

**Submission by the
Australian Psychological Society
to the Psychology Board of Australia**

**Consultation Paper 28 on the
National Psychology
Examination Curriculum
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Contact

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Introduction

The Australian Psychological Society (APS) welcomes the opportunity to comment on the Psychology Board of Australia's Consultation Paper 28 on the national psychology examination curriculum.

The APS, as the largest national professional association for psychologists with almost 23,000 members, has had a longstanding role in setting national standards for psychology education and training and has close relationships with the departments and schools of psychology in Australia's higher education sector and with the Head of Department and School of Psychology Association (HODSPA). The APS also has established relationships with senior psychologists in the public and private sectors. The Society has been working collaboratively with the Psychology Board of Australia (PsyBA) and AHPRA since their inception.

The APS has previously provided feedback to Consultation Papers 9 (2011) and 18 (2013) on Guidelines for the national psychology examination, and Consultation Paper 25 (2015) on ending the higher degree exemption from sitting the national psychology exam. Feedback on Consultation Paper 13 (2012) Exposure Draft: National Psychology Examination Curriculum was also provided directly to the PsyBA by the APS College of Organisational Psychologists.

The APS notes that this consultation focuses on the examination curriculum and supporting documents and does not entail a more substantive review of the national examination. The APS is concerned about the limited scope of the review.

The PsyBA by now would have over three years of data on the exam, with respect to outcomes, procedural issues (e.g., exam dates and locations) and feedback received from exam takers. It is not clear to what extent these data are informing and driving these minor changes, and, more importantly, to what extent they indicate the need for a more comprehensive review of the overall approach to the national psychology examination.

The consultation paper invited **comment on the national examination curriculum** in four areas:

- **Assesses the right competencies for general registration as a psychologist in Australia**

The APS remains concerned that the national psychology examination is being too focused on clinical / mental health related competencies in light of the breadth of the discipline. These concerns have been raised in various submissions in 2012. We note that there is no substantive change in this content imbalance. These concerns about the content of the exam as specified in the curriculum domains remain: reading of the attachments to the consultation paper materials indicates that the national psychology exam retains this focus.

These concerns are addressed explicitly in a separate submission by the APS College of Organisational Psychologists, dated 17 August 2017.

- **Remains fit-for-purpose**

The APS believes that we need to see data on exam outcomes to respond to this question. Concern has been raised by many stakeholders as to whether the national psychology exam does indeed assess competence, rather than only the knowledge component of competence. As stated in our submission to Consultation Paper 25, there is a wide range of options for assessing competence, besides a multiple choice exam, and these alternatives should be considered. Especially psychologists working in academia and with expertise in test construction and assessment continue to note that written exams measure surface rather than the deep structure learning, understanding and applied capabilities expected of generally registered psychologists.

- **Is aligned with the newly published *International declaration of core competencies in professional psychology (2016)***

We note that the Core Competencies in Professional Psychology (2016) are intentionally general and not specific, and were written to serve as a framework or foundation for individual countries and regulators. Thus the examination is aligned but it would also be aligned if it allowed for a greater range of content to be assessed than is currently included.

- **Curriculum is up-to-date with advances in the field of psychology**

Whether the curriculum is up-to-date is probably better reflected in the recency of the empirical literature underlying specific exam questions than the high-level categories specified for the curriculum. The curriculum does not reflect recent developments and trends in the field. One example is on-line or internet based assessment and treatment modalities and their ethical and communication implications.

Timeframes for future reviews

In principle, the proposed 5-year review period (p 7, paragraph 21) seems appropriate; however, given concerns about the assessment and intervention domains of the national examination and the relatively short duration since the examination has been offered, an earlier review of the curriculum, together with the larger-scale review of the type of examination, is preferable. The APS is pleased to note that there is an option for earlier review.

Feedback on the PsyBA's specific questions (p. 15, paragraph74):

1) Which is the best option for reviewing the *National psychology examination curriculum*? (Option 1 – status quo or Option 2 – revised curriculum)

Option 2

The APS supports option 2 – revision of the current curriculum and related documents (paragraphs 28, 29, and 30) but also **recommends a comprehensive review of the national psychology examination and the curriculum** (paragraph 31).

The APS notes that the PsyBA is not proposing substantive changes (paragraph 29) to the examination curriculum. The proposal is for an update to 5 major documents related to the examination curriculum, whilst main elements of the curriculum (the curriculum domains, number and proportion of questions per domain and the examination pass rate would remain the same).

As stated above, the APS considers that a substantive review of the national psychology examination in the near future is desirable. Such a review should consider examination outcomes and feedback, the literature on assessment of competence. Review of the curriculum should also include the content of each of the four domains.

Implementation period. With respect to the proposed six-month implementation period (paragraph 32): Will this time period be sufficient to develop and test new items and allow test-takers adequate preparation?

2) Are there specific areas of the current curriculum that are not working well and would the proposed revised curriculum address the issues?

The APS is pleased to note the inclusion of specific content in the ethics domain on disability services, supervision, understanding of wellbeing, competence, monitoring and practice improvement (p. 10 par. 49), and an increased focus on working with diversity and in a culturally responsive manner.

“Working with diverse groups” could be strengthened by including more detail and a specific focus on cultural awareness, responsiveness and safety, especially when working with people of Aboriginal and Torres Strait Islander descent, for all four domains.

3) Is there any content that should be changed, deleted or added to the proposed revised National psychology examination recommended reading list?

The APS agrees that the reading list (July 2017) is generally appropriate. Overall, we recommend inclusion of more recent references, although we are pleased to see inclusion of updated references since the December 2016 reading list. The APS also recommends review of the reading list (and curriculum content) to include references to current developments in the field, such as for the e-therapy.

4) Is there any content that should be changed, deleted or added to the proposed revised National psychology examination curriculum document?

Overall, the APS supports the recommended changes for the four domains, outlined in paragraphs 49 (ethics), 50 (assessment), 51 (intervention) and 52 (communication) and in attachment C, paragraphs 190 and 194. However, we have noted our concerns about the general content of the assessment and intervention domains above.

Specific concern involves the narrow focus on detailed knowledge of six specific psychological tests (paragraphs 191 and 207); as there is the risk that candidates will study for the test rather than develop competence in appropriate use of the tests. Similarly, paragraph 192 focuses narrowly on the diagnosing psychological disorders, whereas paragraph 204 provides a more general description of this domain.

The APS is pleased about the increased focus on cultural responsiveness (paragraph 195) and the explicit statement that this applies to all four domains. As noted for question 2, that “working with diverse groups” could be strengthened by including more detail and specific focus in on cultural awareness and responsiveness when working with people of Aboriginal and Torres Strait Islander descent.

5) Do you agree with the Board’s proposals to retire the Assessment domain additional resources document?

The APS supports the recommended retirement of the additional resources document, outlined in paragraphs 58 and 59, and its replacement with alternative resources and readings. It is noted, however, that a considerable number of sections in the document remain relevant, and an abbreviated, updated document (removing outdated tests) would continue to provide a helpful resource for exam candidates.

The assessment domain additional resources document provides principally a brief description of the Board mandated tests. Having a summary of all examination-relevant tests could be of benefit to candidates. However, candidates can obtain this information in relevant text books on psychological tests.

Has the PsyBA obtained feedback from candidates as to how helpful this resources document has been? Should there be no data on the document’s utility available, then the APS agrees with the Board’s proposal to retire the document, as long as new and additional resources will be made available for preparation for the examination and provide sufficient information to candidates.

6) Is there any content that should be changed, deleted or added to the proposed revised A brief orientation to the National psychology examination?

The APS supports the proposed minimal changes to this document, as outlined in paragraph 63 and attachment D.

It may be helpful to provide candidates with sample questions for each of the domains, either at the end of each section in this document or to refer explicitly to the sample questions document on the PsyBA website.

7) Is there any content that should be changed, deleted or added to the proposed revised curriculum section (p.4-5) of the Guidelines for the national psychology examination?

With respect to the recommended changes, the APS notes that they are intended to be nominal (paragraph 69).

No changes, additions or deletions are suggested to paragraphs 269 to 276 on pages 48 and 49 of the consultation paper.

For paragraph 277, p. 49, add as a third dot point: Sample Examination Questions

With respect to the guidelines published in attachment E, they generally set out expectations clearly.

8) Is the content and structure of the proposed revised curriculum documents helpful, clear, relevant and workable?

Generally yes

9) Are there other specific effects (positive or negative) from the proposed revised curriculum for practitioners, employers, clients/consumers, the Boards and AHPRA that have not been identified in this paper?

As stated above and in prior consultations, the focus on clinical / mental health issues in the assessment and intervention domains may address risks to the public / consumers of these services. It is not clear how the focus of the examination on those areas serves to mitigate risk for consumers of a wide range of other psychology services that are not covered in the examination. Is it assumed that those other areas are adequately assessed by supervisors in review of provisional psychologists work samples or by direct observation.

If the purpose of the national psychology examination to ensure that generally registered psychologists can demonstrate competence, then a wider scope of questions covering the diversity of the discipline may be appropriate. As stated before, we question if the examination does provide an accurate measure of competence in its current format and content.

The APS is concerned about the risk that provisional psychologists may orient their training to help them pass the national examination at the 70% pass mark rather than on learning a wide range of skills representing the diversity of the profession and ultimately providing better protection of the public.

10) Is there anything else the National Board should take into account in its review of the curriculum, such as impacts on workforce or access to health services?

It is difficult to respond to this question without data on examination pass rates. If there is a reasonable pass rate, then sufficient numbers of candidates would be entering the profession.

If, as raised at (9) above, provisional psychologists focus their training narrowly on clinical / mental health related areas as one way of studying for the test and maximizing passing the examination, the impact on the workforce may be a reduction in the number of practitioners competent in skills required for non-mental health settings, such as health, school, community or organisational settings.

11) Do you have any other comments on the *National psychology examination curriculum* revision?

The overall concerns about the content of the National psychology examination, especially in the assessment and intervention domains are as follows:

- Significant concerns remain that the examination curriculum is too narrowly focused on the mental health/clinical domains. Whilst we agree that a large number of generally registered psychologists practice in those areas, many psychologists practice in different contexts and settings where other assessment and intervention models are prevalent. The PsyBA has recognised this and made this more explicit in the July 2017 *Guidelines for the 4+2 Internship Program* but this does not seem to have been applied to the psychology curriculum revision.
- **National psychology examination guidelines**

With respect to the recommended changes, the APS notes that they are intended to be nominal (paragraph 69).

The consultation paper on page 13 contains paragraph 70 twice. The APS is in strong support of the first paragraph 70 for a consultation that focuses on broader issues and the guidelines document as a whole. The APS is in strong support of a consultation that explicitly addresses those elements specified in paragraph 71, proposed to remain unchanged by the PsyBA. The APS recommends a review of:

- The content covered within each of the four domains, especially assessment and interventions
- The number of exam questions based on examination data and relevant analyses to be empirically guided on the optimal number of questions.
- Empirical data on the 70% pass mark for the exam; i.e., the pass rate for exam candidates.

As stated in our introductory paragraphs, the APS asks about empirical evidence that supports the PsyBA recommendation of no change to key elements of the exam – it is difficult to comment in the absence of data.

The APS is in support of the proposed change in the second paragraph 70 on page 13, (a) edit and rewrite for clarity and (b) providing additional resource documents for exam takers.

- The APS has consistently maintained the position that graduates of APAC-accredited postgraduate psychology programs in the nine specific areas of practice should not be required to sit the examination. The PsyBA has granted an extension of the exemption from taking the exam until 2019 (p. 47, paragraph 265, 267). The APS would like again to state that these postgraduate programs should be explicitly exempted for the long term from the national examination, given the extensive, comprehensive, repeated and multimethod assessment of competencies embedded in these programs.