

Submission to the Psychology Board of Australia
In response to the public consultation:
Reducing regulatory burden: Retiring the 4 + 2 internship
pathway to general registration

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The Australian Clinical Psychology Association (ACPA) appreciates the opportunity to contribute to the public consultation of the Psychology Board of Australia (the Board): *Reducing the regulatory burden: Retiring the 4+2 internship pathway to general registration*. ACPA is the leading professional organisation to represent accredited clinical psychologists that meet the standards of qualification established by the Board to practise as a clinical psychologist in Australia. Qualified clinical psychologists have the strongest training of the mental health professionals in psychological management and intervention of mental illnesses. Hence, ACPA is well positioned to respond to this consultation paper.

ACPA strongly supports the retirement of the 4+2 pathway and considers that this internship model of training falls well short of the required training of psychologists in Australia. The reasons for this are convincingly explicated in the Board's consultation paper.

In response to the Board's invited feedback on the specific questions posed:

1. *Do you agree with the Board's proposal to consider education and training reform, including focusing on reducing regulatory burden, as an important next step in the development of the regulatory environment for psychology?*

ACPA considers the Board's proposal to conduct education and training reform, including focusing on reducing regulatory burden, as a much overdue and essential step in the protection of the public and in the further alignment of psychology training with international standards.

In 2006, Helmes and Helmes stated in relation to the 4+2 pathway to registration, "No other major jurisdiction of which we have knowledge permits the independent practice of psychology with only knowledge of the scientific core of psychology without structured coursework in applied or clinical practice" (p. 105). They add that, "It must be recalled that this model is the same as that previously used in the United Kingdom up to the 1970s, which has recently been described by Skillbeck (2004) as "an awful training route"" (p. 34, cited in Pachana, 2006, p.105). They go on to explain, consistent with the Board in its proposal, that, "Such an apprenticeship-based model suffers from inadequate training in the empirical bases for assessment and psychological interventions, knowledge of ways in which to monitor therapeutic gains, and guided practical experience that builds and extends this knowledge in a programmatic way. There is no guarantee of a common core of knowledge, a minimal level of skills, exposure to a minimum breadth of patients with a range of diagnoses, ages or problem severity, or that the supervision provides training in current evidence-based practice" (p.105). This is similarly the view of ACPA.

2. *Which do you consider is the best option for reducing regulatory burden? Please provide reasons for your stated preference:*

ACPA unequivocally supports Option Two: *retirement of the 4+2 pathway to general registration*. ACPA considers that the 4+2 internship training is no longer fit-for-purpose.

Consistent with analyses by the Board, ACPA holds the view that the retirement of this pathway would:

- Increase protection of the public through greater consistency and more adequate training of generally registered psychologists through enhanced accredited training. As the Board notes, "Accreditation is the key mechanism in the National Scheme to ensure

that practitioners have the knowledge and professional attributes for independent practice in their profession” (Psychology Board of Australia, 2018, p. 30).

- Increase standards within the profession through an additional year of accredited professional training, within the same timeframe as the 4+2 program. This would improve the quality of the education and training received by general psychologists.
- Move Australian psychology training closer to international standards and benchmarks. It is of note that the new standard of a 5+1 pathway to general registration nonetheless continues to place Australia behind other developed countries in terms of the amount of content of psychology taught in the undergraduate degree, while the accredited training in professional practice is half of that received in the EuroPsy (which requires a two-year master’s degree in professional practice).
- Reduce the regulatory burden. There is less requirement for AHPRA resources, compliance costs, and less regulation required when programs have increased accreditation.
- Provide interns that are more work-ready and thereby reduce the risk for supervisors of interns, and the public.
- Reduce competition for internships and increase the number of supervisors available, as the length of the internship component is halved.
- Reduce the risk for supervisors of interns, due to the additional accredited training they have undertaken in professional practice as a psychologist.
- Reduce unnecessary complexity, fragmentation, high costs, training difficulties, and burdensome nature of this training pathway to general registration for the Board, employers, universities, supervisors, and psychology interns.
- Reduce confusion regarding pathways to registration and varying standards of training.
- Support the potential international mobility and e-practice of psychologists from Australia.
- Produce cost savings for those psychologists training via the 5+1 preferred option by reduced payment for supervision and Continuing Professional Development for interns.
- Improve community confidence in the training of psychologists

ACPA believes that, given the addition of the more recent, but widespread and developing, 5+1 internship pathway that has replaced the 4+2 internship pathway to general registration, there is no reason to delay retiring the long obsolete 4+1 pathway.

3. *Are there any specific impacts (positive or negative) or advantages/disadvantages for each of the two options that have not been outlined in the paper?*

The Board has undertaken a comprehensive and thorough analysis of the advantages/disadvantages for the options proposed and it is evident that the advantages of Option Two far outweigh the other options with minimal disadvantage to the public, workforce, or the profession. ACPA offers no further advice in this regard.

4. *Are there any specific risks (for each of the two options) that have not been outlined in the paper?*

It is the view of ACPA that the Board has comprehensively identified potential risks and has established the likelihood and impact of such risks (summarised in Attachment F), with solutions to minimise the likelihood of these risks and impacts (summarised in Attachment E). All risks are minimal, with the exception of the continuing moderate risk of regulatory burden and the lack of accreditation of the internship (5+1) component of the program.

5. *If you prefer option two, do you support the Board making the changes (update/delete) to the standards, guidelines, fact sheets and forms as outlined in Attachment G-J to retire the 4+2 internship pathway?*

ACPA fully supports the Board's proposal to update/delete the standards, guidelines, fact sheets, and forms as outlined in Attachment G–J to retire the 4+2 internship pathway to registration as a psychologist.

6. *If you prefer option two, which transition option do you prefer and why?*

ACPA supports *option b*): last enrolment in the 4+2 internship is 30 June 2020. ACPA does not support any additional delay in the retirement of the 4+2 internship program.

While ACPA's preference is to retire the 4+2 pathway to registration immediately and would choose *option a*): last enrolment in the 4+2 internship is 30 June 2019, if all were equal, ACPA recognises that such timing would unfairly impact on part-time students undertaking a fourth year of an accredited undergraduate degree majoring in psychology with the intention and expectation of undertaking the 4+2 internship pathway to registration upon completion of their fourth year.

7. *From your perspective, can you identify any practical issues in retiring the 4+2 internship pathway?*

ACPA is of the view that likely practical issues have been comprehensively identified and clearly described in the Board's consultation paper. It is evident that the Board has prepared solutions (Attachment E, G-J) to address these issues, and that they have minimum impact.

8. *Is the content and structure of the consultation paper helpful, clear, relevant and understandable? If not, what needs to change?*

The Board presents a well-researched, thoughtful, cogent, and compelling case for the retirement of the 4+2 internship pathway to registration, in which it carefully identifies the advantages/disadvantages, potential risks, and the practical issues. In the view of ACPA, the paper is sufficient for purpose.

Is there anything else the National Board should take into account in its proposal, such as impacts on workforce or access to health services that have not been outlined in the paper?

ACPA is of the view that the Board has identified the potential impacts on workforce and access to health services, and accurately concluded these would be minimal, and if present, short-lived. The Board has also provided solutions to the potential identified impacts in Attachment E. These solutions indicate the costs would be reduced, recoverable or neutral. The benefits clearly outweigh any potential negative impacts.

References

Helmes, E. & Pachana, N.A. (2006). Issues in training in clinical psychology in Australia: Interplay between training goals and legal standards of practice. *Australian Psychologist*, 41(2): 104–111.

Psychology Board of Australia (2018). Public consultation: Reducing regulatory burden: Retiring the 4 + 2 internship pathway to general registration. P.30. Downloaded 2nd May, 2018 from <http://www.psychologyboard.gov.au/News/Current-Consultations.aspx>