



Public consultation paper

7 August 2015

Consultation paper 25:

Consultation on ending the higher degree exemption from sitting the National Psychology Examination

Public consultation

The Psychology Board of Australia (the Board) is releasing the attached public consultation paper on ending the higher degree exemption from sitting the National Psychology Examination.

You are invited to provide your comments on the documents in this consultation paper, including responses to any of the questions in the discussion paper, by **Friday 2 October 2015**. Please provide your submission in a Word document or equivalent¹ by email to psychconsultation@ahpra.gov.au.

How your submission will be treated

Submissions received are generally published on the Board website under [Past consultations](#) after the consultation closes.

The views expressed in the submissions are those of the individuals or organisations who submit them and their publication does not imply any acceptance of, or agreement with, these views by the Board.

The Board publishes submissions on its website to encourage discussion and inform the community and stakeholders. However, the Board retains the right not to publish submissions at its discretion and will not place on the website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the consultation.

Before publication, the Board may remove personally-identifying information from submissions, such as contact details. The Board will also publish submissions anonymously if requested by the respondent, in which case all identifying information, including name and organisation, will be removed before publication.

The Board also accepts submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence. Please let the Board know if you do not want your submission published, or want all or part of it treated as confidential.

For more information about the consultation process please refer to the document *Consultation process of National Boards* available at www.ahpra.gov.au/Publications/Procedures.aspx.

¹ You are welcome to supply a PDF file of your feedback in addition to the Word (or equivalent) file, however we request that you do supply a text or word file. As part of an effort to meet international website accessibility guidelines, AHPRA and National Boards are striving to publish documents in accessible formats (such as Word), in addition to PDFs. More information about this is available at www.ahpra.gov.au/About-AHPRA/Accessibility.aspx.

The Board does not provide individual responses to submissions. Individuals and organisations seeking a personal reply to specific policy or operational questions raised by this consultation paper are invited to write a separate letter to the Chair of the Board at psychologychair@ahpra.gov.au.

Individuals and organisations seeking advice on making a submission to this consultation, such as advice about the format and submission deadline, should send their queries to psychconsultation@ahpra.gov.au. This inbox will be monitored regularly while the public consultation is open.

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Overview of consultation

Summary

1. The Psychology Board of Australia (the Board) is inviting comments on ending the higher degree exemption from sitting the National Psychology Examination.
2. This paper provides an overview of current arrangements, outlines options after the current exemption expires in June 2016, and explains the Board's position about not extending the higher degree exemption after it expires.

Purpose of the proposal

3. The National Psychology Examination marks an important contribution to ensuring a consistent professional standard of psychologists nationally.
4. The Board has applied an exemption from sitting the examination to graduates via the higher degree training pathway (those who have completed an accredited six-year or above professional Masters, Doctorate, or combined Masters/PhD qualification that leads to an area of practice endorsement). Recent reforms in the higher education sector however are leading to greater differentiation between institutions in the types and format and specialised focus of their programs. The Board is of the view that this diversity is perpetuating an additional risk to the regulation of psychologists from this training pathway.
5. While the Board acknowledges that accreditation is an important quality assurance mechanism for accredited programs, the introduction of the exam for the higher degree training pathway will address any issues about the comparability of programs and diversity of graduates that may emerge in the current evolving higher education landscape. Whilst accreditation assures quality of programs, it is constrained in its ability to regulate or oversee individuals within those programs. The examination will assure all graduates meet the national standard.
6. Further, the Board believes this regulatory intervention will establish a comprehensive and integrated suite of quality control mechanisms to assess competence, ensure the minimum standard for general registration is demonstrated by all, and continue to strengthen public protection. The proposal would maintain the current entry to general registration requirements for overseas applicants and internship pathway applicants (4+2 and 5+1).
7. There are several pathways for provisional psychologists to gain general registration as a psychologist – the internship pathway (the 4+2 or 5+1 internship) and the higher degree pathway (a Masters/Doctorate in professional psychology). Currently, only those registrants who are undertaking the internship pathway are required to sit the national psychology exam. The Board believes that it is particularly inequitable to have some Australian-trained provisional psychologists required to demonstrate competence through sitting the exam and others who do not. A single national standard met by all applicants is the fairest and most consistent approach.
8. Should the Board's proposal be supported, transition provisions for registrants applying for general registration via the higher degree pathway would be developed. The Board has detailed three options for transition with its preference for higher degree students to sit the national psychology exam if they apply for general registration on or after 1 July 2017.
9. At this stage, the Board anticipates a minimal impact on practitioners from the proposal and expects all suitably prepared applicants for registration to be able to pass the exam. At \$450, the cost of sitting the exam is low in comparison to other health profession examinations in Australia (see Appendix D), and the exam is expected to be self-funding so as not to increase registration fees.

Overview of current arrangements

10. The Health Practitioner Regulation National Law, as in force in each state and territory (the National Law), requires National Boards to develop registration standards, which may include registration standards about issues relevant to the eligibility of individuals for registration in the profession.

11. The requirements for registration in the psychology profession are detailed in the *General registration standard*². The *General registration standard* was developed by the Psychology Board of Australia and approved by the Australian Health Workforce Ministerial Council (the Ministerial Council) on 31 March 2010 with approval taking effect from 1 July 2010.
12. The Board has determined that the qualifications that lead to general registration are:
- a six-year accredited sequence of study (such as an accredited Masters degree), or
 - a five-year accredited sequence of study followed by a one-year Board-approved internship (5+1), or
 - a four-year accredited sequence of study followed by a two-year Board-approved internship (4+2), or
 - a qualification that in the Board's opinion is substantially equivalent to either (a), (b) or (c).

In addition to the completion of an approved qualification, the Board may require the passing of an examination prior to accepting an application for general registration.

13. The *Guidelines for the national psychology examination* (the guidelines)³ were published in October 2013⁴. The guidelines outline the groups of people that are required to pass the examination before applying for general registration as a psychologist:
- provisionally registered psychologists undertaking a five-year accredited sequence of study followed by a one-year Board-approved internship (5+1)
 - provisionally registered psychologists undertaking a four-year accredited sequence of study followed by a two-year Board-approved internship (4+2)
 - individuals intending to return to practise as a psychologist who have not practised for more than 10 years, and
 - overseas-trained psychologists seeking general registration in Australia.

Additionally, passing the exam is required for individuals who are directed to sit it by the Board, or by a panel or tribunal, in relation to an application for registration under Part 7 of the National Law or a notification about their health, performance or conduct under Part 8 of the National Law.

14. Applicants from New Zealand applying under the [Trans-Tasman Mutual Recognition](#) arrangements are exempt from sitting the examination.
15. The Board has applied an additional exemption from sitting the examination to graduates who apply for general registration before 30 June 2016 with:
- an accredited six-year professional Masters
 - Doctorate, or
 - combined Masters/PhD qualification that leads to an area of practice endorsement.
16. The guidelines state that this exemption reflects the Board's view that the internal examination and assessment processes in these accredited degree programs currently meet the Board's standards for general registration.

In keeping with good regulatory practice, the Board has stated that it will review this exemption before 2016 and will consult widely with the profession and the community.

² The *General registration standard* is available on the Board's website at: <http://www.psychologyboard.gov.au/Standards-and-Guidelines.aspx>.

³ The *Guidelines for the national psychology examination* are available on the Board's website at: www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx

⁴ The *Guidelines for the national psychology examination* were published in October 2013 after three public consultations: Consultation #9 on the *Guidelines for the national psychology examination* (April 2011); Consultation #13 on the examination curriculum (November 2011), and Consultation #18 on the *Guidelines for the national psychology examination* (April 2013).

Options statement – ending the higher degree exemption from sitting the National Psychology Examination

17. The Board has considered two options in developing this proposal.

Option one – Status quo

18. Option one would continue with the existing higher degree exemption from sitting the national psychology exam for another three years.

Option two – Proposed revised guideline

19. Option two would involve the Board ending the higher degree exemption from sitting the national psychology exam and updating the relevant policy statements that appear in the guidelines.

20. The key reasons for ending the proposal include:

- establishing a comprehensive and integrated suite of quality control mechanisms
- providing for the protection of the public by ensuring that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered
- ensuring that the minimum standards for general registration in psychology are being demonstrated by all
- facilitating the provision of high quality education and training of health practitioners, and
- enabling the continuous development of a flexible, responsive and sustainable psychology workforce that meets the needs of the Australian public.

21. Option two would require developing transition arrangements for ending the higher degree exemption. The Board has proposed three options for transition arrangements. Higher degree students would be required to sit the national psychology exam if they:

- a) apply for general registration on or after 1 July 2016
- b) apply for general registration on or after 1 July 2017, or
- c) enrol in any higher degree program after 1 July 2016.

Preferred option

22. The Board prefers option two.

23. The Board recommends option b) as the preferred transition arrangement.

Discussion of preferred option

24. A number of matters are discussed below that the Board would particularly like to highlight with regard to ending the higher degree exemption from sitting the national psychology exam and amending the guidelines.

National Psychology Examination – an important contribution to ensuring a consistent professional standard of psychologists

25. The National Psychology Examination marks an important contribution to ensuring a consistent professional standard of psychologists nationally. The examination assesses applied psychological knowledge which forms a significant basis of competence in the profession. The exam is a case study based exam with considerable emphasis on ethical knowledge and behaviour, and the integration of knowledge and skills. It is a complementary method of assessment to supervised practice in assessing the competencies required of psychologists for general registration.

26. The examination supports the Board's *General registration standard* which provides that, in addition to successfully completing an approved qualification, applicants for general registration as a psychologist in Australia are required to pass the National Psychology Examination before the Board will accept their application for general registration.

27. As detailed in the guidelines, the Board applied an exemption from sitting the examination to graduates who apply for general registration before 30 June 2016 who have completed an accredited six-year professional Masters, Doctorate, or combined Masters/PhD qualification that leads to an area of practice endorsement.
28. At that point in time, this exemption reflected the Board's view that the internal examination and assessment processes in these accredited degree programs met the Board's standards for general registration. This exemption allowed the Board to develop and trial the national psychology exam with manageable numbers of registrants at the early stages of the National Registration and Accreditation Scheme (the National Scheme). Between December 2013 and December 2014, 247 candidates sat the National Psychology Examination with a total of 260 sittings (including failed and repeated sittings). Three types of provisional psychologist sat the exam – those completing their 4+2 program, those completing a 5+1 program, and international applicants completing a transitional program. The overall pass rate for the National Psychology Examination over the first year was 88 per cent, meaning 217 out of 247 people sitting the exam passed. The overall pass rate for the practice exam was slightly lower at 84 per cent. The national psychology exam is found to be an effective regulatory instrument used by the Board in determining readiness to move from provisional to general registration and independent practice⁵. For further details an early report on the performance of the exam can be found in the [Board's Newsletter – Connections Issue #13 \(April 2015\)](#).

A growing regulatory risk – the diversity of outcomes from the higher degree pathway

29. Recent reforms in the higher education sector are leading to greater differentiation between institutions in the types and format of their programs. Some universities and private educational providers are investing heavily in online and distance teaching, some are concentrating effort in smaller face-to-face classes of high quality, while others are focusing on postgraduate and research outcomes.
30. Reforms in accreditation processes of universities and private educational providers, and of the health professions, increasingly emphasise the demonstration of competency. This has allowed a more flexible and differentiated structure of program types and styles of teaching.
31. In addition to these reforms there are nine areas of practice endorsement for the psychology profession in Australia. The Australian Psychology Accreditation Council (APAC) accredits higher degree programs in each of these areas, leading to further diversity in the training provided by universities and private educational providers⁶. Pathways between general registration and advanced areas leading to area of practice endorsement are mixed - meaning both are done simultaneously. Provisional psychologists in Masters Degrees typically are taught to the standard of the area of practice endorsement. This can create tensions in ensuring the broad competencies required of all psychologists for general registration are met, along with the narrower specialist skills in the area of practice.
32. The Board is of the view that this complexity and diversity in outcome is perpetuating an additional risk to the regulation of psychology in assuring a single minimum standard of competency of professional psychologists.
33. The Board considers education and training reform an important next step in the development of the regulatory environment for the psychology profession.
34. The Board is currently working with the Australian Psychology Accreditation Council (APAC), the Heads of Departments and Schools of Psychology Association (HODSPA), and the Australian Psychology Society (APS) on the future of the psychology education and training model. This work intersects with the regulatory environment in significant ways. For example, unlike in other health professions, there are: a) several pathways to registration for psychology, and b) the qualification for general registration and the qualification for area of practice endorsement are the same, rather than separate qualifications. For reform work to be able to be carried out, the Board is of the view that additional safeguards need to be put in place, such as requiring all applicants for general registration to pass the National Psychology Examination.

⁵ The exam supports that most provisional psychologists completing their sixth year of training possess the applied knowledge and skills required to pass the examination and practice independently. However, a small proportion of these candidates were found to not yet be ready for independent practice, and poor performance at the practice examination may be an early indicator that additional preparation was required.

⁶ Note: the qualification for general registration and the qualification area of practice endorsement for psychology are typically the same (rather than a different) qualification.

Accreditation – an important quality assurance mechanism

35. The Board regards accreditation as an important quality assurance. Accreditation is a form of program evaluation in which the quality of an education program is judged against defined accreditation standards through a combination of self-assessment and external peer review. Accreditation of programs ensures that the education and training leading to registration as a health practitioner is rigorous and prepares the graduates to practise a health profession safely.
36. The Australian Psychology Accreditation Council (APAC) is the accreditation authority responsible for accrediting education providers and programs of study for the psychology profession. For psychology this means the assessment of more than 500 psychology programs and the ongoing monitoring of these programs to ensure they continue to meet the approved accreditation standard for the psychology profession.
37. Accreditation does not however assure competence to practice as a registered psychologist for individual graduates from those programs. APAC's role is to accredit institutions and the Board's role is to register individuals – it is possible that an individual may pass an approved program of study but not be an appropriately qualified candidate for registration. The National Psychology Examination is a competency-based assessment of the integration of knowledge and skills in psychology and passing the exam assists the Board in being confident of a person's ability to practise safely.
38. The international experience from other regulatory bodies⁷ indicates that university training, even doctoral training, does not assure the minimum competence to pass an examination for registration and to keep the public safe.
39. The National Psychology Examination is currently being developed and administered by the Board. This is because APAC is not responsible for the unaccredited pathways of the 4+2 or the +1 of the 5+1. The Board is aware that for a number of the other health professions regulated under the National Scheme there is reliance on their accreditation authorities to administer exams (see Appendix D). The Board is open to future discussions with APAC about including a national psychology exam as an accreditation standard and function.

Removing the exemption for the higher degree pathway

40. The Board believes that in the context of this expanding diversity of higher education outcomes that removing the exemption for the higher degree pathway would address any issues about the comparability of programs and diversity of graduates that may emerge in the current evolving higher education landscape.
41. This regulatory intervention would assist the Board to:
Establish a comprehensive and integrated suite of quality control mechanisms to assess competence
42. The Board regards psychology to be a complex and diverse discipline and profession. Psychologists perform a number of tasks on the public that require both knowledge and skill. The development of competence is a dynamic and developing process that requires both summative and normative assessment throughout the lifelong learning process.
43. The Board supports multiple methods of assessment of provisional psychologists' competence in both the accredited (higher degree) and non-accredited (internship) pathways to general registration in order to ensure competence in the diverse tasks required of psychologists. Assessments of competence may include exams, case reports, reports from supervisors, direct observation, role plays and conducting psychological assessments, to name a few. The national psychology exam is one measure of competence among other assessments necessary to assist the Board in ensuring an adequate assessment of the minimum standard of practice expected of general psychologists is achieved.
44. The aim of the National Psychology Examination is to provide the Board with one standardised method of assurance that the exam candidate demonstrates many core foundational competencies necessary to safely practise as a general psychologist. These foundational competencies include the knowledge, skills, attitudes and values which underlie the function of psychologists.

⁷ Such as in North America where there has been an exam for registration/licensure for psychology in operation since 1965.

Ensure the minimum standard is demonstrated by all

45. Currently, the groups required to sit the exam to gain initial registration as a general psychologist include overseas-trained psychologists and Australian-trained psychologists undertaking the internship pathway to general registration (the 4+2 and 5+1).
46. The higher degree exemption from sitting the exam could be seen to discriminate against the groups who are required to sit the exam and those who are not required to sit. The Board believes that it is particularly inequitable to have some Australian-trained provisional psychologists required to demonstrate competence through sitting the exam and others who do not.
47. The Board has no evidence or grounds to support the view that applicants for general registration who have a higher degree should not also demonstrate the minimum standard for registration through sitting the exam.
48. The Board recognises that close oversight by the Board of interns in the fifth and sixth year of a higher degree is less necessary in accredited (higher degree) versus unaccredited pathways (internship pathway) to registration. However, the outcomes of both pathways should be to produce safe and competent practitioners as demonstrated by passing the examination.

Strengthen public protection

49. The Board's role is to protect the public by ensuring that any psychologist holding general registration possesses a general skill set in applied psychology that allows independent psychology practice across a wide range of workplaces.
50. Psychology is unique in terms of complexity, scale and size. Psychology is the third largest health profession in Australia after Nursing and Midwifery and Medicine. Psychological practice is by its nature high risk, since treatment often involves mental health issues with vulnerable people undertaking psychological interventions to treat serious disorders or with potential for harm, and treatment commonly occurs without others present. Issues of isolation, burnout and boundary (sexual or non-sexual) violations are significant sources of harm and risk for psychologists. Accordingly, the psychology risk profile⁸ has recently been assessed as 3.5/5, along with the dental and pharmacy professions. Table 1 shows the comparative numbers of notifications for the five higher risk and therefore higher regulatory workload professions.

Table 1: Higher regulatory workload professions (2012–13) including NSW data

Profession	Registrants	Proportion of total registrants	Notifications	Proportion of total notifications	Notifications per '000 practitioners
Medical	95,690	16.2%	4,709	54.5%	49.2
Nursing and Midwifery	345,955	58.4%	1,598	18.5%	4.6
Psychology	30,561	5.2%	471	5.4%	15.4
Pharmacy	27,339	4.6%	429	5.0%	15.7
Dentistry	19,912	3.4%	1,052	12.2%	52.8
Totals	519,457	87.7%	8,259	95.8%	

Source: Review of the National Registration and Accreditation Scheme for health professions, Consultation paper August 2014.

⁸ Risk profile taken from Deloitte analysis 2013

51. The Board deals with the outcomes of poor practice when members of the public or others make complaints and notify the Board. The effects of poor psychology practice can be severe, with enduring serious consequences. Psychologists receive a high number of notifications and, over the past few years, have consistently fallen in the top five health professions receiving the highest number of mandatory notifications. Indeed, a recent study, using a comprehensive methodology, reported that "Psychologists had the highest rate of notifications, followed by medical practitioners, and then nurses and midwives" (47, 41, and 40 reports per 10,000 practitioners per year, respectively) (Bismark, Spittal, Plueckhahn & Studdert, "Mandatory reports of concerns about the health, performance and conduct of health practitioners", Medical Journal of Australia, 201, 1-5, 2014). Mandatory reports are made in the most serious cases where public protection is paramount. Table 2 shows the comparative numbers of mandatory notifications by profession 2011-2014.

Table 2. Registrants involved in mandatory notifications by profession (including NSW) - 2011-2014

	2011/12	2011/12	2012/13	2012/13	2013/14	2013/14
	No. Practitioners	Rate / 10,000 practitioners	No. Practitioners	Rate / 10,000 practitioners	No. Practitioners	Rate / 10,000 practitioners
Nurse/Midwife	421	12.2	543	15.7	552	15.2
Medical practitioner	204	22.3	277	28.9	270	27.2
Psychologist	42	14.2	56	18.3	42	13.2
Pharmacist	30	11.3	35	12.8	48	17.0
Dental practitioner	11	5.8	16	8.0	22	10.6
Physiotherapist	12	5.1	7	2.8	13	5.0
Occupational therapist			4	2.6	9	5.5
Medical radiation practitioner			7	5.0	8	5.6
Chiropractor	4	9	3	6.4	6	12.4
Podiatrist	4	10.8			4	9.7
Optometrist	2	4.4			2	4.2
Chinese medicine practitioner			2	4.9		
Osteopath	2	11.9	1	5.7		
Total	732.0	13.3	951	16.1	976	15.8

Source: AHPRA 2013-2014 Annual report: Table N19: Registrants involved in mandatory notifications by profession (including NSW)

52. The Board is of the view that the introduction of the National Psychology Examination would assist in ensuring that entry level psychologists have demonstrated to the Board the minimum professional standard to keep the public safe. The Board considers that a one-off three and a half hour competency exam (and any associated travel costs) for all practitioners for general registration is not an especially onerous task for practitioners to undertake to more effectively protect the public.

Transition requirements

53. Should option two (ending the higher degree exemption from sitting the National Psychology Examination) be supported, the Board would develop transition provisions for registrants applying for general registration via the higher degree pathway.

54. The Board has considered three options for transition, as follows:

Option a) higher degree students would be required to sit the National Psychology Examination if they apply for general registration on or after [1 July 2016](#)

55. This would mean that currently enrolled higher degree students would need to sit the exam. In this option the transition period is effectively a three-year time period from October 2013 (the publication of the guidelines) until 1 July 2016.

Option b) higher degree students would be required to sit the National Psychology Examination if they apply for general registration on or after [1 July 2017](#)

56. The exemption to sit the exam would be extended for one year. This would allow for a longer transition time to consult with the public and the profession adequately on the end of the exemption. It would allow people who were enrolled in a higher degree prior to the publication of the guidelines one extra year to complete their degree and apply for general registration or early general registration (for doctoral student or students undertaking a combined degree)⁹.
57. In this option the transition period is effectively a four-year time period from October 2013 (the publication of the guidelines) until 1 July 2017.
58. This option also allows sufficient time for the Australian Health Practitioner Regulation Agency (AHPRA) to transition processes to accommodate the additional numbers required to sit the National Psychology Examination and to ensure sufficient testing centres can be provided across Australia by the Board's external testing facility provider.
59. This extension mirrors that provided to 4+2 and 5+1 interns, who were required to sit from 1 July 2013 but given a further year's extension to 1 July 2014.

Option c) higher degree students would be required to sit the National Psychology Examination if they enrol in any higher degree program after 1 July 2016.

60. This means that any student who can demonstrate they were enrolled in a higher degree program on or before 30 June 2016 would not need to sit the exam when they graduate and apply for general registration.
61. In this option the transition period is effectively a five-year time period from October 2013 (the publication of the guidelines) until 1 July 2018 when graduates from a Masters program could be expected (at the earliest) to apply for general registration.
62. The Board's preferred transition option is b). This option has the following advantages:
 - there is a timely transition for ending the higher degree exemption. The five-year transition for option c) is considered too long
 - there is a timely transition for requiring the minimum standard be required by all provisional psychologists, and
 - this option allows more time than option a) to transition and operationalise processes to accommodate the additional numbers sitting the exam.

Considerations for decision-making

63. In coming to the position of supporting option two (with transition option b), the Board considered the revised draft guidelines (at Appendix A) and agreed that they meet the objectives and guiding principles of the National Law (section 3) and the National Scheme's regulatory principles:
 - a) *to provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered*
64. The revised draft guidelines, if approved, will provide for the protection of the public by ensuring that all practitioners granted general registration, regardless of their training pathway, meet a minimum standard of education and that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered as general psychologists.
 - b) *to facilitate the provision of high quality education and training of health practitioners*
65. Increasingly, 'output' oriented competency-based training and regulation is replacing older 'input' defined curricula that had required the more passive incorporation and testing of defined knowledge. The approach and design of the National Psychology Examination reflects this trend towards competency-based certification. The examination tests psychological reasoning applied to case studies, where selection of the correct answer requires judgement acquired through training. It does not test the recall of facts. Recent reforms in the higher education sector are leading to greater differentiation between institutions in the types and format of their programs. Requiring applicants for general registration via the higher degree pathway to demonstrate competence through sitting a national psychology exam will ensure that education providers

⁹ See the *Policy for higher degree students applying for general registration* at: www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx.

will include these competencies as part of their training because of the obligations they have towards their students and the accrediting authority. Having the examination externally assessed by the regulatory board provides the appropriate checks and balances in a high-stakes environment determining entry to a regulated profession.

c) *to enable the continuous development of a flexible, responsive and sustainable Australian health force*

66. There is already a great number and variety of pathways to become a psychologist. With reforms to higher education, even greater differentiation will manifest itself. The Board supports such diversity. However, the challenge is to ensure within this diversity that core minimum standards are met. Including applicants for general registration via the higher degree pathway as one of the groups required to sit the exam, will enable education providers in psychology to develop a more flexible and differentiated structure of program types and styles of teaching. This encourages a sustainable psychology workforce that meets the needs of the Australian public.

d) *Using the minimum regulatory force to manage the risk posed by their practice, to protect the public*

67. A one-time competency-based exam is considered by the Board to be using the minimum regulatory force to manage some of the risk posed by registrants' practice to protect the public.

Potential benefits and costs of ending the higher degree exemption from sitting the National Psychology Examination

68. The benefits of the preferred option to end the higher degree exemption from sitting the exam include the following:

- a minimum standard of competence to be demonstrated by all applicants for general registration through passing the National Psychology Examination
- increased confidence in the competence of all practitioners to meet a minimum professional standard to keep the public safe, and
- allowing for the development of a more diverse offering of training by education providers and more flexible accreditation standards.

69. The costs of the preferred option are:

- costs to applicants of the exam
- if the exam is not fully cost recovered, costs to other registrants
- adding more regulation to the higher degree pathway
- applicants for general registration through the higher degree pathway, higher education providers, other stakeholders, AHPRA, and the national and regional psychology boards will need to become familiar with the new policy, and
- there may need to be a period of transition to the requirement for higher degree students to sit the exam should option two be approved.

Estimated impacts on ending the higher degree exemption from sitting the National Psychology Examination

70. The changes proposed in the draft revised *Guidelines for the national psychology exam* (the guidelines) are relatively small.

71. At this stage of the process, the Board anticipates minimal impact on practitioners from the revised guidelines. The exam assesses general competencies for registration that should reinforce already existing learning via the higher degree pathway. The National Psychology Examination is not designed to be tricky, or excessively onerous to prepare.

72. The registration standard that allows the Board to require registrants to pass an examination for general registration has been in force since 1 July 2010, but a six-year transition period for registrants in the higher degree pathway, until 1 July 2016, has been applied to date. Pending approval of the Board's proposal, this transition would be extended for a further year. This period of grace will allow an additional one-year period before the exam becomes a requirement for registration for applicants via the higher degree pathway. This additional year will allow registrants a further year to prepare for the examination.

73. The proposal is not expected to impact on the current levels of competition among health practitioners nor result in an unnecessary restriction of practice. There is little impact anticipated on practitioners already holding general registration or on business or other stakeholders arising from the changes proposed.
74. There is not expected to be any adverse impact for consumers of health services, or government or other regulators. This proposal is considered a relatively minor change as it does not substantially alter the existing regulatory arrangements for registrants. The Board considers that the proposed revised guidelines will support consumer choice, by establishing clear requirements for the qualifications and training arrangements that all practitioners must meet to enter the profession. The Board considered the overall costs of the draft revised guidelines to members of the public, registrants and governments and concluded that the likely costs are appropriate when offset against the benefits that the revised draft guideline contributes to the National Scheme.
75. Subject to stakeholder feedback on the proposed revisions, the revised draft guideline should have a relatively small impact on the costs to applicants via the higher degree pathway. While the Board acknowledges that the exam is an additional hurdle for registrants, and there is an additional cost, the Board is of the view that the one-off three-and-a-half-hour competency exam is a necessary addition to ensure the public is protected.
76. The cost of sitting the exam¹⁰ has been set as low as possible to allow candidates from all parts of the country to attend a testing centre. This low cost has been achieved with the Board choosing a test centre administration provider that is price-competitive. The exam is expected to be self-funding so as not to increase registration fees. The exam has been in operation from July 2013 for other categories of applicants for general registration demonstrating cost-effectiveness and a self-funding approach.
77. There will be an impact on AHPRA in managing the increased numbers of registrants sitting the exam via the external exam provider. The Board and AHPRA have agreed mechanisms in place to manage any increase in the numbers of exam candidates.

Groups that are not affected by the proposal to end the higher degree exemption from sitting the National Psychology Examination

There are several groups of registrants that will not be affected by the proposal to end the higher degree exemption from sitting the National Psychology Examination. These include the following:

- a) Provisional psychologists working towards general registration via the internship pathway (the 4+2 or 5+1) are already required to pass the National Psychology Examination (among other requirements) before applying for general registration. This proposal does not alter the requirements for these registrants.
- b) Applicants with qualifications in psychology gained overseas are already required to pass the National Psychology Examination (among other requirements) before applying for general registration. This proposal does not alter the requirements for these registrants.
- c) Applicants for registration with qualifications from New Zealand apply under the [Trans-Tasman Mutual Recognition](#) arrangements and will continue to be exempt from sitting the examination. The provisions of the [Trans-Tasman Mutual Recognition](#) arrangements indicates that a person registered as a psychologist in either New Zealand or Australia are eligible to apply for registration in the other/second country based on their current registration.
- d) Applicants who are applying for area of practice endorsement. The National Psychology Examination is for registrants seeking general registration. The exam assesses general knowledge at the fifth and sixth year, and does not assess specific knowledge related to an area of practice. Area of practice endorsement can only be applied to a registrant who has already held general registration for at least two years. There is no additional exam for area of practice endorsement. (See the Board's website on the registrar program for more information on the requirements for area of practice endorsement).

¹⁰ By way of comparison to another profession, pharmacy interns are required to pass a written exam at a cost of \$550 (per attempt) and pass an oral exam at a cost of \$395 (per attempt).

General questions for consideration

78. The Board invites feedback on the following questions:

1. From your perspective, are you in support of the Board ending the exemption for provisional psychologists undertaking the higher degree pathway (i.e. Masters/DPsych) from sitting the National Psychology Examination?

Please provide a rationale for your support of option one or option two as described above.

2. If option two is supported, do you have a preference regarding transition requirements (option a, b or c) for registrants via the higher degree pathway? Please provide a rationale for your support of your preferred option.
3. Is there any content that needs to be changed or deleted in the revised draft guidelines (see Appendix A) in relation to the proposal to end the higher degree exemption? (Please note that to show the text changes to the revised draft guidelines, the **new text is highlighted in yellow** and a ~~red line~~ has been put through the deleted text).
4. Do you have any other comments on the proposal?

Legislation

79. Every Board decision must be in accordance with the objectives and guiding principles of the National Scheme and all actions taken by the Board must fall within the functions assigned to National Boards under the National Law.
80. 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 the standards are not set impossibly high so as to inhibit the continuous development of the workforce to meet the demands of the public for psychological services.
81. The first consideration in every Board decision is the health and safety of the Australian public.
82. The relevant sections of the National Law are included in Appendix C for easy reference. Please take a few minutes to read them and take them into account when providing your feedback.

Appendices

Appendix A: Revised draft guidelines for the National Psychology Examination

Appendix B: Statement of assessment against AHPRA's Procedures for development of registration standards and COAG Principles for best practice regulation

Appendix C: Legislation

Appendix D: Comparison - Pharmacy Board of Australia examination requirements

Appendix A – Revised draft Guidelines for the National Psychology Examination

Please find the revised draft *Guidelines for the National Psychology Examination* below. Note that **yellow = added information** and ~~red is deleted information.~~

Guidelines for the National Psychology Examination

Month 2015

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1. Overview of the examination

These guidelines were developed by the Psychology Board of Australia (the Board) in July 2013 to assist candidates preparing for the National Psychology Examination (the examination). These approved guidelines were first published in October 2013 and are subject to regular review.

The National Psychology Examination supports the Board's [General registration standard](#).¹ The Board has determined that the qualifications that lead to general registration are:

- a) a six-year accredited sequence of study (such as an accredited Masters degree), or
- b) a five-year accredited sequence of study followed by a one-year Board-approved internship (5+1), or
- c) a four-year accredited sequence of study followed by a two-year Board-approved internship (4+2), or
- d) a qualification that in the Board's opinion is substantially equivalent to either (a), (b) or (c).

In addition to successfully completing an approved qualification, groups of psychologists (see below) must pass the examination from 1 July 2013 before applying for general registration.

Purpose of the examination

The examination makes an important contribution to ensuring a consistent professional standard of psychologists nationally. [Attachment A](#) provides a background on planning before 1 July 2013 to implement the National Psychology Examination.

An examination pass is needed to gain general registration.

The examination assesses applied psychological knowledge, which forms a significant basis of competence in the profession. The examination helps demonstrate that internship training has produced a practitioner with an appropriate level of applied professional knowledge and competence, which will more effectively protect the public.

The examination should never be used as the sole test of a practitioner's competence to practise psychology. Passing the examination is not a substitute for a period of provisional registration under supervision.

Who needs to sit the examination?

The following groups must pass the examination before applying for general registration as a psychologist:

1. provisionally registered psychologists undertaking a five-year accredited sequence of study followed by a one-year Board-approved internship (5+1)
2. provisionally registered psychologists undertaking a four-year accredited sequence of study followed by a two-year Board-approved internship (4+2)
3. provisionally registered psychologists undertaking the higher degree pathway, including an accredited Masters degree, accredited doctoral degree, or combined Masters/PhD qualification. Higher degrees are accredited by the Australian Psychology Accreditation Council (APAC) and appear in the Board's list of approved programs of study
4. individuals intending to return to practise as a psychologist who have not practised for more than 10 years, and
5. overseas-trained psychologists seeking general registration in Australia.

Additionally, passing the exam is required for individuals who are directed to sit it by the Board, or by a panel or tribunal, in relation to an application for registration under Part 7 of the Health Practitioner

Regulation National Law, as in force in each state and territory (the National Law) or a notification about their health, performance or conduct under Part 8 of the National Law.

Exemptions

~~The Board has applied an exemption from sitting the examination to graduates who apply for general registration before 30 June 2016 with:~~

- ~~• an accredited six-year professional Masters~~
- ~~• Doctorate, or~~
- ~~• combined Masters/PhD qualification~~

~~that leads to an area of practice endorsement (including those applying under provisions for Doctorate students included in the statement of assessment in form PDEC-76).~~

~~This exemption reflects the Board's view that the internal examination and assessment processes in these accredited degree programs currently meet the Board's standards for general registration. The Board will review this exemption before 2016 and will consult widely with the profession and the community.~~

Applicants from New Zealand applying under the [Trans-Tasman Mutual Recognition](#) arrangements are exempt from sitting the examination.

Start date

The requirement to sit and pass the examination applied from 1 July 2013 for the following groups:

1. provisionally registered psychologists undertaking a five-year accredited sequence of study followed by a one-year Board-approved internship (5+1)
2. provisionally registered psychologists undertaking a four-year accredited sequence of study followed by a two-year Board-approved internship (4+2)
3. individuals intending to return to practise as a psychologist who have not practised for more than 10 years
4. overseas-trained psychologists seeking general registration in Australia, and
5. individuals required to do so by the Psychology Board of Australia, panel or tribunal.

The requirement to sit and pass the examination for applicants for general registration via the higher degree pathway applies from 1 July 2017.

Transition provisions

The *General registration standard* includes the option for the Board to require the passing of an examination before accepting an application for general registration, and has been in force since 1 July 2010.

The Board applied a three-year transition period until 1 July 2013 which exempted all applicants from sitting the examination during this period.

The July 2014 transition provision

Additional transition provisions, including some exemptions, applied until July 2014. Provisionally registered psychologists who were undertaking 4+2 or 5+1 pathways to registration and individuals returning to practise after an absence of 10 years or more, who applied for general registration before 1 July 2014, were not required to sit the national examination.

Individuals in these groups who apply for general registration from 1 July 2014 are required to pass the examination before applying for general registration.

The July 2017 transition provision

The Board has applied an additional transition provision exempting applicants for general registration via the higher degree pathway from the requirement to sit the national psychology exam until 1 July 2017.

Individuals who complete a higher degree and who apply for general registration from 1 July 2017 must pass the examination before applying for general registration.

Table 1: Who needs to sit the examination and when

Applicant	When you need to sit examination	Date you need to have passed the exam to apply for general registration
Provisional psychologist in 4+2 internship	During sixth year (after 1,540 hours of supervised practice internship)	1 July 2014
Provisional psychologist in 5+1 internship	During sixth year (within approved supervised practice internship)	1 July 2014
Person returning to psychology practice after 10 years	As directed by the Psychology Board of Australia in response to application	1 July 2014
Provisional psychologist in Masters/DPsych/combined Masters/PhD	During sixth year at any time as determined by the individual registrant*	1 July 2017
Person with overseas qualifications in psychology who meet other requirements	During approved supervised practice internship (usually this is a three-month program)	1 July 2013
Person required to do so by board or panel or tribunal	As directed by authority	1 July 2013

*Note: Higher degree institutions are not party to the examination process. Sitting and passing the examination is completely independent of a university program. Registrants are required to enrol and sit their exam at their own choosing, and exam results are not communicated to universities.

2. Content of the examination

Curriculum

Candidates need to be familiar with the examination curriculum, which is published on the Board's website under *Registration > National Psychology Exam*. The 2012 edition of the curriculum was approved by the Board in March 2012 and is currently in force. It is due for review in 2015.

The examination questions are derived from the curriculum. They test candidates' applied knowledge of the areas of psychology described in the curriculum.

The responsibility to prepare and pass the examination rests with the candidate. The Board expects all suitably prepared applicants for registration to be able to pass the examination. Examination preparation should reinforce existing knowledge and learning and is not expected to require new knowledge, or to change or add to the existing training requirements.

Candidates are expected to develop a broad strategy for preparing for the examination. This preparation should include private reading and study, seeking advice and assistance from supervisors, training institutes and workshop providers, and seeking appropriate structured and unstructured learning opportunities.

The examination is designed to test applied knowledge appropriate for the fifth and, in particular, the sixth year of psychology training. The curriculum is not designed to test foundational knowledge of the discipline obtained during the first four years of psychology at university. The examination is designed to test the application of this knowledge to practise, and is therefore based on actual case studies and professional issues.

This examination does not test all the competencies of a practising, generally registered psychologist. Some of the other competencies not tested by the examination are currently assessed during the fifth and sixth years of internship training, by methods that include:

- direct observation
- case studies, and
- assessment by approved supervisors of an intern's performance while engaged in professional practice.

The examination curriculum does not relate to area of practice endorsements. Area of practice endorsement is an annotation on the Register of Psychologists for psychologists who have additional accredited training and supervised experience in one or more of the approved areas of practice. General registration is required before a psychologist can apply for admission to a registrar program leading to an area of practice endorsement. The areas of knowledge of psychologists with an area of practice endorsement would be expected to be at a greater depth in a specific area of practice than that assumed in a newly-registered psychologist.

Recommended reading

The Board has published a recommended reading list to guide candidates preparing for the examination on its website under *Registration > National Psychology Exam*. The reading list is recommended but not mandatory. The applied psychology field has extensive literature covering the curriculum domains, with many more resources that complement those in the list.

Candidates preparing for the examination should use their judgement about how to prepare, and consult their supervisor in designing a plan of study based on the curriculum. The recommended reading list is updated from time to time as new editions, other journal articles and improved monographs become available. Supervisors and examination candidates should check the Board's website regularly for updates.

Examination format

The examination is multiple choice, which is deemed suitable to test applied knowledge. The exam allows candidates to demonstrate psychological reasoning. Although the questions can rely on a factual knowledge base, the examination relies more on the application of that knowledge to actual psychological cases.

The questions are designed to test the application of psychology knowledge appropriate for candidates in the sixth year of training preparing for general registration. The examination assumes candidates have the foundation knowledge of the first four years of training (that is, in the undergraduate curriculum), but does not specifically test that knowledge.

The examination examines skills in:

- assessment approaches
- intervention selection and implementation
- communication and reporting skills, and
- applied ethical and professional reasoning.

Examination questions will be mostly in the format of:

- a vignette or scenario
- a lead-in question, and
- a set of five options, of which one is the correct answer and four are distracters.

Correct answers are determined by the National Psychology Examination Committee. The correct answer is the best, or most correct, option in the view of the examination committee.

The exam questions have been developed by senior practitioners and the best answer is their consensus view. Questions are developed to test core components of the published examination curriculum, as described in the professional and scientific literature and the recommended reading.

The Board, in conjunction with the examination committee, reviews all questions for the examination for content and validity, and analyses their statistical reliability. This provides the basis for further question development and improvement.

Duration

The duration of the examination is 3.5 hours (210 minutes).

Candidates need to allocate a total of four hours to complete registration procedures, a pre-testing phase, and post-examination administration activities.

Number of questions

There are 150 questions in the examination, all of which must be attempted.

Test questions are changed regularly so candidates who repeat the exam will get a different set of questions.

Proportion of questions testing each domain of the curriculum

The examination will comprise questions testing the four components of the curriculum:

1. ethics
2. assessment
3. intervention, and
4. communication.

As the first three components incorporate greater content, they have a greater number of questions than the fourth component. Refer to Table 2 for details.

Table 2: Number of questions testing the domains of the examination

Exam domain	Number of questions	Percentage
Ethics	45	30
Assessment	45	30
Intervention	45	30
Communication	15	10
Total questions	150	100

Pass grade

The Board has applied a scaled passing score of 70 per cent.

The scaled passing score is the Board's view of the minimum level of applied knowledge required for independent psychology practice.

As there are five options per question (a, b, c, d, or e), a candidate responding randomly is likely to achieve a score of 20 per cent based on chance alone. Therefore, a passing score of 50 per cent has been adjusted to 70 per cent (50+20). Seventy per cent is the standard passing score for many tests of this type.

Raw scores (the total number of answers that were correct) will be arithmetically converted to a scale that ranges from 0 to 100 that takes into consideration differences in difficulty among different versions of the tests.

Adjusting scores will ensure that the passing score will remain the same, even if different versions of the test vary in difficulty. This ensures that candidates will not be penalised if a test is harder, or given an unfair advantage if a test is easier.

The examination and pass rates are moderated by the National Psychology Examination Committee of the Psychology Board of Australia. The pass rate only applies to the total score. Candidates are not required to pass all four curriculum components in addition to achieving a passing score on the overall examination.

3. Sitting the examination

Eligibility

To be eligible to sit the examination, candidates must have:

- completed the first four years of accredited study, plus 1,500 hours of supervised practice in the 4+2 pathway, or
- completed the first five years of accredited study, and have entered the sixth (+1) intern year in the 5+1 pathway and there is an approved plan and supervisor arrangements in place, or
- completed the fifth year (full-time equivalent) of an accredited sequence of study and have entered the sixth year of study, or
- completed a course of study overseas that is assessed by the Board as substantially equivalent to a six-year accredited sequence of study in psychology, and be seeking general registration as a psychologist in Australia, or
- previously held general registration as a psychologist in Australia and are now intending to return to practise after more than 10 years without practising, or
- been directed to sit the examination by the Psychology Board of Australia, a panel or tribunal, in relation to an application for registration under Part 7 of the National Law, or a notification about their health, performance or conduct under Part 8 of the National Law.

If a candidate fails the exam, they must wait three months before re-sitting.

Applications from overseas-trained practitioners

Overseas-trained practitioners are included in the groups required to pass the examination before being eligible to apply for general registration. The examination will only be available in Australia.

Applicants from overseas need to ensure they meet the mandatory registration standards, including the [English language skills registration standard](#). The Board may apply additional conditions to an overseas-trained practitioner's registration to ensure they meet all registration standards.

Generally, the Board will require overseas-trained practitioners to be registered as a provisional psychologist and complete a minimum three-month transitional program in Australia before applying for general registration. This allows them to satisfy all competencies for general registration including knowledge of Australian ethical and legal requirements, and to ground their skills in an Australian socio-cultural context. Once an overseas applicant has been registered as a provisional psychologist, they become eligible to sit the examination.

If an overseas-trained applicant is exempt from the transitional program and required to sit the exam, they are required to wait three months before being able to re-sit the exam if they fail any attempt. These applicants may be required to provisionally register and undertake a transitional program for the three months.

Examinations timetable

The timetable of examination dates will be published on the Board's website under *Registration > National Psychology Exam*, along with the closing dates for applications. Examinations will usually be scheduled at least twice per year and up to four times a year.

Exams will be made available in the capital city of each state and territory of Australia.

Application to sit the examination

Candidates may only lodge one application to sit the examination per quarter period in any of the states or territories. When advised by the Australian Health Practitioner Regulation Agency (AHPRA) of their eligibility, candidates need to book and pay for the examination by the application closing date.

Candidates need to create a candidate account through the examination portal, accessible on the Board's website *Registration > National Psychology Exam*. The candidate account will grant access to the practice examination and enable booking and payment.

Examination fee

Candidates need to pay an examination fee for each sitting, payable online at the time a candidate registers for the exam. The Board has set the fee as low as possible to allow candidates from all parts of the country to attend regional testing centres. The fee is published on the Board's schedule of fees on its website.

Changing the scheduled examination date

Candidates are permitted to change the date and time of their scheduled examination for any reason more than 72 hours before the scheduled examination date without forfeiting their examination fee. Candidates are only permitted to change the date and time within 72 hours of the exam if special circumstances apply – see the section on *Special considerations* in these guidelines.

Requests to change the date and time of examinations that have been booked and paid for are done through the examination portal.

On the day

Candidates need to bring their booking receipt (which is provided by email once the examination has been booked and paid for) and two pieces of identification, including one piece of photo ID, to the examination centre to be able sit the examination. Failure to do so may result in exclusion from the examination.

Candidates will not be permitted any reference material (electronic or hard copy) during the examination. Mobile phones and other equipment must not be taken into the examination. Access to the internet will not be permitted in the examination rooms or in the examination waiting areas.

Failure to comply with any rule or instruction by an adjudicator or supervisor will be regarded as a breach of discipline, and may lead to exclusion from the examination and the candidate deemed to have failed. More serious breaches of examination rules or security may result in disciplinary or criminal action.

Before sitting the examination, candidates must agree to a set of terms and conditions for the examination, including keeping the content of the examination and questions confidential. This includes agreeing to a statement similar to the following:

This exam is confidential and proprietary. It is made available to you, the examinee, solely for the purpose of assessing your proficiency level in the skill areas referenced in the title of this exam. To protect the integrity of the examinations, the examinee must adhere to strict guidelines. The examinee shall not disclose to any third party the contents of this examination, including but not limited to questions, form of questions, or answers, in whole or in part, in any form or by any means, verbal or written, electronic or mechanical, for any purpose. I have read and agree to the terms of the above statement.

Receiving results

Candidates will receive their examination results by email. Results will not be given by telephone.

After the examination has finished, any communication about the examination must be addressed to AHPRA. Candidates must not communicate with the adjudication staff, members of the Psychology Board of Australia, or the Board's committees about the examination.

Additional needs

Candidates with a disability are able to request support to provide appropriate assistance to allow them to sit the examination. Special needs requests need to be made in advance and no later than at the time of lodging the application to sit the examination.

Candidates with special needs will be provided with facilities to support the following:

- **Mobility condition:** all exam centres have wide passages, wheelchair access, accessible toilets and adjustable desks.
- **Visual impairment:** the examination can be delivered with larger fonts and higher contrasting colour, and reader assistance.
- **Hearing impairment:** site support can be provided to ensure that invigilators can communicate instructions in a satisfactory manner.
- **Other mental or physical impairment:** other impairments, supported by appropriate documentation, are addressed on a case-by-case basis.

Special consideration

Special consideration is available to candidates who are unable to sit or complete an examination due to exceptional circumstance beyond their control. Candidates may be given an opportunity to re-sit the examination at the next available date without incurring additional examination fees.

Applications for special consideration:

- will only be accepted from eligible candidates
- will not be approved unless there are exceptional circumstances beyond the control of the candidate, and
- must be supported by convincing evidence of the exceptional circumstances.

Candidates who can demonstrate that they have adverse circumstances beyond their control are eligible for special consideration.

These reasons include:

- acute illness (such as hospital admission, onset of serious illness)
- loss or bereavement (such as death of a close family member)
- hardship or trauma (such as being victim of crime, severe disruption to domestic life)
- unforeseen call-up for service (such as military service, court appearance, jury service, emergency service)

- work commitments and circumstances beyond their control (a letter on company/organisation letterhead from an employer confirming this must be attached to the application for special consideration)
- religious convictions (a letter from a religious leader must accompany the application)
- computer malfunction at the examination centre, or
- bomb threat or similar such event requiring evacuation of the examination centre.

Candidates who complete the examination are usually not eligible for special consideration unless there are special circumstances. The only special consideration mechanism available for candidates who fail the examination will be based on process.

No special consideration request will be considered based on the content of the examination. The special consideration procedure is not a means of circumventing the Board's usual examination process.

Possible outcome of an application for special consideration

When a request is granted, the usual outcome would be to allow the candidate to re-sit the examination as soon as possible at no additional cost to the candidate.

If approved, special consideration may consist of:

- deferral of the examination until the next available date (no additional or reduced fee), or
- other special arrangements for undertaking the examination (no additional or reduced fee).

Applications for special consideration must:

- be in writing
- be submitted before or within 14 working days of the date of the examination (depending on the nature of the request)
- include relevant documentary evidence of the exceptional circumstances beyond the control of the candidate, such as:
 - medical certificate
 - death certificate
 - police report
 - statutory declaration
 - examination centre report, or
 - evidence of requirement to attend court, jury service, military service, emergency service.

A candidate who believes that they have cause to apply for special consideration on the outcome of the examination must apply by email to the national exam coordinator at nationalpsychologyexam@ahpra.gov.au attaching supporting documentation, no later than 14 days after completing the examination.

Failure to follow this process may result in the application being delayed or not accepted.

This email initiates the special consideration procedure, and will be reviewed and considered by the Board as well as assessed against the special consideration criteria (outlined above). The review will take place within 21 days of receiving the request.

If the Board grants the request for special consideration, it will decide on how special consideration will take effect and let the candidate know in writing. Any special arrangement for consideration will be acted upon promptly. Failure to comply with the arrangement will mean the candidate will sit the examination during the next scheduled examination period published on the Board's website.

The Board's decision is final.

Examination failure

Registrants who fail the examination are permitted to re-sit the examination after completing a further three months of supervised practice as a provisionally registered psychologist.

If a registrant fails three times, they will not be able to sit another examination until their registration renewal or a new application for provisional registration is approved by the Board. At this point the Board may:

1. grant renewal or registration and allow the person to re-sit the examination up to three additional times
2. grant renewal or registration with conditions and on those conditions being met, allowing the person to re-sit the examination, or
3. propose to refuse the person's application or renewal.

In the instance of 1 or 2, the Board will provide feedback to the candidate on the knowledge areas requiring improvement.

In the instance of outcome 2 or 3, the candidate is allowed to make a submission to the Board to support their renewal as a provisionally registered psychologist.

Renewing provisional registration has time limitations under the National Law, and provisional psychologists will need to get permission from the Board to continue their training if they go beyond these limits.

Further information

More information is available on the Psychology Board of Australia website:

www.psychologyboard.gov.au.

Contact

All correspondence about the national psychology exam should be directed to the national exam coordinator at nationalpsychologyexam@ahpra.gov.au.

Date of issue: 18 October 2013

Last reviewed: xx 2015

These guidelines will be reviewed five years from the date of last revision.

Attachment A: Development of the examination

Background on the implementation planning of the National Psychology Examination before 1 July 2013

The planning for a national psychology examination has a rich history in Australia. This is a summary timeline showing the development of the exam, which began in 1986.

Year	Action
1986	All psychology registration boards in Australia (with their New Zealand counterpart) resolved to develop a national examination, with a particular focus on using it to test overseas psychologists applying for registration in Australia
1987	Consideration was given to a budget to finance the development of a national examination system
1990	A national examination system was approved in principle
2007	Determined to instigate a process to develop options for a national examination, including that a working party be established to explore a national examination proposal and report by March 2008 Ministers of Health determined to continue supporting the unaccredited two-year internship pathway to general registration
2008	The New South Wales Psychology Board issued a consultation paper on the development of a national psychology examination for public comment Feedback and further consultations with key stakeholder groups at that time indicated strong support for the development of the examination
2009	An update on the examination project was presented and made subject to peer review by all state and territory boards, representatives from the Australian Psychological Society and the Heads of Departments and Schools of Psychology Association (HODSPA) An update on the status of the examination was published (Grenyer, B.F.S. (2009). Development of a national psychology examination. <i>InPsych: Bulletin of the Australian Psychological Society</i> , 32 (3), 13)
2010	Early in 2010 the NSW Board, prior to the National Registration and Accreditation Scheme (the National Scheme), approved funds to help support the initial development of the examination The registration standard for general registration (which includes that the Board may require the passing of an examination) was approved by Ministerial Council and came into effect on 1 July 2010 with the introduction of the National Scheme In September 2010 the Psychology Board of Australia approved the appointment process for a National Psychology Examination Panel

2011

In February the Psychology Board of Australia announced the National Psychology Examination Panel and that it had held its first meetings, in its communiqué, stating: *'the Board advises that the National Examination will be implemented on 1 July 2013 for applicants seeking general registration. The examination will be the final assessment before moving from provisional to general registration... In April 2011 the Board aims to publish for public comment, a consultation paper on the format and curriculum of the examination.'*

In March the Board announced in its communiqué: *'The National Psychology Examination is being developed to support applications for general registration, and to ensure a consistent professional standard of psychologists nationally. The Board advises that the National Examination will be implemented from 1 July 2013 for applicants seeking general registration.'*

In April the Board released the first public consultation papers on the development of the National Psychology Examination

In November the Board released the *draft National Psychology Examination curriculum* for public consultation

In November the Board also published its third newsletter to registrants which provided an update on the curriculum consultation process and stated: *'The Board has determined that from 1 July 2013 a National Psychology Examination will apply to provisional psychologists who are in the supervised practice pathway to general registration (4+2 and 5+1) to be sat in their sixth and final year of training, before being granted general registration. It is intended that the exam will also apply to overseas applicants and practitioners returning to practise after lengthy periods without practising, or where there are concerns about practice... Persons applying for general registration before 1 July 2013 will not be required to sit the examination.'*

Over the period of February to November, the Board held seven public consultation forums across states and territories that included information about the examination commencing 1 July 2013

2012

Four further public consultation forums held over 12 months

In March the final curriculum for the examination, based on stakeholder feedback, was approved by the Board and published on the website

In July the Board tested draft questions for the National Psychology Examination and undertook statistical analysis of their reliability and validity, which provided the basis for further question development and improvement

In August 2012 the Board published its fifth newsletter to all registrants, which included the following information on the examination: *'General registration as a psychologist requires six years of training, but at present there are multiple pathways to achieve that training. The fifth and sixth years of training, during which professional practice skills of psychologists are required, are currently provided by both accredited and unaccredited training options. The proposed National Psychology Examination will test the application of psychological knowledge gained in these years and the focus will be on testing applied psychological knowledge and judgement which form the basis of competence in the profession. The National Psychology Examination is a mechanism for measurement of a minimum level of applied professional knowledge of psychology and competence that is acceptable for general registration in the profession in order to ensure the protection of the public.'*

In October the Board initiated a tender process for providers of computer-based testing to provide the platform for administering the examination within confidential test centres and environments in each state and territory. The successful tender was announced in December.

In December the Board appointed a new nine member National Examination Committee

2013

In February the new National Examination Committee met for the first time

In April, the Board released the *draft Guidelines for the National Psychology Examination* for public consultation

Also in April, the Board made available new resources on the examination, including example examination questions and additional curriculum and reading resources

From 1 July 2013, the National Psychology Examination came into effect

Appendix B: Statement of assessment

Please find the statement of assessment against AHPRA's *Procedures for development of registration standards* and *COAG principles for best practice regulation* here below.

Statement

Statement of assessment against AHPRA's Procedures for the development of registration standards and the COAG Principles for best practice regulation

Proposal to end the higher degree exemption for sitting the National Psychology Examination

The Australian Health Practitioner Regulation Agency (AHPRA) has produced the document *Procedures for the development of registration standards* which is available at www.ahpra.gov.au.

The procedures have been developed by AHPRA in accordance with section 25 of the Health Practitioner Regulation National Law, as in force in each state and territory (the National Law), which requires AHPRA to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme (the National Scheme) operates in accordance with good regulatory practice.

Below is the Psychology Board of Australia's assessment of its proposal to end the higher degree exemption for sitting the National Psychology Examination and the consequent amendments to the *Guidelines for the National Psychology Examination* (the guidelines).

1. The proposal takes into account the National Scheme's objectives and guiding principles set out in section 3 of the National Law
--

Board assessment

The Board considers that the revised draft guidelines meet the objectives and guiding principles of the National Law.

The revised draft guidelines, if approved, will provide for the protection of the public by ensuring that all practitioners granted general registration, regardless of their training pathway, meet a minimum standard of education and that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered as general psychologists.

The Board regards psychology to be a complex and diverse profession. The Board supports multiple assessments of provisional psychologists' competence in both the accredited (higher degree) and non-accredited (internship) pathways to general registration in order to ensure competence in the diverse tasks required by psychologists. The national psychology exam provides the Board with one standardised method of assurance that the exam candidate demonstrates the core foundational competencies necessary to practise as a general psychology on the public safely. It is the Board's view that to ensure a consistent professional standard of psychologists all applicants for general registration should be required to pass the exam as part of a comprehensive and integrated suite of quality control mechanisms to access competence.

There is a great number and variety of pathways to become a psychologist. With recent reforms in the higher education sector, even greater differentiation will manifest itself. The Board supports such diversity. However, the challenge is to ensure within this diversity that core minimum standards are met and that regulatory risk associated with this diversity is managed. Requiring applicants for general registration via the higher degree pathway as one of the groups required to sit the exam, will enable education providers in psychology to develop a more flexible and differentiated structure of program types and styles of teaching. This encourages a sustainable psychology workforce that meets the needs of the Australian public.

2. The consultation requirements of the National Law are met

Board assessment

The Board considers that the revised draft guidelines meet the consultation requirements of the National Law:

- The National Law requires wide-ranging consultation on proposed registration standards.
- The National Law requires the Board to consult other National Boards on matters that may reasonable be expected to be of shared interest.

The Board is undertaking wide-ranging consultation on the proposed revisions to the *Guidelines for the National Psychology Examination* in accordance with the consultation framework set out in the *Consultation process of National Boards* which is available at www.ahpra.gov.au.

Consultation is carried out to obtain feedback from a wide range of stakeholders on legal, operational, workforce, accreditation, governance, professional and public interest matters.

The Board will ensure that there is public exposure of the proposed revised guidelines by undertaking an eight week public consultation process which is an opportunity for public comment. This process includes the publication of the consultation paper (and appendices) on its website and inviting feedback to be provided.

The Board will take into account the feedback it receives from preliminary and public consultation when finalising the guidelines.

3. The proposal takes into account the COAG Principles for best practice regulation

Board assessment

In developing the revised draft guidelines for consultation, the Board has taken into account the Council of Australian Governments (COAG) *Principles for best practice regulation* www.coag.gov.au/sites/default/files/coag_documents/COAG_best_practice_guide_2007.pdf.

As an overall statement, the Board has taken care not to propose unnecessary regulatory burdens that would create unjustified costs for the profession or the community.

The Board makes the following assessment specific to each of the COAG principles expressed in the AHPRA procedures.

COAG principles

A. Whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

Board assessment

The purpose of the *General registration standard* is:

1. to provide for the protection of the public by ensuring that only practitioners who are suitably trained and qualified to practise under supervision in a competent and ethical manner are provisionally registered, and
2. to support the continuous development of a flexible, responsive, and sustainable psychology workforce that meets the needs of the Australian public

The National Psychology Examination supports the Board's *General registration standard* which provides that in addition to successfully completing an approved qualification, applicants for general registration as a psychologist in Australia are required to pass the National Psychology Examination before the Board will accept their application for general registration.

The Board considers that its proposal to end the exemption higher degree exemption from sitting the national psychology exam will ensure that all applicants for general registration are required to meet the minimum standard for registration.

The proposal would maintain the current entry requirements for overseas applicants and provisional registration via the internship pathway (4+2 and 5+1) and ensure that applicants via the higher degree pathway also demonstrate the minimum standard for registration through passing the national psychology exam. The Board believes that it is particularly inequitable to have some Australian-training provisional psychologists required to demonstrate competence and others who do not. The Board has no evidence or grounds to support the view that applicants for general registration who have a higher degree should not also demonstrate the minimum standard for registration through passing the exam.

As only minor changes to the existing guidelines are proposed with effects on one section of the profession, the Board considers that the proposed revised guidelines would have a low impact on the profession. These low impacts are significantly outweighed by the benefits of continuing to provide the same high standard of public protection and providing clearer, simpler requirements, in the public interest.

B. Whether the proposal results in an unnecessary restriction of competition among health practitioners

Board assessment

The Board considered whether its proposals could result in an unnecessary restriction of competition among health practitioners. The proposals are not expected to impact on the current levels of competition among health practitioners. There is little impact anticipated on practitioners already holding general registration.

C. Whether the proposal results in an unnecessary restriction of consumer choice

Board assessment

The Board considers that the proposed revised guidelines will support consumer choice, by establishing clear requirements for the qualifications and training arrangements that practitioners must meet when they practise, in accordance with the National Law.

D. Whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved

Board assessment

The Board considered the overall costs of the draft revised guidelines is to members of the public, registrants and governments and concluded that the likely costs are appropriate when offset against the benefits that the revised draft guideline contributes to the National Scheme.

Subject to stakeholder feedback on the proposed revisions, the revised draft guideline should have only minimal impact on the costs to applicants via the higher degree pathway. A one-off three hour competency exam is not viewed as an onerous nor expensive task for practitioners to undertake in order to protect the public. The cost of sitting the exam is low in comparison to other health profession examinations in Australia, and the exam is expected to be self-funding so as not to increase registration fees. The exam has been in operation from July 2013 for other categories of applicants for general registration demonstrating cost-effectiveness and a self-funding approach.

E. Whether the requirements are clearly stated using 'plain language' to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants

Board assessment

The Board considered the draft revised guideline have been written in plain English that will help practitioners and members of the public to understand the requirements of the guideline.

F. Whether the Board has procedures in place to ensure that the proposed registration standard, code or guideline remains relevant and effective over time

Board assessment

If approved, the Board will review the revised *Guidelines for the National Psychology Examination* at least every five years, including an assessment against the objectives and guiding principles in the proposed National Law and the COAG *Principles for best practice regulation*. However, the Board may choose to review the standard earlier, if it is necessary to ensure continued relevance and workability.

Appendix C: Extracts from the National Law

Legislation

The Psychology Board of Australia is established under section 31 of the Health Practitioner Regulation National Law, as in force in each state and territory (the National Law), and the purpose of the National Law is to establish a National Registration and Accreditation Scheme (the National Scheme) for the regulation of health practitioners. The role of the Board is to work with the Australian Health Practitioner Regulation Agency (AHPRA) and other National Boards to achieve the objectives of the National Scheme in accordance with the guiding principles of the scheme. The sections of the National Law relevant to the consultation are set out below.

3. Objectives and guiding principles

- (2) The objectives of the National Registration and Accreditation Scheme are—
 - (a) to provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered; and
 - (b) to facilitate workforce mobility across Australia by reducing the administrative burden for health practitioners wishing to move between participating jurisdictions or to practise in more than one participating jurisdiction; and
 - (c) to facilitate the provision of high quality education and training of health practitioners; and
 - (d) to facilitate the rigorous and responsive assessment of overseas-trained health practitioners; and
 - (e) to facilitate access to services provided by health practitioners in accordance with the public interest; and
 - (f) to enable the continuous development of a flexible, responsive and sustainable Australian health workforce and to enable innovation in the education of, and service delivery by, health practitioners.
- (3) The guiding principles of the National Registration and Accreditation Scheme are as follows—
 - (a) the scheme is to operate in a transparent, accountable, efficient, effective and fair way;
 - (b) fees required to be paid under the scheme are to be reasonable having regard to the efficient and effective operation of the scheme;
 - (c) restrictions on the practice of a health profession are to be imposed under the scheme only if it is necessary to ensure health services are provided safely and are of an appropriate quality.

Division 2 Functions of National Boards

35 Functions of National Boards

- (1) The functions of a National Board established for a health profession are as follows—
 - (a) to register suitably qualified and competent persons in the health profession and, if necessary, to impose conditions on the registration of persons in the profession

- (b) to decide the requirements for registration or endorsement of registration in the health profession, including the arrangements for supervised practice in the profession;
- (c) to develop or approve standards, codes and guidelines for the health profession, including—
 - (i) the approval of accreditation standards developed and submitted to it by an accreditation authority; and
 - (ii) the development of registration standards for approval by the Ministerial Council; and
 - (iii) the development and approval of codes and guidelines that provide guidance to health practitioners registered in the profession;
- (d) to approve accredited programs of study as providing qualifications for registration or endorsement in the health profession;
- (e) to oversee the assessment of the knowledge and clinical skills of overseas-trained applicants for registration in the health profession whose qualifications are not approved qualifications for the profession, and to determine the suitability of the applicants for registration in Australia;
- (f) to negotiate in good faith with, and attempt to come to an agreement with, the National Agency on the terms of a health profession agreement;
- (g) to oversee the receipt, assessment and investigation of notifications about persons who—
 - (i) are or were registered as health practitioners in the health profession under this Law or a corresponding prior Act; or
 - (ii) are students in the health profession;
- (h) to establish panels to conduct hearings about—
 - (i) health and performance and professional standards matters in relation to persons who are or were registered in the health profession under this Law or a corresponding prior Act; and
 - (ii) health matters in relation to students registered by the Board;
- (i) to refer matters about health practitioners who are or were registered under this Law or a corresponding prior Act to responsible tribunals for participating jurisdictions;
- (j) to oversee the management of health practitioners and students registered in the health profession, including monitoring conditions, undertaking and suspensions imposed on the registration of the practitioners or students;
- (k) to make recommendations to the Ministerial Council about the operation of specialist recognition in the health profession and the approval of specialties for the profession;
- (l) in conjunction with the National Agency, to keep up-to-date and publicly accessible national registers of registered health practitioners for the health profession;
- (m) in conjunction with the National Agency, to keep an up-to-date national register of students for the health profession;
- (n) at the Board's discretion, to provide financial or other support for health programs for registered health practitioners and students;
- (o) to give advice to the Ministerial Council on issues relating to the National Registration and Accreditation Scheme for the health profession;

- (p) if asked by the Ministerial Council, to give to the Ministerial Council the assistance or information reasonably required by the Ministerial Council in connection with the National Registration and Accreditation Scheme;
- (q) to do anything else necessary or convenient for the effective and efficient operation of the National Registration and Accreditation Scheme;
- (r) any other function given to the Board by or under this Law.

39 Codes and guidelines

A National Board may develop and approved codes and guidelines –

- (a) to provide guidance to the health practitioners it registers.

40 Consultation about registration standards, codes and guidelines

- (1) If a National Board develops a registration standard or a code or guideline, it must ensure there is wide-ranging consultation about its content.
- (2) A contravention of subsection (1) does not invalidate a registration standard, code or guideline.

Appendix D: Comparison - Pharmacy Board of Australia examination requirements

By way of comparison to another profession, pharmacy interns are required to pass a written and oral exam for general registration. This is in addition to the completion of the intern training program and 1,824 hours of approved supervised practice.

Examinations for General registration standard

To be eligible for general registration as a pharmacist in Australia, in accordance with section 52 (1)(b) of the Health Practitioner Regulation National Law, as in force in each state and territory (the National Law), an individual must successfully complete any examination or assessment required by an approved registration standard. The *Examinations for general registration standard* published by the Pharmacy Board of Australia (the Board) states that an individual must successfully complete a written and/or an oral examination in order to demonstrate their competence to practise.

Examination

The examination consists of two parts being:

- a) a written examination (\$550 per attempt)

The Australian Pharmacy Council (APC) conducts the written competency examination on behalf of the Pharmacy Board. The object of the written examination is to assist in the assessment of a candidate's ability to apply their knowledge and experience in pharmacy practice. The written examination consists of 125 multiple choice questions (MCQ) which include: calculation questions; forensic/ethics questions; and practice-based (clinical) questions.

- b) an oral examination or examinations (\$395 per attempt)

The oral examination (practice) conducted by the Pharmacy Board is an assessment of competence that requires candidates to demonstrate that they can competently apply their knowledge and skills to situations that may be encountered in practice.

The Pharmacy Board has adopted competency-based standards as a framework for both the written and oral examinations. These standards are set out in the document *National competency standards framework for pharmacists in Australia*, November 2010.