



Professor Brin Grenyer
Psychology Board of Australia
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By email: psychconsultation@ahpra.gov.au

Dear Brin

Consultation – Reducing regulatory burden: Retirement of the 4+2 internship pathway to general registration

Thank you for the opportunity to comment on the Psychology Board of Australia's preliminary consultation on the 'Retirement of the 4+2 internship pathway to general registration'. The Australian Psychology Accreditation Council (APAC) is pleased to provide responses below to the nine questions contained in the preliminary consultation document:

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

APAC is supportive of measures to reduce regulatory burden where possible and is supportive of the direction of travel set out in the consultation paper.

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

- *option one - status quo*
- *option two - retirement of the 4+2 pathway to general registration*
- *none of these options, or another option.*

Option 2 – the retirement of the 4+2 pathway to general registration - would appear to be a good option for reducing regulatory burden and the paper makes clear the rationale for this.

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?*

None that we can think of at this time.

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

None that we can think of at this time.

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?*

Yes. This seems sensible.

6. *If you prefer option two, which transition option do you prefer and why?*
- option a): last enrolment in the 4+2 internship is 30 June 2019
 - option b): last enrolment in the 4+2 internship is 30 June 2020
 - option c): last enrolment in the 4+2 internship is 30 June 2021
 - none of these options or another option (please specify)

APAC does not have a strong view on this, expect to flag that 30 June 2019 would appear to be quite an early last enrolment date given that the full consultation is unlikely to conclude until mid-2018.

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

None at this stage.

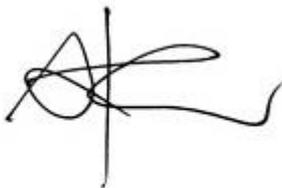
8. *Is the content and structure of the consultation paper helpful, clear, relevant and understandable? If not, what needs to change?*

The paper is well structured and the rationale for the change is clear.

9. *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?*

Nothing that we can think of at this time.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Simon Crowe', written over a vertical line.

Professor Simon Crowe
Chair