

30 September 2015

Dear Professor Grenyer,

On the following pages is the College of Organisational Psychologists' submission to Consultation Paper 25, regarding the National Psychology Examination.

This submission has been prepared by members of the COP National Committee, and has been disseminated to all College members to invite their feedback.

The College strongly believes in the importance of maintaining high professional standards across all areas of psychology. We also agree that it is important for the Psychology Board of Australia to manage the risk posed to the public by inadequate or inconsistent training.

However, the College has a number of concerns about extending the National Psychology Exam to graduating students of Masters and Doctoral programs. Based on these concerns, our recommendation is to not proceed with the extension of the exam to these cohorts.

We have detailed our concerns in the attached submission and we would be available to meet to discuss these in greater detail. We would also be very willing to work in close collaboration with the Psychology Board to discuss ways in which professional standards can be maintained.

Please feel free to contact us any time to discuss any of the specifics of our submission.

Yours sincerely,



Timothy Colin Bednall
Chair of the College of Organisational Psychologists

We are responding to this request for comment in our capacity as representatives of the profession of organisational psychology

1. Minimum Standards

Our concern relates to the fact that the National Psychology Examination is an assessment of a knowledge base and not necessarily an assessment of the application of skills. At a professional level, we consider a minimum level of profession skill, rather than knowledge per se, as a necessary requirement for the protection of the public. It is not clear how a knowledge-based examination will establish whether a provisionally registered psychologist can practice in a 'competent and ethical manner'. The Psychology Board of Australia currently undertakes accreditation assessments that are designed to ensure that training providers have the necessary capabilities to undertake assessments of graduate psychologists' skills. We consider this a necessary and appropriate strategy that has, to this point, safeguarded the public.

1.1. Nature of Notifications

Pages 9-10 of the Consultation Paper provides statistics about the number of notifications made against psychologists compared to other health professions. The nature of the complaints made against psychologists is unclear from the description provided. Moreover, the statistics do not indicate which types of psychologist are most likely to receive notifications (e.g., psychologists trained under the 4+2 model vs. those trained under the 5+1 model; clinical psychologists vs. other types of psychologists). In the absence of an analysis of these complaints and their causes, it is unclear how a knowledge-based test will address breaches of ethical and professional boundaries and reduce risk to the public.

1.2. Cost benefits analysis

The effectiveness of the National Psychology Examination in reducing the number of notifications against psychologists is unknown. Given that the National Psychology Examination has been in use with psychologists trained under the 4+2 model, the Board should show evidence of its impact. For example, the Psychology Board could compare the number of complaints made against psychologists who have completed the National Psychology Exam versus an equivalent cohort of non-examinees within a similar time-span (e.g., within two years after registration is obtained).

As the effectiveness of the National Psychology Examination in reducing complaints is unknown, it is impossible to conduct a cost-benefits analysis of the reduction of risk against the imposition of costs to individual practitioners and the profession at large. Given the scope of the

regulatory change, the Psychology Board should undertake such an analysis before extending the Examination to psychologists trained under the 5+1 model.

2. Diversity

2.1. Outcomes

As an evidence-based practice, the College is interested to understand the data concerning the diversity of outcomes from the higher degree pathway. Is there, in fact, an evidence base to support this conclusion? If not, the College would recommend that the Psychology Board of Australia seek evidence to establish the veracity of this assumption, since the introduction of the National Psychology Examination represents a major policy and educational change and as scientist-practitioners, these decisions need to be evidence-based.

2.2. Complexity

While there is a degree of diversity within the psychology profession, a National Psychology Examination, assessing knowledge at the initial stages of development as an applied psychologist, will not necessarily translate to sustained performance over an extended period of practice where that practice does not coincide with the training environment. Declarative knowledge, such as that evaluated in the National Psychology Examination degrades relatively quickly, and is unlikely to be retained over an extended period (Kim, Ritter, & Koubek, 2013). By contrast, practice-related skills or procedural knowledge, is retained for an extended period and, importantly, can be adapted and applied within different contexts. To assess knowledge during the initial stages of skill acquisition will arguably have little or no bearing on performance at the latter stages of practice (Cross, Seaburn, Gibbs, Scmeelk-Cone, White, & Caine, 2011).

3. High Quality of Education

Rather than facilitating high quality education, there is a great deal of evidence to suggest that strategies such as the standard National examination will, in fact, degrade the quality of education since education providers will be implicitly encouraged to ensure that students are prepared for the minimum requirements to satisfy an examination, rather than exceeding those requirements and assessing competencies in a range of contexts (e.g. Higgins, Miller, & Wegmann, 2006).

The College is concerned that, unlike other professions, a National Examination is imposed on psychology students where this is not the case for other professions with arguably much greater rates of public dissatisfaction and complaint, and much greater risk of injury to the public. While the College is concerned that the public remains protected,

the evidence would suggest that the existing strategies that the Psychology Board of Australia has in place, including accreditation, provides an appropriate level of protection for the public.

4. Workforce

4.1. Participation

The College is concerned that the increasing costs associated with meeting the requirements for registration will necessarily restrict participation in psychology as a discipline, to those students who have the necessary financial support. Inevitably, this reduces participation from lower socioeconomic groups and this is clearly evident in other health professions, such as medicine (Garlick & Brown, 2008). Imposing an additional cost on a process whereby psychology students are already forced to pay fees for provisional registration may have the unintended consequence of restricting participation. Already, University courses have reported significant declines in first preferences for psychology due to the length of training and we recommend that the Psychology Board of Australia carefully weigh the expected benefits associated with the introduction of the National Examination, against the potential negative consequences in further contributing to the reducing demand for psychology as a preferred profession.

In addition, student feedback has indicated that international students are likely to experience difficulty in undertaking the exam in the limited amount of time they have on their study visas.

Several universities (e.g., the University of Queensland) have also established programs in Business Psychology, which offer training in similar knowledge and skills to organisational psychology programs. If requirements for registration become excessively costly, the College is concerned that many students will drift towards these programs. As these graduates compete with our members for similar work but do not register as psychologists, greater risk is posed to the public.

4.2. Responsiveness

It is not clear how a National Psychology Examination will enable continuous development of the professional since, inevitably, it represents an educational outcome, preparations for which must be initiated some time (up to two years) prior to the examination. Responsiveness requires a degree of agility in recognising and responding to community needs and this is an approach that is incorporated within the accreditation process.

5. Anti-Competitive Requirements

In its current form, the National Psychology Examination mandates that all psychologists be able to administer, score, interpret and write reports

using current editions of six selected tests (the WAIS IV, the WISC IV, the PAI, the DASS, K-10, and the SDQ). The tests have been chosen on the basis of their educational value and availability of Australian norms. These criteria are a reasonable basis for their selection. However, the requirement for all psychologists to be trained in these particular tests introduces a high barrier to entry for alternate test providers and publishers to develop and market new instruments. There is a risk that test publishers would view the current arrangements as anti-competitive, as psychologists would be likely to favour instruments they were already familiar with. Thus, these arrangements may discourage innovation in psychometric assessment development.

A better alternative would be to allow individual practitioners the choice of instruments they wish to be tested on within the domains required by the Board (i.e., cognitive ability testing, personality assessment, mental health screening). This change would also better reflect the types of assessments that are typically used by different groups of psychologists.

References

Cross, W. F., Seaburn, D., Gibbs, D., Schmeelk-Cone, K., White, A. M., & Caine, E. D. (2011). Does practice make perfect? A randomized control trial of behavioral rehearsal on suicide prevention gatekeeper skills. *The Journal of Primary Prevention, 32*(3-4), 195-211.

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