

Requirements for general registration, continuing professional development and recency of practice for psychologists: An APS submission to the Psychology Board of Australia

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Background and Introduction

The Australian Psychological Society (APS) welcomes the opportunity to provide feedback to *Consultation Paper 22: requirements for general registration, continuing professional development and recency of practice for psychologists* (Consultation Paper). This submission builds on previous submissions by the APS to the Psychology Board of Australia (the Board).

The APS understands that this consultation is a part of the requirements for regular review of the standards. The APS has approached this submission on the basis of the principle stated by the Board that:

Board decisions often need to find a balance between two objectives or principles, such as facilitating high quality education and training of health practitioners while ensuring that the standards are not set impossibly high so as to inhibit the continuous development of the workforce ... (p. 2).

This is a crucial principle that underpinned the development of the Australian Healthcare Practitioner Regulation Agency (AHPRA) and the formation of various national Boards. In addition, the APS also proposes the following principles that guided its submission.

Recognition of practitioners' previous psychological practice and experience

The APS recognises that there are inherent differences between a novice practitioner (less than five years of experience) and individuals with extensive experience but who have not practised as a registered psychologist for a period of time. The APS contends that these two different groups of practitioners require different approaches, particularly in relation to their professional development and recency of practice requirements. In particular, while novice practitioners may require training, consolidation and development of new skills, the latter group of experienced practitioners (and those who have not yet practised in Australia) would benefit most from a skills re-acquisition and contextualisation approach. A one-size-fits-all approach that focuses on re-training of psychological skills and supervision is counterproductive to the latter group.

Striking the right balance between administrative guidelines and expert clinical oversight

The APS contends that the Board must ensure ease of administrative process while also ensuring sufficient flexibility to maintain a fair and equitable process for applicants and registrants. The APS agrees that the current standards in relation to registration, professional development and recency of practice will benefit from updating. However, the revised standards must not be so administratively rigid that they remove flexibility to meet individual needs and ensure quality of practitioners while not negatively impacting on the workplace or the safety of the public.

This submission sequentially addresses all three areas covered by the consultation. In each case, comment is made on the sections of the respective Option 2 paper that represents an improvement to the existing standards, followed by sections that are problematic or require further attention, followed by a series of recommendations. A summary of the recommendations in response to each component of the Consultation

Paper (with reference to each corresponding section and page number) can be found below:

General Registration: Registration Standard

1. A reconsideration of the separation of the minimum approved qualification requirement and the eligibility requirements for registration (s. 2.1, p.4).
2. The provision of exemption guidelines outlining the inclusion and exclusion criteria for the Board-approved transitional program (s. 2.2, p.5).
3. Clarification regarding the manner in which the registration standard applies to applicants for renewal of registration (s. 2.3, p.5).
4. Definitions and any other elements of the guidelines to remain in the guidelines, rather than be included in the standard and, where appropriate, standards can refer to the guidelines. (s. 2.4, p.5).
5. Review of the policy for candidates with overseas qualifications to make it common practice for these individuals to be granted general registration with conditions (such as supervision) (s. 3.1, p.6).
6. The provision of formal feedback to the concerns raised in the 4 + 2 internship submission before finalising the general registration standard (s. 3.2, p.8).

Continuing Professional Development: Registration Standard and Guidelines

7. Review and revise the language and structure of the proposed CPD registration standard to be simpler and easier to understand (s.5, p.10).
8. Removal of reference to the registrar program requirements, and the provision of a citation for those who wish to view the registrar requirements in full (s.5.1, p.10).
9. Removal of the requirement of 2.5 hours of CPD for every month part thereof, and maintain the requirement for 2.5 hours of CPD for every full month (s. 5.2, p.11).
10. Retention of the requirement for psychologists to retain CPD records for 3 years (s. 5.3, p.11).
11. Removal of optional aspects of CPD from the standard (s. 5.4, p.11).
12. Review words that indicate suggestion rather than requirement in the standard (s. 5.5, p.11).
13. Clarification regarding how failure to comply with the CPD standard applies to health professionals *prior* to registration or endorsement (s. 5.6, p.12).
14. Providing explicit information where reference to an examination is made (s. 5.6, p.12).

15. Clarification regarding the outcomes when a psychologist does not meet the CPD standard, in addition to a citation for further Board published materials regarding disciplinary proceedings (s. 5.6, p.12).
16. Revision of the definition of peer consultation in line with adult learning principles (s. 6.1, p.13).
17. The Board to permit supervisors for the internship pathway and registrar program to be able to count up to 10 hours of the supervision they deliver towards CPD (s. 6.2, p.14).

Recency of Practice: Registration Standard and Policy

18. Adequate recognition of psychological practice (s.7, p.15).
19. The development of recency of practice guidelines based on assessing applicants' gaps in skills and knowledge and directing applicants to appropriate CPD programs (s.8, p.15).
20. The adoption of a new definition of recency of practice, specifically "*having undertaken psychological practice for the past five or more years*" (s.9, p.16).
21. The removal of the requirement to be registered as a psychologist to ensure safety but also not deprive the workforce of skilled psychologists (s.9, p.16).

General registration: Registration standard

1. Areas that represent improvement to the existing standards

1.1 Eligibility requirements

The proposed standard includes specific details pertaining to the eligibility requirements in the relevant legislation. The APS agrees that this change makes it much easier for applicants to understand what is required of them to be eligible for registration. The specific reference to the mandatory registration standards required by the legislation and the web page where the standards are published also improves clarity regarding the requirements.

The registration standard proposed in Option 2 outlines the eligibility requirements for general registration based on the minimum training qualifications, and is a part of the regulatory framework for the psychology profession. The APS agrees with the proposal by the Board not to change the minimum standard of training and registration, as the six year standard provides a good balance of rigorous training that produces suitably qualified practitioners.

1.2 Replacing the term 'Masters'

The APS agrees with the Board's proposal to replace the term 'Masters' which is found in the current version of the general registration standard with '6 years of training'. This recognises qualifications by levels, rather than titles and removes potential for misunderstanding.

2. Areas that are problematic or still require attention

2.1 Qualification requirements

Under s.52 and s.53 of the *Health Practitioner Regulation National Law Act 2009*, there are separate clauses for eligibility for registration and qualification for registration (p. 72). It is *critical* to separate eligibility and qualification for registration for professions who can claim specialist registration in addition to their general registration (such as medical practitioners) as there are distinct differences in their eligibility requirements. However, this does not apply to the psychology profession.

The revisions to the general registration standard seek to retain the requirement for a six year sequence of education and training and set out the two stages of training by specifying the minimum *approved qualification requirement* for registration followed by the *eligibility requirements* for registration. The APS acknowledges that the proposed revised standard retains the requirement for the six year sequence of accredited education and training and agrees with the comments outlined on page 4 of the Board's Consultation Paper: "*Eligibility for general registration is a broader requirement in that the individual is not only qualified for general registration but has also successfully completed any period of supervised practice, examination, or assessment required by the registration standard.*" While the concepts of minimum qualification and eligibility requirements are valid, the way this has been described in the standard is not clear and is likely to lead to considerable confusion.

Option 2 states:

The minimum qualification required to be qualified to apply for general registration is:

- a) a four-year accredited sequence of study in psychology that has been approved by the Board as providing a qualification for registration in the profession, that has been completed within the last ten years, or*
- b) a qualification that in the Board's opinion is substantially equivalent to a).*

The National Law specifies that an individual is eligible for provisional registration if the individual is qualified for general registration. For the individual or employer who is unfamiliar with the National Law the above Option 2 could be mistakenly interpreted as a four year accredited sequence being the acceptable minimum qualification required to apply for general registration. This poses significant risk to the public, particularly if an employer mistakenly equates the minimum qualifications required (4 years) as meeting the eligibility criteria for general registration.

2.2 Eligibility requirements

Although the eligibility requirements are clearer on page 8 of the proposal, section e) part v. of Option 2 states that one of the eligibility requirements, in order to apply for general registration is "*an overseas qualification and supervised practice assessed by the board as substantially equivalent to either i), iii), or iv) and successful completion of a Board-approved transitional program (unless exempt)*". The APS seeks to clarify what the exemption criteria are. Specifically, how do such candidates demonstrate that they are exempt from the Board approved transitional program? Providing a set of exemption guidelines outlining the inclusion and exclusion criteria would likely provide greater clarity.

2.3 'Does this standard apply to me?'

The revised standard states that "*This standard applies to all applicants for general registration **and applicants for renewal of registration** as a psychologist*" (bold inserted) (p. 8). The APS seeks to clarify how this standard applies to applicants for renewal of registration. Psychologists renewing registration should have already met the requirements for registration in their initial application for general registration. Providing further information about how this affects psychologists renewing registration, or alternatively, excluding renewals from the general registration standard would reduce confusion.

2.4 Definitions

The proposal in Option 2 to include a new 'definitions' section in the general registration standard does not provide additional clarification around the key requirements for general registration, as it provides some but not all information from the guidelines. Furthermore, the decision to include detailed information on the requirements contained in the internship programs and the transitional program is confusing. In order to make the requirements clearer the APS proposes that elements of the guidelines remain in the guidelines and, where appropriate and/or needed,

standards can refer to the guidelines. Standards must be clear and define the parameters that one can work within, whereas guidelines are a statement by which to determine a course of action leading to the standard.

3. Issues still not addressed

3.1 The overseas qualification pathway to general registration

Option 2 requires overseas applicants with qualifications assessed as equivalent to a six-year accredited sequence of psychology who are applying for general registration in Australia to undertake a three month Board-approved transitional program followed by the National Psychology Exam. Individuals with overseas qualifications with general or endorsed registration as a psychologist in their country of origin are subject to the Board-approved transitional program before being granted general registration as a psychologist in Australia. The Board stipulates that this program can only be undertaken while the candidate is registered as a provisional psychologist.

The existing standard and that proposed in Option 2 raise major equity issues for candidates with many years' experience who are categorised by registration type as at the same level of training and qualification as an Australian intern who has just completed 4 years of undergraduate training. A training program for an intern is unlikely to meet the learning needs of an experienced overseas psychologist who is seeking to integrate the Australian context into their existing skills and knowledge base. Employers may also find it difficult to distinguish between a postgraduate student with provisional registration and an overseas psychologist with recognised qualifications and extensive experience.

For the overseas candidate with years of training and experience this also creates significant barriers to finding work in Australia, where general registration is a requirement to work under funded programs and services including Better Access, Access To Allied Psychological Services, Transport and Accident Commission, and Worksafe etc. The existing standard and that proposed in Option 2 represent unrealistic barriers for overseas candidates based on the untested assumption that such candidates are equivalent to an intern with 4 years of undergraduate training irrespective of their experience as psychologists outside of Australia. This is likely to inhibit the development of the workforce to meet the demands of the public for psychological services. Provisions do currently exist for exemptions from the Board approved transition program, however, there is no clarity regarding these exemptions and what would constitute grounds for an exemption in any publicly released documentation, policy or information online from the Board.

The Board registration policy for psychologists who have overseas qualification states "*Overseas qualified applicants must demonstrate that their qualifications and supervised experience are substantially equivalent to the qualifications required by the general registration standard*" (p. 1). However, the only way an overseas qualified psychologist can demonstrate 'substantially equivalent' training and supervised practice in legal, ethical and professional and cross-cultural issues relevant in an Australian context is if they have undertaken supervised practice in Australia. In order to undertake supervised practice in Australia the policy essentially asks overseas

psychologists to organise a training placement and a job without the support or assistance of any institution. This requirement places overseas psychologists in a powerless position – not only are these psychologists seeking work with an employer but they also depend on the employer to help them through the registration process. Thus, for the overseas psychologist it would be difficult, for example, to turn down unreasonable work requests such as certain hours. As seen in the APS Ethical Guidelines (p. 101), this is an example of a multiple relationship that may result in a conflict of interest. The policy for overseas qualified applicants for registration places the psychologist in a difficult position and at a disadvantage when compared to applicants trained in Australia. Please see the box below for a case example of some of the difficulties faced by overseas psychologists when seeking employment in Australia.

Overseas applicant case study

Judith (pseudonym) is a psychologist who completed a clinical doctorate from the United Kingdom and had 10 years' experience post-qualification. Judith contacted the APS regarding her difficulty finding employment in Australia due to the constraints of provisional registration and the PsyBA transitional program, despite being an experienced psychologist.

Judith initially experienced difficulties in attaining employment as employers found it difficult to distinguish between postgraduate students with provisional registration and overseas applicants with recognised qualifications and experience. The biggest difficulty Judith reported experiencing was that she could not work as a Medicare Provider, which omitted approximately three quarters of the positions she could apply for.

Judith also found that employers not only had difficulty distinguishing between postgraduate students with provisional registration and overseas applicants with recognised qualifications and experience, but were also reluctant to take on individuals undertaking a 3 month transitional program as they believed that upon completion (when eligible for general registration) they would seek employment elsewhere. Employers are generally looking to retain staff and employ work-ready candidates, and Judith found that her opportunities reduced further when this factor came into consideration.

Judith reports that the only employment that remained for her to apply for were positions that did not require psychology training (e.g. counsellor) or were outside her area of expertise (e.g. rehabilitation). Judith's case highlights inequities for the psychologist, difficulties for employers and potential confusion for the public.

The APS proposes that the Board consider reviewing its policy for candidates with overseas qualifications to make it common practice for these individuals to be granted general registration with conditions (such as supervision). This would alleviate equity issues, remove barriers to gaining employment and be a more accurate representation and recognition of qualifications and experience while still maintaining safety to the public. Provisions currently exist for a National Board or an adjudication body to impose a condition on the registration of a practitioner, or on an endorsement of registration. Current conditions which restrict a practitioner's practice of the profession are published on the register of practitioners. When a National Board or adjudication

body decides they are no longer required, they are removed and no longer published. Utilising this existing provision would maintain acceptable standards for the workforce and inform the public while preserving high quality education and training of health practitioners.

3.2 The internship pathway to general registration

The proposed general registration standard includes definitions and criterion that are based on the guidelines for the 4+2 internship program that are still under review. The APS is concerned that the definitions and principles introduced by the proposed general registration standard could be locked in for a 5 year period without the 4 + 2 internship guidelines having been finalised. This is alarming as there are a number of areas of concern with the content in the guidelines, which the proposed general registration standard seeks to authorize and approve. The future of the psychology workforce will be affected by the changes in the requirements for individuals completing the internship pathway.

The establishment of the Board and the introduction of the national registration scheme in July 2010 resulted in significant changes to the training requirements for individuals completing the internship (4+2) pathway to obtain general registration as a psychologist. The changes to the supervision component included overly prescriptive and rigid requirements for provisionally registered psychologists, which have resulted in major barriers to building the capacity of the psychology workforce, particularly in rural regions where some degree of flexibility is required to meet challenging conditions.

The provision of internships is no longer seen by industry as a financially viable option due to these intensive supervisory requirements. Not only is the internship pathway particularly onerous for psychology graduates but it has also caused considerable difficulties for employers seeking to engage a psychology workforce. The completion of an internship has now become an unattractive option for both the public sector and non-government organisations and the requirements threaten to be a major obstacle to building on the capacity of the psychology workforce particularly in the health and education sectors.

According to the 2010 Australian Psychology Workforce Survey, approximately 50 per cent of newly registered psychologists were trained via the internship pathway. More recent data from November 2013 shows a decline in the number of provisionally-registered psychologists to 4,019 from 4,494, an overall drop of over 10 per cent. Of the 4,019 provisionally registered psychologists, 32 per cent were undertaking their training via the internship pathway and 68 per cent via postgraduate study (see Table 1 below). These data presents a very concerning picture of the training pipeline for the psychology workforce. In the five years between 2008 and 2013 (which incorporates the changeover to the national registration scheme), there has been a drop in the number of intern psychologists and there is no longer an even split between the two pathways to registration. That is, internships are now providing a pathway to registration for only about 30 per cent of psychologists, a drop of nearly 40 per cent in the five year period (from 2,118 down to 1,307).

Table 1. Number of provisionally-registered psychologists across the two training pathways in 2008 and 2013

	Workplace internship	%	Postgraduate (Masters/Doctorate) training	%	Total
October 2008*	2,118	47%	2,376	53%	4,494
November 2013^	1,307	32%	2,712	68%	4,019

Sources:

*Littlefield, L., Giese, J. and Geffen, G. (2009). Examination of current dual pathways of psychology training. *InPsych*, 31(3), 11-12.

^Psychology Board of Australia. Presentation at public forum, Adelaide November 2013.

Retrieved from www.psychologyboard.gov.au/Standards-and-Guidelines/Presentations.aspx

In January 2012 the APS responded to a public consultation from the Board regarding the guidelines to the 4+2 internship (Attachment 1). The submission by the APS highlighted areas for concern and provided evidence demonstrating the flaws in the guidelines. It is worth noting that two and a half years have now passed since this submission was made and the APS has yet to receive a response regarding the important issues raised and the recommendations for future directions. The APS invites the Board to provide formal feedback to the concerns raised in the submission.

The APS proposes that the Board consider taking the aforementioned issues into consideration, not only for the proposed general registration standard but also for the guidelines for the 4+2 internship. The internship pathway to registration is a vital training pathway which helps maintain the psychology workforce. Changes in the requirements have caused detrimental effects for graduates and employers and its impact can be seen in the declining numbers completing this pathway. It is essential that Board consider the impact that these declining numbers will have on the workforce, particularly in light of the limited number of postgraduate training positions available.

Continuing Professional Development: Registration Standard and Review of the CPD Guidelines

4. Areas that represent improvement to the existing standards

4.1 Active CPD

The existing Continuing Professional Development (CPD) standard states that of the 30 hours of CPD required annually, “10 hours are recommended to be ‘active’ CPD activities” (p. 13). The APS agrees with the proposal by the Board to not make active learning compulsory. Each individual practitioner is best placed to determine their own learning needs and goals and how best to achieve them, and as outlined in the Consultation Paper, it is important to retain a highly flexible adult learning model. The APS also agrees with the Board’s proposal to remove active CPD from the registration standard because it is a recommendation and not a requirement. In order to be as clear as possible, the revised standards should clearly set out the mandatory CPD requirements for psychologists because psychologists have consistently reported that the inclusion of information about aspects that are optional has been very confusing. Information about active CPD is more appropriately placed in the CPD guidelines to best reflect the nature of the recommendation.

5. Areas that are problematic or still require attention

As indicated in section 4.1, the CPD registration standard proposed in Option 2 improves on some aspects of the current standard. However, the language used throughout the standard is often ambiguous and mixes suggestions with requirements which increases confusion. The structure in Option 2 is also more problematic than that used in the existing standard, and lacks a logical flow. The APS suggests that the language and structure of the proposed CPD registration standard be reviewed and revised to be simpler and easier to understand.

5.1 Clarifying active CPD requirements

Page 30 of the Consultation Paper states “At least 10 hours of active CPD is recommended for psychologists each year, but this is a recommendation, not a requirement, unless you are a psychology registrar working towards an area of practice endorsement, in which case 40 hours of active CPD per year is a requirement of your registrar program” which is confusing because it introduces some of the requirements of the registrar program (which will not be applicable to a large number of psychologists reading the guidelines) and does not provide a reference to the full guidelines for the registrar program. The APS proposes that the Board rectify this by removing reference to the registrar program requirements and provide a citation for those who wish to view the registrar requirements in full.

5.2 Pro-rata requirements

The proposal in Option 2 to continue to allow CPD to be completed pro-rata for individuals who have not held general registration for the whole registration year is sound. However, the proposed standard in Option 2 (also found in appendix B (p. 34) of the guidelines) states: "*If you have held general registration for less than 12 months when you apply for renewal of registration or endorsement, you must have completed 2.5 hours of CPD for every month, **or part thereof** that you have been generally registered, and one third of the pro-rata CPD must be peer consultation*". (Bold inserted)

It is unreasonable to expect that a psychologist (for example) who was granted general registration on 29 November 2014 would be required to complete 2.5 hours of CPD (for the one day they were registered in November) in order to apply to renew their registration for the 2014-2015 cycle. The assumption that part of a month equates to a full month is also found in part C of the guidelines (policy for exemptions from CPD requirements). The APS proposes that the Board remove the requirement of 2.5 hours of CPD for every month part thereof, and maintain the requirement for 2.5 hours of CPD for every full month. Not only is this more reasonable, it is consistent with Medicare Australia CPD requirements for psychologists providing government funded Medicare services.

5.3 Retention of records for CPD audit

The APS strongly opposes the Board's proposal in Option 2 to include a specification that CPD records must be maintained for five years and provided to the Board if selected for audit. While the reasoning for this timeframe "*Now that formal processes are in place for annual CPD audit*" (p. 14) is insufficient, the five year requirement for the retention of CPD records is more onerous than the requirements of several of the other Board's governed by AHPRA. For example, the Medical Board of Australia requires records for CPD activities to be kept for 3 years. The APS proposes that the Board retain the requirement for psychologists to retain CPD records for 3 years.

5.4 'What must I do?'

The content contained in points 6 and 7 (p. 17) in Option 2 provides information about electing where and how to undertake CPD and the types of recording portfolios that may be accepted. These points relate to optional aspects of CPD and are more appropriately placed in the CPD guidelines rather than the standard.

5.5 'Evidence'

Page 17 of the Consultation Paper states "*You **should** maintain records of your CPD activity for five years in case you get audited*" (bold inserted). The use of the word 'should' suggests that maintaining records for five years is a suggestion rather than a requirement or standard. Furthermore, as outlined in section 5.3, the requirement to retain records for five years is excessive and unjustified. The APS recommends a period of three years.

5.6 'What happens if I don't meet this standard?'

As outlined on page 18 of the Consultation Paper *"The National Law establishes possible outcomes if you don't meet this standard, including that: "the Board **may refuse an application for registration or endorsement**, or renewal of registration or endorsement, if you do not meet a requirement in an approved registration standard for the profession (sections 82, 102, and 112 of the National Law)"* (bold inserted). The APS seeks to clarify how failure to comply with the CPD standard applies to health professionals *prior* to registration or endorsement. CPD across all health professionals in Australia is for *registered* health practitioners. This registration standard should only apply to psychologists with general registration. This statement is also in clear contradiction of the statement on page 17 of the Consultation Paper which states: *"You don't need to meet this standard when you apply for general registration as a psychologist for the first time in Australia, but you will be required to commit to completing the requirements for CPD during your period of general registration."*

Page 18 of the Consultation Paper states that as a result of failure to comply with the standard *"the Board may impose a condition, or conditions, on registration or endorsement of registration that requires: "the registered psychologist to undergo **an examination** (sections 82, 83, 102, 103 and 112 of the National Law)"* (bold inserted). Currently, the only established examination is the National Psychology Exam. If this is the exam that may be undertaken if psychologists fail to comply with the CPD standard, then this should be explicitly stated.

Greater clarity is required regarding the potential outcomes in the event that a psychologist does not meet the CPD standard. For example, within the section entitled 'What happens if I don't meet this standard?' on page 18 of the Consultation Paper it states:

- *"a failure to undertake the CPD required by this standard **is not an offence**, but may be behaviour for which **health, conduct** or performance action may be taken by the Board section 128 of the National Law), and*
- *registration standards, codes or guidelines **may be used in disciplinary proceedings against you** as evidence of what constitutes appropriate practice or conduct for the psychology profession (section 41 of the National Law)." (bold inserted)*

The first bullet point outlines that failure to undertake the CPD required by the standard is not an offence; however, the second bullet point outlines that it *may* be used in disciplinary proceedings. This information appears contradictory and requires clarification. Furthermore, it is unclear what is intended by the phrase *'health, conduct or performance action'*. The use of the words *'health'* and *'conduct'* further increases ambiguity as failure to undertake the require CPD is a performance issue and should not be confused with health issues such as drug and alcohol dependency, or conduct issues such as an inappropriate relationship with a client. Clarification regarding the outcomes when a psychologist does not meet the CPD standard is required, in addition to a citation for further Board published materials regarding disciplinary proceedings.

6. Issues still not addressed

6.1 Peer consultation

Practitioners regulated by the AHPRA are required to meet CPD standards to maintain general or endorsed registration in accordance with the requirements of their specific CPD standard. For the psychology profession, the CPD registration standard is part of the regulatory framework and when applying to renew their registration, psychologists make a declaration that they have completed the CPD required by the Board.

The psychology profession, like many other health professions governed by the AHPRA, is required to complete CPD annually in order to maintain, improve and broaden knowledge, expertise, and competence. However, the CPD requirements for the various regulatory Board's governed by the AHPRA differ in their fundamental requirements, systems, format and language. It is acknowledged that each profession is unique and thus requires a different set of CPD standards; however, a comparison of each of the CPD guidelines for each profession with that of psychology highlights considerable inequities. The main inequity is the definition of peer consultation adopted by the Psychology Board.

The Psychology Board differentiates itself from the CPD requirements of other professions under AHPRA by placing requirements on the definition of peer consultation. The Psychology Board definition of peer consultation stipulates that psychologists may only count peer consultation hours spent focusing on their own practice, even though it is common practice for psychologists to learn from hearing the experiences of other experienced psychologists and to use the experience of a colleague and apply it to their own situation. However, under the current standards and those described in Option 2, discussing the experience of other colleagues does not meet the requirements of peer consultation. This makes the overall number of hours of CPD generated each year by psychologists even higher than the published minimum.

When compared to other health professions regulated by the AHPRA, the current and proposed (Option 2) CPD standards for psychology are by far the most onerous requirements. Adult learning theory and research suggests that effective CPD activities should evolve from the didactic approach and use innovative avenues which are solution-based and collaborative for the adult learner. It is important that the peer consultation definition takes into account the process of self-directed inquiry and emphasis on equality between the teacher and adult learner. The APS proposes that the Board revise its definition of peer consultation in line with adult learning principles.

6.2 Provision of supervision as a CPD activity

The Board CPD guidelines outline that supervision provided to another psychologist for the purposes of assisting that psychologist to meet the 10-hour peer consultation requirement *can* be counted towards active CPD hours for the supervisor. However, providing supervision or consultation to others outside this specific peer consultation purpose *cannot* be counted as any variety of CPD by the supervisor. This includes time spent in a formal role as a supervisor of a trainee psychologist in the 4+2 internship program or of a psychologist seeking area of practice endorsement, which *cannot* be counted as CPD.

While the reasons why supervisors *cannot* count supervision they provide (outside of peer consultation) have not been made clear, the assumption is that these activities do not allow supervisor to advance their practice. However, supervision provided to the trainee psychologists and generally registered psychologists seeking area of practice endorsement includes conveying information that is up to date with advances in a particular area of practice via a critical reflective focus on the supervisor's own practice. This involves reviewing and renewing one's own theories, evidence and practice. When a supervisor provides oral or written information to a supervisee they are engaged in a form of active learning.

The provision of supervision to trainee psychologists and generally registered psychologists seeking area of practice endorsement maintains the tenets of adult learning principles as it uses approaches to learning that are problem-based and collaborative rather than didactic, and also emphasises a shared responsibility for learning between the teacher and learner. The APS proposes that the Board permit supervisors for the internship pathway and registrar program to be able to count up to 10 hours of the supervision they deliver towards their CPD requirements. Not only is this consistent with adult learning principles and involves a critical reflection on one's own practice, it is also an incentive for more supervisors to provide supervision which may assist with some of the difficulties inherent in the 4 + 2 internship pathway.

Recency of Practice: Policy and Registration Standard

7. Adequate recognition of psychological practice

The Board defines recency of practice as practitioners had "*maintained adequate connection with, and recent practice in, the profession since qualifying or obtaining registration*". At an operational level, recency is defined in the Consultation Paper as practised "*as a registered psychologist for five years or more*" (p. 51). The emphasis on being a registered psychologist appears to be at odds with the Board's broader definition of psychological practice and disproportionately focuses the Board on the applicant's previous registration status.

There does not appear to be any flexibility for the Board to consider the applicant's broader psychological work, skills and experience. The existing and proposed definition of practice allows for experienced practitioners to work in psychological related areas but without having to be registered with the Board. For example, an experienced Human Resources specialist with qualifications and experience in organisational psychology would not be required to be registered with the Board unless he/she wants to take on the protected title of psychologist (with or without endorsement). This is because of the broad and inclusive definition of "practice" adopted by the Board (see 'When is it necessary to be registered as a psychologist?'). However, under the proposed recency of practice policy and standard, if that person applies for registration or re-registration after five years, he or she would be considered comparable to a 4+2 provisional psychologist at the administrative level because the Board's position is that that it will not be accepted as evidence of "*unregistered practice involving activities of a psychological nature*" (p. 57).

One of the advantages of formal registration for psychologists is that it provides for the use of protected titles by someone undertaking psychological practice. However, it is well known that an individual can undertake psychologically related work and not necessarily be registered as a psychologist. Using the same scenario of HR specialists above, if one maintained his/her registration while another person in the same situation did not; under the recency of practice registration standards, only the one who maintained registration may be able to count his or her work as psychological practice, while the latter would be viewed as someone who has engaged in unregistered practice and therefore not having his/her experience and skills considered. Therefore a contradiction exists where the "broad and inclusive" definition of "practice" under the registration standard allows for unregistered practice of psychological nature, but such practice may not be considered under the recency of practice policy and standard.

The implication of this contradiction between the registration standard and the recency of practice standard is that some practitioners are unable to be registered because they are undertaking unregistered psychological related work, despite such work being acceptable to the Board as psychological practice. This situation has led to some applicants being unable to demonstrate that their extensive practice of a psychological nature is comparable or equivalent to that of a fully registered psychologist. Under the current and proposed standards such applicants are given provisional registration status, resulting in some experienced applicants being more skilled and knowledgeable than their appointed supervisors. The consequence of this 'one-size-fits-all' approach

is that it acts as a barrier for experienced practitioners to be re-registered with the Board and has the potential to undermine the future of the psychology workforce in Australia.

8. Re-entry into the profession should focus on professional development

The APS contends that the majority of applicants seeking re-registration had practised as psychologists for a period of time prior to their registration status lapsed for various reasons (e.g. raising a family). It should follow therefore, that the recency of practice policy and registration standard should focus on the skills of these applicants and identify any gaps that require re-development in order to practise again. This is a much more preferable approach than treating applicants as though they are entry level practitioners, who have not yet practised independently.

The APS argues that the recency of practice policy and registration standard should focus on re-training of practitioners with non-current skills rather than focusing on skills acquisition for entry level practitioners. The proposed policy and registration standard seem to be based on an assumption (not supported by any presented evidence) that when an applicant has not been registered as a psychologist for five years or more (as opposed to undertaking psychological related practice as outlined above), they will require to be re-trained as a psychologist.

The emphasis of the existing and proposed standard seems to be on the administrative requirement of a registration status rather than an appraisal of the applicant's psychological practice and experience with appropriate clinical oversight. By contrast, the Medical Board of Australia has taken a skills re-acquisition approach in its recency of practice standard, underpinned by identifying applicants' shortfalls in their clinical skills and their potential to overcome these through their professional development obligations. The standard can be found at: <http://www.medicalboard.gov.au/documents/default.aspx?record=WD10%2f108&dbid=AP&checksum=ePw%2fM61E57VzMD27KPKV0w%3d%3d>

The APS contends this is a much more appropriate approach which recognises applicants' existing skills and experience and identifies any gaps in their knowledge that require further development. For example, there may be a need to revise changes to applicable legislation such as the mental health acts. The rigid requirements for applicants who have not "*practised as registered psychologists*" (p. 58) offers no flexibility for recognition of applicants' experience prior to the lapsing of their registration status. This 'one-size-fits-all' model will impact the psychology workforce negatively. It would be possible, for example, for someone with over ten years of experience to be supervised by a psychologist with less than five years of experience simply because the former took more than five years away from the profession to raise a family. As a profession that comprises 80% females, this presents a serious barrier towards workforce re-entry.

Similarly, when an experienced overseas trained practitioner applies for registration in Australia, the focus should be on the contextualisation of their existing skills and experience in Australian settings. For example, understanding service delivery models

and Australian legislative requirements such as the mental health act. Under the current arrangements, such applicants are deemed to be equivalent to a provisional psychologist, and once again may be subject to professional supervision by someone with less clinical skills and experience.

In summary, this one-size-fits-all approach lacks flexibility and does not take into account the applicants' recent experience and practice. The APS requests that this issue be resolved to ensure appropriately qualified overseas applicants can find work in Australia. The APS therefore urges the Board to develop recency of practice guidelines based on assessing applicants' gaps in skills and knowledge and directing applicants to appropriate CPD programs. To achieve this, the APS suggests a closer linkage between the recency of practice standard and the CPD standard.

9. Way forward

Consistent with the Board's broad and inclusive approach to the definition of psychological practice, there needs to be greater flexibility to acknowledge an applicant's previous experience when assessing recency of practice. The APS recommends the adoption of a new definition of recency of practice, specifically "*having undertaken psychological practice for the past five or more years*". The removal of the requirement to be registered as a psychologist would enable an individually targeted approach, consistent with adult learning principles that would ensure safety but also not deprive the workforce of skilled psychologists. Under this model, the Board would still retain its discretion in assessing what constitutes psychological practice while the applicant would still be required to demonstrate to the Board his or her recent experience and practice.

**Attachment 1:
APS Response to PsyBA Consultation Paper regarding the internship program**

Guidelines for the 4+2 internship program: An APS submission to the PsyBA

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Executive summary

The establishment of the Psychology Board of Australia (PsyBA) in July, 2010 resulted in changes to training requirements for individuals completing the internship (4+2) pathway to obtain generalist registration as a psychologist. Changes to the requirements of the program include: an increase in the number of competencies, and an increase in the number of psychological practice, professional development and supervision hours that interns are required to address. These changes have caused considerable stress and difficulties for psychology graduates seeking to become interns as well as to employers seeking to support a psychology workforce. These changes threaten to be a major obstacle to maintaining the psychology workforce and the ongoing retention of psychology positions in the health and education workforces particularly.

A number of issues have been raised through consultation with organisations, supervisors and interns including: difficulties addressing the competency of experience across the lifespan, the onerous nature of documentation, the increase in demands on supervisors, and the increase in professional development and psychological practice hours. The Australian Psychological Society proposes a number of major changes be made to the current internship guidelines to ensure the viability of this training pathway. These include:

1. Broadening the scope of what is defined as psychological practice;
2. Reducing the requirements for direct client contact;
3. Reviewing the requirement for "practice across the lifespan";
4. Increasing the flexibility for offsite supervision;
5. Reviewing reporting and assessment requirements;
6. Increasing the flexibility of supervision arrangements; and,
7. Reducing the requirement for co-signing of all documentation.

Introduction

The establishment of the Psychology Board of Australia (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 specialist endorsement, continuing professional development obligations and changes to training requirements for people completing the internship (4+2) pathway to obtain generalist registration as a psychologist. The latter area has produced considerable stress and difficulties for psychology graduates seeking to become interns as well as to employers seeking to support a psychology workforce. These changes threaten to be a major obstacle to maintaining the psychology workforce and the ongoing retention of psychology positions in the health and education workforces particularly.

To be eligible for generalist registration under the requirements of the Australian Health Professions Regulatory Agency (AHPRA) (and specified by the Psychology Board of Australia, PsyBA) the individual must either complete an approved post-graduate Masters or Doctoral professional psychology program or complete a 'supervised practice program'. The latter has been called the 'internship' pathway and may be entered after the individual has completed a four-year sequence of study in psychology accredited by the Australian Psychology Accreditation Council (APAC). The internship program involves a training and supervision plan approved by the PsyBA (the 'Board') consisting of supervised psychological work and professional development activities designed to enable a provisional psychologist (or 'intern') to develop the psychological 'competencies' required for work as a professional psychologist. The terms 'internship' and 'supervised practice program' will be used interchangeably throughout this document to refer to the internship program.

The national internship model varies from the supervised practice programs previously conducted by States and Territories and has been designed to make requirements across the States and Territories consistent. However, in doing so, the new guidelines have presented a number of difficulties in the application and the sustainability of psychologist internship programs.

What concerns the Australian Psychological Society (APS) is that these changes to the internship pathway threaten its feasibility for psychologists and it is likely that there will be a shortage of psychologists achieving registration by this path in the very near future. Currently half of the psychology workforce (Mathews et al, 2010) is comprised of psychologists that have achieved registration by the internship pathway. A major emerging response is that many organisations that have previously employed 'provisional psychologists' (the registration classification for those on the internship pathway) are now resorting to employing other allied health professionals (such as nurses and social workers) in roles that were previously occupied by provisional psychologists.

The APS acknowledges the strengths of a national Board, and the benefits of a standardised internship program and commends the aims of setting high standards, clear goals and targets, and specified responsibilities for those involved. It shares with the Board a desire to develop experienced and competent registered psychologists. However, there is growing evidence that these ideals have in practice produced an unfortunate expectation of what is realistic to achieve in a two-year program.

Through consultation with potential provisional psychologists, current interns, supervisors, and organisations, it is apparent that the new internship program, as it currently stands, is not viable as a means to train psychologists within a reasonable timeframe and cost. Many organisations and supervisors are no longer prepared to support this program. What the APS proposes is that there is a way for the strengths of the new internship program to be retained, whilst reducing the extent of the requirements and allowing for more flexibility to achieve these standards.

This document firstly outlines the major changes to the supervised practice program requirements and provides a summary of the major issues arising as a consequence of these changes for organisations, supervisors and provisional psychologists undertaking this pathway. These issues will be supported by reports and data from a range of organisations and individuals affected by these changes. Finally, suggested amendments that will address the consequences of these changes will be presented.

Summary of changes from the previous State and Territory requirements for the psychology internship

Several changes to the requirements for the supervised practice program have made it increasingly difficult for organisations to continue to provide viable internships to provisional psychologists.

1. Supervised hours

Prior to national registration the number of hours of supervised practice varied across Australian States and Territories. The PsyBA now requires provisional psychologists to complete a minimum of 3080 hours of supervised practice at 35 hours a week over two years. This is almost double the previous requirements for the Australian Capital Territory, New South Wales, Northern Territory and Queensland. Furthermore, the requirements for professional development have doubled compared to the previous requirements for the majority of States and Territories. There have also been dramatic increases in the amount of supervision and face-to-face client hours required. See Table 1 for a summary of the previous State and Territory requirements for the internship compared with the current PsyBA standards.

2. Required competencies

Previously, to complete an approved internship, the provisional psychologist was required to demonstrate skills in six main areas of competence. These included a) knowledge of the discipline, b) ethical, legal and professional matters, c) psychological assessment and measurement, d) intervention strategies, e) research and evaluation, and f) communication and interpersonal relationships. The PsyBA introduced two additional key competencies including g) working within a cross-cultural context and h) practice across the lifespan. Although 'working within a cross cultural context' has been welcomed by many supervisors, meeting the new competency requiring practice across the lifespan is a major concern for many organisations who provide these internships.

3. Costs

The costs associated with employing a psychology intern have increased dramatically under the new guidelines. Relationships Australia in NSW calculated that it would cost \$17,000 p.a. to cover the costs of supervising one intern. Thus, many organisations are no longer able to employ provisional psychologists as the costs and demands on supervisors are prohibitive. Furthermore, many organisations are no longer employing interns and instead offering volunteer positions or charging the intern as placements become scarce.

4. Placement hours

Finally, the definition of what constitutes a placement hour has changed significantly. Prior to the new internship guidelines, the internship consisted of around 40% client related activities (with the rest being administration, meetings etc) which has escalated to 100% client contact and client-related activities under the new guidelines. Therefore, many previous full time positions are now technically considered part time, which in several instances makes the program more than five years long.

These changes have made it increasingly difficult for both for interns undertaking this training pathway and also for organisations providing psychology internships and threaten the viability of the internship pathway.

Table 1. Summary of the previous requirements for the psychology internship prior to national registration July, 2010

State/ Territory	Professional Development (in hours)	Supervised psychological practice (in hours)	Supervision (in hours)	Face-to-face client contact (in hours)
ACT	60	~1600 Min. 20/week for 2 years	100 60 individual, 40 group (or individual)	Not specified
NSW	30 to 60	~1600 Min. 20/week for 2 years	100 Min. 60 individual, 40 group (if 60 hours of PD are completed)	~768 (eight /week for 96 weeks)
NT	60	~1600	100 70 individual, 30 group (if practising over 25 hours a week, should have an hour of supervision per week)	800
QLD	60	1600 Min. 16/week for at least 48 weeks per year. Minimum 2 years.	160. Min. of 100 must be face to face, of this, 60 must be individual. Maximum of 40 can be group supervision. If practising for more than 20 hours per week must have 1 hour of supervision week. 20 hours a week or less: must have one hour of supervision a fortnight.	Not specified but hours can include 600 hours academic teaching and/or research
SA	Not specified	~3600. 35–40/week for 2 years	Not specified	Not specified

TAS	60	~3450 Full-time practice for 92 weeks	100 60 individual, 40 group	Not specified
VIC	124	3600 480 days x 7.5 hours (minimum of 15 hours per week).	96 (75% individual and 25% group). Have supervision at least one hour per week if working more than 20 hours per week, or one hour a fortnight if working between 15 and 20 hours.	1440
WA	Not specified	3600 37.5/week for 2 years (no less than 15 hours per week part time)	192 Supervision is required to be two hours per week if working full time or a minimum of one hour per week if working part time. Did not have to have any face-to face supervision, just two hours face-to-face contact (with webcam) a year.	Not specified
PsyBA (current)	120	3080 35/week for two years	176 117 individual. For every 17.5 hours of supervised practice, must have an hour of supervision. Min. one hour of supervision a week, and one hour per fortnight of individual supervision. Supervision must be face-to-face unless in exceptional circumstance pre-approved by the Board.	1232

Major concerns and issues

In attempting to understand the impact of the changes on the psychology workforce, the APS has talked extensively with individual interns, supervisors and representatives of organisations who have, and may continue to, employ interns.

Issues raised by these people and organisations include: concerns about

1. The ability of organisations to meet new areas of competency;
2. The hours and program duration;
3. Onerous levels of documentation;
4. The supervision requirements;
5. The professional development requirements; and,
6. Procedural issues.

These issues will be discussed in further detail below.

7. 1. Addressing competencies: Across the lifespan

The PsyBA stipulates that the internship should take place in a wide range of professional practice settings and workplaces. The intern must complete the placement with substantial client contact in at least two different developmental stages with at least one stage being either childhood or adolescence and another being either adulthood or late adulthood. Based on the requirements specified in the new guidelines, it is apparent that, in many settings, interns will need to seek more than one placement arrangement to achieve this competency. For many provisional psychologists it is difficult to secure one internship placement let alone two. This may be made even more difficult if organisations are faced with interns moving to another place of employment rather than completing the full internship in their organisation. Employers are interested in investing in the education and training of provisional psychologists with the view that they may employ those that demonstrate suitability to the role in the future. If provisional psychologists are restricted to shorter internship placements, they will become less attractive and more costly proposition for employers.

A number of organisations that have provided internships for provisional psychologists are no longer able to offer interns the placement experiences required to fulfill the new competency for work experience across the age spectrum. The Education Department in NSW, SA, VIC and WA, Corrections in Victoria, the Department of Defence and many rehabilitation groups have indicated that they are having difficulty meeting the requirements.

A number of stipulations in the guidelines make it even more difficult to meet the work experience across the spectrum requirement. For instance, secondary supervisors are not permitted to provide more than 25% of the total supervision. Therefore, if the primary supervisor is not an expert in all age groups, or does not have access to a broad range of clients, the provisional psychologist must have another supervision arrangement with another primary supervisor. If the secondary

supervisor was able to provide more supervision, perhaps it would be easier to meet the requirements. Furthermore, if an intern is fortunate to find a second placement to meet the age range requirement, they are required to complete another laborious supervised practice plan.

A number of organisations and supervisors across Australia have reported that they have attempted to provide their interns with an appropriate supplementary placement, generally at a cost to the organisation. They have reported that it is difficult to know what constitutes an appropriate second placement as the Board does not specify an amount of time or number of cases which will meet the requirement and report they are told to just put it in the plan, and then they are commonly rejected.

Finally, with the increase in requirements for experience across the age spectrum several supervisors suggested that it may make sense for interns to be able to enroll in single units at universities to take a course in child therapy or adult psychopathology to assist in meeting these competencies. However, these dual pathways are prohibited. The impact of the inclusion of the new competency of experience across the lifespan has not been well thought out and supervisors and interns have been left completely unsupported in meeting this new requirement. This requirement is one of the major barriers to the viability of the internship pathway.

8. 2. Hours and program duration

As mentioned previously, the PsyBA now requires provisional psychologists to complete a minimum of 3080 hours of supervised practice at 35 hours a week for two years. These hours can only be comprised of either 'direct client contact' or 'client related activities'. Direct client contact is defined by the Board as "direct contact with clients including performing the specific tasks of psychological assessment, intervention, and prevention". 'Client related activities' refers to activities including reading and researching to assist problem formulation and diagnosis, case consultation with colleagues, formal and informal reporting and professional development. Furthermore, the Board specifies that that clerical duties, marketing and promotion, management duties and driving between client appointments, teaching or tutoring in psychology, self-care, or working in research do not constitute psychological practice. Additionally, it is unclear whether completing the case examples is 'client related'. Thus, these hours cannot be counted towards the total hours of psychological practice. Furthermore, the definition of direct client hours is very restrictive and does not capture the nature of the work done in some workplaces such as in school, organisational contexts. Reports from a supervisor in the Tasmanian education sector report that face-to-face work with parents and staff does not constitute direct client work under the current definition.

The requirement of 3080 hours of psychological practice is almost double the previous requirements for Australian Capital Territory, New South Wales, Northern Territory and Queensland. Furthermore, the Board has specified that 40% of the hours (1232 hours) must be made up of direct client contact. Under the previous

State and Territory guidelines the amount of direct client contact was not specified except for the NT and NSW which required interns to complete 800 hours. However in 2009, the Victorian Registration Board required 1440 hours of direct client contact which reportedly caused significant difficulties for the sustainability of the program (see *Report to APS Board by Victorian Branch*).

Several provisional psychologists and supervisors have reported that it is not realistic, or ethical, for interns to be engaged in 14 hours of client contact per week from the very beginning of their placement, considering prior to this that have had no experience with client contact. Furthermore, it is predicted that once supervision, professional development, administration, meetings, and travel time are accounted for each day, the intern has only 90 minutes preparation, learning, and report writing time for each client hour. This is an extremely short period of time for an intern to complete these activities, and be sufficiently prepared to work directly with clients.

The impact of the increased requirements for direct client contact hours can be illustrated by the case of an intern who contacted the APS while currently working in a government agency. He had predicted, based on his current rate of direct clients hours (18.5% of his total psychological practice hours), that it would take four years to meet the requirements. Prior to the introduction of the new guidelines in 2010, this same agency was able to provide a steady number of internships that were successfully completed within two years. This intern reported that the administrative requirements of the government and the Board, as well as driving to client sessions, take up a significant amount of time each day. Thus his ability to meet the requirements based on the very restrictive definition of psychological practice is further limited. There have been several reports to the APS of interns who will not be able to complete the internships within the maximum five years because of the restrictive nature of claimable psychological practice hours.

Finally, the Board dictates that interns are not permitted to take more than four weeks leave per year. This is a disadvantage to those who need sick or parental leave.

9. 3. Onerous nature of documentation

The onerous nature of the documentation associated with meeting the PsyBA requirements is a major barrier to supervisors' willingness to either take on or continue providing supervision to provisional psychologists.

The daily log book requirements are particularly extensive and many supervisors are concerned that they do not have the time to review over 3000 hours of log book entries and there is a view that this takes up company time that has no value. Also, several supervisors have stated that the six monthly progress report templates are also very long, repetitive and not user friendly. Further, the administrative and documentation requirements of the supervision plans have been described as being overly onerous. This is exacerbated for organisations when supervision plans are rejected on the basis of unclear and arbitrary decision-making such as the

percentage of time spent with a particular client group resulting in additional documentation. One supervisor described the plan as 'enormous, overwhelming and poorly laid out'

10.4. Supervision issues

Several supervisors have reported that supervising psychology interns has become very taxing. This is intensified by the vast amount of paperwork as well as a perceived lack of support from the Board. Many report that economically it has always been difficult but was usually undertaken as a way to give back to the profession. Many supervisors and organisations are now reporting that it is no longer viable, thus threatening the future of this pathway to registration.

4.1 Availability of supervisors

Across organisations and regions, supervisors are reporting that they will not take on provisional psychologists or, at least, are very hesitant about doing so. Thus, as a direct consequence of the changes to the requirements, the number of available supervisors for provisional psychologists is becoming increasingly limited. Furthermore, the requirement that the provisional psychologist must find a new principal supervisor within a five week period (when their original principal supervisor is no longer able to fulfill this role) is particularly challenging in regional areas. One intern reported finding it extremely difficult to secure a supervisor in their region and applied to the Board for an extension. This was rejected and as a consequence the provisional psychologist had no option but to make a six hour round trip fortnightly for each supervision session.

Even those who have been receiving remuneration for their supervision are reporting that they will no longer take on interns as the amount of paperwork required makes it not financial viable even though many report highly valuing their 'giving back' to the profession in this way.

4.2 Restrictions on external supervision

The PsyBA has indicated that their preference is that the primary supervisor is located on-site at the intern's workplace and it is at the Board's discretion whether any off-site supervision arrangement is allowed. This can be problematic for a number of reasons: the supervisor may be the intern's manager (raising the ethical issue of multiple relationships), the intern may have to change supervisors during the two years when gaining experience across the lifespan, therefore disrupting continuity of supervision, and many workplaces may not have enough supervisors or be able to afford the costs of supervision. Requiring the supervisor to be on site rules out external supervision which is how many smaller organisations and placements in rural and remote areas provide supervision. The Australian College of Applied Psychology (ACAP) has offered 1,110 internship programs Australia wide since 1996. When the changes to the program came into effect in 2010, the reason ACAP terminated their Psychologists Registration Supervision Program because they rely on off-site supervision and the new guidelines were too restrictive.

4.3 Co-signing documentation

The new guidelines state that supervisors must "read and co-sign all reports and correspondence written by the provisional psychologist". Some organisations such as Maximus Solutions, who utilise external supervisors and have been high employers of provisional psychologists, (80% of their workforce), cannot send documents off-site because contractual agreements with government departments do not allow this. A provisional psychologist who had her correspondence co-signed by a registered psychologist within the organisation (not the secondary or primary supervisor) had her application rejected. In this case the organisation cannot function when every piece of correspondence needs to be sent out to the primary supervisor for co-signing. Furthermore, even if the primary supervisor is on site, the requirement of all correspondence to be co-signed is incredibly onerous and impractical.

4.4 Requirements of face-to-face supervision

The guidelines report that it is the Board's preference for supervision to be conducted face-to-face or using 'high quality, professional video-conferencing systems'. Supervision via high quality, professional video conferencing systems can make up 55% of the intern's total supervision. The guidelines do not provide any guidance to what is an acceptable amount of supervision that can be provided over the phone or via webcam. The guidelines report that "The Board will review requests for use of a form of communication other than high quality, professional videoconferencing systems (telephone, webcam) on a case-by-case basis but a proportionally increased requirement for face-to-face supervision will be required." As a consequence, many supervisors and interns have reported concerns about accessing supervision in rural and remote areas with several reports of interns driving over three hours for each supervision session. For example one supervisor was concerned about the vagueness in Boards' documentation of amount of phone supervision that can be provided. He mentioned that he did not know how many hours to ask for and when he contacted the Board for guidance they did not provide any advice on what was an appropriate number. Allowing for, and specifying the amount of, phone or 'Skype' supervision in rural and remote areas would assist to alleviate the anxiety of supervisees and perhaps even the deficit of supervisors in those regions.

4.5 Restrictions on principal and secondary supervisors

Under the new requirements, primary supervisors can only take leave for five weeks. Many supervisors have reported to the APS that they choose to supervise later in their careers to give back to the profession. Moreover, they have reported that making the commitment to supervise a student that may take up to five years to complete the internship is a further deterrent to supervise as they are unable to take extended leave or maintain the arrangement for five years.

Considering the introduction of the competency requiring experience across the age spectrum, there needs to be concurrent flexibility in the provision of supervision. Currently the secondary supervisor can only provide 25% of supervision. To allow for

more flexible placements to meet this new competency, many supervisors have suggested that it would assist if the secondary supervisor could provide more supervision, as opposed to completing another supervision plan.

11.5. Professional Development requirements

The current Board requirements for professional development have doubled the amount of professional development previously required under the State and Territory guidelines (except for Victoria). The dramatic increase in professional development requirements is associated with significant increase in cost for either the intern or organisations. Several organisations have reported that these increased requirements now mean that it is much more expensive to hire a provisional psychologist than hiring other allied health professionals and, as a consequence, have ceased employing provisional psychologists.

The increased professional development requirements are particularly difficult for interns in rural and remote regions to meet. Several interns have alleged that the cost and time associated with travel and accommodation to access professional development has made this pathway inaccessible to those living in these areas. Considering there are no distance education Masters degrees in psychology (that do not require the individual to already be registered with the Board), this further disadvantages aspiring psychologists in rural and remote areas and inhibits the development of the rural and remote psychology workforce.

12.6. Procedural concerns

6.1 Delay in approving plans and poor communication

There has been consistent feedback to the APS of long delays in approving supervision plans and poor communication further delaying the commencement of internships at a cost to organisations and interns. One such example is of a supervisor in Queensland who reported that it had taken four months for the PsyBA to approve a supervision plan and the Board had recently informed him that it would take at least two more months to approve the plan. He reported that he was unable to employ a provisional psychologist on this basis.

Another supervisor reported that it took the Board two months to approve a plan, which they subsequently did not communicate to the intern or her principal supervisor (even though they had provided their details) as they did not update her contact details. Over several months the Board did not respond to emails from the principal supervisor until he called the Board directly. After this he was told he could not be informed of the progress of the plan because it was confidential, even though he was the principal supervisor. It took five months just to find out that the plan was approved and to overcome these barriers to communication with the Board. Another example of poor communication is regarding the feedback on the six monthly progress plans. One intern reported that she submitted her report and received feedback that there was one piece of information missing. She proceeded to resubmit the progress plan again, waited again for the monthly Board meeting and then received feedback that there was another piece of information missing from a

different section which the Board failed to mention in the first review. This resulted in further delays to the internship, a loss of claimable hours, and disillusionment on behalf of the intern and her supervisor with the Board's processes.

6.2 Case examples

There is a lack of consistent processes across the States and Territories in regard to the marking of case examples. This appears to be an issue particularly experienced in Victoria where there are reports of case examples being rejected numerous times even though highly experienced supervisors have found them to be of a sound quality. There are no clear guidelines regarding what constitutes an appropriate case example and case example rejection has extended the placement time significantly for a number of interns and caused a lot of distress to both interns and supervisors. The APS has also received numerous reports of significant delays in assessing case examples. Many supervisors of provisional psychologists have expressed concern that they feel unable to support interns through what has been described as "a constant shifting of goal posts". One of the major objectives of forming a national Board was to have a consistent approach and standards across the States. Therefore it is paramount that the assessment processes pertaining to the case examples are standardised and transparent.

A summary of concerns and changes in organisations Australia-wide are presented in the following table.

Table 2. How organisations are responding to the changes to the supervision pathway Australia-wide

Organisation	Previous services	Concerns	Current position
Department of Defence	Provided internships Australia wide	<ul style="list-style-type: none"> • Cannot meet the lifespan requirement as they work with adults only • PD requirements are not sustainable • Concern about meeting supervision requirements in Darwin and other rural and remote areas. • Do not always have an onsite supervisor to sign off paperwork. • Paperwork is very time consuming, making supervisors more reluctant to take on interns 	Consideration is being given to reduce the 4+2 intern quota and increase the intake of registered psychologists or those enrolled in a Masters program
Maximus Solutions	70% of workforce was psychology interns.	<ul style="list-style-type: none"> • Unable to provide onsite supervision 	No longer taking on interns. Beginning to take on nurses to fill these positions.
SA education department	Previously offered internships	<ul style="list-style-type: none"> • Increased administration and supervision workload 	The supervisors are not going to take on any more provisional psychologists next year. Department may outsource supervisors if the costs aren't too great.
NSW education department	Currently have 84 provisional psychs which comprise of 10% of their workforce	<ul style="list-style-type: none"> • They also reported that most supervisors are finishing their current case loads and not going to take on any more provisional psychologists 	They are going to review their program and see if they can take on provisional psychs next year
Catholic education	Provider of internships		Unlikely to take on new interns
Centrelink	76 provisional		Reducing intakes

	psychologists currently working at Centrelink nationally		
Altius group (Rehabilitation consultant)	Had six interns	<ul style="list-style-type: none"> • Cannot find supervisors • Cannot meet lifespan requirements 	Since new guidelines they have taken one intern but will now take social workers instead.
Corrections	Previously had a large number of intern psychologists in a two year program	<ul style="list-style-type: none"> • Meeting lifespan requirements • Meeting PD • On site supervision 	The Board has restricted corrections to a one year program. Most likely will not be taking on any more interns. Will instead be employing other allied health professionals.
Headspace (Several supervisors)	Previously offered internships	<ul style="list-style-type: none"> • Supervision costs prohibitive 	Several headspace site supervisors reported that provisional psychologists will be replaced by other allied health professionals.
Relationships Australia (NSW)	Previously offered internships	<ul style="list-style-type: none"> • Supervision costs prohibitive 	No longer offering internships
Australian College of Applied Psychology	Provider of 1,110 internships since 1996	<ul style="list-style-type: none"> • Supervision costs prohibitive 	No longer offering internships
Victorian Education	Large provider of internships pre 2009	<ul style="list-style-type: none"> • Lack of communication re case examples • Lack of communication re additional placements • Delays in plans being approved • Travel time not being counted 	No longer offering internships
Tasmania Education	Provider of internships	<ul style="list-style-type: none"> • Supervision requirements difficult to meet 	Internship pathway may no longer be viable

Future directions and recommendations

13. Major recommendations

The APS proposes a number of major changes be made to the current internship guidelines to ensure the viability of this training pathway.

1. Broaden the scope of what is defined as psychological practice

It is paramount to increase the scope of the definition of psychological practice to recognise the diverse role of psychologists. The National Allied Health Casemix Committee (2001) which published the Health Activity Hierarchy Version 1.1 (endorsed by the Department of Health and Ageing) defined clinical care and the APS recommends that the activities included in this definition be permitted as counting towards psychological practice hours. This definition included:

- Phone calls with clients and colleagues;
- File review;
- Direct client contact;
- Report writing;
- Secondary consultations;
- Team reporting and meetings;
- Completing log books and assessment tasks;
- Supervision;
- Professional development; and,
- Travel with regard to client sessions.

Furthermore, this document stated that Individual Patient and Non-Individual Patient Attributable travel activities were listed as clinical care. While acknowledging this, it seems reasonable with regards to the internship, to suggest that travel, in regard to client care, should be limited to a maximum of 20% of psychological practice hours. This is particularly relevant for regional and remote interns.

The APS recommends that the definition of 'direct client contact' be expanded too, to include work with clients, their families, employers, supervisors, teachers, health providers or legal guardians with regard to client care. It is also recommended that phone contact with clients (and those mentioned above) be included in 'direct client contact' hours.

2. Reduce the requirements for 'direct client contact'

Students enrolled in Clinical psychology Masters Degree are required to complete 400 face-to-face or 'direct client contact' hours. Therefore the 1232 hours required for the 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% (770) of the total hours of psychological practice should be direct client contact'. Furthermore, the Board could consider allowing for the direct client contact hours to increase over the program in a sliding scale fashion, so as the intern gains more experience, they take on a more appropriate direct client contact hours. Therefore, in the first six months of the internship the provisional psychologists' direct client contact hours can be as low as 10% of their total hours of psychological practice and this would increase over the two years to meet the 770 total hours.

3. Review the requirement for "Practice across the lifespan"

The introduction of this new competency is the greatest barrier to many organisations and supervisors ability to provide internships. Firstly the APS recommends that the Board reduces the hours for the second age group to 20% of the total internship (600 psychological practice hours, 150 direct client contact hours) utilising the redefined terms of 'psychological practice' and 'direct client contact'. Secondly, the APS recommends that the Board promotes more evidently the revised flexibility expressed in the "Policy for the 4+2 internship program: limited work role" which allows provisional psychologists working in a child/adolescent setting to apply for the accrual of hours providing intervention with parents, teachers, or similarly, for provisional psychologists in adult services to accrue hours with the clients' children and relatives to meet the lifespan requirements in the one placement. Our interpretation of these guidelines would suggest a number of settings could meet the across the lifespan within the one placement including:

- Parents and teachers in schools as the balance for children/youth;
- Youth (under 21) in the workplace as a balance for adults;
- Both youth (under 21) and adults in forensic, employment agencies, rehabilitation centres, Corrections and Defence roles.

4. Increase the flexibility for supervisors to be off-site whilst stating preference for onsite supervisors

5. Review reporting and assessment requirements

- Review and reduce the length of the supervision plan and progress reports by relying more on supervisor expertise;
- Review and reduce the length and detail of the log books. The log book format is very case focused and needs to be generalised to make it amenable to other psychology settings (such as organisational, community and forensic);
- Ensure standard and transparent assessment processes pertaining to the case examples and allow case examples to be resubmitted.

6. Increase flexibility in supervision arrangements

- Allow for a significant proportion (50%, [55% is what is specified in the current guidelines for professional videoconferencing]) of supervision to be provided by phone or Skype and specify this in the information provided to applicants. Once again stress the preference for distance supervision by a visual modality;

- Increase the number of approved secondary supervisors that an intern can be supervised by. In some cases a secondary supervisor may be another professional such as a psychiatrist or social worker, but they can only provide 25% of the supervision;
- Allow secondary supervisors (if they are psychologists) to provide a greater proportion of supervision (40%);
- Allow primary supervisors to take longer periods of leave (over 5 weeks) as long as another supervisor is available.

7. Reduce the requirement for co-signing of all documentation

Increase flexibility to allow supervisors to 'review' major reports and regularly review examples of case notes and correspondence, as opposed to requiring the supervisor to co-sign all documents and correspondence. Co-signing of all documents and major correspondence could be required during the early stages of the internship (e.g. the first six months) and relaxed as the internship progresses to match the previous Western Australian supervision guidelines (which required 'regular review' of major documents and correspondence).

14. Other specific recommendations

The APS also suggests a number of further recommendations that would assist with the sustainability of this training pathway:

1. Reduce the number of professional development hours required to 80 hours over two years. The number of hours of professional development has doubled for most States and Territories;
2. Provide a handbook for setting up an internship program including specific guidelines of what is expected of plans, case examples and common issues that arise;
3. Consider trialling an online forum for interns to support each other;
4. Consider trialling an online forum for supervisors to support each other;
5. Appoint an officer in each Regional Office to provide interim approvals of progress plans between Board meetings;
6. Allow interns to take more than four weeks leave a year, if necessary;
7. Allow interns to utilise dual pathways, such as single university subjects, to meet specific competencies such as assessment;
8. The concept of a national exam should allow for the reduction of the expectations of the supervisor;
9. Discontinue calling the internship '4+2' in its current form. It is unrealistic to complete this program in two years as it currently stands and is distressing for the intern as they constantly feel like they are falling behind;
10. Allow a limited amount of backdating to occur whilst the plan is being approved by the Board. This might include items such as preparation for supervision, reading or professional development activities.