

FEEDBACK TO CONSULTATION PAPER 24 – Proposed amendments to the:

- **Provisional registration standard, and**
- **Guidelines for the 4+2 internship program**

This feedback is provided by individuals employed in the Department for Education and Child Development (DECD) in South Australia. It has been prepared in consultation with supervisors and provisionally registered psychologists within DECD. It does not represent a position from the agency itself.

The Department for Education and Child Development has a long history of employing provisional psychologists and providing them with a consistent 4+2 internship program. Currently there are 5 provisional psychologists on programs within DECD. As a result of a recent recruitment process DECD will employ at least 6 more provisional psychologists over the next few weeks.

General comment:

The new guidelines appear to have more clarity and flexibility.

The core competencies adequately reflect the range of skills and knowledge common to psychology across a range of settings.

The description of the requirements and expectations across the two years of the internship is useful and clear.

Assessment and case reports

1. Supervisor determining competency versus a set number of administrations – while this is a good concept, how does AHPRA intend to ensure there is consistency in the application of this determination. There is risk in the measure of competency being differentially applied.
2. Change in the case reports to include focus on assessment and intervention separately - This change of focus is strongly supported, allowing the provisional psychologist to provide sufficient information to the moderators. The intervention case study still runs the risk of being hard to complete within the word limit as there still needs to be considerable coverage of sections A, B, and C. The word limit restricts adequate description of both the assessment and the intervention in the one case report.
3. Case report requirements – the requirements for the case reports are clear and helpful, and improved on the previous. Would an example case report from each type also be helpful? Perhaps an example of how a first year report would differ from a second year report in complexity and depth. Perhaps examples from different settings (i.e. a clinical work environment versus organisational versus educational).
4. Two case reports in first half of internship and two in second half of internship – generally supported. The ability to have an adequate case report (for the purposes of The Board's requirements) in the first half may be problematic for some interns and in some settings. The depth and complexity will likely differ markedly across the time of an internship, and The Board would have to take that into account in their moderation.
5. An increase from 6 to 8 case reports – this may add significant impost on interns, as the writing of case reports is quite time consuming and stressful, particularly if there is no capacity to resubmit when there is a minor error in the presentation of the case report.
6. Increased responsibility for supervisor cf. PsyBA in case reports – is The Board changing its role regarding the case reports to a moderator, or do they remain the assessors?
7. Case report feedback – more detailed feedback for case reports is very welcome. This will be informative to both the intern and the supervisor.
8. Resubmission of case reports - there should be the capacity to resubmit a case report where the questions are not in psychological practice, or e.g. because of word limits information was not included. This may be less of a concern with the splitting of the case reports.
9. Supervisor assessed tasks – supported, there is more clarity about requirements
10. Range of psychometric tests – appropriate for 4+2 interns

Psychological practice and work roles

1. Greater flexibility to undertake different work roles and professional development in order to develop all the core competencies, through e.g. "minor placements / organisational visits" is supported. It is critical that these allow for competency to be demonstrated as per the competency concept outlined in #110, and

does not demand full placement status (e.g. 300 hours). Full placement in another work role is not possible, nor practical, when the intern is employed by an agency or employer.

2. Simulated client contact – while simulated client contact and test administration is a useful strategy for interns to use in order to practice and develop skills, the proposed number of hours allowed to be reported is not supported. Simulated activities are usually benign and not the same as working with a real client.

Supervision

1. Increased supervision from the secondary supervisor – this change is supported. This allows for more flexibility in provision of supervision, and allows the secondary supervisor to be more actively involved in the ongoing supervision of the intern. It would also facilitate supervision if an intern is working across more than one setting. Also reduces red tape and unnecessary administration should the primary supervisor wish / need to take leave.
2. Unlimited number of interns per supervisor – This is not supported as there is a risk of the quality of supervision being compromised if the supervisor takes on too many interns. The removal of the limit runs the risk of encouraging a “market economy” in supervision, which is not appropriate if supervision is to have integrity.
3. Remote supervision methods – a limit of non face-to-face supervision to 40 hours on the telephone is restrictive to the adequate provision of remote supervision. Currently remote supervision for our provisionally registered psychologists in the country involves far more than 40 hours of telephone contact across the two years. We provide the telephone contact on top of meeting face-to-face requirements. The telephone time should be allowed to be recognised as legitimate and valued supervision time. The use of video-conferencing can be unavailable or unreliable within our organisation. The use of Skype is not available at the moment.

Reporting and recording forms

- The case report submission cover sheet should be retained as is.
- Case Report Feedback – very welcome
- The original (2010) transitional / progress report included a rating scale of 1 to 5 for all areas that were expected to be assessed. This was very useful as a means of gauging progress, discussion with interns, and planning for the next six months. A modification of this as a tool for use by supervisors in the preparation of progress reports would be good.
- The log book, while providing detail of time spent and practice undertaken, is onerous. It would be appreciated if a better excel book where everything was macro-ed in the weekly and cumulative form, i.e. the ability to see the weekly supervision hours plus a macro with the current cumulative total, the ability to differentiate between primary versus secondary supervisor in hours, client-contact hours broken down and counted by adult/child, etc.,

Undergraduate provisional registration – not supported

Provisional registration for Master students – this should remain as is, i.e. for the duration of their study.

Recency of Qualifications – refresher training programs should include the research methods and core knowledge of the discipline, as well as the four subject areas. This would be a better match to the core capabilities of the provisional program.

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