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5 July 2013

Professor Brin Grenyer
Chair - 5+1 Consultation
Psychology Board of Australia

Dear Chair and panel members,

Re: Draft Guidelines for the 5+1 Internship program

We write in response to your invitation to provide feedback regarding the draft guidelines for the 5+1 program. After reviewing the document, and in light of eighteen months of experience in delivering Queensland's first 5+1 program, we conclude the following:

1. Level of detail provided for each year is manifestly unequal

Although information provided for the 6th year internship is welcome, we had anticipated greater detail in respect of the 5th year component. Given that all registrants are required to meet the core capabilities set out in the Psychology Board of Australia's (PsyBA) *PPAC-10 Final Assessment of Competence* form, it would be helpful to have more details regarding the specific number of core capability tasks to be completed in the 5th year.

According to the draft guidelines, only the number of case study submissions and required hours of practice and supervision are adjusted for the 6th year, compared to the 4+2 pathway. We expected that other capability areas would be similarly adjusted. For example, provisional registrants are still required to verify five administrations, scoring, interpretations, and written reports in respect of tests completed for *Competence 2 Psychological Assessment and Measurement*. If 5+1

programs are deemed to have met APAC accreditation standards, some degree of uniform achievement in the core content areas, such as psychological assessment, could be presumed. It therefore seems reasonable to expect further adjustments to the core capability task requirements.

We appreciate that different universities will approach the 5th year component differently. We also appreciate some of the concerns raised about universities 'teaching to the competencies', although the validity of this argument is open to question. However, we contend that more could be done to establish benchmarks for specific 5th year skills and knowledge outcomes that would support aims regarding a consistent baseline for provisional registrants beginning their 6th year internships.

2. *Matching 5th year competency attainment to PsyBA forms/processes*

Following from the above, our brief experience with the *Postgraduate Diploma in Professional Psychology* indicates that a considerable number of the capability tasks are met in the 5th year, but there are challenges inherent in translating them to a single format for verification. That is, the process of confirming each student's individual attainment is difficult and cumbersome, and would be better served by a standard format suitable for all programs, which could 1) be readily transferred to the PsyBA's PPAC-10 form, and 2) serve as an institutional record for each student. Although we are working towards an answer to this specific problem for USQ students, we'd like to see a collaborative resolution that could support all 5+1 programs as a preferred strategy and outcome.

3. *Limited recognition of external factors impacting practica timelines*

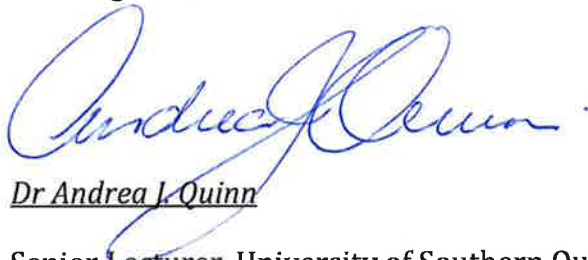
Given the known challenges facing postgraduate psychology programs regarding access to appropriate placement sites, we are concerned that some registrants will be (are being) adversely affected in terms of the timing of their 5th year practica completion. The effects are experienced by registrants as job refusals and challenges balancing career goals with survival needs. We acknowledge the good work being done by Health Workforce Australia to redress the problem with clinical placements. However, the shortage of placements has been further compounded by delays and confusion with PsyBA processes. This applies to processing of registration applications and responses to phone and email queries. This last comment is not intended as a criticism, however; we acknowledge the PsyBA is still in its own process of adaptation to the National Law, and await improvements as the PsyBA systems and processes become more embedded.

Nevertheless, when advocating with the Board's professional staff, we are informed that placements are viewed as "the university's problem" (most recent personal communication, June 26th, 2013). While this may be true,

such a response reveals little regard for how external factors intersect with the work of the university and with students' needs. While each university may be accountable for placement management, the national shortage of placements and PsyBA delays are external factors over which we have no control. Our observation is that these obstacles sometimes lead to situations that threaten registrants' abilities to meet the minimum number of practice hours per week. Through no fault of their own, and despite everyone's best efforts, they find themselves facing a technical breach of mandated attendance requirements. We understand that the PsyBA works only as the delivery vehicle for the National Law: however, there is – and has been – cases where aspects of the Law collide with reality. Failure to recognise the interconnectedness of these factors is somewhat myopic. Thus, in drawing attention to it here, we again ask for a collaborative and informed response to a situation that has implications for all 5+1 programs.

If, as the adage suggests, form should follow function, there is room for further development of the 5+1 guidelines, especially given that the change process can now be informed by experience. We look forward to upcoming revisions as the consultation process draws to a close. Thank you for the opportunity to offer our comments and feedback.

Kind regards,



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