

Response to the Psychology Board of Australia Public Consultation Paper 25:

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

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Recommendations

The Australian Psychological Society (APS) recommends the following:

- With respect to the two options offered by the Psychology Board of Australia (PsyBA), the APS chooses Option 1, to continue the existing higher degree exemption from sitting the national psychology exam for another three years.
- Consider Option 3: That the PsyBA endorse a third option, that is, to refrain from requiring any higher degree graduate of a master or doctor of psychology program in any of the nine areas of practice recognised by the Board. That the PsyBA acknowledge the extensive assessment in those programs and explicitly exclude this pathway from the examination as competence is extensively assessed.

Introduction

The APS welcomes the opportunity to comment on the Psychology Board of Australia *Public Consultation Paper 25, Consultation on ending the higher degree exemption from sitting the National Psychology Exam*.

The APS is the peak national professional association for psychologists with over 22,000 members. The APS has had a longstanding role in setting national standards for psychology education and training and has close relationships with the schools and departments of psychology in Australia's higher education sector and with the Head of Department and School of Psychology Association (HoDSPA). The APS has nine Colleges that represent nine areas of practice and specific expertise in professional psychology (Clinical Neuropsychology, Clinical Psychology, Community Psychology, Counselling Psychology, Educational and Developmental Psychology, Forensic Psychology, Health Psychology, Organisational Psychology, and Sports and Exercise Psychology). The APS provides quality assurance and oversight of professional training standards via its College Course Approvals process, conducted in parallel with the APAC accreditation process of postgraduate programs.

This submission reaffirms the position of the APS on the national psychology examination. The APS has previously provided feedback to Consultation Papers on Guidelines to the National Psychology Examination (Paper 9 in May 2011 and Paper 18 in 2013). Moreover, the APS College of Organisational Psychologists commented on Consultation Paper 13 in 2012.

The APS is making this submission in collaboration with its nine Colleges. It is anticipated that some Colleges will make individual submissions representing additional unique challenges and issues raised by the national psychology exam for those respective Colleges. Moreover the APS Tests and Testing Reference Group (TTRG) has provided input for this consultation and raised concerns in the APS response to PsyBA Public Consultation Paper 24 (March 2015).

Background

There has been extensive feedback on consultation papers on the national psychology exam since 2012 (Consultation papers 9, 13, and 18). In these prior submissions, there has been a consistent message by major stakeholders that an exam is not necessary for graduates of the higher degree training pathways for psychologists (e.g., Australian Psychology Accreditation Council, [APAC] Head of Department and School of Psychology Association HoDSPA), The Psychology Foundation of Australia, the APS and individual APS Colleges).

These submissions have consistently pointed out concerns about the exam, including its design and content, the examination timetable and location, and cost to provisional psychologists required to take the exam. Prior submissions have also noted that provisional psychologists in the 5+1 pathway will have already been assessed on applied knowledge in their respective programs.

This submission focuses on providing support for Option 1 (or as noted above Option 3, not yet offered by the PsyBA) and we would like to reiterate these major points:

1. The national psychology exam was brought in as part of the process to assure competence to practice so generally registered psychologists following the 4+2 pathway could be assessed more effectively and efficiently than via case studies. This is in response to concerns about the 4+2 training pathway which, when benchmarked internationally, is below the international standards for psychology training.
2. Students in APAC accredited higher degree pathways to registration, especially in the nine areas of practice, are being assessed extensively with a wide range of assessment tools. Students demonstrate their knowledge in assessment tasks that include multiple choice, essay and short answer exams, written class papers, reflective essay, oral presentations, case conference presentations/case studies. Students' research knowledge and skills are assessed via additional proposals, research progress and final research presentations, and finally by two or more external examiners that are experts in the field. With respect to the assessment of competence in practical skills, there is in-vivo and recorded observation of performance; with most placements including a mid and final placement evaluation.

In short, students are assessed extensively throughout their studies, and, consistent with current assessment principles, with a range of assessment techniques. In our view, the assessment of competence of higher degree coursework, research and practicum by higher education providers vastly exceeds and is clearly superior to assessment as part of a one-time multiple choice exam.

3. APAC accreditation and ongoing monitoring of professional postgraduate courses assures:
 - a. A clear framework for higher education providers of knowledge, skills and attitudes that are expected to be demonstrated by their graduates. We note that all courses accredited by APAC must be approved by the Psychology Board.
 - b. Monitoring and auditing of compliance with accreditation standards. This in-depth review of programs as part of the accreditation (and the APS College Assessment) processes includes the rigorousness of assessment of the students. For example, APAC site visitors do review student work samples to assure that there is a high standard.
 - c. Higher education providers benchmark their course content, assessments and outcomes with each other.
 - d. Consistent input from the field (supervisors, employers) via, for example, Course Advisory committees and supervisor assessments.
 - e. APAC standards explicitly require that students not be allowed to graduate without formal documented assessment of their competence, proficiency and professionalism in every core capability specified in the standards.
 - f. The higher degree pathway currently ensures that candidates reach *at least an equivalent standard of knowledge* in relation to tests and testing as the national exam.

4. The exam poses a risk that higher education providers will include teaching focussed on the content assessed in the national psychology examination rather than using their resources on developing other relevant competencies. The TTRG has previously provided feedback to the PsyBA on a number of matters of concern in relation to the test and testing curriculum for the National Exam (see APS submission to consultation paper 24). The Group is concerned that, should the exemption be lifted, the current practices evident in the curriculum may lead to a 'dumbing down' of testing material in postgraduate courses as universities move towards teaching to the National Exam.

5. Entry to postgraduate professional programs is highly competitive. Higher education providers use rigorous selection processes (including interviews and references). Therefore the cohort of students accepted into these programs is of very high calibre. Adding a further hurdle to achieving general registration after years of study may discourage rather than encourage students to pursue postgraduate professional study in psychology. For a postgraduate student voice, please see Appendix 1.

In summary, for the options provided by the PsyBA, the APS and the nine Colleges of the APS strongly oppose Option 2, consider Option 1 (status quo) as acceptable, but propose that the PsyBA consider an Option 3, that is, explicitly exclude the postgraduate professional degree pathway from the national psychology examination.

Appendix 1:

A student voice:

Gaining admission to these programs is highly competitive, and the calibre of the Masters / PhD students is therefore exceptionally high. I started with over 500 first year students, completed Hons with around 50 students, and was then one of 10 students accepted into Masters from over 130 applicants. Only applicants with First Class Hons were interviewed, and even the interview itself required a high level of knowledge of the APS code of ethics as applied to a case scenario, a broad knowledge of the professional requirements of Clinical Psychology, continuing professional development, knowledge of common presenting issues, case conceptualisation, a brief role play etc. The point being that even to gain entry, students needed to demonstrate a high level of competency.

Having nearly completed the coursework component of the Masters (with 3 x clinical placements and a thesis still to go), I can attest to the rigour of the program, and the commitment of the staff to ensuring our competence. A handful of examples of what I have undertaken in this course (without listing every seminar and piece of assessment I have attended / completed this year) are: submission of video recordings of role played CBT sessions, and assessments (i.e. the WISC); a full psychological report written to professional standards; a full mental health assessment and report including case formulation, diagnosis, differential diagnosis and treatment plan written to professional standards, a detailed MCQ and SAQ examination on the DSMV; a presentation to both practitioners and a group of 'clients' on sleep disorders and CBT for insomnia, and on Monday, we are being put through our paces by way of an observed structured clinical examination (OSCE) in the simulation labs at the medical school, in which we will need to demonstrate (on two separate stations) competence in motivational interviewing skills with a simulated patient. Three staff from the school of psychology will be observing us via video link during this exercise.

Based on the (very brief and speedily composed) points above, it should be clear that the processes that the national exam seeks to ensure i.e. quality control, competence etc. ARE ALREADY MET - IF NOT EXCEEDED BY higher degree coursework (not to mention placements, supervision and thesis research to come)! I do hope that it is clear that the exam is not only unnecessary for Masters / PhD students (as our competency is assessed in several ways and on several occasions throughout our course of study) but also I feel very unfair - as we will end up doing so much more work / assessment than 4+2 or 5+1 students.

With the cost of the Masters and all the work required and then to contemplate an additional financial cost and time / energy / stress to prepare for yet ANOTHER exam - it wouldn't surprise me if other pathways become preferable to students and the higher degree courses lose out. This would be a travesty given the calibre of students they attract, and the commitment of teaching staff and clinicians who often volunteer their time to ensure that we are getting the highest possible level of training.