



THE AUSTRALIAN
CLINICAL PSYCHOLOGY
ASSOCIATION

Submission to the Psychology Board of Australia
in response to the public consultation on proposed
amendments to the Provisional registration standard and
the Guidelines for the 4+2 internship program

Prepared by: A/Prof Lesley Bretherton, Dr Judy Hyde & A/Prof Bliokas on
behalf of the Australian Clinical Psychology Association

Contact:

Dr. Judy Hyde
President – ACPA
judy.hyde@acpa.org.au

The *Australian Clinical Psychology Association* (ACPA) response to the public consultation on proposed amendments to the:

- **Provisional Registration Standard**
- **Guidelines for the 4+2 Internship Program**

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The *Australian Clinical Psychology Association* (ACPA) thanks the Board for the opportunity to comment on Consultation Paper 24 and applaud the determination of the Board to maintain standards of practice across Australia.

General response to the Psychology Board of Australia's (PsyBA's) consultation on Provisional Registration Standard, and Guidelines for the 4+2 internship program:

The proposed changes put forward in Consultation Paper 24 are fully supported, and welcomed, with the following caveats and recommendations:

1. The PsyBA needs to work towards implementing the higher degree extended Master's pathway as the only pathway for eligibility for general registration. Australia is lagging behind international standards in retaining the 4+2 and 5+1 pathways to registration.
2. It would be expected that at the completion of the entire 4+2 supervision pathway the provisionally registered psychologist would meet the identified competencies at a basic level and be competent to practice, but they would not be at the same level of competence as a graduate from an accredited program of training. These pathways are not equivalent, nor can they be aligned in the manner proposed.
3. The aims and desired outcomes for the 4+2, 5+1, 6+2, and 7+1 programs need to be mapped strategically to ensure that differentiation of skills and degree of competency attainment are clearly identified for each level of training. These pathways are *not* equivalent, although within the current system, the public is largely kept uninformed in that regard.

Response to specific 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 preferred option is **Option 2** with some revisions.

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?

We did not identify a public benefit for registration of students given they do not generally have any contact with the public.

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 fourth pathway proposed to be added to the *Provisional Registration Standard*; a Board-approved transitional program as specified by the Board, should be included in the guidelines as worded to clearly avoid confusion with bridging plans or inferior alternate pathways to registration that have been exploited in the past.

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

None have been identified.

Registration options for higher degree pathway provisional psychologists

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

We strongly recommend **Option 1**: To maintain the current standard that students register at the commencement of enrolment and continue to be registered throughout their degree, as this is a more efficient and cost effective manner in which to

administrate registrations than the alternatives, and provides best protection for the public.

6. Which factors influence your preferred option?

It is important for students to perceive their training as a professional training and their conduct and behavior during all aspects of training as subject to the standards of the profession. Professional training does not simply apply to clinical work, but to all aspects of the work undertaken by a psychologist, including learning, throughout the professional's career. Having students provisionally registered throughout their degrees underpins this view of the professional nature of all aspects of their work, including research, theoretical learning, and professional conduct throughout the program itself.

It is more efficient to require higher degree students to register at the commencement of enrolment (Option 1) and therefore more cost effective to administrate than the alternatives, given that most higher degree candidates will apply for registration at the same time of year. This is the same time as when other checks are undertaken for placement preparation, such as criminal records checks, vaccination etc. to meet compliance requirements for practising as a provisional psychologist in the public health system.

Should registration be permitted to lapse at any point during training future placements are put at risk. Given the time required to re-register excessive pressures would be placed on students, educational institutions, supervisors, and training settings. The time necessary to re-register would lead to delayed completion of the program, missed placement and research opportunities, and negative impacts on the student, supervisor, their service and the educational institution, and lead to increased costs.

The proposed alternatives to the current standard would place increased responsibility on students and education providers to ensure that registrations are in place for placements and place increased responsibility on students to keep abreast of any legislative or policy changes that could affect them in the future while they are unregistered and not receiving any updates from the Board.

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

ACPA believes that Option 3 and 4 would not encourage students to perceive themselves as professionals in training throughout their program and regard registration as essential for all aspects of psychological work with the public. This could

impact on professional and ethical behavior in ways that would not be in the public's best interest.

Definitions

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

'Cross-cultural context' needs to be re-defined as 'socially or culturally diverse context'.

'Foundational' competencies need to be explained.

A definition of 'an across the lifespan practice issue' needs to be provided.

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)

We prefer Option 2 – adopt the revised guideline presented here with the recommended changes outlined in our response.

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

We support evaluated competency outcomes and believe 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. However, it needs to be recognised that these competencies are difficult to achieve through an unaccredited program of supervision to the standards required to practice in all areas of psychology. It may be preferable to limit the practice of those registering under the unaccredited pathway to specific areas of practice, and not require competencies, for example, across the lifespan. It also needs to be recognised that the competencies are achieved to a greater level of expertise by those undertaking professional training via an accredited pathway and the expectations for each level of training need to be delineated and mapped.

Assessment and Case Reports

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

We consider that the categories are appropriate for this level of training. However, we recommend that the requirements for case studies be defined to include interpretive

reports of psychometric assessments and that at least one psychometric case report is submitted for review by the Board. This is an area in which competence is difficult to assess by the National Psychology Examination or by a supervisor who does not review a written report, has limited experience in psychometric assessment, or whose own training has led to inadequate practices. Of notable concern is the number of generally registered psychologists who provide scores, rather than descriptive ranges, to clients of intelligence testing without providing and explaining the measurement error inherent in any scores obtained. We strongly agree that half of the case reports should be submitted for independent review; one of these needs to be a psychometric report to give feedback to interns and supervisors that this is not accepted practice.

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)

It is important that case reports are reports on clients from the provisional psychologist's current work role. Appendix E gives sufficient detail apart from:

B. Assessment – the test instruments used and their edition number and abbreviation should be listed here for documentation purposes and so the reader knows exactly what was used to assess the client. This makes the report a more useful document.

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?

Submission of two case reports in the first year and two in the second year allows for feedback and an opportunity to improve. We do not see any disadvantage for the provisional psychologist or the public for early submission of case reports.

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.

We are unable to comment on this.

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

We do not believe that the supervisor-assessed tasks, together with the exam, will sufficiently test skill and reporting development for psychometric assessments (see above).

While we support the changes in the requirements for other supervisor assessed tasks, we question the wisdom of allowing supervisors to assess these areas without any independent review - given the relationship which develops between supervisor and intern (see below).

We also recommend that a means of recording the demonstration of relevant competencies, which are not part of the primary work role, be required.

We support the plan of requiring two competent demonstrations to an observing supervisor of the administration of psychometric assessments with real clients, but do **not** support that these both be in a realistic simulated learning environment. At least one demonstration must be with an actual client.

Generally, other than these points, and providing the guidelines are rigorously applied and strictly adhered to, we believe the 4+2 internship program should be sufficient to protect the public in areas where extended knowledge and expertise is **not** required, such as with more complex cases of mental health problems.

However, the safety of the public is contingent upon the competence of the supervisor. We agree that supervision is vitally important in training; however, the quality of supervision is crucial when there is a strong focus on the supervisor as both the training provider and primary assessor in the internship. We believe (as does the Australian Psychology Accreditation Council) that;

“the quality of the training provided by supervisors relies on each individual supervisor’s suitability, skills, diligence, and on the nature of the training opportunities and work environment(s) available to the trainee and supervisor, without involving any direct independent external scrutiny of the quality of supervision and other training undertaken. This arrangement leaves open the possibility that there is a high degree of variability in the quality of the supervision and training received, as well as in the level and breadth of competency candidates attain, despite the requirements and reporting measures set down by the PBA for this training.

An additional problem with any system which relies so heavily on a primary supervisor as both mentor and competency assessor is the conflict between these roles.”

(May, 2011, APAC Submission to the Psychology Board of Australia, p. 3).

Thus the preferred option is for the 4+2 internship program to be phased out as a pathway to registration, and for all provisional psychologists to be enrolled in an accredited post graduate psychology training program. However, we recognise that the Board does not intend to amend the minimum standard of education for provisional registration at this stage of the consultation process, and are thus pleased to be able to comment on the proposed amendments with the above caveat applied.

Due to these concerns we believe that the National Psychology Exam is essential to monitoring the quality of the psychologist's knowledge, skills and practice before full registration is achieved.

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

The proposal of the Board to simplify the testing requirements for the 4+2 internship by removing detail of assessment and measurement requirements and elective tests from the guideline and instead referring interns and supervisors to the exam curriculum to ensure that knowledge and practical experience in all the areas covered in the exam are incorporated into the internship program plan needs to be modified. These skills and competencies need to be applied *within the context of the presenting problem of the client* rather than simply to meet the examination criteria.

Psychological practice and work roles

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

We support the removal of the limited work role policy and the substitution of the Psychological practice guidelines section 3. However, we note that removing the 770 hours minimum client contact in each lifespan stage is likely to limit competence and understanding of the developmental influences and trajectory, and stage of life challenges impacting mental health, and hence places the public at risk unless there is a definite plan that contributes to achievement of the (lifespan) competency. Some significant client contact in different lifespan stages would remain necessary to achieve the competency, demonstrate this achievement to the supervisor, and to pass the exam. As stated previously, with limited exposure to each lifespan stage, it may be preferable to limit the practice of those registering under the unaccredited pathway to specific selected areas of lifespan practice, and not require competencies across the lifespan.

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

The information provided is clear and concise.

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?

As long as the limits of simulated client contact is noted and recorded as such.

12. Should skills acquisition activities be mandatory?

Skills acquisition activities undertaken prior to real client contact is essential and should be remain mandatory. However, this does not require a specified time period for these activities; it requires a set of competencies to be demonstrated and assessed. Simulated client contact could be used to upskill in areas of need. This would provide protection of the public by ensuring a uniform level of competence before the provisional psychologist begins seeing clients.

Supervision

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

Increasing the amount of supervision that can be provided by a secondary supervisor to 50% allows for more than one supervisor to assess competencies, and provides diversity in supervisor approach and different skill sets and expertise. This is advantageous only as long as both the principle and secondary supervisor are Board approved supervisors.

We agree that flexibility in how and when competence is demonstrated is useful, especially for interns working in rural and remote settings. Some realistic simulated learning may be possible, but we question how the quality of this will be ensured. Similarly, we recommend clearer guidelines for how competencies will be demonstrated and assessed via distance communication.

While we agree that more variation in intensity of supervision frequency best meets the needs of interns, we strongly recommend that some limit/guidelines on the period between supervision sessions be set to protect the public from interns who are not proactive in seeking regular supervision from busy supervisors.

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?

While we support the use of video conferencing for supervision, we do not support the use of Skype as the platform is not secure and confidential. We also recommend that at least two personal meetings between the supervisor and intern are essential at the beginning of the first and second years of supervision and should be mandatory. We also question why is the Board allowing 40 hours of telephone supervision when face to face videoconferencing is so freely available and telephone supervision is less effective? Telephone supervision should only be used in exceptional circumstances.

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?
- a. Retain the four subject areas that are currently required (assessment and diagnosis; psychological intervention; ethics; and psychopathology), or
 - b. 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.

We strongly prefer Option B – which will align the applicant more closely with the content of accredited fourth year programs of study. The past ten years in Australia have seen an enormous amount of change in the profession and standards have been raised. We hope the next ten years will aspire to ongoing change in increasing standards to international requirements to enable international mobility for Australian psychologists, 70% of whom would currently not be considered adequately trained to practise in any other comparable English speaking jurisdiction.

The recent changes to standards make it essential that any person wishing to return to practise after a lengthy period of absence from the profession is sufficiently skilled to meet current requirements and standards. The mix of attrition of knowledge and skills and the advances in the field, suggest that those returning after a lengthy period without meeting current requirements may pose potential risk to the public.

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

Where an applicant for provisional registration has been working in the field without registration, for example in a research or teaching capacity, a skills and knowledge assessment could be applied to identify areas of required development.

General questions

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

We consider the proposed revisions generally do achieve the purposes for which they are proposed, with consideration of the points above.

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

While the ability to work competently in a cross cultural context is important it is also important to be able to work competently in a socially diverse context and this should be part of the provisional registration standard.

Two part internship

The aims and desired outcomes for the 4+2, 5+1, 6+2, and 7+1 programs need to be mapped strategically to ensure that differentiation of skills and competencies are clearly identified for each level of training. These pathways are **not** equivalent. The content and competencies contained in an accredited two year Master's or three year professional Doctoral degree cannot be reliably obtained via a two year supervision program, or a one year Master's degree plus a one year supervision program. To assume that outcomes for all levels of training are identical is a nonsense that leads directly to a lack of recognition of the value of accredited qualifications in psychology for professional practice.

It would **not** be expected that both the 4+2 pathway and 5+1 pathway provisional psychologists should enter the sixth year internship with a comparable level of skill, knowledge, and progress towards achieving the eight core competencies at the same level of expertise. While in the first year the 4+2 intern has primarily been undertaking a supervision program the 5+1 candidate has been undertaking a concentrated period of accredited learning with some minimal supervised practice.

In a comparison of those undertaking a 4+2 supervision pathway to registration and those undertaking an accredited professional post-graduate training in clinical psychology, O'Donovan, Bain and Dyck found that after one year of training post-graduate trainees, at this point, 'demonstrate greater clinical competence as a consequence of training' and that accredited training 'impacts on the trainee's level of knowledge and practice ability' (2005, p. 109). There was no notable difference between the two groups on the relationship skills of trainees, despite the relative lack of supervised practice undertaken at this point in the accredited Master's training program. This study also found that skills levels declined in the group not undertaking accredited training over their one year of supervised practice.

It would be expected that at the completion of the entire 4+2 supervision pathway the provisionally registered psychologist would meet the identified competencies at a basic level and be competent to practice, but they would not be at the same level of competent as a graduate from an accredited program of training. These pathways are not equivalent, nor can they be aligned in the manner proposed.

While setting the minimum standard for registration at six years of accredited training is admirable, and the general registration standard is incorporated into this standard, the additional two years of accredited professional training, or three years of professional Doctoral training, are not equivalent, and cannot be made equivalent to an unaccredited two year supervision program. This approach diminishes the value and outcomes of accredited professional training, whatever the framework of learning provided in the unaccredited program.

It is recommended that the training acquired in a 4+2 and the first six months of a post-graduate degree for the 5+1, 6+2 and 7+1 programs would need to meet 'foundational competencies and skills', although these terms need to be adequately defined. Currently students in a post-graduate clinical psychology program are not permitted to assess, diagnose, formulate, and treat clients in their first placement without meeting fundamental competencies in ethical, legal, professional and clinical practice.

The homogenisation of psychology by promotion of the belief that all pathways lead to the same outcomes has undermined the value of accredited professional training in psychology, and reduced the drive for Australia to meet international standards of training. No other equivalent jurisdiction accepts unaccredited pathways to registration or licensure. The claim that all pathways are equal undermines the value of accredited training programs and severely restricts the public's capacity to make informed decisions.

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

Nothing further is identified.

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

Unaccredited internship programs of training need to be phased out, however until this occurs a specific framework in the registration standard is essential to strengthen the requirements of the program, because a registration standard is a legal document and the protection of the public will be enhanced by this addition.

The differentiation of coursework-only Master's degrees and 'extended' Master's degrees that incorporate additional coursework, placements and further research demands, under the new Australian Qualifications Framework (AQF) for Level 9 degrees, is extremely problematic, as the Board has identified. Referring to 5th and 6th years of higher degree study diminishes the value of accredited degrees and recognition by the public of known qualifications.

The AQF revised standards have undermined the quality of the profession in terms of meeting international standards. Three year professional Doctoral programs across the country have closed. The University of Sydney, for example, has been required to revert to a Master's and Master's/PhD program after 14 years of offering only an internationally recognised professional Doctoral degree. The amount of professional training in a Master's/PhD is a year less than a professional Doctorate and reduces standards further in a country that is already renowned for holding the lowest standards of registration in the developed world.

We request that the Board make submission to the in the Tertiary Education Quality and Standards Agency (TEQSA) in the next review of the AQF framework in order to comment on the requirements for Level 10 Doctoral degrees so that educational institutions may be able to offer professional doctorate programs that do not require a research component at the Doctor of Philosophy level. This would enable educational institutions to reinstate programs that were meeting international standards under the previous AQF framework.

Failing this, we recommend that the Board consider making clear the differentiation of training pathways by submitting to TEQSA to allow those completing extended Master degrees be granted the capacity to use the title Doctor, as occurs for other professions.

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?

Yes the guideline is clear, concise and user friendly.

18. 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)?

The draft guidelines are clear and concise and support Appendix D.

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

The proposed log book Attachment E provides an adequate level of detail.

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

The Case report submission should be combined with the new case report submission checklist.

21. 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?

The forms provided are sufficient for purpose.

22. What are your preferred formats for forms? Forms may in 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).

Interactive PDF is preferable.

23. 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?

None have been identified.

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

The 4+2 pathway appears to be attempting to provide a Master's level of education via an unaccredited pathway. While competency in legal, ethical, and professional practice is essential for any individual practising in the role of a psychologist the spread and depth of clinical development is limited in this program. We recommend considering the option for 4+2 interns to limit their practice to specific areas and learn these in greater depth, rather than be required to develop competencies across the lifespan.

ACPA thanks the PsyBA for its ongoing rigorous efforts to develop and maintain sound standards of practice for psychologists. The work of the Board is very much appreciated and brings credibility to the profession and safety and protections to the public.

Reference:

O'Donovan, A., Bain, J. D. & Dyck, M.J. (2005). Does clinical psychology education enhance the clinical competence of practitioners? *Professional Psychology Research and Practice*, 36, 104 – 111.