

Psychology Board of Australia  
C/- AHPRA  
GPO Box 9958  
Melbourne VIC 3001

28 September 2015

Dear Psychology Board of Australia

**Please accept this as a submission regarding the Consultation paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination**

**I write to submit my opinion that the exemption** for postgraduate degree graduates (i.e. via a higher degree pathway) not to undertake/pass the National Psychology Examination **continue**.

Further, I submit my opinion that the word *exemption* implies that those students undertaking a higher degree were given a benefit that is now being reconsidered, when it is my recall that the National Psychology Examination was introduced to 'protect' the public from 4+2 psychologists who did not undertake the higher degree intensive training, supervision, placement and examination processes delivered across a extensive breadth of psychology subject matter that their postgraduate counterparts completed. **Thus, I also state that the word 'exemption' should be changed to acknowledge this key difference (i.e., postgraduates are not exempt but are better trained and assessed and therefore do not require to sit the 'baseline' Examination).**

The Consultation Paper 25 makes several statements and inferences that I disagree with.

- 1) **It assumes that the National Psychology Examination (Exam) is somehow a 'gold standard' exam that would ensure the public are protected, and that to ensure this protection remains, higher degree students should sit this exam.**
  - a. The Examination itself is an application of knowledge only, and not necessarily an assessment of skill application. I would argue that a review of many of the supported complaints to the PBA reflect a failure to *implement* knowledge (especially around ethics, confidentiality and boundaries of practice) rather than a lack of knowledge. How exactly does the completion of the Exam screen for individuals who may propose a risk to the public should they be given registration as a psychologist, when the PBA surely understands a key psychological principle is that behaviour cannot be predicted by knowledge alone?
  - b. I have not yet seen any evidence of the Exam's reliability or validity in its ability to 'protect the public' or meet the PBA's original intent. Given assessing reliability and validity is one of the key skills required of a psychologist (including, no doubt, being able to evaluate the psychometric properties of the assessments<sup>1</sup> mentioned in the Exam), the PBA's *belief* that the Exam would meet its desired needs seems to be somewhat unscientific given the absence of relevant data to support this hypothesis.
  - c. The higher degree pathway (via courses approved by the Australian Psychology Accreditation Council) already includes dozens of subject-focussed examinations and

assessments on the application of skills, tests and knowledge across a range of domains and contexts. This longitudinal, subject-based, focussed assessment process provides a far superior assessment of psychology than the single assessment methodology applied via the Exam. Indeed, contemporary Educational theory clearly proposes that for an assessment to be reliable and a strong indication of competency, longitudinal, multi-modality assessment is required versus an archaic single Exam approach.

- 2) **The PBA has presented a view that there are risks in extending the so called exemption. Yet, the PBA has not provided an appropriate review of the issues using a fully formed Risk Matrix that also evaluates the costs of applying their proposed (and assumed without evidence) risk mitigation strategy. I submit a few of these costs:**
- a. If the National Psychology Examination was a final requirement for registration, the content would influence the focus of higher degree study. More time would be spent on preparing candidates to pass this Examination of knowledge and less time would be available to develop the skills required to *fully implement* this and other, equally important, knowledge
  - b. The focus would narrow the stream of education. The Examination is very clinical however, there is little representation in the Examination of the other knowledge and skills required to provide a fully comprehensive skilled psychology workforce (I invite the PBA to review the knowledge covered in the spectrum of Psychology postgraduate degrees preparing candidates to be eligible for the specified endorsements).
  - c. Had I, as a higher degree graduate, been required to undertake a postgraduate course that was focussed on ensuring I passed the National Psychology Exam, I would not have developed the breadth of knowledge and skills I require to practice as a Clinical and Organisational Psychologist working in occupational health. This is a critical area of psychological practice given the increasing need for high workforce participation rates against the growing numbers of mental health illness and disability. In devising the Examination and assuming it will 'protect the public' the Board is being very limited in its view of who the public is. The public is also large organisations and a significant workforce of individuals working in these organisations, and not just an individual member of the community presenting with mental health or vocational issues in a private practice or public health setting.
  - d. There is significant risk in minimising diversity through a focus on the Examination, and indeed, the Consultation Paper's statement that the Exam will somehow address the diversity of outcomes of higher degree courses is poorly argued. How can an Exam ensure that the diversity of outcomes of a two to three year degree be managed to a level of consistency? The risk of the Exam is that an attempt to minimise the diversity of education outcomes will result in something much worse, a lack of diversity in the skills required to meet today and tomorrow's needs for psychology in an advanced Australia.

I thank you for reviewing my submission.

With kind regards

Dr Melissa Lehmann  
Clinical and Organisational Psychologist

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<sup>i</sup> I also state that there is bias in focussing on specific assessments in the Exam that inherently delivers a commercial benefit to licence/publication owners of these assessments, and delivers an unfair disadvantage to those commercial owners of Assessments not included. Is this an appropriate approach for a regulation entity?