5+1 pathway provisional psychologists would come to their internship being more 'client ready', thus removing the considerable burden on the employer to provide access to several months of professional training in order for the provisional psychologist to be competent to start work with clients. In other words, the up-front

intensive work required by the supervisor and costs in acquiring continuing professional development should be substantially reduced.

The structured learning undertaken in the fifth year within the regulated environment of a higher education provider should also considerably reduce the workload on the supervisor. Given the additional year of structured learning focused on professional knowledge and skills undertaken by provisional psychologists in their fifth year, it is expected that the requirements of the one-year internship should be reduced by more than fifty per cent of that required of the two-year internship.

A number of factors have thus informed the APS response to the Draft Guidelines:

- The need for uniform nationally consistent high standards for practising Australian psychologists to ensure the safety of the community who receive our services
- The original aims of the 5+1 pathway to registration
- The current reduction in available internship positions.

3 Our response to the Draft Guidelines

In formulating its response to the Draft Guidelines, the APS has talked extensively with provisionally registered psychologists, supervisors and representatives of organisations who have, and may continue to, provide internships. It has also consulted with the higher education facilities that currently provide the 5+1 pathway. The APS also made a detailed comparison of the requirements of the 4+2 and 5+1 internship programs (see Appendix A).

In general, the APS commend the new 5+1 pathway for its attempts to raise the professional standards in psychology to meet international benchmarks. It is particularly pleasing to see that the Board has provided a detailed clarification of the term 'direct supervision' that comprises the majority of the supervision (70 of 80) hours. The inclusion of videoconferencing, Skype and telephone in the definition of direct supervision is a significant improvement from the 4+2 Guidelines and will also make the one-year internship more feasible, particularly in rural and remote locations.

The APS, however, has a number of specific issues with the Guidelines including:

- Maintenance of some of the problems inherent to the 4+2 Guidelines (including hours and program duration, documentation)
 - The professional development requirements
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- Supervision requirements
- Examination requirements
- Integration between university program and workplace.

In addition to these issues, the APS continues to receive feedback from members concerned about the process of implementing the 4+2 Guidelines including processing delays and inconsistency in marking of case studies. There are concerns that these issues will continue with the one-year internship program.

3.1 Maintenance of some of the problems inherent to the 4+2 Guidelines

Hours and program duration

The APS commends the Board for reducing the minimum hours of supervised psychological practice by 55 per cent from 3080 hours for the 4+2 pathway to 1400 hours, thus reflecting the significant structured learning that has occurred during the fifth year, including 300 hours of practicum (see Appendix A). However, we reiterate the concerns raised in our submission to the Board on the 4+2 Guidelines in January 2012:

Students enrolled in Clinical Psychology Masters Degrees are required to complete 400 face-to-face or 'direct client contact' hours. Therefore, the 1232 hours required for the [4+2] internship, which does not have the same advantages as the postgraduate pathway (such as the ability to gain endorsement) is excessive. Previous arrangements under each State and Territory either did not specify the amount of direct client contact hours, or had a requirement of 800 hours (with the exception of Victoria), therefore, the number of direct client contact hours could reasonably be reduced significantly. The APS suggests 25 per cent (770) of the total hours of psychological practice should be direct client contact (pp.19-20).

Maintaining the required hours of direct client contact at 40 per cent of total hours in the one-year internship will be extremely difficult for provisional psychologists to achieve in the recommended program time span. Feedback to the APS continues to suggest that provisional psychologists find it very difficult to meet the required hours of practice and client contact in the standard time span, and are required to use a considerable proportion of the maximum 5-year timeframe to complete the internship.

The APS note that the definition of direct client contact has been amended in the 5+1 Guidelines to specifically include “provision of advice and strategies and other direct contact (such as in person, via videoconference or telephone) with associated parties of the primary client with whom the provisional psychologists interacts in the course of providing a service to the primary client, such as a parent or teacher of a client who is a minor” (p.11). This is a pleasing clarification that will ensure that the nature of much of the work in key settings that traditionally provide internships (e.g., school and organisational psychology settings) can meet requirements. However, failure to recognise that the delivery of outreach services forms a substantial component of rural and remote psychological practice and is an essential part of client-related care, means that rurally-based provisional psychologists will continue to be significantly disadvantaged compared to their more urban counterparts.

As argued in the submission on the 4+2 Guidelines, APS recommend that the PsyBA increase the scope of the definition of client-related activities to recognise the diverse role of psychologists, including those who work in rural and remote locations. The APS reiterate that the National Allied Health Casemix Committee (2001) include travel related to client sessions in their definition of clinical care. It is thus recommended the PsyBA expand the definition of psychological practice (client-related activities) to include travel in regard to client care and that this be limited to a maximum of 20 per cent of client-related activities.

Given that the National Allied Health Casemix Committee also include team reporting and meetings, completing log books and assessment tasks and supervision in their definition of clinical care, the APS recommend that these activities be incorporated into the definition of client-related activity, with specified maximum limits.

Recommendation 1:

The APS recommend that the requirement for 40 per cent of the total hours of psychological practice devoted to direct client contact be reduced to 25 percent for the 5+1 pathway.

Recommendation 2:

The APS recommend the expansion of the definition of psychological practice (client-related activities) to include travel in regard to client care and that this be limited to a maximum of 20 per cent of client-related activities. It is also recommended that team reporting and meetings,

completing log books and assessment tasks and supervision be included in the definition of client-related activity, with specified maximum limits.

Onerous nature of documentation

The APS notes that the onerous nature of the documentation associated with meeting the PsyBA requirements is likely to remain a burden for supervisors of provisional psychologists undertaking the one-year internship program. The APS continues to receive feedback that, as reported in our response to the draft 4+2 Guidelines, supervisors find the review of the log book, completion of the six monthly progress report templates, co-signing of documents, work associated with case studies and other administrative documentation time consuming and unhelpful. Moreover, organisations report they are reluctant to support internships because of the significant loss of time of senior staff (the supervisors) to the administrative requirements of supervision. While it appears that co-signing every report and key correspondence written by the supervisee does not appear in the 5+1 Guidelines, the administrative demands on the supervisor remain extensive and are likely to render the 5+1 pathway unattractive to the workplace.

Recommendation 3:

The APS recommend that the supervision plan and progress reports be reviewed with consideration to reducing their length and acknowledging supervisor expertise.

The APS recommend that the log book be reviewed in terms of length and detail and made more applicable to provisional psychologists in a range of settings (such as organisational, community and forensic).

3.2 The professional development requirements

The APS raised concerns about the amount of professional development included in the 4+2 pathway in our January 2012 submission to the PsyBA. At that time its concerns focused on the financial burden of this sizeable amount of professional development to organisations and provisional psychologists and hence the viability of this pathway to registration. The APS is concerned that the PsyBA has maintained the required hours of professional development at 60 for the internship year of the 5+1 program. It contends that leaving professional development requirements at the same level as that required for each year of a two-year internship fails to recognise the structured (and accredited) learning undertaken during the fifth year

of university-based study that includes practicum and skills training. Given the APAC guidelines require the fifth year to include foundational education and training in the core capabilities and attributes, as well as 300 hours of supervised practicum and skills training, it would not seem necessary to include the same amount of professional development as the two-year internship program.

Recommendation 4:

The APS recommend that that the requirement for professional development be reduced to 30 hours in line with the requirements for a registered psychologist.

3.3 Time limit on supervision

The APS notes the requirement in section 4.1.1 for individual supervision to be “at least one hour per session” (p.13). There is no rationale provided for this requirement. It is possible that this requirement could work against safe practice by provisional psychologists. For example, sometimes an issue may arise that requires immediate supervision but a full hour may not be available at that time. The danger is that a short 15-30 minute supervision session will be postponed ‘because it doesn’t count’. It is unclear why sessions of less than a full hour could not be included, as long as a substantial proportion of sessions were of sufficient length to facilitate in-depth supervision activity.

Recommendation 5:

The APS recommend that the requirement for all supervision sessions to be 60 minutes be removed and replaced with a limit for short supervision sessions (under 60 minutes) of 20 per cent of overall supervision hours.

3.4 Examination

The APS notes the requirement under the Board’s *General registration standard* for provisional psychologists undertaking the 5+1 internship program to complete the national psychology examination before applying for general registration. However, the plan to have these provisional psychologists complete the same examination as those undertaking a two-year internship seems to be at odds with the Board’s rationale for exempting graduates of accredited post-graduate programs because they will have already undertaken a broad range of assessment tasks as part of their

degree. Students in the 5+1 program will have also undertaken assessments as part of their additional accredited university studies yet will be required to sit the full examination.

The APS also recommend the Board include more details in the 5+1 Guidelines with regard to timeframes to complete the examination (section 2.3.3). While this was mentioned in the Draft *Guidelines for the national psychology examination*, the discussion of the 5-year rule in section 2.4 of the Draft 5+1 Guidelines may lead to considerable confusion amongst provisional psychologists as to how long they have to sit the examination after completing the internship. It is also unclear in the 5+1 and Examination Guidelines as to whether or not an applicant who fails the examination can continue to practice as a provisionally registered psychologist until they do pass the examination.

Recommendation 6:

The APS recommend that the length of the national examination for provisional psychologists in the one-year internship program be reduced.

The APS recommend that further information be provided to clarify whether or not a provisional psychologist who fails the national examination can continue to practice in that role until they do pass the examination.

The APS recommend that more details be provided on the timeframe for sitting the examination following completion of the internship program.

3.5 Integration between university program and workplace

Given the difficulty of obtaining an internship, particularly a funded internship, and absence of financial support to provisional psychologists in their internship year, many of the institutions offering the fifth-year program are providing a variety of supports to their students (e.g., interview practice, information about placement agencies) and graduates to assist them to procure the one-year internship. Some of the higher education institutions report that they feel a moral obligation to support students to complete the internship year but note this is not sustainable as they do not receive funding for this role. There was general consensus that more funding is needed to support the development of truly integrated programs that are better able to integrate tertiary programs and workplaces so that the future of internship pathways is assured.

Given the currently limited integration of the higher education sector and workplaces that employ psychologists, there may be a need for universities offering the five-year program to provide graduates with sufficient documentation to enable supervisors to develop supervision programs that will target knowledge and skill gaps. It appears that currently, different courses do different things leaving supervisors and graduates to determine what is required in the internship year on a case by case basis. This again highlights the need for incentives for partnerships between organisations and universities to develop and provide more integrated programs.

Recommendation 7:

The APS recommend that the PsyBA identify and support incentives for universities and workplaces who employ psychologists to partner to develop integrated internship programs.

3.6 Implementation issues

Flexibility to incorporate processing delays

The APS raised concerns about procedural matters associated with the PsyBA's oversight of the internship program, particularly delays in approving plans and poor communication, in its January 2012 submission on the 4+2 Guidelines. Feedback on the 5+1 program indicates that this has continued to be a problem with the one-year internship. These issues, however, are magnified in the 5+1 route because of the short timeframe for the program. The APS has reports of provisional psychologists paying for supervision in non-remunerated roles for several months while they await approval of the supervision plan, with the potential that it may not proceed. Employers report they are reluctant to provide internships, even though the 5+1 provisional psychologists are more work ready, because the organisation cannot take the risk of employing the individual and the potential for a lengthy delay in approval of the supervision plan, or even of it not being accepted by the Board. The delay in processing of plans is not conducive to effective employment practices for many organisations, especially government departments, and will continue to threaten the sustainability of the internship pathways.

The non-recognition of hours whilst replacement supervisors are recognised by PsyBA also continues to plague the one-year internship program. With the increasing reluctance of psychologists to supervise provisional psychologists and the difficulty

of accessing qualified supervisors, replacing a principal supervisor can be challenging, compounded by the lengthy wait to receive approval from the PsyBA of the change of supervisor. The APS contends that the procedural delays would be better managed by enabling placement hours completed whilst awaiting approval for a plan or supervisor, to be recognised retrospectively, following Board approval.

Recommendation 8:

The APS recommend that placement hours for certain activities completed whilst awaiting approval for a plan or supervisor be recognised retrospectively, following Board approval.

Inconsistency in marking of case studies

The APS notes that the PsyBA has reduced the number of case studies required in the one-year internship to four, with the requirement to submit two to the PsyBA (see Appendix A). It is also pleasing to see the requirement for a case study to be submitted at the halfway point of the internship to reduce the pressure at the end of the 12 month period. However, the APS reiterate the concerns previously raised with the PsyBA, that the current procedures around the case studies are creating considerable concern for provisional psychologists and supervisors across the country. This is primarily due to the lack of consistency between jurisdictions in marking of the submitted case studies. The APS contends that adequate quality control could be achieved by allowing the case studies to be marked by the principal supervisor with regular auditing by the PsyBA. Note that in the case of accredited higher degree programs, students will have had case studies marked under the conditions of a higher education institution, that is, resubmissions would be allowed and there would be the opportunity for a second and third marker to be involved to resolve the final grade. The APS recommends that PsyBA specify similar procedures for the management of case studies in their internship programs.

Recommendation 9:

To further reduce procedural delays, the APS recommend that the case studies be marked by the principal supervisor with regular auditing by the PsyBA. To be commensurate with procedures in the higher education sector, resubmissions should be allowed with the opportunity for a second and third marker to be involved to resolve the final grade.

4 Summary of recommendations

1. Reduce the length of the requirements for 'direct client contact'

The APS recommend that the requirement for 40 percent of the total hours of psychological practice devoted to direct client contact be reduced to 25 percent for the 5+1 pathway.

2. Broaden the scope of what is defined as 'client-related activities'

The APS recommend the expansion of the definition of psychological practice (client-related activities) to include travel in regard to client care and that this be limited to a maximum of 20 per cent of client-related activities. It is also recommended that team reporting and meetings, completing log books and assessment tasks and supervision be included in the definition of client-related activity, with specified maximum limits.

3. Reduce reporting requirements

The APS recommend that the supervision plan and progress reports be reviewed with consideration to reducing their length and acknowledging supervisor expertise.

The APS recommend that the log book be reviewed in terms of length and detail and made more applicable to provisional psychologists in a range of settings (such as organisational, community and forensic).

4. Reduce the professional development requirement

The APS recommend that that the requirement for professional development be reduced to 30 hours in line with the requirements for a registered psychologist.

5. Revise requirement for supervision session to be 60 minutes

The APS recommend that the requirement for all supervision sessions to be 60 minutes be removed and replaced with a limit for short supervision sessions (under 60 minutes) of 20 per cent of overall supervision hours.

6. Revise and clarify examination requirements

The APS recommend that the length of the national examination for provisional psychologists in the one-year internship program be reduced.

The APS recommend that further information be provided to clarify whether or not a provisional psychologist who fails the national examination can continue to practice in that role until they do pass the examination.

The APS recommend that more details be provided on the timeframe for sitting the examination following completion of the internship program.

7. Support integrated programs

The APS recommend that the PsyBA identify and support incentives for universities and workplaces who employ psychologists to partner to develop integrated internship programs.

8. Address delays in implementation of Guidelines

The APS recommend that placement hours for certain activities completed whilst awaiting approval for a plan or supervisor be recognised retrospectively, following Board approval.

9. Improve case study processes

To further reduce procedural delays, the APS recommend that the case studies be marked by the principal supervisor with regular auditing by the PsyBA. To be commensurate with procedures in the higher education sector, resubmissions should be allowed with the opportunity for a second and third marker to be involved to resolve the final grade.

References

Mathews, R., Stokes, D., & Grenyer, B. (2010). A snapshot of the Australian psychology workforce. *InPsych*, 32(5), 28-30.

National Allied Health Casemix Committee. (2001). *Health activity hierarchy, version 1.1*. Canberra: Commonwealth Department of Health and Aged Care.

Appendix A:

Comparison table of the requirements of the 4+2 and 5+1 internship programs

4+2	5+1
Hours	
2 years based on 35-hour week, seven-hour day Minimum of 3080 hours	Minimum 1400 hours
17.5 hours per week psychological practice	
Minimum 40% of direct client contact 1232 hours	Minimum 40% of direct client contact 560 hours
Maximum 8 weeks for personal and annual leave	Maximum 8 weeks for personal and annual leave
Supervision	
Supervision with Board-approved supervisor at a ratio of 1 hour of supervision to 17.5 hours of supervised practice Minimum total 176 hours	Minimum 80 hours supervision
Two-thirds must be individual supervision. Minimum 117 hours	Two-thirds must be individual supervision. Minimum 50 hours Must be with principal supervisor
No more than one-third is group/other supervision.	No more than one-third is group/other supervision.
Maximum 'alternative supervision' 55 per cent using videoconferencing for individual supervision only.	Minimum 70 hours of the total 80 hours supervision must be direct (e.g. real time – same room or videoconference, Skype, phone) Maximum 10 hours indirect supervision (e.g. providing written feedback)
Approved secondary supervisors can provide up to 25 per cent of the total number of supervision sessions provided.	The principal supervisor must provide two thirds of the provisional psychologist's total supervision. Maximum of one third of supervision can be provided by one or more secondary supervisors with the written agreement of the principal supervisor.
Other	
60 hours professional development per full time year	60 hours professional development during the internship
The program must be completed within 5 years of commencement	The program must be completed within 5 years of commencement
6 monthly progress reports provided by supervisors to the Board	6 monthly progress reports provided by supervisors to the Board

4+2	5+1
On completion, a final Assessment of Capabilities is signed by the supervisors with case studies and submitted to the Board	On completion, a final Assessment of Capabilities is signed by the supervisors with case studies and submitted to the Board
6 case studies (2500 words) Of which 3 are submitted with their application to the Board for general registration.	4 case studies (2000-2500 words) (2 x assessment cases and 2 x intervention cases) Of which 2 are submitted to the Board (1 assessment and 1 intervention), one halfway through the internship, and the other at the end of the 1400 hours
