

**From:** Guy Curtis

**Sent:** Thursday, 20 August 2015 2:15 PM

**To:** Psychconsultation

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

Re: Consultation paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination

I am writing to strenuously object to the proposal contained in "Consultation paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination". The consultation paper proposes to end the exemption for graduates of Australian Psychological Accreditation Council (APAC) accredited Masters programs in psychology from sitting the National Psychology Exam in order to obtain registration. I have four reasons for my objection.

First, it is an unnecessary duplication of existing checks and balances that apply to Masters programs through accreditation processes. The Board already sanctions APAC to set the standard for content, knowledge, and achievement in Masters courses. APAC already oversees courses to make sure that Masters students are taught core skills and knowledge domains assessed in the Exam such as assessment and ethics, as applicable to the specialisation of the masters programs. In addition, APAC checks that the assessment in these courses meets their standards. Students who complete a Masters have been assessed to an already-regulated standard multiple times. At my university, Masters students complete 8 units in their first year of study, each with at least 3 assessment items, this is at least 24 assessments that are already scrutinised by APAC, the Australian University Quality Agency (AUQA), and various internal university checks on unit and assessment quality. The policy at my university, and variations on it are universal at Australian universities, is that a significant proportion of the assessment must be supervised or invigilated. For people who take a 4+2 internship pathway to registration there is no way of knowing, before they register, if they have completed any formal assessment of their knowledge, let alone invigilated assessment, but this is simply not the case for Masters graduates. In a political environment where the government is keen on cutting red tape, the Board is seeking to impose red tape that is clearly not needed.

Second, it will force masters programs to teach to the Exam. As the economist Charles Goodhart neatly surmised "when a measure becomes a target, it ceases to be a good measure." This is because people essentially begin to game systems to meet targets at the expense of the underlying constructs the measure seeks to examine. Educators bemoan standardized testing, such as the SATs in the USA and NAPLAN in Australia, because these force educators to teach to the test. And, they are right to complain about this because the evidence shows that teaching to tests can compromise, rather than enhance, educational standards and undermines desirable educational diversity. If Masters courses teach to the exam, which they will, they will doubtless focus excessively on the 4 areas covered in the exam at the expense of other important educational outcomes for psychologists such as research skills, critical thinking, and, most critically, domain-specific knowledge for their masters specialisation.

Third, it is yet another unnecessary cost imposed by the Board on students. I have written on previous consultations that I believe the Board is in error to require Masters students to be provisionally registered. The Board should revisit this policy and use student registration for Masters students instead. Student registration gives the Board the same power to take disciplinary action against students for the protection of the public as does provisional registration, but it does not impose the significant costs that are demanded of provisionally registered psychologists. Two years of provisional registration cost more than \$900, which students need to find on top of the cost of books, ever-increasing course fees, amenities fees, and living expenses. The annual registration cost is the same as for someone working full-time, but a full-time worker can deduct the cost of their registration from their tax, whereas students cannot, this means that students effectively pay more for registration than full-time workers! This \$900 figure presumes full-time enrolment, for a part-time student they may have to find double this, up-front, to maintain provisional registration over the course of their Masters. Students can defer course and amenities fees, borrow books from the library, and get Centrelink assistance with costs of living, but the up-front registration fees are inescapable and a significant burden on students living hand-to-mouth. As an academic, I have seen students in tears weighing the decision to quit the post-graduate studies that they were admitted to on the basis of academic merit because of the prohibitive nature of the \$450+ it would cost for them to take out provisional registration! No other profession in Australia imposes up-front fees of this kind on university students, and it is entirely outrageous. Now, you are seeking to impose a further \$450 cost on these students to sit the exam when they graduate and apply for general registration! Students currently face ever-decreasing financial support from government, rents and living costs the like of which older generations never experienced in their youth; and a tight, increasingly casualized, job market with stagnant wages growth where well-paying stable work is hard to find. Seeking to impose further costs on these students in order for them to join their profession after completing a highly-regulated degree already is at best negligent, but, truthfully, I consider it to be unethical.

Finally, the exam itself is fatally flawed. This has been pointed out in numerous submissions in three previous consultations on the content and application of the exam, which the Board have, thus far, apparently dismissed without any sign of consideration". The exam is not "fit for purpose": it has been argued that it will help ensure ethical behaviour, yet it is only a knowledge test and psychological research on ethical behaviour clearly shows that knowledge of ethics makes only a very minor contribution to ethical behaviour. The example questions are poorly constructed, but if they serve as examples of the whole exam it is a wonder anyone passes. No information has been provided by the Board as to the construct, content, or predictive validity of the exam. This is basic test design information that one would hope psychologists would understand. Moreover, the exam is very long, and the time given, for what is a complex cognitive task, would no doubt see most people perform poorly toward the end of the exam because of fatigue. Again, the design of the test simply does not seem to have been informed by what we know about human behaviour, performance, and mental processes from decades of psychology research. In addition, as has been pointed out in numerous submissions in three previous consultations the exam is slanted toward a clinical/health view of psychology that is at odds

with other well-developed practice areas of psychology such as organisational and sports psychology. The window dressing of adding a career development assessment to the study requirements for the Exam does not begin to correct this fundamental bias.

As I stated at the outset of this submission, I object to the proposal and I hope the Board sees sense and does not impose the National Psychology Exam on graduates of accredited Masters programs.

Sincerely,

Guy Curtis

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