

## **PsyBA CONSULTATION PAPER 19**

### **Draft Guidelines for the 5+1 Internship Program**

#### **INDIVIDUAL SUBMISSION**

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#### **MAJOR POINTS**

##### **1. Positives:**

- More pragmatic, realistic and flexible;
- More responsibility given back to the Supervisor;
- “Cross-cultural” given wider scope of meaning;
- More explicit focus on the broad range of psychological practice including organisational;
- More emphasis on “reflective practice”;
- Less doubling up with the National Psychology Exam;
- Early submission of Case Studies;
- Clarifies the problems in the 4+2 Program where there was a clash between the number of required “face to face” hours specified in the Guidelines (1232) and those specified in the Supervised Practice Plan (40% of 2784 supervise practice hours = 1120); much more logical;
- Table 1 in the Guidelines is very helpful and would be very useful for the 4+2 Program too;
- Better emphasis on the “scientist/practitioner” model;
- Better emphasis on the wide range of areas encompassed in “psychological practice”;
- Better definitions of what constitutes “psychological practice”;
- Better definitions of “client” and “client contact”;
- “Asynchronous” supervision is good and reflects reality of practice;
- Good to emphasise direct observation of sessions, to include the secondary supervisor in doing that and to emphasise the ethical issues involved;
- Good to allow recording of line-management supervision as client-related, if it relates to psychological practice – this prevents “lost” hours in a working day;
- Good to initiate and develop a habit of CPD for long term future career in psychology;
- Good to emphasise the Code of Ethics;
- Good that we can now use the term “Intern Psychologist”, so long as used appropriately;
- “Appendix B; Supporting Documents” - very helpful.

##### **2. General Points:**

a) Changes to the 5+1 Internship Program are highly salient to my workplace, the Australian Defence Force, as I am one of a number of Supervisors in a large 4+2

Internship Program in Army and it is anticipated that changes to the 5+1 may inform the upcoming revision of the 4+2 Program (which was originally expected to occur in the first half of 2013).

b) It is difficult to comment in full on the proposed Guidelines until the entire suite of forms and documents (ie Supervised Practice Plan, Progress Reports, Final Assessment of Competence, Logbooks, case study marking criteria and the various Fact Sheets and FAQs that support the Guidelines) can be reviewed. These documents contain significant and important information about how the Internship is run in practice and also need to be examined in this consultation process.

c) It is acknowledged that the Provisional Registration Standard has already been changed in July 12 and the Guidelines are bound to reflect what is in the Standard. However, a number of suggested changes to the 5+1 (and by default, the 4+2) would also require a review of the Registration Standard hence it is important that this also be scheduled for further review in the short term. If this is not possible, it is important to at least look at compromises so that changes to the Guidelines can be made while still complying with the Registration Standard. This may include applying a more flexible definition of “client contact” to achieve this goal.

### **3. Key Problems:**

#### ***a) Hours:***

(i) The number one key problem with the 5+1 (and the 4+2) Internship Program is that the numbers of hours do not work.

(ii) In other words, the 5+1 (and the 4+2), as designed, cannot be completed in one year (or two years respectively) – it is physically impossible based on the numbers in the Guidelines. The central sticking point is the requirement to achieve 40% (minimum) of client work as “face to face” client contact, with 60% (minimum) as client-related.

(iii) One solution would be to simply rename the Internships, removing the reference to 1 year or 2 years respectively. However, there may be legislative or other barriers to such a change.

(iv) The other solution is to rework the numbers.

(v) The simplest approach to reworking the numbers would be simply to reduce the overall ratio of face to face client contact hours to client-related hours from 40% to 30%. This has been proven to be achievable in my workplace, the Defence Force, and is a highly desirable option. This may involve a change to the Standard but is likely to yield such a positive result for the ongoing viability of the Internship Program pathways, it should be considered in the short term.

(vi) At this stage, to meet the hours requirements in the time given, a Provisional Psychologist needs to be “face to face” (however defined) with a client (however defined) at a rate of 12 to 15 hours a week (2 to 3 hours per day) every single week (day) of 44 weeks, from the very first day they start the Internship.

(vii) When Provisional Psychologists first start, even those who have had a fifth year of study, they do not have the skills to see clients at this rate from the first day. Nor do they have the knowledge of the systems/processes of their workplace to be able to see clients at this rate from the first day. The supervisor is unlikely to have the time to sit in on every client at that rate from the first day to compensate for this lack of skill and knowledge.

(viii) In the light of this, it would be unethical to require unskilled individuals to deliver client services at this rate.

(ix) Another way to consider the question of hours is that, for every 60 minutes spent face to face with a client, there is only 90 minutes to spend on everything else that is required to support that one “face hour” (Supervision and PD are extra) from Day One of the Internship.

(x) Furthermore, this rate of “face to face” client contact, particularly in the first half of the Program, devalues important learning activities such as reading, researching, writing and simply thinking about one’s practice. It sends the message that “face time” is privileged over development of professional knowledge and over “reflective practice”. This is not the message that should be sent to new Psychologists.

(xi) If clients are not seen at this rate from the first day, then the rate of face-to-face contact that has to be “made up” as the Program progresses either builds up so it eventually has to become the bulk of a working day or the Internship extends beyond the 1 year or 2 years specified in the Guidelines.

(xii) One solution to this would be a gradual ramping up over time of the face to face requirement as the level of skill and knowledge, both psychological and workplace-specific, develops. For example:

#### **5+1**

- Month 1 – up to 5 hours week face to face (while doing orientation to workplace and acquiring of basic skills to ensure client safety);
- Months 2 to 3 – 20% of supervised practice to be face to face;
- Months 4 to 6 – 30% as above;
- Months 7 to 12 – 40% as above;

#### **4+2**

- Month 1 – 5 hours week (as above);
- Months 2 to 6 – 20% of supervised to be face to face;
- Months 7 to 12 – 30% as above;
- Months 13 to 24 – 40% as above, but with some flexibility so that time can be quarantined for exam and case study preparation without developing a face hours backlog.

4+2 Program participants would need a more gradual ramping up than the 5+1 as they have not benefited from a fifth year of professional training at University.

(xiii) Reducing the percentage of face to face hours required gives time flexibility for preparation for the National Psychology Exam and the preparation of Case Studies. In the current model, a Provisional Psychologist would be pressured to complete these activities outside of work time. This sends a negative message about work life balance, which may be a particular problem for Provisional Psychologists who have other responsibilities such as child care. The Internship Program is intended to be do-able within the agreed hours of work (35 hours per week or as agreed in specific workplaces). It should not be set up so as to force after hours work to meet the Program requirements.

(xiv) All employed Psychologists work in organisations, big or small, that have inherent requirements for members of that organisation such as workplace meetings. There should be some “grace” given for activities in a typical 35 hour working week in a typical workplace that are part of the Provisional Psychologist’s job – this should be no more than 5 hours per week, 3 may be suitable.

**Worked example:**

The following example illustrates some of the difficulties with the current design of the Internship Program:

- Provisional Psychologist has contract of employment to work 35 hours a week (may be 40 hours a week but 35 of these are “psychological practice”);
- Plans to work 44 weeks of the year of their employment contract with that employer (assuming start date of employment contract within a couple of weeks of approval of Internship Program by PsyBA – an unlikely scenario);
- Sees clients “face to face” 13 hours a week/up to 3 hours a day every day, (from Day One);
- This leaves 22 hours that week;
- Formal supervision session at 2 hours a week (though will be needing much more at the beginning of the Program);
- This leaves 20 hours that week;
- Does formal professional development 90 minutes per week;
- This leaves 18.5 hours per week/about 3.5 hours a day for everything else that needs doing including:
  - Reading
  - Thinking
  - Exam study
  - Test marking
  - Case notes
  - Report writing
  - Researching
  - Case studies
  - Case formulation
  - Peer discussion’
  - Informal supervision
  - Test preparation
  - Sourcing resources (eg handouts) for clients
  - Rehearsals
  - Preparing organisational interventions
  - Development of intervention packages

- And others.

- Provisional Psychologist attends a three day Conference at about Week 12 of their Internship Program;
- They record 18 hours Professional Development that week;
- They need to “make up” 9 hours of lost “face time”;
- One option is to fit 9 hours of “face time” into the two remaining days of that week (resulting in 7.5 hours of “face time” each of these two days and no time for anything else);
- Another option is to find another week in which to make up the lost “face time”, for example, the next week they have to do 21 of the 35 hours as “face time”;
- In the week they have done 21 hours “face time”, subtracting 2 hours for formal supervision, there are 12 hours that week/2.5 hours each day to do everything else that is required to support that 21 hours of “face time”, in other words 12 hours to prepare for, write up and report on 21 hours of client sessions, approximately 30 mins per session hour;
- A backlog of “face time” has very quickly built up but cannot be “made up”. The Internship Program is automatically pushed out beyond the initial one year of the employment contract.

***b) Supervision:***

(i) Supervision rates could also be more flexible. In the second half of the Program, there is no longer a clinical need for two hours a week formal supervision for a Provisional Psychologist working full time. Supervision could be ramped down from 1 hour per 17.5 hours of practice in the first half of the Program (both 5+1 and 4+2) to one hour per week where there has been any psychological practice occurring during that week. Flexibility to allow for skipping formal supervision sessions during weeks of Exam and Case Study preparation should be allowed for.

(ii) It should not be specified that Supervision must be “at least one hour per session”. This may be appropriate where supervision is being purchased outside the workplace but is impractical and not necessary in a dynamic workplace where the Supervisor works side by side with the Provisional Psychologist. Alternatively, it should be one session per week (or fortnight) of a minimum one hour, then other supervision during the week (or fortnight) can be shorter, in order to capture short feedback sessions and discussion of questions that arise in the conduct of daily practice (which are important for learning and should be valued);

***c) National Psychology Exam:***

(i) Preparation for the National Psychology Exam will influence the other components of the Internship Program. It is likely that Provisional Psychologist activities will be biased towards passing the Exam, with a lesser focus on less quantifiable learning activities. Given the timeframes and availability of the Exam, it will be in the Provisional Psychologist’s interests to attempt the exam part way through the one year of the 5+1 Program, to ensure there is time for re-attempts before the one year is complete. This means they will be being examined on knowledge gained before they have finished their experiential training. This will result in an unbalanced learning experience.

(ii) It is no solution to say that they should first attempt the Exam at the end of the one year Internship Program as the Provisional Psychologist's contract of employment will normally have expired by then, unless the employer can continue to employ them while the Exam is being attempted and results are awaited.

#### **4. Additional points:**

a) The Internship Program seems to be underpinned by a University placement approach. The term "placement" is frequently used when talking about a "job role". It does not fit comfortably in an employment setting, where the Provisional Psychologist's obligations as an employee can be at odds with their Internship Program requirements. For example, a workplace must choose the type of clients to allocate to the Provisional Psychologist based, not on workplace needs, but, on the Internship Program needs. Other workers in the organisation are then required to take up the slack. It is no solution to say that the Internship Program must be extended to take this into account as it is not in the employers or the Provisional Psychologist's interests to extend the Program. A Program that more flexibly accommodates the work patterns of real workplaces delivering real psychological services will be more attractive to employers. It will potentially increase the number of Internship placements available for prospective Psychologists in the community who do not have the financial means to become registered through the Masters pathway.

b) Resolution of these problems is particularly important in my workplace, the Defence Force, where an Internship is currently associated with the rank of Lieutenant and a two year posting to a pool position, in a location where supervision would be available. If the Army were to accept 5+1 Internships, it is assumed there would be an expectation of completion in one year. The inability to complete the 4+2 Internship in two years has implications for pay (associated with rank) and postings and, as a consequence, the ability for the Army to predictably manage its operational psychology capability in the medium term across the entire nation.

c) The final Application for Full Registration can only be submitted after the Exam has been passed and after the Case Studies, which can only be submitted at the end of the Program, are approved and then there will be a further waiting time for the Application for Full Registration to be approved. By this time, the Provisional Psychologist will be already, at best, well into their second year (for the 5+1) or third year (for the 4+2) before they will finally be registered. They will be in employment limbo during this phase, relying on the good will of the employer to keep employing them beyond the initial contract of employment for the Internship.

d) If the Internship Program starts only when the Program is approved by AHPRA, the Provisional Psychologist will already be some way into their employment contract and won't have been able to count any activities they have done in the workplace in these intervening weeks. Some limited, controlled backdating of the Program, allowing some credit for activities that have been used to prepare, during the waiting period, the Provisional Psychologist to commence practice with clients so they have some basic skills and knowledge. This is permitted in the situation of changing work roles (see Para 7.3) so the same principle could be applied to new work roles;

## MINOR POINTS

### 5. Minor Suggestions:

- Ensure the term “minimum” is added wherever hours are noted;
- Incorporate the “Limited Work Role” policy into the Guidelines themselves rather than have them as a separate document;
- Clarify “wide range” of clients – difficult to get a “wide range” in one year in one work place although a reasonable range can be expected;
- One of three Case Studies should be mandatory as either Cross-Cultural or Across the Lifespan – this is not a burden in any normal workplace and makes an important point;
- Add “Supervisor signs Logbook” to Table 3 “Required reporting” – as the Guidelines say the Supervisor may be investigated for Professional Misconduct if the Logbooks are unsatisfactory, it needs to be made mandatory that the Supervisor signs the Logbook;
- In “Case Studies”, amend “750 hours” to “770 hours” (half way through a 1540 hour Program);
- In “Progress Reports”, clarify whether 28 calendar days or 28 business days (4 weeks vs 5.5 weeks) – this is critical as failure to submit in the required period may lead to non-recognition of work done in that period;
- Where “supervised practice” is written, replace with “Internship Program”, unless specifically talking about the practice subcomponent of the Program;
- Point 8 in the requirements for Case Studies states the Case Study is to “demonstrate.....holds the competencies to practice independently”. This cannot happen for the first Case Study which will have been written during the first six months of the Program. Could be changed to “demonstrates progress towards”;
- Table 5 “arranging a... Internship” indicates that the prospective Provisional Psychologist may need to approach several supervisors before agreeing with one – this suggests a “placement” model of training rather than an “employment” model of training. Usually, there are only a limited number of potential supervisors in any workplace and the Provisional Psychologist may not have a choice – this should be noted in the Table;
- Need a way to record/log all the little 5min here and there contacts with clients that will add up to “client contact” – current logging tools are biased towards block sessions of contact;
- In 4.2 “Supervisor arrangements”, completion of the Progress Report is a joint effort between the Supervisor and the Provisional Psychologist;
- If a Provisional Psychologist is already provisionally registered as a fifth year University student, it would not be right to say that the “proposed internship plan must be submitted to...Board...as part of application for provisional registration” – that would already exist in that case;
- Wide range of PD activities are permissible but it should be emphasised that some should be about acquisition of practical skills in psychological techniques, otherwise the Provisional Psychologist might want to spend the whole 60 hours on studying for the National Psychology Exam (because when else can they fit it in).

## 6. Questions to be Resolved:

- Is the 60 hours of PD a total amount for the entire Program or is it per year (noting that the 5+1 will in fact take more than one year to complete);
- Final Assessment of Competence is described as “certifying” that the Provisional Psych has met the Program requirements – but doesn't the National Psychology Exam also do that? How do the two interact with each other? Ie if the Supervisor “certifies” the Provisional Psychologist has met requirements but they fail the Exam, what does that say about whether the requirements have been met or not. Or vice versa – if they pass the Exam, it might be tricky to say they don't have the knowledge, skills and abilities from the Internship Program. How will conflicts between these two measures be resolved?
- Will there be “Mandatory and Elective tests” in the 5+1 like the 4+2? If so, what will they be, how many etc;
- Will there be Knowledge of Discipline vignettes, and Ethical and Professional Limitations vignettes in the Final Assessment of Competence for the 5 + 1 like the 4+2? If so, how many will there be?
- One of the final assessment criteria is “evidence of readings” – what constitutes acceptable evidence and what is the line below which there is too little evidence of the required readings, constituting a failure – is passing the Exam itself evidence that the required readings were done? If not, how else does the Supervisor attest that they were done? This will only be an issue in cases where the Provisional Psychologist's performance is problematic but does need to be clarified;
- Now that Logbooks are to be submitted to the Board, should examples be provided to show the required standard? This is critical if the Supervisor's professional conduct is to be queried if the Logbooks do not meet a (yet to be specified) standard;
- Will there be new versions of the Logbook, Progress Reports and Final Assessment of Competence that contain spaces for “reflection” and “evaluation”?
- If Secondary Supervisors can sign Supervision Records, can they also be permitted to sign Logbooks, in the absence of the Principal Supervisor?
- Will there be a suggested format for the CPD portfolio or will the Board accept any format of the Provisional Psychologist's choosing?
- If a the Principal Supervisor “assesses” that the Case Study is satisfactory, what then is the role of the Board in also “assessing” that Case Study? If it is satisfactory to the Supervisor, can it still be found unsatisfactory by the Board? If so, there is little point in asking the Supervisor to “assess” it;
- If a Supervisor finds in good faith that a Case Study is satisfactory, it is not the Provisional Psychologist's fault if the Board then goes on to find it unsatisfactory, thereby extending the Provisional Psychologist's Program and contract of employment (or termination of that contract) until it does meet the Board's standards – how will this be resolved?
- May a prospective Provisional Psychologist approach the Board before signing an employment contract for a job in case the work role is not approved

and the person may need to break that contract and look for another job, being unemployed in the meantime?

- Where is Exam preparation and Case Study preparation recorded – under Client-Related practice?
- Provision of written feedback to Provisional Psychologists can now be counted for up to 10 hours of supervision time (though unclear if this is per year or per the entire Program) but how does the Provisional Psychologist actually count the time – is it the time they spend reading and correcting the feedback the Supervisor provided? It can't be just the time spent by the Supervisor providing the feedback as that is the Supervisor's time not the Provisional Psych's;
- What form should the “written agreement” take between Secondary and Principal Supervisors? Is this necessary when both are in the same workplace?
- Will a Change of Supervisor Form be made available on the website? A Form is mentioned in Para 7.4.1 but in 7.4.2.1, a “letter” is mentioned instead - which will it be?

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