



THE AUSTRALIAN
CLINICAL PSYCHOLOGY
ASSOCIATION

**Response of the Australian Clinical Psychology Association (ACPA) to
the Psychology Board of Australia's Consultation Paper 25: On ending
the higher degree exemption from sitting the National Psychology
Examination**

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The Australian Clinical Psychology Association (ACPA) thanks the Psychology Board of Australia (the Board) for consulting on the proposal to end the higher degree exemption from sitting the National Psychology Examination. ACPA does not believe that requiring higher degree students to sit the National Examination is the appropriate mechanism to address the failures of regulation and accreditation that have led to the Board's proposal. These failures need to be addressed within the regulatory and accreditation structures that have been established to ensure high quality training, not by having higher degree students carry the burden of these failures by the impost of a substantial and unacceptable additional cost, time, effort, and delay in registration on these students who meet the highest standard of training in psychology nationally.

*ACPA strongly supports **Option one**: Status quo; continue with the existing higher degree exemption from sitting the national examination.*

We acknowledge that it is the responsibility of the Board to ensure that the diversity of types, format and specialised focus of accredited professional higher degrees maintain adequate standards. We concur that a national examination is currently necessary to ensure that overseas qualified psychologists, those whose practice has been determined inadequate by panels and tribunals, those who return to practice after a lengthy absence, and those that train in professional psychology via unaccredited pathways meet a basic standard of competence to practise.

There is no evidence to suggest that higher degree graduates are found wanting by panels or tribunals in terms of their competencies to practise. The risks in this area are most likely to come primarily from registrants who have undertaken unaccredited pathways to registration where they have not been subject to the rigorous and continual examination and assessment of all aspects of their knowledge, skills and professional practice by numerous of senior members of the profession. In Australia psychologists with no accredited professional training are currently permitted to undertake work in the same realms as those who have undertaken advanced accredited higher degrees, thus placing the public at substantial risk, particularly when dealing with serious mental health disorders. For these registrants the National Psychology Examination is essential.

Australia holds the lowest standards for training of psychologists in the Western world. No other developed country allows psychologists to register or become licenced without undertaking accredited post-graduate training in professional psychology. The unaccredited pathway is one of guided self-directed learning and supervised practice, frequently undertaken with a single supervisor overseeing learning and practice. In itself this pathway incorporates no standard forms of assessment, other than keeping a logbook of learning and submission of a small number of case studies to the Board. It is currently essential to protect the public by ensuring that these particular psychologists meet minimum standards for practise. It is agreed that the National Psychology Examination makes an important contribution to ensuring a consistent minimum professional standard for such psychologists. However, we believe that the best way to ensure "that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered (Psychology Board of Australia, 2105, Consultation Paper 25, p. 6) is to discontinue unaccredited pathways to registration.

The failures of regulation and accreditation raised by the Board are not appropriately addressed by imposing a national examination on the most highly trained students who undertake accredited higher degrees in professional psychology. The failures identified by the Board need to be addressed by the regulatory and accreditation bodies established to oversight standards.

Potential threats to standards identified by the Board

1. Recent reforms in education

There is no evidence to suggest that changes to higher degree education are likely to undermine the current standards for training of higher degree students, rather than enhance them as they are intended to do. The anxiety of the Board that “issues about the comparability of programs and diversity of graduates that *may* emerge [emphasis added]” (The Psychology Board of Australia, 2015, Consultation Paper 25, p.4) is currently unfounded, and seemingly warranted.

Recent reforms in higher education that implement technologies and teaching approaches in line with adult learning principles are designed to enhance learning and the development of competencies not undermine them. There is no evidence to suggest such educational advances put outcomes for individuals at risk, and the Psychology Board provides no such evidence.

The Board currently holds the view that the accredited internal examination and assessment processes undertaken by educational institutions and oversights by the accrediting body meet the Board’s standards for general registration. Current examination and assessment of students in higher degree programs is not set to change in any way other than to move to competency based outcomes rather than inputs, which have a stronger emphasis on individual outcomes. Current examination and assessment covers the acquisition and application of knowledge, capabilities and skills in a consolidated program of development assessed in numerous ways at every level and in every area of practice by numerous senior clinical academic and clinical members of the profession in numerous settings, and is not going to lessen with changes to teaching practices focussed on enhancing adult learning.

Senior clinical and clinical academics in the profession, who oversee higher degree programs, remain best placed to assess outcome competencies across all professional practice domains, given that they are employed on the basis of their expertise and experience in higher degree professional education for psychologists. Indeed it was these members of the profession who developed the National Psychology Examination.

The change in focus from inputs to outcome competencies enhances the capability of educational institutions, and the accreditation process, to ensure all graduates from higher degree programs exit with established standards of competency in knowledge, skills, research and their application to professional practice in the particular areas of endorsement catered to by the higher degree. To take advantage of this valuable change, the accreditation body needs to establish clear guidelines as to the measurement of outcome competencies for graduates, ensuring competencies are met both at the general registration level and for the particular area of endorsement covered by the degree.

It is not the role of the Psychology Board to usurp the responsibilities of the educational institutions and accreditation body and increase the impost on higher degree students by

requiring them to additionally sit a national examination. The profession, the public and the higher education institutions pay substantial fees to ensure the adequate accreditation of psychology programs in order to ensure the safety of the public in the practice of graduating higher degree students. If accreditation processes are failing to deliver this assurance, these need to be rectified so that those who pay for accreditation of programs can be assured that adequate standards of all trainees are met, or programs lose accreditation status. It is not just to add the costs of potential failures of regulation and accreditation to higher degree students.

2. Output oriented competency-based training

It appears that the Board is highly ambivalent about recent reforms in higher education. The Board claims this leads to the potential for issues about the “comparability of programs and diversity of graduates” (The Psychology Board of Australia, 2015, Consultation Paper 25, p.4), yet states that such change leads to the development of more flexible and differentiated structures of program types and teaching.

Diversity is not to be curtailed to the disadvantage of public need in higher degree programs. Psychology practice does not represent a single narrow knowledge and skills base applied in a specific manner. Diversity in training methods and increased application of adult learning principles and competency-based assessments is essential to ensure that the workforce is flexible, adaptable, capable, competent, and meets the variety of needs of the public. Graduates exiting from training in different programs are required to have developed and repeatedly demonstrated particular knowledge, skills and competencies. Comparability of graduates from diverse programs becomes obsolete if accreditation processes ensure a minimum standard of training and competencies are adequately assessed through competency based outcomes across all aspects of training.

As the Board describes, a major reform in higher education is away from the use of inputs to evaluate programs towards competency-based outcomes. Higher degree professional programs have largely embraced this approach in teaching, training and examining and assessing trainees across their programs. Furthermore, “The approach and design of the National Psychology Examination reflects this trend” (Psychology Board of Australia, 2015, Consultation Paper 25, p. 11). Education providers of accredited higher degrees are best placed to examine and assess the “applied psychological knowledge which forms a significant basis of competence in the profession” (Psychology Board of Australia, 2015, Consultation Paper 25, p. 6) on which the National Psychology Examination is based.

It appears that competency-based outcomes are strongly supported by the Board and allow programs to be evaluated not only on inputs but on how these competencies are assessed. Education providers need to be guided by the accrediting body to apply sound competency-based outcome examination and assessment across all domains of learning and application of learning. Sound competency-based outcomes will ensure all higher degree students meet a full range of competencies across their programs.

3. Restriction of learning of one assessment of competency becomes the focus

Requiring higher degree students to sit the National Psychology Examination is, most likely to inhibit innovation in teaching, and reduce flexibility and differentiation of programs as educational institutions restrict and focus teaching on the outcome competencies assessed by the National Psychology Examination and forego other means of examination and assessment that ensure competencies in other areas of practice. “To support the continuous development of a flexible, responsive, and sustainable psychology workforce that meets the needs of the Australian public” (The Psychology Board of Australia, Consultation Paper 25, p.30) the Board needs to retain the exemption for higher degree students to sit the National Psychology Examination.

2. Ensuring suitably trained and qualified psychologists to provide for better protection of the public

It is correct that in Australia “a single national standard met by all applicants is the fairest and most consistent approach (The Psychology Board of Australia, 2015, Consultation Paper 25, p.4) and that “there is a great number of pathways to become a psychologist” (The Psychology Board of Australia, Consultation Paper 25, p.29); many of these are unaccredited pathways. It is unacceptable that Australia continues to register psychologists who have undertaken their professional training via unaccredited pathways.

It is deplorable that the Board considers the 4 + 2 and 5 + 1 pathways to registration as equivalent to a six year sequence of accredited professional practice training via a higher degree. In no other profession does an unaccredited supervision pathway substitute for a higher degree. Higher degree students are examined throughout their post-graduate training via multiple means and numerous clinical academic psychologists on their academic knowledge (assignments, vivas, case studies, examinations etc.), research skills (development and delivery of a significant research project), and clinically (by a minimum of three Board approved post-graduate supervisors. They subsequently go on to complete a further program of supervised practice by a Board approved supervisor in the area of endorsement for which they have trained to bring the total period of professional training to four years.

This view of the Board of the equivalence of unaccredited supervision pathways to this rigorous accredited higher degree training pathway perpetuates major divisions and conflict within the profession. Those who have not undertaken an accredited higher degree in professional psychology are supported in their claim to be equivalent to those who have undertaken this training, constantly undermine the value of accredited training, while demanding equal pay. This needs to cease and Australia needs to meet at least the minimum standards of training held in the Western world.

To increase protection of the public and ensure adequate standards are met in professional psychology the Board needs to focus on ending all unaccredited pathways to registration. This will have the greatest impact on raising standards and reducing uninhibited diversities in competency outcomes, due to the lack of accreditation in training. Unaccredited training in professional psychology is not accepted in any other jurisdiction in the developed world. It is unacceptable for Australia.

While diversity related to areas of practice endorsement is welcome as various areas of expertise are developed within identified areas, a reduction in the number of areas of endorsement would also reduce the risks of negative impacts in diversity in training. With nine areas of practice endorsement, Australia has the largest number of regulated areas of practice in the world. New Zealand has three regulated areas of specialised practice; the USA and Canada have three regulated areas of specialised practice; and the United Kingdom has six regulated areas of specialised practice.

In Australia some areas of practice endorsement have less than 100 regulated psychologists who do not also belong to other areas of practice endorsement. Some areas of endorsement, such as organisational psychology, may prefer a separate means of regulation that does not require the focus on mental health that is required for general registration of all psychologists for the protection of the public. Organisational psychology has a strong focus on organisational management, rather than individual psychology.

Should some of these programs for areas of endorsement do not meet the standards for general registration they need to be removed as areas of training, or regulated separately. This would advantage the Psychology Board and accreditation body in enabling less diversity of standards to be applied in psychology.

1. [The requirements for some provisional psychologists being required to sit and examination and others not is inequitable](#)

ACPA agrees that the current system whereby some Australian-trained provisional psychologists (those undertaking the 4 + 2 and 5 + 1 routes to registration) are required to undertake the examination and other do not i.e. Master's and Doctoral students) is inequitable. Given that the internship pathways represented by the 4 + 2 and 5 + 1 pathways are not accredited and do not inherently contain the level of examination of an accredited higher degree pathway; nor do they meet standards for practise in any other comparable jurisdiction, the fairest manner to resolve this inequity is to remove unaccredited under-examined pathways to registration and ensure all psychologists undergo accredited post-graduate training in professional psychology for registration that incorporates the level of assessment and examination currently incorporated into accredited pathways. This will also reduce the diversity of training options thereby removing the least examined pathways that do not meet standards in other comparable jurisdictions of the Western world.

2. [The impact on applicants for registration](#)

The Board may considers that a \$450 cost of sitting the examination is low compared to other health profession examinations and assures the profession the examination will be self-funding so as not to increase registration fees. However, the disregard for the level of impost of this cost on students, who are already struggling to pay substantial post-graduate program costs and support themselves while undertaking these programs, is unacceptably high and completely unnecessary, given the level and rigor of continuous examination and assessment under which higher degree programs are conducted.

3. [Exemption for New Zealand psychologists](#)

It is noted that the exemption for New Zealand psychologists applying for registration under the Trans-Tasman Mutual Recognition arrangements will remain. To practice as a psychologist in New Zealand an accredited six year sequence of psychology, incorporating a higher degree in professional practice, and a period of supervised practice in the particular scope of practice for which they are training, is required; no national examination is undertaken. It is highly inequitable to require Australian psychologists who undertake the same level of training as New Zealand psychologists to take the national examination, but not these particular, similarly trained, overseas applicants.

4. Examinations for registration or licensure in other jurisdictions and professions

Only North America requires an examination for licensure to practise as a psychologist. In North America, however, licensure is not national, as in Australia, and is granted by individual states. Each state has separate, discrete laws that impact on the practice of psychology in that jurisdiction. The primary aim of examination for licensure is to ensure competent practice according to individual state laws. No other Western country requires registrants of licensees to undertake a national examination.

There is no evidence of any relationship between the exemption of higher degree students from the National Psychology Examination and the volume of notifications. There is no evidence to suggest that higher degree graduates are involved to any particular extent in mandatory notifications relative to those from other pathways who have undertaken the National Psychology Examination. Thus it is unclear as to how removing the exemption would reduce mandatory notifications.

The Board cites the requirement for all pharmacy interns to take a written and an oral examination for registration. Yet, rates of mandatory notifications for pharmacists remain identical to those for psychologists, despite higher degree psychology registrants not being required to undertake a national examination (Review of the National Registration and Accreditation Scheme for health professions, Consultation paper August 2014). Thus, there is no evidence that imposing the national examination onto higher degree psychology general registrants will provide any additional protections for the public.

The majority of Australian Health Professions Regulation Boards do not impose national examinations on registrants other than those trained overseas, those who are required to demonstrate competency due to failures leading to notifications, and those returning to practice after a substantial period of absence. The vast majority of National Boards utilise regulatory and accreditation functions to ensure standards are met and do not impose additional and unnecessary regulation on registrants for little gain.

5. There is no evidence to support the need for the removal of the exemption for higher degree students

If the Board sincerely believes that the changes to education practices in higher degree programs puts the public at greater risk, evidence needs to be obtained to ensure this is the case and that there are no unintentional consequences on the breadth and nature of training that negatively impacts competency outcomes by enforcing a National Psychology Examination for higher degree students. Without support for any concerns that higher education is weakened by innovative reforms that aim to increase learning and ensure competency in outcomes, the Board

must not impose this additional burden on students that carries the risk of undermining training through restriction of teaching and learning to the areas covered by the national examination.

References

Psychology Board of Australia (2105). Consultation paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination.