

Response to Consultation paper 25: ending the higher degree exemption from sitting the National Psychology Examination

As senior academic clinicians, we are strongly of the opinion that the current higher degree exemption from the National Psychology Exam should be retained. There are several reasons for this view.

In its consultation paper, the Board argues that postgraduate courses at the Masters and Doctorate level are designed to provide training in an area of endorsement and, as a result, there is a risk that the broader competencies required may not be met. The exam would, therefore, ensure that graduates meet these minimum requirements.

This argument is flawed on several grounds. Firstly, while such courses may focus on areas of endorsement, all courses are required by APAC to teach units in professional and ethical issues, assessment, and intervention. Training in confidentiality, avoidance of dual relationships, and so forth, form the content of all post graduate professional training courses. Similarly, assessment and intervention skills taught in the courses include in-depth coverage of the core competencies referred to by the Board.

Secondly, the postgraduate training courses are designed to ensure that students have the opportunity to develop the specified core competencies and these are rigorously and systematically assessed throughout the program and increasingly through the use of competency-based assessments, such as Objective Structure Clinical Exams (OSCE's). These are acknowledged as a much stronger and more ecologically valid method for assessing competencies than traditional multiple choice exams. Furthermore, in contrast to 4+2 and 5+1 pathways where independent evaluation of the interns occurs through their Board-submitted progress reports and case studies and the National Exam, higher degree students' competencies are assessed by multiple well-credentialed examiners and by multiple methods that are staged across the course. Further, with respect to practicum placements, students in higher degree courses are required to receive supervision at the rate of 1 hour per 7.5 hours, a rate more than double that currently required of 4+2 and 5+1 interns (1 hour per 17.5 hours).

Thirdly, the Board states that the accreditation body APAC can assess the quality of the programs but is constrained in its ability to regulate or oversee individuals in the programs. This is a specious argument; the Board designated body, APAC, sets the content and competencies to be developed in the courses. They rigorously evaluate courses' adherence to those standards. It is the responsibility of the University teaching staff to ensure that students demonstrate their development of the competencies. In fact, the APAC guidelines stipulate that:

5.1.13 No student must be permitted to graduate from the course without undergoing formal documented assessment of his/her competence, proficiency and professionalism in each of the core capabilities and attributes listed in Standard 5.1.12 (a-f).

5.1.14 No student must be permitted to graduate from the course unless he/she is assessed as having attained a sufficiently high level of competence, proficiency and professionalism in each of the core capabilities and attributes listed in Standard 5.1.12. Documented evidence of this assessment must be available for inspection by APAC.

5.1.15 The AOU must be able to provide clear documented evidence of the assessment procedures used to assess the competence, proficiency and professionalism of each student for each of the core capabilities and attributes listed in Standard 5.1.12 and in particular must be able to show the recorded outcomes of those assessment procedures for each student.

Fourthly, the Board raises issues of the impact of diversification of teaching methods and program delivery across providers. If it has such concerns, then the appropriate mechanisms should be to work with APAC to review the accreditation standards, including the requirement that providers demonstrate the effectiveness of their program in ensuring that students develop required competencies.

Fifthly, the Board points to the number of notifications of psychologists and states that all those seeking general registration should be required to sit the National Psychology Exam to ensure that all psychologist possess the broad competencies. Again, this is a specious argument. Firstly, no data is presented to indicate that since the introduction of the exam, the rate of notifications has decreased. Secondly, no data is presented to indicate that higher degree graduates are more subject to notifications, presumably as a result of not sitting the exam.

Sixthly, the argument that requiring some psychologists to sit the exam while higher degree students do not is inequitable can be countered by pointing out that higher degree students commit to undertaking a program at their own expense, accumulating considerable debt, typically being unable to work more than a few hours a week, and with limited capacity to work as a provisional psychologist outside of the course. In contrast, 4+2 and 5+1 interns undertake their internship through paid employment and do not accumulate a debt (excluding the 5th year of the 5+1). To expect students who have paid for their further education while maintaining their provisional registration to then pay \$450 to demonstrate they have acquired the competencies before being able to earn a wage using these skills can be argued to be inequitable.

Finally, it is our view that given the Board is undertaking a review of psychology education and training models, the introduction of a requirement for higher degree students to sit the National Psychology Exam should be postponed until this review is completed and that the current exemption be maintained for at least the next three years.