

Current Consultations
Psychology Board of Australia
via email: psychconsultation@ahpra.gov.au

**PUBLIC CONSULTATION ON PROPOSED AMENDMENTS TO THE PROVISIONAL
REGISTRATION STANDARD AND THE GUIDELINES FOR THE 4+2 INTERNSHIP
PROGRAM**

The Western Australian Department of Education (Department) is pleased to provide a submission to the Psychology Board of Australia (Board) as part of the public consultation on proposed amendments to the Provisional registration standard and the Guidelines for the 4+2 internship.

I understand that the consultation relates to the standard that psychologists must meet for entry into the profession as a provisional psychologist; and the requirements for developing the knowledge, skills and competence required for entry into general registration via the 4+2 internship program pathway.

The Department's School Psychology Service employs approximately 280 full time equivalent (FTE) school psychologists, translating into around 350 psychologists with provisional or general registration with the Board. School psychologists working in Western Australian public schools must have tertiary qualifications in both psychology (entitling registration with the Board) and education.

The Department has a strong history of supporting psychologists to achieve general registration with the Board and at the time of this submission, 75 school psychologists were provisionally registered, with 74 undertaking the 4+2 internship program.

The Department welcomes the great majority of the proposed changes to the 4+2 internship program and thanks the Board for the opportunity to provide input. Queries relating to the submission should be directed to Mr Chris Gostelow, Manager, School Psychology Service on (08) 9264 4313 or Chris.Gostelow@education.wa.edu.au.

Yours sincerely

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Att.

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RESPONSE TO PUBLIC CONSULTATION ON PROPOSED AMENDMENTS TO THE PROVISIONAL REGISTRATION STANDARD AND THE GUIDELINES FOR THE 4+2 INTERNSHIP PROGRAM

Consultation questions on the *Provisional registration standard* for consideration:

Options statement – provisional registration standard

1. What is your preferred option for the provisional registration standard – option 1 status quo, or option 2, the revised standard (with or without further revisions)?

The Department of Education (Department) prefers Option 2, the revised standard.

Rationale for provisional registration

2. Is there a public benefit to introducing student registration for undergraduate psychology major students that the Board has not identified?

The standard appears to consider that those undertaking a higher degree in psychology are the only ones that undertake a practicum with a focus on psychology. In Western Australia, students with a four year undergraduate qualification in psychology complete a Diploma in Education with a view to becoming a school psychologist in Western Australian public schools. These students complete a practicum alongside school psychologists (rather than teachers). There is no provision for the public to take recourse through the Board in this scenario. While it is promoted as ‘work shadowing’, in reality these students conduct assessments and counselling independently when their school psychologist mentor believes they are ready. Once employed as a school psychologist, these same students cannot do the work they undertook as students until their provisional registration status is awarded. This appears to be somewhat of a ‘double standard’. It would be helpful if students who do not meet the requirement for provisional registration but undertake practicums in the area of psychology are registered as students for the period of the practicum, usually a maximum of 12 weeks.

Non-standard provisional registration pathway

3. Do you have any feedback about the proposal to include an option for non-standard applications for provisional registration that applies to overseas- trained applicants and return-to-practice applicants?

The Department considers this proposal to be worthwhile.



4. Are there other circumstances where the Board should grant provisional registration that have not been allowed for in the proposed *Provisional registration standard*?

The Department considers that there some circumstances in which provisional registration could be applied intentionally by the Board. Where an adverse finding is made against a psychologist and conditions are subsequently imposed by the Board, a condition that includes the 'supervision' of a psychologist implies a return to the status of provisional registration.

Registration options for higher degree pathway provisional psychologists

5. What is your preferred option for the registration of higher degree interns? (Options 1-4).

The Department of Education prefers Option 1.

6. Which factors influence your preferred option?

Option 1 is considered to be clearer for the public and other psychologists. It's simple and less burdensome from an administrative perspective.

7. If a placement is due to commence but the higher degree student does not have provisional registration in place they will not be able to undertake the placement. Who would be impacted by this and what would be the impacts be?

It is possible that both the student and the organisation might be impacted upon but this is not known. The Department has had very few higher degree students on placement up to this point.

8. What other impacts would changing the registration requirements for higher degree provisional psychologists have?

In any option other than Option 1 is taken, the public might not be protected adequately.

Definitions

9. Are there any definitions that should be amended or added to the standard?

No.

General questions

10. Do the proposed revisions the *Provisional registration standard* improve clarity and make the standard easier to understand?

The Department considers the proposed revisions improve clarity and make the standard easier to follow.

11. Is there any content that needs to be changed or deleted in the revised draft registration standard?

None detected at this point in time.

12. Is there anything missing that needs to be added to the revised draft registration standard?

The Department considers that the draft registration standard gives guidance to provisionally registered psychologists about actions in response to dissatisfaction or poor performance of the supervisor but provides little in the way of direction for a supervisor where the supervisee is non-compliant (e.g. not completing log books) or performing poorly. There is a 'grey' area between the need to acknowledge the developmental nature of the program and mandatory/voluntary reporting. Some direction for supervisors in this area would be welcomed, and would sit alongside any action that an employer might take in this area.

13. Do you have any other comments on the revised draft registration standard?

The revised draft registration standard achieves the aim regarding clearer language, revised structure, definitions and reporting requirements. Replacing the term 'Masters' with 5th and 6th year is clearer and essential as the term 'Masters' changes in the future.

Consultation questions on the *Guidelines for the 4+2 internship program* for consideration:

Options statement – guidelines for the 4+2 internship program

1. What is your preferred option for the guideline for the 4+2 program: option 1 – adopt the interim guideline as the new guideline; or option 2 – adopt the revised guideline presented here and as shown at Appendix D? (see separate attachment).

The Department's preference is Option 2.

Core competencies

2. Do you think that the eight core competencies accurately reflect the range of skills and knowledge common to all areas of psychology and necessary for general registration and independent practice?

Yes.

Assessment and case reports

3. Are the mandatory psychometric test categories appropriate for 4+2 interns?

Yes.

4. Are the requirements for case reports clear and is there sufficient detail about what to include in case reports to guide provisional psychologists and their supervisors? (see Appendix E of the guideline at Appendix D which is attached to this paper)

The specific requirements for the intervention case report includes the same requirements for the assessment report plus information about the intervention. The Department considers that it needs to be clearer how the 'assessment' sections in an intervention report differ from the 'assessment' sections in an assessment report.

5. What is your view on the proposal to require submission of two case reports to the Board in the first half (1540 hours) of the internship and two in the second half? Are there any specific advantages or disadvantages with early submission of case reports?

The Department supports this proposal as it would assist in organisation of the program and ensure the provisionally registered psychologist was able to receive early feedback. Timely feedback on case reports is essential to support the supervision plan and track the development of psychological skill acquisition.

6. Do you have any feedback on how the 5+1 internship case studies are working in practice that is relevant to the 4+2 case reports? This may include the criteria, format, and timeframes for submission to the Board.

The Department is unable to comment on the 5+1 internship.

7. Will the proposed supervisor-assessed tasks, together with the exam, sufficiently test skill development and achievement of the core competencies?

Yes. The Department will need to provide support to ensure adequate moderation among groups of supervisors. Consideration could be given to the capacity for audit of supervisor assessed tasks.

8. Do you have any other feedback or suggestions about assessment tasks?

The flexibility outlined on page 27 (item 152) is very welcomed and will allow the supervisor and the supervisee to determine the best approach. Suggest retaining the templates for ethical dilemmas, target problems and professional limitations for optional use. The Board may not consider this their responsibility in which case the Department may choose to retain them as useful documents.

Psychological practice and work roles

9. Do you support removal of the *Limited work role policy*?

Yes.

10. Is there sufficient detail about what is required in work roles for the 4+2 internship?

Yes.

11. Do you support the proposal for simulated client contact, including simulated test administration to be able to be counted towards the requirements of the internship?

The Department supports this proposal and will prevent the need for some provisionally registered psychologists to 'create' a referral of an adult client where this might not ordinarily be made. Bookings of test equipment and resources can be planned well in advance and activities can be undertaken in non-school contact time.

12. Should skills acquisition activities be mandatory?

Yes. The Department would recommend that scheduling of activities should be flexible in timing and fit with the individual's supervision plan.

Supervision

13. Do you support the proposed changes to supervision requirements for the 4+2 internship program?

Yes. In particular the Department welcomes the potential for the secondary supervisor to undertake up to 50% of the one-to-one supervision.

14. Are remote supervision methods effective? (e.g. videoconference, Skype, telephone and any other remote supervision mediums). Do you have any other comments on the Board's proposals for supervision?

Yes and sometimes the only available option in a state as vast as Western Australia. The Department welcomes the possibility of enabling increased amount of remote supervision via methods such as videoconferencing and this may represent a significant cost saving. In very remote areas where this technology remains challenging, there may be some merit in allowing an increase in other forms of supervision such as telephone from 40 hours. This could be applied for in writing on a case by case basis but would ensure that provisionally registered psychologists in remote locations that have a visiting supervisor can still meet the requirements. This would be of benefit to not only the provisionally registered psychologist but the community as it will allow psychological services to be provided despite difficult supervision arrangements.

Policy of recency of qualifications

15. What is your preferred option for the content of refresher training programs for applicants whose qualifications are more than ten years old?
- Retain the four subject areas that are currently required (assessment and diagnosis; psychological intervention; ethics; and psychopathology), or
 - Retain these four required subject areas, and add two more (core knowledge of the discipline; and research methods) to align the content more closely with the content of accredited fourth year programs of study.

The Department's preference is Option B.

16. Do you have any other feedback on the requirements for refresher training to meet recency of qualifications requirements?

The flexibility is welcome and the refresher training is not onerous.

General questions for consideration

17. Is the content and structure of the draft revised guideline helpful, clear, relevant and more workable than the current interim guideline?

The Department considers the content and structure of the draft revised guideline to be a significant and welcome improvement.

18. Is there any other content that needs to be changed or deleted in the draft revised guideline?

Some clarity around the definition of on-site and off-site supervision (paragraphs at 4.2.2) would be welcomed. Almost all school psychologists work at different schools to their supervisors but in the same geographical region.

19. Is there anything missing that needs to be added to the draft revised guideline?

Poor performance or non-compliance of supervisee and student registration requirements as previously mentioned.

20. Do you have any other comments on the draft revised guideline?

The Department welcomes the easier process to change supervisors, often required for instances of long service leave, etc.

Leave arrangements of eight weeks give no margin for school psychologists working in public schools requiring additional leave who already have eight weeks of leave per year. It is unclear how longer term sick leave might be managed. Leave arrangements appear to be suited more towards those employed by the public sector. It should be noted that it is likely that school psychologists employed in the Western Australian non-government schools or in other states may have similar conditions to teachers and eligible for up to 13 weeks leave per year.

The Department supports the removal of the maximum of five supervisees per supervisor but allowing for an application of 'exceptional circumstances', involving decision making between the employer, supervisor and supervisees. There may be some merit in the Department employing school psychologists to provide supervision only. Private organisations could move towards providing supervision of high numbers of provisionally registered psychologists which has risks and benefits.

The potential for the Board to approve a 14 hour per week plus supervision/professional learning of 3.5 hours per week allows for employment at 0.4 FTE rather than 0.5 FTE which may have some merit for the Department.

Consultation questions on the reporting and recording forms for the 4+2 internship program for consideration:

1. Are there changes would you suggest be made to the draft reporting and recording forms at Appendix E to ensure they effectively support the 4+2 internship program as set out in the proposed new guidelines (Appendix D)?

It is noted the requirement to record lifespan hours on PPPR76 has now been removed.

2. What is your preferred option for layout and level of detail in the log book?

The spreadsheet is preferred.

3. Should the case report submission cover sheet be retained or combined with the new case report submission checklists?

Retained.

4. Are there any other forms that have not been included but are necessary for effective recording and reporting to the Board in the internship program?

A professional development plan is required so a template form would be useful.

5. What are your preferred formats for forms? Forms may be published in the following formats:
 - Microsoft Word: standard DOC or rich text format RTF
 - Microsoft Excel (XLS),
 - Portable Document Format: standard PDF or smart/interactive PDF (e.g. allows users to check boxes and type directly into the blue fields).

The Department prefers the Excel format for logbooks.

6. Are there any changes in these proposed forms for the 4+2 internship that should also be made to the forms for the 5+1 internship?

The Department has no experience with the 5+1 internship program at this time.

7. Do you have any other ideas or feedback about forms for the 4+2 internship program?

The Department is interested in the Board's proposed transitional arrangements. The draft revised guidelines provide considerable flexibility that would be welcomed in those currently undertaking the 4+2 internship program.