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ACAPP submission to Consultation Paper 25: Ending the higher degree exemption from sitting the National Psychology Examination

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Thank you for offering a consultation process on this controversial proposition of requiring postgraduate trained psychologists to undertake the Board based exam before general registration will be granted to them. ACAPP does not agree with ending the temporary exemption, but requests that it be made a permanent exemption. There is no evidence or sufficient argument presented by the Boards consultation paper which indicates that the additional regulated training in postgraduate programs is insufficient to prepare graduates for general registration without the exam.

We concur with the Boards original view that:

“The guidelines state that this exemption reflects the Board’s view that the internal examination and assessment processes in these accredited degree programs currently meet the Board’s standards for general registration. “

We also agree with the Boards statement claiming there is less necessity for the Board to have additional oversight of accredited higher degree pathways, versus unaccredited internship pathways:

*“The National Psychology Examination is currently being developed and administered by the Board. This is because APAC is **not responsible for the unaccredited pathways of the 4+2 or the +1, of the 5+1. The Board recognises that close oversight by the Board of interns in the fifth and sixth year of a higher degree is less necessary in accredited (higher degree) verses unaccredited pathways (internship pathway) to registration.**” (emphasis added).*

ACAPP supports that the university regulated postgraduate system has sufficient checks and balances to make the sitting of the Board exam for these candidates superfluous. These include strict academic criteria for entrance to a higher degree, interviews to select those candidates who have the personal attributes for professional practice, assessment of academic competency during the higher degree and assessment by regulated supervisors during the practical placement during the higher degree. The Board then also regulates the internship supervision required for endorsement. It could be readily argued that this process is a more thorough process to assess competency for independent professional practice, than a multi-choice exam. ACAPP believes adding an exam to this process would place unnecessary burden and costs on psychologists completing postgraduate degrees, be an unnecessary duplication of university based assessments, and represent a significant over-regulation of our profession by the Board.



ACAPP does not agree with the Boards assumption that the national psychology exam is an effective regulatory instrument in determining readiness to move into independent practice for psychologists who have undertaken the unregulated training pathways. Whilst the unregulated pathways still exist however, ACAPP supports the exam remaining a complementary method of assessment to supervised practice, in assessing the competencies required of psychologists for general registration, for 4 plus 2 and 5 plus 1 pathways. Our preference would be however for the 4 plus 2 and 5 plus 1 unregulated pathways to be completely phased out, leaving only the university regulated postgraduate training pathways, along with the two years of Board regulated supervised internship, as the requirements for full registration. This would be the most thorough process and level of training for ensuring safe and competent practitioners for the Australian public.

ACAPP would like to specifically comment on the arguments presented below by the Board (in red), which have been used to support their view that the exam exemption should be removed.

20. The key reasons for ending the proposal include:

□ **establishing a comprehensive and integrated suite of quality control mechanisms.** As stated above, ACAPP sees this as a **duplication of assessment** and **over-regulation** by the Board, if additional assessment requirements are forced onto psychologists completing postgraduate training.

□ **providing for the protection of the public by ensuring that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered.** If the Board takes this issue seriously, then we would recommend they remove the unregulated pathways of training and align Australia with other countries in the OECD. People who complete post graduate programs and supervision for endorsement, are more “suitably trained and qualified” than psychologists only completing the unregulated pathways. Postgraduate psychologists have also already demonstrated competency through a more thorough regulation process making the Board exams superfluous.

□ **ensuring that the minimum standards for general registration in psychology are being demonstrated by all.** This is a nonsensical argument as the exams were originally designed to deal with the low levels of training in the unregulated training pathways, (especially the 4 plus 2 pathway), not because the postgraduate training was deemed as inadequate for professional independent practice and general registration. There is no reasonable argument that over-regulating postgraduate trained psychologists is necessary, given the significant extra regulated training they undertake.

□ **facilitating the provision of high quality education and training of health practitioners.** This is again a nonsensical argument as the exam process does not provide any extra training, nor provide any high quality education – the postgraduate program does this. The exam can only indicate to the Board if someone can demonstrate they have sufficient knowledge to pass the exam.



□ enabling the continuous development of a flexible, responsive and sustainable psychology workforce that meets the needs of the Australian public. The meaning of this statement is difficult to interpret as one could argue that the Board could best meet these requirements by ensuring that postgraduate training and two years of supervision were to be made an essential requirement for independent practice, that university courses covering all nine professional area in psychology remain viable, and that specialist registration be obtained for all nine areas of practice in psychology. To indicate that the exam process and mandating postgraduate trained psychologist to undertake the exam ensures this requirement, is quite short sighted.

25. The National Psychology Examination marks an important contribution to ensuring a consistent professional standard of psychologists nationally. The examination assesses applied psychological knowledge which forms a significant basis of competence in the profession. The exam is a case study based exam with considerable emphasis on ethical knowledge and behaviour, and the integration of knowledge and skills. Given that our profession has nine different areas of expertise, each with their own postgraduate programs and supervision requirements, it is a considerable overstatement that the exam can cover all nine areas of psychological knowledge to ensure a consistent professional standard of psychologists nationally. This is particularly in the light of the ability of a psychologist with only 4 years of regulated training can establish themselves (as long as they don't use the titles), to practice in the fields of neuropsychology, clinical psychology, forensic psychology or any of the other expert area, without this specific training. The lack of regulation of what a 4 plus 2 or 5 plus 1 psychologist can practice, continues to be a major flaw in our system. The general public still assumes that the title "psychologist" means the same level of training has been completed by every holder of this title. They do not realise that a "psychologist" can have any one of six very different levels of training in our profession. Unfortunately the Board did not deal with this poor and complicated legacy from the APS, but instead added another unregulated pathway to our training (5 plus 1), and continues to reside over the lowest standards of training (4 plus 2) into professional practice in the OECD.

26. The examination supports the Board's *General registration standard* which provides that, in addition to successfully completing an approved qualification, applicants for general registration as a psychologist in Australia are required to pass the National Psychology Examination before the Board will accept their application for general registration. The Board has the ability to define the requirements necessary for general registration, as shown in the Board's current decision to have an exam exemption for higher degree trainees. The Board is making a choice to redefine the requirements to include higher degree applicants to do the exam, without good argument, and which ACAPP sees as an over-regulation of our profession and a duplication of university regulated processes.

Provisional psychologists in Masters Degrees typically are taught to the standard of the area of practice endorsement. This can create tensions in ensuring the broad competencies required of all psychologists for general registration are met, along with the narrower specialist skills in the area of practice. What tension does it create, and if there are any, is this a sufficient argument to override the points above? It is interesting to note that the Board has used the term "specialist" to describe the skills learnt in the postgraduate programs.



The Board is of the view that this complexity and diversity in outcome is perpetuating an additional risk to the regulation of psychology in assuring a single minimum standard of competency of professional psychologists. This point is very unclear. There are no sufficient or supported arguments proposed in the Boards consultation paper to validate the statement claiming that complexity and diversity creates risk to regulation, especially when the higher degree components of courses are already regulated to ensure standards of competency by APAC, and have successfully been done so for many years in Australia.

Unlike in other health professions, there are: a) several pathways to registration for psychology, and b) the qualification for general registration and the qualification for area of practice endorsement are the same, rather than separate qualifications. For reform work to be able to be carried out, the Board is of the view that additional safeguards need to be put in place, such as requiring all applicants for general registration to pass the National Psychology Examination. It is true there is no separate registration for people who have completed a postgraduate degree plus supervision. These however are separate and extra qualifications. The Board has merely chosen not to recognise this via a registration process. Instead the Board uses “endorsement” to give extra credentials to those having undertaken this significant additional training. In doing so, it has also made postgraduate training non-essential, that is, an “optional extra” - not required for registration or professional practice in any expert area of psychology. Rather than the lack of separate registration for higher degree training and supervision being used as an argument to over-regulate those who have completed this training, the lack of differentiation should be used to argue for specialist registration, to encourage psychologists to continue to gain extra training and supervision, especially considering the significant personal, professional and financial costs involved.

The Board regards accreditation as an important quality assurance. Accreditation is a form of program evaluation in which the quality of an education program is judged against defined accreditation standards through a combination of self-assessment and external peer review. Accreditation of programs ensures that the education and training leading to registration as a health practitioner is rigorous and prepares the graduates to practise a health profession safely. Accreditation does not however assure competence to practice as a registered psychologist for individual graduates from those programs. APAC’s role is to accredit institutions and the Board’s role is to register individuals – it is possible that an individual may pass an approved program of study but not be an appropriately qualified candidate for registration. The National Psychology Examination is a competency-based assessment of the integration of knowledge and skills in psychology and passing the exam assists the Board in being confident of a person’s ability to practise safely. This argument has completely ignored the role of the universities to assess and exam the individual who is going through the accredited courses. Universities play a major role in assessing candidates for entrance into postgraduate programs, for assessing their competency throughout the two years (minimum) training and have regulated supervision processes. In addition, the role of APAC in accrediting postgraduate programs of study (not institutions) also significantly contributes to the preparation of the graduate to practice a health profession safely. The combination of these two components at postgraduate level far surpasses the use of a multi-choice exam.



The Board believes that in the context of this expanding diversity of higher education outcomes that removing the exemption for the higher degree pathway would address any issues about the comparability of programs and diversity of graduates that may emerge in the current evolving higher education landscape. This appears to play down the significant role APAC plays in accrediting training programs to ensure they are comparable and of sufficient standard, regardless of diversity. It also contradicts the Boards previous statements about accreditation providing quality assurance: *“Accreditation of programs ensures that the education and training leading to registration as a health practitioner is rigorous and prepares the graduates to practise a health profession safely”*.

The higher degree exemption from sitting the exam could be seen to discriminate against the groups who are required to sit the exam and those who are not required to sit. The Board believes that it is particularly inequitable to have some Australian-trained provisional psychologists required to demonstrate competence through sitting the exam and others who do not. This argument does not appear to take into consideration that those who are currently exempt from the exam are exempt because they completed at least two additional years of university training and at least an extra year of regulated supervision. Discrimination cannot be argued in these circumstances, unless there is an argument mounted for discrimination against those who are continuing to do significant further training.

The Board has no evidence or grounds to support the view that applicants for general registration who have a higher degree should not also demonstrate the minimum standard for registration through sitting the exam. The Board also has no grounds or evidence to support the view that applicants need to do the exam to meet general registration requirements. The Board has not provided any argument to override their original opinion that *“The guidelines state that this exemption reflects the Board’s view that the internal examination and assessment processes in these accredited degree programs currently meet the Board’s standards for general registration.”*

Psychologists receive a high number of notifications and, over the past few years, have consistently fallen in the top five health professions receiving the highest number of mandatory notifications. Indeed, a recent study, using a comprehensive methodology, reported that "Psychologists had the highest rate of notifications, followed by medical practitioners, and then nurses and midwives" (47, 41, and 40 reports per 10,000 practitioners per year, respectively). The Board is of the view that the introduction of the National Psychology Examination would assist in ensuring that entry level psychologists have demonstrated to the Board the minimum professional standard to keep the public safe. ACAPP believes it is questionable whether a multi-choice exam, no matter how case based it tries to be, ensures competent and ethical practice once a person has passed the exam. It is also unclear whether the high notifications could be the result of insufficient training and supervision, as the Boards statement about notifications unfortunately does not differentiate the number of notifications made against postgraduate trained psychologists versus psychologists from the unregulated training pathways.



Board must meet the objectives and guiding principles of the National Law (section 3) and the National Scheme's regulatory principles:

a) to provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered

b) to facilitate the provision of high quality education and training of health practitioners

ACAPP argues that the Board significantly fails both of these objectives by maintaining unregulated pathways to professional practice and accepting the lowest standards in the OECD for professional practice. The use of the "endorsement process" making postgraduate training an *optional extra*, is also completely in contrast to all other OECD countries and does not encourage psychologists to undertake the significant extra time, cost and effort to do this essential training. These major flaws need to be dealt with if the Board wishes to meet the objectives and guiding principles of the National Law.

Increasingly, 'output' oriented competency-based training and regulation is replacing older 'input' defined curricula that had required the more passive incorporation and testing of defined knowledge. The approach and design of the National Psychology Examination reflects this trend towards competency-based certification. The examination tests psychological reasoning applied to case studies, where selection of the correct answer requires judgement acquired through training. It does not test the recall of facts. This argument is completely false in that any multi-choice exam has only one correct answer (or fact) which the candidate must learn in order to pass. Being faced with a "client" on paper is vastly different from being faced with a real client, with all the complexities of the situation. The only true assessment of "output" oriented competency based training is via regulated supervision and training of a psychologists direct skills, showing competency in knowledge, practice and ethics directly with the client and/or organisation.

c) to enable the continuous development of a flexible, responsive and sustainable Australian health force. Including applicants for general registration via the higher degree pathway as one of the groups required to sit the exam, will enable education providers in psychology to develop a more flexible and differentiated structure of program types and styles of teaching. The exams have been running for a number of years now, where is the evidence for this effect? Such statements cannot be made without concrete evidence to support them, otherwise they are just empty statements.

In conclusion, ACAPP supports the continuation and permanent exemption of higher degree holders from sitting the exams, to avoid a serious over-regulation of our profession and a wasteful and unnecessary duplication of university assessments and regulation of higher degree holders.

As requested in the consultation paper, on the next page we have deleted the changes we feel are not supported by the Boards arguments.



Areas to delete in the Boards new draft: (red delete; yellow leave)

Who needs to sit the examination?

The following groups must pass the examination before applying for general registration as a psychologist:

1. provisionally registered psychologists undertaking a five-year accredited sequence of study followed by a one-year Board-approved internship (5+1)

2. provisionally registered psychologists undertaking a four-year accredited sequence of study followed by a two-year Board-approved internship (4+2)

~~3. provisionally registered psychologists undertaking the higher degree pathway, including an accredited Masters degree, accredited doctoral degree, or combined Masters/PhD qualification. Higher degrees are accredited by the Australian Psychology Accreditation Council (APAC) and appear in the Board's list of approved programs of study~~

4. individuals intending to return to practise as a psychologist who have not practised for more than 10 years, and

5. overseas-trained psychologists seeking general registration in Australia.

Additionally, passing the exam is required for individuals who are directed to sit it by the Board, or by a panel or tribunal, in relation to an application for registration under Part 7 of the Health Practitioner

Exemptions

The Board has applied an exemption from sitting the examination to graduates who apply for general registration before 30 June 2016 with:

an accredited six-year professional Masters

Doctorate, or

combined Masters/PhD qualification

that leads to an area of practice endorsement (including those applying under provisions for Doctorate students included in the statement of assessment in form *PDEC-76*).

This exemption reflects the Board's view that the internal examination and assessment processes in these accredited degree programs currently meet the Board's standards for general registration. The Board will review this exemption before 2016 and will consult widely with the profession and the community.

Start date

~~The requirement to sit and pass the examination applied from 1 July 2013 for the following groups:~~

~~1. provisionally registered psychologists undertaking a five-year accredited sequence of study followed by a one-year Board-approved internship (5+1)~~

~~2. provisionally registered psychologists undertaking a four-year accredited sequence of study followed by a two-year Board-approved internship (4+2)~~

~~3. individuals intending to return to practise as a psychologist who have not practised for more than 10 years~~

~~4. overseas-trained psychologists seeking general registration in Australia, and~~

~~5. individuals required to do so by the Psychology Board of Australia, panel or tribunal.~~

~~The requirement to sit and pass the examination for applicants for general registration via the higher degree pathway applies from 1 July 2017.~~



~~The July 2017 transition provision~~

~~The Board has applied an additional transition provision exempting applicants for general registration via the higher degree pathway from the requirement to sit the national psychology exam until 1 July 2017.~~

~~Individuals who complete a higher degree and who apply for general registration from 1 July 2017 must pass the examination before applying for general registration.~~

Table 1: Who needs to sit the examination and when	When you need to sit examination	Date you need to have passed the exam to apply for general registration
Applicant Provisional psychologist in 4+2 internship	During sixth year (after 1,540 hours of supervised practice internship)	1 July 2014
Provisional psychologist in 5+1 internship	During sixth year (within approved supervised practice internship)	1 July 2014
Person returning to psychology practice after 10 years	As directed by the Psychology Board of Australia in response to application	1 July 2014
Provisional psychologist in Masters/DPsych/combined Masters/PhD	During sixth year at any time as determined by the individual registrant*	1 July 2017
Person with overseas qualifications in psychology who meet other requirements	During approved supervised practice internship (usually this is a three-month program)	1 July 2013
Person required to do so by board or panel or tribunal	As directed by authority	1 July 2013

~~*Note: Higher degree institutions are not party to the examination process. Sitting and passing the examination is completely independent of a university program. Registrants are required to enrol and sit their exam at their own choosing, and exam results are not communicated to universities.~~

3. Sitting the examination

Eligibility

To be eligible to sit the examination, candidates must have:

- completed the first four years of accredited study, plus 1,500 hours of supervised practice in the 4+2 pathway, or
- completed the first five years of accredited study, and have entered the sixth (+1) intern year in the 5+1 pathway and there is an approved plan and supervisor arrangements in place, or
- ~~completed the fifth year (full-time equivalent) of an accredited sequence of study and have entered the sixth year of study, or~~
- completed a course of study overseas that is assessed by the Board as substantially equivalent to a six-year accredited sequence of study in psychology, and be seeking general registration as a psychologist in Australia, or
- previously held general registration as a psychologist in Australia and are now intending to return to practise after more than 10 years without practising, or