

THE PSYCHOLOGY FOUNDATION OF AUSTRALIA

(Incorporated in New South Wales)

c/o School of Psychology, University of New South Wales, Sydney 2052, NSW, Australia

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30 September 2015

The Psychology Foundation of Australia response to:

Psychology Board of Australia Consultation paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination National Psychology Exam.

The Psychology Foundation member schools have many decades of involvement in the delivery of evidenced-based training in Psychology and are strongly in favour of rigorous accreditation of those training programmes. The Foundation does not support the requirement for students who have successfully completed 6 or more years of academic training in accredited programmes to be further examined using the National Psychology examination. There are two major reasons for this position. First, the graduates have already been rigorously examined to ensure their adequacy for exactly the same role and second, a single, largely multiple choice examination, is an inferior form of assessment in comparison to that they will have already completed. It therefore represents a further delay and financial impost without any useful purpose in reliably evaluating the competence of the successful course graduates for their intended roles. The requirement should be scrapped (not deferred) for those students who have competed 6 year university-based Masters and 6+ year DPsych and MPsych/PhD programmes.

Rationale

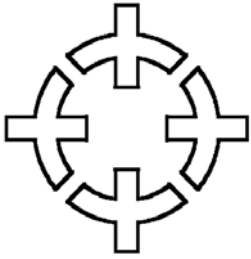
What is the purpose of accrediting training pathways?

These accredited routes are designed to ensure appropriate material is taught and that the material is assessed in an appropriate manner. There is no single, optimal form for the delivery of assessment, e.g. coursework material may be best assessed by reflective essay, short answer questions or, occasionally, multiple choice. Client interaction is best assessed by observation of the interactions over extended periods and research competence is best assessed by conducting a project and presenting an extended account of the research (i.e. a thesis). Accredited programmes contain (and are required to contain) all of these options. They, therefore, provide a comprehensive and nuanced assessment of the training requirements for professional practice.

The accreditation teams also monitor the standards maintained at each institution, as part of the accreditation process. Therefore, providing accreditation is rigorous and regular, those students graduating from such a programme must have demonstrated

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adequate training for their chosen professional role – a conclusion that is based on a large number of assessments distributed over a minimum of 6 years. This is a process that is well-supported by the evidence base of the discipline and has proven to be effective over many decades.

While the cost of accreditation itself is considerable, the advantage of this process is that students can know that when they complete a chosen programme they will satisfy registration requirements. This is an important consideration with proposed course fees amounting to a considerable sum for 6+ year training options (e.g. at UWA the current fee is up to \$10,266 per annum for the first four years, and either \$12,481, \$32,337 or \$43,116 for a Masters [depending on options], 4 x \$10,266 + Masters = \$53,545, \$73,401 or \$84,180 total course cost). It is unreasonable to expect a student to pay this amount, satisfy all requirements, and still risk it all on a single assessment with the additional impost of \$450. Our undergraduate courses in research methods and statistics teach all psychologists that such a single test (with its intrinsic error) will always be inferior to multiple, tailored assessments of content distributed over time. If the single test reaches a different conclusion from the multiple tests, it is overwhelmingly likely that the single test is in error and should be ignored.

Even if a more comprehensive assessment were to be designed it is not necessary both to accredit and use an exam. If the exam is truly adequate for determining all aspects of suitability for general registration (an hypothesis we do not accept) then pursuing an accredited course with the many requirements stipulated is rendered unnecessary. Institutions should be allowed to run any course they choose to prepare applicants for the exam. On the other hand, if the exam cannot act as a valid and reliable assessment of all aspects of suitability for general registration, then it has no purpose when all of these aspects of performance must be demonstrated to successfully complete an accredited 6+ year training programme at Masters and MPsych/PhD level.

We are an evidence based discipline with expertise in assessing human performance – this proposal ignores this wealth of evidence. It can neither function as promised, nor is it logical or consistent with our accreditation framework to propose it.

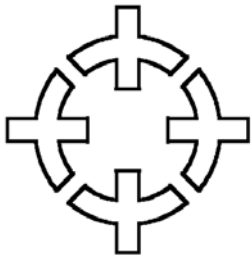
What arguments are listed in the consultation paper to support the suggested need for the exam?

3. The National Psychology Examination marks an important contribution to ensuring a consistent professional standard of psychologists nationally.

This assertion is only true if the examination provides a more robust form of assess-

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ment than the myriad nuanced assessments, tailored to addressing different forms of knowledge, which the students need to have successfully completed during their 6+ years of university training. No single examination can achieve such an outcome and therefore we reject the assertion as it applies to 6+ year university trained graduates of accredited courses.

4. The Board has applied an exemption from sitting the examination to graduates via the higher degree training pathway (those who have completed an accredited six-year or above professional Masters, Doctorate, or combined Masters/PhD qualification that leads to an area of practice endorsement). Recent reforms in the higher education sector however are leading to greater differentiation between institutions in the types and format and specialised focus of their programs. The Board is of the view that this diversity is perpetuating an additional risk to the regulation of psychologists from this training pathway.

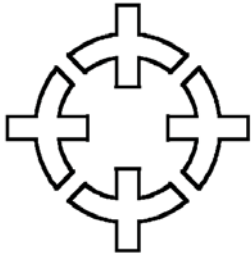
This is not an argument against the adequacy of the current accreditation system. Rather, it is an argument for diversity in that system to account for the differences in training pathways. A single examination will be inadequate for assessing students for multiple outcomes and so there is need of a range of appropriately tailored accreditation requirements to ensure that graduates of each training programme meet the minimum acceptable standards.

5. While the Board acknowledges that accreditation is an important quality assurance mechanism for accredited programs, the introduction of the exam for the higher degree training pathway will address any issues about the comparability of programs and diversity of graduates that may emerge in the current evolving higher education landscape. Whilst accreditation assures quality of programs, it is constrained in its ability to regulate or oversee individuals within those programs. The examination will assure all graduates meet the national standard.

This is a spurious argument. Accreditation standards are intended to ensure that only appropriately trained graduates successfully complete those programmes. A single examination will never have the reliability to support the argument that, in spite of a student passing all aspects of assessment in a fully-accredited programme, they are still unsuitable to practise. The evidence base of our own discipline makes this point clearly. If there are concerns with graduates not meeting the standards after completing an accredited programme then the problem is with the application of the accreditation standards and should be remedied at that point, not after a student has completed 6 years of training successfully passing everything that was required of them. Moreover, and as stated above, no single exam could possibly address issues of

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comparability in the way proposed.

6. Further, the Board believes this regulatory intervention will establish a comprehensive and integrated suite of quality control mechanisms to assess competence, ensure the minimum standard for general registration is demonstrated by all, and continue to strengthen public protection. The proposal would maintain the current entry to general registration requirements for overseas applicants and internship pathway applicants (4+2 and 5+1).

Those students with 6+ years of university training have already passed more rigorous assessment. Their competence is demonstrated by passing an accredited programme. Why penalise everyone for the potential risk posed by a miniscule number of students who fluke adequate performance on a very large number of assessments over 6+ years - one additional assessment cannot question the adequacy of the earlier assessments.

7. There are several pathways for provisional psychologists to gain general registration as a psychologist – the internship pathway (the 4+2 or 5+1 internship) and the higher degree pathway (a Masters/Doctorate in professional psychology). Currently, only those registrants who are undertaking the internship pathway are required to sit the national psychology exam. 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. A single national standard met by all applicants is the fairest and most consistent approach.

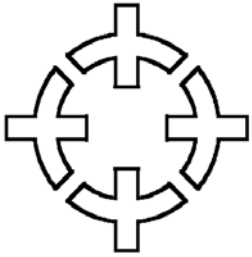
We do not accept this argument. It is not inequitable at all. The group with 6+ years of university training typically require higher performance levels for entry to the programmes and, on completion, they have already demonstrated their competence by a much more rigorous set of assessments in an extended course- the other group has not. There is a quite justifiable case to argue that the former have already demonstrated their adequacy while the latter group are still doing so. The two groups are treated differently because of these real differences in the groups and their training pathways. The different requirements flow from the different training routes.

8. Should the Board's proposal be supported, transition provisions for registrants applying for general registration via the higher degree pathway would be developed. The Board has detailed three options for transition with its preference for higher degree students to sit the national psychology exam if they apply for general registration on or after 1 July 2017.

None of these options should be necessary. The requirement for sitting the exami-

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nation should not be applied to 6+ year university trained graduates of accredited courses.

9. At this stage, the Board anticipates a minimal impact on practitioners from the proposal and expects all suitably prepared applicants for registration to be able to pass the exam. At \$450, the cost of sitting the exam is low in comparison to other health profession examinations in Australia (see Appendix D), and the exam is expected to be self-funding so as not to increase registration fees.

If the board expects all applicants for registration to pass, it is recognising that they will have the required expertise/knowledge gained during their MPpsych, DPpsych or MPpsych/PhD. Otherwise, the board would not be making such a prediction. Thus the Board, itself, is arguing our position: that trainees from such higher degree programs will have the required skills because of the level of training they have received and because they have passed the many, varied, in depth and nuanced assessments required by such accredited programs. Again we reiterate, this examination is redundant for those students completing a 6+ accredited university programme leading to either an MPpsych, DPpsych or MPpsych/PhD. The \$450 is therefore an unwarranted impost on top of an otherwise already expensive training programme.

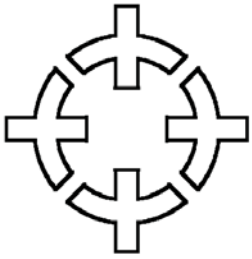
Overall, the Psychology Foundation does not agree that the stated reasons for removing the exemption from the National Psychology Examination for those who have completed an accredited six-year or above professional Masters, Doctorate, or combined Masters/PhD qualification that leads to an area of practice endorsement, is warranted. Appropriately rigorous accreditation can adequately ensure students meet minimum standards. A single examination is an unreliable method to act as quality control for these training pathways but may add value for pathways with less advanced training. This is yet to be determined. We were not reassured by the statement that:

Three types of provisional psychologist sat the exam – those completing their 4+2 program, those completing a 5+1 program, and international applicants completing a transitional program. The overall pass rate for the National Psychology Examination over the first year was 88 per cent, meaning 217 out of 247 people sitting the exam passed. The overall pass rate for the practice exam was slightly lower at 84 per cent. The national psychology exam is found to be an effective regulatory instrument used by the Board in determining readiness to move from provisional to general registration and independent practice.

Without knowing the validity and reliability of the examination the results could

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mean that 12% of graduates were not sufficiently well-trained, or, alternatively, that 12% of candidates who had passed all course requirements and were adequately trained were nonetheless excluded from registration, or that some number of inadequately trained people nonetheless passed the examination. These are not trivial differences in our view. Ideally one would want to validate the examination against some known standard to ensure its adequacy. Normally one might propose the successful completion of an extensive set of nuanced assessments tailored to the professional role as the appropriate standard. The Board appears to have rejected that option but it is unclear what has replaced it as the benchmark. However, this is tangential to the main question.

Overall, it is our view that the current exemption, from the requirement to sit the National Psychology Examination, applying to higher degree graduates who have successfully completed accredited training programmes, should be retained indefinitely.

Signed on behalf of the members of the Psychology Foundation of Australia.

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