



Public consultation

Area of practice endorsements registration standard

October 2018

The Psychology Board of Australia (the Board) is releasing this public consultation paper to seek feedback on a draft *Area of practice endorsements registration standard* (AoPE standard).

The Board commenced this review in 2015 and consulted on a revised AoPE standard and *Guidelines for area of practice endorsements* (AoPE guidelines) in 2016. The review was placed on hold until new accreditation standards for the psychology profession were finalised. Now that the new *Accreditation Standards for Psychology Programs* and supporting *Evidence Guide* have been [published](#), the Board has re-commenced its review of the AoPE standard and guidelines. The Board is proposing to vary the standard from the version consulted on in 2016 to ensure it aligns with the new accreditation standards.

The Board also proposes to remove content from the AoPE standard that is sufficiently detailed in the AoPE guidelines. For this reason the Board is releasing a copy of the proposed AoPE guidelines. While the guidelines have been revised since public consultation in 2016, the Board is not consulting further on the AoPE guidelines at this time except where content relates to the proposed changes to the AoPE standard. The Board is planning a larger, more comprehensive review of the approved areas of practice, including competencies, as part of its broader education and training reform agenda.

The purpose of this consultation is to obtain comments and suggestions about the proposed AoPE standard from the profession, community, governments, employers, and other interested stakeholders. The following consultation paper explains and discusses the proposed changes to the AoPE standard and asks questions about the review you may wish to address in your response.

Your feedback

You are invited to provide your feedback in a Word document to psychconsultation@ahpra.gov.au by close of business **Friday 7 December 2018**.

You are welcome to supply a PDF file of your feedback in addition to the Word (or equivalent) file, however, we request that you do supply a Word or text file. As part of an effort to meet international website accessibility guidelines, AHPRA and the Board are striving to publish documents in accessible formats (such as Word), in addition to PDFs. More information on this is available on [AHPRA's website](#).

How your submission will be treated

Submissions will generally be published unless you request otherwise. The Board publishes submissions on its website to encourage discussion and inform stakeholders and the community. However, the Board retains the right not to publish submissions at its discretion, and will not place on its website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the consultation.

Before publication, the Board will make reasonable effort to remove information that personally identifies individuals making submissions, as well as individuals referred to in submissions, including their contact details.

The views expressed in submissions are those of the individuals or organisations who submit them and publication does not imply any acceptance of, or agreement with, those views by the Board.

Psychology Board of Australia

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The Board will also accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Whilst the Board and AHRPA will take reasonable steps to preserve the confidentiality of these submissions, these may be disclosed if this is required by law or by a committee of a parliament. Usually, requests for access to a confidential submission will be determined in accordance with the Freedom of Information Act 1982 (Cth), which has provisions designed to protect personal information and information given in confidence.

Please let the Board know if you do not want your submission published, or want all or part of it treated as confidential.

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Overview of consultation

Background

1. The role of the Psychology Board of Australia (the Board) is to work with the Australian Health Practitioner Regulation Agency (AHPRA) and other National Boards to achieve the objectives of the [National Registration and Accreditation Scheme](#) (the National Scheme), in accordance with the guiding principles of the scheme. The Health Practitioner Regulation National Law (the [National Law](#)) requires National Boards to develop and recommend registration standards about various matters to the Ministerial Council. This may include matters relevant to the eligibility of individuals for registration in the profession, including endorsement of registration in the profession.
2. The *Area of practice endorsements registration standard* (AoPE standard) was developed by the Board in the lead up to the commencement of the National Scheme in 2010. The standard was approved by the Ministerial Council with effect from 1 July 2010. The 2010 version of the standard included seven approved areas of practice. The Ministerial Council later approved two additional areas of practice and the registration standard was updated accordingly, with the revised version taking effect from 9 March 2011.
3. The *Guidelines on area of practice endorsements* (AoPE guidelines) were developed to support the AoPE standard by providing guidance to registered psychologists who hold endorsement in one of the approved areas of practice and to those undertaking a registrar program to become eligible to apply for an endorsement (and their supervisors and employers).
4. To ensure continued relevance in a dynamic regulatory environment, the Board regularly reviews its registration standards, guidelines and policies. In this consultation the Board is seeking input from stakeholders on further revisions to the AoPE standard after the draft was first released for public consultation in 2016.

2016 consultation

5. The Board commenced a review of the AoPE standard and guideline in 2015, which progressed to public consultation in January 2016. The Board considered that the requirements for endorsement and for the registrar program were largely appropriate and working well, and did not propose major changes to these documents.

AoPE standard

6. In 2016, the Board did not propose any changes to the nine areas of practice or the qualifications and training required for endorsement. It did identify improvements to the AoPE standard to make it clearer and easier to understand, including clarifying language, revising structure, and adding key definitions.
7. The 2016 draft standard sought to retain and better explain the pathways to endorsement set out in the current (2011) standard: (a) the Masters' pathway; (b) the Doctorate pathway; and (c) the 'other' pathway (primarily for overseas qualified applicants). The draft 2016 standard also proposed to:
 - Separate the combined Masters and PhD pathway from the Doctorate pathway, and set out the different registrar program requirements for each pathway.
 - Explicitly include bridging programs within the standard Masters pathway to account for the introduction of post-masters bridging programs.
 - Refer to qualifications by year-level rather than name (e.g. 'fifth and sixth year' rather than 'Masters') to better align with the [Australian Qualifications Framework](#) and to ensure those undertaking a fifth year as part of the 5+1 pathway to general registration (e.g. Masters of Professional Psychology) are not misled in thinking that qualification would allow entry into a registrar program.
 - Add a pathway for applicants who previously held endorsement under the National Law, allowing them become endorsed again on the basis of the qualification and training that previously qualified them for endorsement.
 - Specify the supervised practice requirements of the registrar program in hours rather than years, to make the requirements clearer for those undertaking the program part-time (this change results in a small discount in total hours for all pathways).

AoPE guideline

8. [Attachment C](#) contains a summary of changes to the AoPE guidelines proposed in 2016 and a summary of further changes made following the 2016 public consultation process. Updated draft guidelines are at [Attachment D](#).
9. While the Board did not propose a comprehensive review of the areas of practice and associated competencies, submissions received during and since the 2016 consultation indicate that such review is a priority for some stakeholders. The focus of the Board's education and training reform agenda over the past few years has been the retirement of the 4+2 pathway to registration. The next priority is a thorough, systematic review of the approved areas of practice, including how each area's competencies differ from other areas and from general registration. The Board has determined that the nine areas of practice and competencies should not be changed until a detailed review is undertaken. Stakeholder feedback received to-date will inform the planning of this review.

Current consultation

New accreditation standards

10. Following the 2016 public consultation the Board placed the AoPE review on hold until the Australian Psychology Accreditation Council completed its review of the accreditation standards for psychology programs, which it did in late 2017. To ensure the AoPE standard aligns with the [new accreditation standards](#), the Board is now proposing changes that warrant further consultation with stakeholders.
11. In addition to the traditional postgraduate qualification for endorsement, which combines professional (general registration) competencies and area of practice (endorsement) competencies in a minimum two-year program, the new accreditation standards allow for the development of 'stand-alone' area of practice programs. These programs will be equivalent to an accredited sixth year of study (i.e. one-year full-time programs). The key difference between these stand-alone programs and 'bridging' programs that have already been approved by the Board is that the accreditation standards allow higher education providers to offer stand-alone programs to psychologists who do not already hold a postgraduate qualification or endorsement in an approved area of practice, and who did not obtain general registration through a postgraduate qualification, for example, those who completed a 4+2 internship pathway.¹
12. The proposed AoPE standard and guidelines have been revised to recognise these stand-alone programs. Higher education providers will be eligible to start delivering stand-alone programs from 1 January 2019, when the new accreditation standards take effect.

Other structural changes

13. Some structural changes have been made to the proposed AoPE standard since the 2016 consultation to ensure consistency with the format of the Board's general and provisional [registration standards](#), updated in 2016 and 2017 respectively. The updated draft standard specifies the minimum qualification necessary to apply for endorsement first, followed by other requirements to be eligible for endorsement (i.e. the registrar program).
14. Additionally, the Board is proposing to remove the specifics of the supervised practice requirements (registrar program) from the standard and instead refer to the AoPE guidelines, which set out these requirements in detail at section 3. No change to the eligibility requirements is proposed (other than including stand-alone programs, as mentioned above); the Board is simply removing detailed information that is more appropriately described in a guideline rather than a standard.
15. The proposed AoPE standard now simply states that the minimum qualification for endorsement is an approved postgraduate qualification in an area of practice, which is defined as 'a program of study relevant to the endorsement appearing on the Board's online list of approved programs'. This [online list](#) indicates which programs lead to endorsement. To provide additional guidance, the year-level and titles of the various endorsement qualifications remains set out in the proposed AoPE guidelines.
16. The proposed standard then states that, in addition to the minimum qualification, applicants for endorsement need to complete a registrar program. The typical registrar program consists of 3000 hours

¹ The accreditation standards stipulate that such applicants will require a minimum of 12 months' practice as a registered psychologist with no conditions on their registration.

of supervised practice, referred to as 'two years of full-time practice' in the current (2011) AoPE standard. Discounts on the number of hours will remain available to individuals completing approved programs of study longer than the typical two-year Masters pathway (e.g. a Doctorate or combined Masters/PhD), as well as to those who already have an endorsement in another area of practice. These discounts are explained in the draft AoPE guidelines.

17. The Board considers that detail about the specific qualifications that lead to endorsement and their corresponding registrar program requirements are better addressed in the AoPE guidelines rather than within the AoPE standard. Simplifying the content in the standard allows the Board to be more responsive to changes in the psychology education and training environment, as the Board will have greater flexibility to update the guidelines independently of registration standards. This flexibility will be particularly important in coming years as higher education programs evolve under the new accreditation standards, and as progress is made on other Board education and training reform initiatives.
18. The proposed AoPE standard retains content from the 2016 draft, including:
 - a pathway to endorsement for overseas-qualified applicants who completed a qualification deemed substantially equivalent to the minimum qualification required for endorsement, and a registrar program or period of supervised practice that is deemed substantially equivalent to the registrar program, and
 - a pathway for those who previously held an endorsement to apply to re-obtain that endorsement.

Purpose of this consultation

19. A draft copy of the proposed AoPE guidelines are attached to this consultation paper to provide context to the proposed changes to the AoPE standard. The Board has made some amendments to the guidelines following feedback received in the 2016 public consultation, however, the Board is not consulting further on the AoPE guidelines at this time except where content relates to changes proposed to the AoPE standard.
20. Extensive feedback from stakeholders during the 2016 consultation indicated a need for the Board to conduct a much larger and more comprehensive review of the areas of practice, including competencies. The Board intends to commence a comprehensive review of areas of practice endorsement shortly, after progress has been made on other education and training reform priority initiatives. Changes to higher degree program offerings as a result of the new accreditation standards and the Board's education and training reform project will be important for informing the next AoPE review.
21. The purpose of this consultation is to:
 - provide stakeholders with an opportunity to consider whether implementation of the proposed AoPE standard could have any impact on them or the broader regulatory environment, now or in the future
 - identify any existing or potential operational, workforce or legal impacts or barriers to adopting and implementing the proposed AoPE standard
 - provide stakeholders with an opportunity to suggest improvements to the proposed AoPE standard that will provide for increased public protection and directly contribute to achievements of the objectives of the National Law
 - provide stakeholders with an opportunity to suggest improvements to the presentation of information in the proposed AoPE standard, and
 - meet the consultation requirements of the [National Law](#).

Options statement

22. The Board has considered two options in further developing this proposal.

Option 1 – Status quo

23. Option 1 proposes to continue with the current AOPE standard, last updated in 2011, with no changes.
24. The current standard does not explicitly allow for endorsement of registration for psychologists completing a post-Masters bridging program, or those completing a stand-alone sixth year program which does not require an existing postgraduate qualification in another area of practice (as enabled by the new [accreditation standards](#)).

25. This option would involve retaining the current AoPE guidelines, published in 2011, as the proposed guidelines (at [Attachment D](#)) do not align with the current registration standard. Therefore the various benefits of moving to the proposed new guidelines, outlined in [Consultation Paper 26](#) and summarised in [Attachment C](#), would not be realised under this option.

26. The current (2011) AoPE standard and AoPE guidelines are on the [Board's website](#).

Option 2 – New AoPE standard and guidelines

27. Option 2 is to recommend the proposed AoPE standard, at [Attachment B](#), to Ministerial Council for approval.

28. The proposed standard is succinct, less prescriptive, and will allow the Board to efficiently and effectively respond to changes in psychology education and training. This will be particularly important in coming years as higher education programs evolve under the new accreditation standards, and as progress is made on other education and training reform initiatives.

29. This option would allow the Board to adopt the revised version of the AoPE guidelines, which would enable the various benefits outlined in [Consultation Paper 26](#) and summarised in [Attachment C](#).

Preferred option

30. The Board prefers Option 2.

General questions for consideration

31. The Board invites feedback on the following questions. You may choose to answer one, some or all of these in your submission.

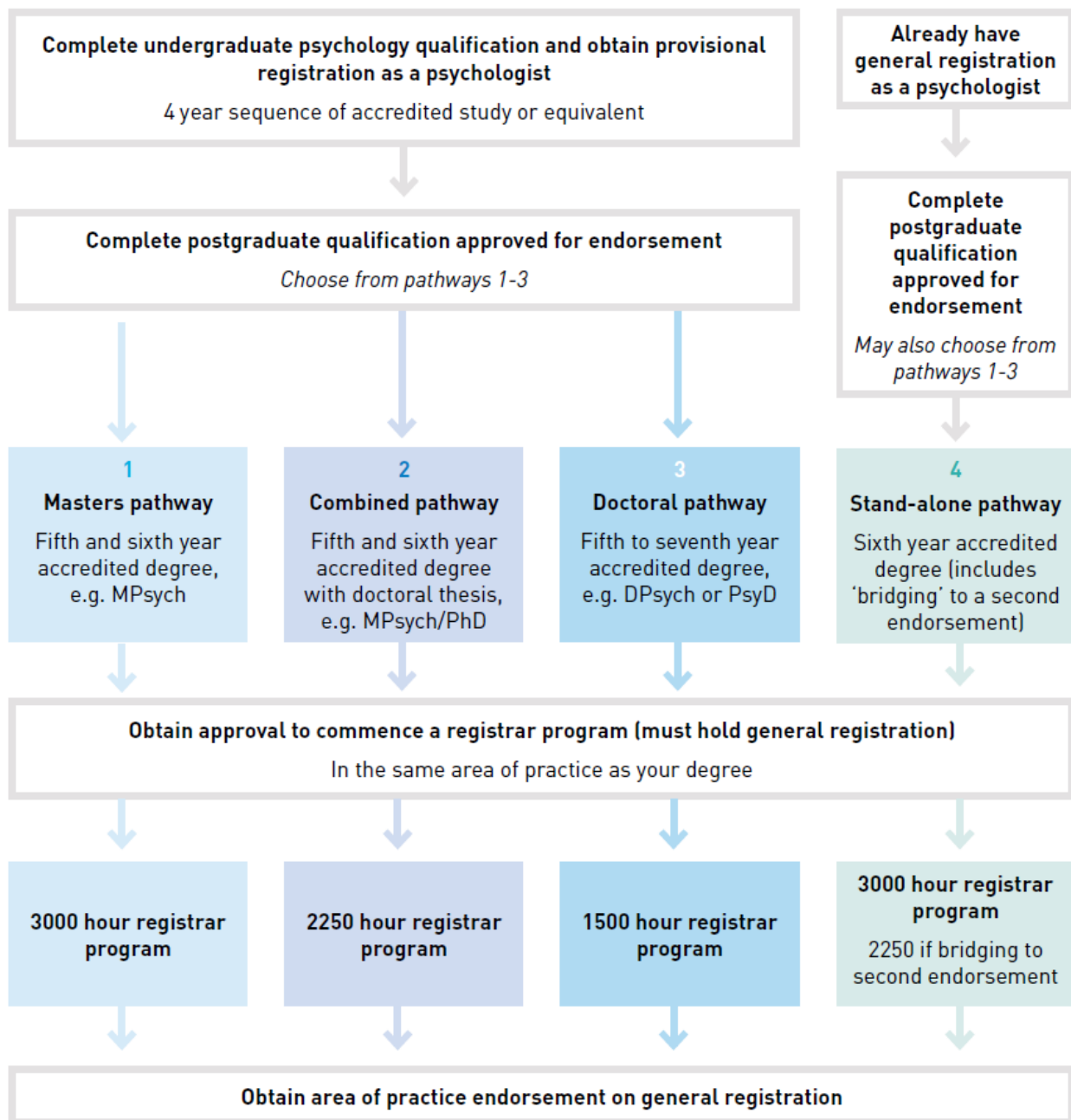
1. Which option do you prefer – the status quo or option 2 (proposed standard)?
2. What are the advantages and disadvantages of moving from the current AoPE standard (supported by the current AoPE guidelines) to the proposed AoPE standard (supported by the proposed AoPE guidelines)?
3. Are there other specific impacts (positive or negative) arising from the proposed AoPE standard that need to be considered? This may include impacts from the proposed removal of content from the standard that is set out in the proposed AoPE guidelines.
4. Is the content and structure of the proposed standard helpful, clear, relevant and workable?
5. Is there any content that needs to be added to, deleted from, or changed in the proposed standard?

Next steps

32. The Board will consider further consultation feedback on the proposed AoPE standard before finalising a proposal.

33. The Board intends to conduct a larger, more comprehensive review of the areas of practice, including competencies, as part of its broader education and training reform agenda.

Attachment A: Diagram of proposed pathways to endorsement



Attachment B: Proposed AoPE registration standard

Registration standard: Area of practice endorsements

Effective from: <<date>>

Summary

This registration standard sets out the Psychology Board of Australia's (the Board) requirements for endorsement of general registration for an approved area of practice.

An area of practice endorsement is a notation on the public Register of Practitioners that indicates that the individual has completed an approved postgraduate qualification and a registrar program in an approved area of practice.²

Areas of practice for endorsement are approved by the Ministerial Council (section 15 of the National Law). The approved areas of practice are:

- clinical neuropsychology
- clinical psychology
- community psychology
- counselling psychology
- educational and developmental psychology
- forensic psychology
- health psychology
- organisational psychology, and
- sport and exercise psychology.

Who does this standard apply to?

Area of practice endorsement is only available to psychologists who hold general registration.³

This standard applies to psychologists who wish to apply for endorsement of general registration for an approved area of practice.

Qualification requirements

The minimum qualification necessary to be qualified to apply for endorsement of registration is an approved postgraduate qualification in that area of practice or another qualification that, in the Board's opinion, is substantially equivalent.⁴

Eligibility requirements

In addition to the minimum qualification, applicants must have completed a Board-approved registrar program including 3000 hours of supervised practice with a Board-approved supervisor, or another period

² Or equivalent for overseas-qualified psychologists or psychologists granted endorsement under transition provisions at the commencement of the National Registration and Accreditation Scheme (1 July 2010-30 June 2013). Further information on non-standard pathways is available on the Board's website: www.psychologyboard.gov.au/Endorsement/Non-standard-pathway.

³ The Board's *General registration standard* sets out the requirements for general registration as a psychologist: www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards.aspx.

⁴ Overseas-qualified applicants should refer to the Board's website for further information: www.psychologyboard.gov.au/Registration/Overseas-Applicants.

of supervised practice that, in the Board's opinion, is substantially equivalent to the registrar program.

Some individuals may be eligible for a reduction in the number of hours of supervised practice required in the registrar program, depending on the program of study they completed or any existing endorsement.⁵

Other eligibility

Psychologists who previously held endorsement in an approved area of practice under the National Law are eligible to apply for that endorsement if they met the requirements to maintain that endorsement while registered and are not otherwise disqualified from holding that endorsement.

Definitions

Approved area of practice means that the Ministerial Council has, on the recommendation of the National Board, approved the area of practice in the profession as being an area of practice for which the registration of a practitioner in the profession may be endorsed.

Approved qualification for endorsement of registration means a qualification obtained by completing an approved program of study relevant to the endorsement which appears on the list of approved programs of study on the Board's website.

Board means the Psychology Board of Australia established under section 31 of the National Law.

General registration means general registration as a psychologist granted by the Board.

National Law means the Health Practitioner Regulation National Law as in force in each state and territory of Australia.

Psychologist means a person who holds general registration as a psychologist under the National Law.

Registrar program is a program of post-masters or post-doctoral supervised practice (in the same area of practice as the approved qualification) comprising psychological practice in an approved work role, supervision with a Board-approved supervisor, and active continuing professional development undertaken in accordance with the requirements set out in the *Guidelines on area of practice endorsements*.

Authority

This registration standard was approved by the Ministerial Council on <<date>> with approval taking effect from <<date>>.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

Review

This standard will be reviewed from time to time as required. This will generally be at least every five years.

Last reviewed: <<review date>>

This standard replaces the previously published registration standard dated 9 March 2011.

⁵ Refer to the *Guidelines on area of practice endorsements* for details: www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.

Attachment C: Summary of proposed changes to AoPE guidelines

Through engagement with members of the profession, employers and other stakeholders, the Board identified some opportunities for improvement to the AoPE guidelines, including better alignment with the objectives of the National Law. The Board released a first draft of the revised AoPE guidelines for consultation in early 2016.

Changes proposed in 2016

This section summarises changes to the AoPE guidelines proposed by the Board in 2016 compared to the existing (2011) version of the AoPE guidelines. Refer to [Consultation Paper 26](#) for a detailed explanation and rationale for the changes proposed in 2016.

Overall

- Revision of language and structure to make the guidelines easier to read and understand.
- Updating content, including definitions, to align with updates to other Board documents (registration standards and guidelines).

Section 2: Endorsement and use of title

- Improving the explanation of area of practice endorsement and eligibility requirements so that they adequately reflect the requirements under sections 98 and 99 of the National Law, and to ensure psychologists are not misled into thinking work experience, professional development courses, supervision, etc. will qualify them for endorsement.
- Removal of redundant transitional information regarding specialist title after the transition provisions ended in 2013.

Section 3: Qualifications and supervised practice requirements for endorsement

- Changes to eligibility criteria to align with the draft AoPE standard, as proposed in 2016, including:
 - Separating the combined Masters and PhD pathway from the Doctorate pathway and setting out the different registrar program requirements for each pathway.
 - Inclusion of 'bridging programs' within the Masters pathway criterion (bridging programs are currently assessed as a 'substantially equivalent qualification'). The change would mean the 'substantially equivalent qualification' criterion would only be used to assess qualifications completed overseas or prior to the establishment of APAC in 2003.
 - Specifying the supervised practice requirements of the registrar program in hours rather than years, resulting in a small discount in total hours for all pathways.
 - Stating the level of the degree rather than the title, e.g. 'fifth and sixth year' instead of 'Masters'.
- 'Equivalency guidelines' section updated to specify that the Board may consider relevant membership of a recognised overseas professional body when an overseas postgraduate qualification alone is deficient in a practical component or constituent element.
- 'Maintaining endorsement' section updated to remove detailed information on CPD requirements and replace it with information about psychologists' obligation to maintain competence in their area of practice.

Section 4: The registrar program

- 'Entry into the registrar program' section revised to clarify and add information for overseas-trained applicants without changing the entry requirements.
- 'Content of registrar program' updated with revised framework of practice hours, supervision and CPD, to incorporate similar flexibility that had been introduced into the Board's 4+2 and 5+1 internship guidelines. Changes include:
 - Small reductions in the amount of hours to be completed in the registrar program (3080 to 3000 for a Masters; 2310 to 2250 for a Masters/PhD; 1540 to 1500 for a Doctorate)
 - Removing specification that the registrar program must be completed within five years as this may be too restrictive in some circumstances.

- Changing the requirement for supervision to be provided at least fortnightly to a recommendation, allowing the supervisor to vary the frequency over the course of the program as appropriate.
- Changing the requirement for supervision sessions to always be one hour in duration to a recommendation and allowing up to 25% of total supervision to be undertaken in sessions less than one hour long.
- Defining 'direct supervision' as 'real-time verbal communication between the registrar and the supervisor', making it clearer that all supervision in the registrar program can be undertaken remotely (i.e. by telephone and videoconference).

Attachment B: Competencies

- Amendment to competency 7 for all approved areas of practice, to align with the Board's updated 'diverse groups' core competency for general registration.

Further proposed changes (2018)

This section summarises the further changes the Board is now proposing to the AoPE guidelines following the 2016 public consultation process (revised draft at [Attachment D](#)).

Section 2: Endorsement and use of title

- Section restructured to improve clarity
- Additional references to National Law provisions relating to use of title

Section 3: Qualifications and supervised practice requirements for endorsement

- Additional criterion 'd)' to include stand-alone programs allowed for under the new accreditation standards. Bridging programs has been moved to this criterion (from 'c') as both programs are equivalent to an accredited sixth year. A footnote has been added to explain the difference between the programs.
- 'Trans-Tasman Mutual Recognition' section updated to include an additional scope of practice, neuropsychologist, which has been recently added as a scope of practice in New Zealand. The Board has decided to recognise this scope of practice as equivalent to an area of practice endorsement in clinical neuropsychology.
- 'Equivalence guidelines' section updated to align with revised wording of eligibility criteria earlier in section 3, and to include additional guidance on the Board's assessment of overseas professional membership and credentials (this guidance was provided in the 2016 consultation paper).
- 'Maintaining endorsement' section updated to refer readers to the Board's *Guidelines for continuing professional development* which contain specific requirements relating to CPD for areas of practice endorsement.

Section 4: The registrar program

- Simplifying the 'Entry into the registrar program' section by removing procedural information that is set out on the Board's website and in policy documents.
- Removing direct and indirect references to the five-year time period to complete the registrar program. The Board proposed to remove this requirement in 2016, however unintended references remained in this section.
- Small revisions to clarify the requirements when completing the registrar program.
- Content moved from old 'Section 5: Board-approved supervisors' to 'Supervision' section within section 4, and simplified by removing detailed requirements that are sufficiently set out in the Board's *Guidelines for supervisors*.

Attachment D: Proposed AoPE guidelines

This document has been separately uploaded to the Board's website alongside this consultation paper.

Attachment E: Statement of assessment

Area of practice endorsements registration standard and guidelines

The Australian Health Practitioner Regulation Agency (AHPRA) has produced the document [Procedures for the development of registration standards, codes and guidelines](#). The procedures have been developed in accordance with section 25(c) of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law) which requires AHPRA to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme operates in accordance with good regulatory practice.

Below is the Psychology Board of Australia's statement of assessment of the proposal for revisions to the *Area of practice endorsements registration standard* and the *Guidelines for area of practice endorsement* against the three elements outlined in the AHPRA procedures.

1. The proposal takes into account the National Scheme's objectives and guiding principles set out in section 3 of the National Law

The Board considers that both the proposed revised registration standard and guideline meet the objectives and guiding principles of the National Law.

The proposed revised registration standard and guideline:

- Together with the provisions of the National Law, provide a mechanism that enables the public, employers, and the profession to identify practitioners who have completed an approved postgraduate qualification and registrar program training in a specific approved area of practice. This helps the community make informed choices when seeking psychology services. It also facilitates access to services in the public interest by making it easier for the public to identify practitioners who are trained to provide the types of psychological services they require.
- Facilitate the provision of high-quality education and training by supporting higher degree programs in approved areas of practice, and provide incentive for psychologists to undertake post-masters or post-doctoral supervised practice (the registrar program) structured around the achievement of advanced competencies in specialised areas of practice.
- Do not place restrictions on the practice of psychologists and therefore support the continuous development of a flexible, responsive and sustainable Australian psychology workforce.
- Promote transparency and accountability by providing the public with more information about registered psychologists' training, using a mechanism that is efficient, effective and fair because it imposes the minimal regulatory burden necessary.
- Take into account the costs of endorsement with regard to the efficient and effective operation of the National Scheme. The proposed revisions to the standard and the guideline will not require any new fees to be charged and the cost of renewing endorsements will continue to be absorbed into the general registration renewal fee. The Board considers that the draft guidelines meet the objectives and guiding principles of the National Law.

2. The consultation requirements of the National Law are met

The Board considers that both the proposed revised registration standard and the proposed revised guidelines meet the consultation requirements of the National Law, including:

- wide-ranging consultation on proposed registration standards, and
- consultation with other National Boards on matters that may reasonably be expected to be of shared interest.

The Board is undertaking wide-ranging consultation on the proposals in accordance with the consultation framework set out in the *Consultation process of National Boards*, available at: www.ahpra.gov.au. This process has included preliminary consultation with internal stakeholders (including AHPRA and other National Boards) and government. The process has also involved meeting the requirements of the Office of Best Practice Regulation.

The Board is also ensuring there is public exposure of both the proposed revised standard and guideline by undertaking two eight-week public consultation processes, providing an opportunity for public comment. This process includes the publication of Consultation Paper 26 in 2016 and this consultation paper on the Board's website, and on both occasions notifying stakeholders and interested parties and inviting feedback.

The Board will take into account the feedback it receives from both preliminary and public consultation when finalising its proposals for submission to the Ministerial Council

3. The proposal takes into account the COAG Principles for best practice regulation

In developing the proposed revised registration standard for consultation, the Board has taken into account the Council of Australian Governments (COAG) [Principles for best practice regulation](#).

As an overall statement, the Board has taken care not to propose unnecessary regulatory burdens that would create unjustified costs for the profession or the community. The Board makes the following assessments specific to each of the COAG principles expressed in the AHPRA procedures.

A. Whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

The purposes of the *Area of practice endorsements registration standard* are to:

- provide for recognition of psychologists who have completed advanced qualifications and supervised practice in a specialised area of practice via notation on the register and the right to use a title associated with an area of practice, and
- clearly set out the minimum requirements for becoming eligible to apply for an area of practice endorsement.

The purpose of the *Guidelines on area of practice endorsements* is to support and further clarify the requirements set out in the registration standard. This includes providing guidance to psychologists who are seeking to become endorsed and to psychologists who are seeking to maintain endorsement of registration.

The Board has considered various options for achieving these purposes using other regulatory mechanisms under the National Law (such as specialist registration) as well as non-regulatory options. The Board considers that the proposal to update the *Area of practice endorsement registration standard* and the accompanying *Guidelines on area of practice endorsements* is the best option for achieving the stated purposes.

The proposal seeks to maintain the current nine approved areas of practice and the qualification and training requirements for area of practice endorsements, which have been proven effective for achieving this purpose. The updated proposal seeks to allow new qualifications, permissible under revised accreditation standards for the psychology profession, to be approved for endorsement purposes.

Improvements to the structure and language of both the standard and the guideline are also proposed to improve clarity and ensure the documents are easy to understand.

As only minor changes to the existing standard and guidelines are proposed, the Board considers that a revised standard and revised guideline would have a low impact on the profession. These low impacts are significantly outweighed by the benefits of continuing to provide the same high standard of public protection and providing clearer, simpler requirements, in the public interest.

B. Whether the proposal results in an unnecessary restriction of competition among health practitioners

The Board considered whether its proposals could result in an unnecessary restriction of competition among health practitioners. The proposals are not expected to have any impact on the current levels of competition among health practitioners.

C. Whether the proposal results in an unnecessary restriction of consumer choice

The Board considers that the proposal to revise the *Area of practice endorsements registration standard* would not result in any unnecessary restriction of consumer choice. Rather, the proposal supports and promotes consumer choice. The standard does this by establishing clear requirements for the qualifications and training arrangements that practitioners must meet to obtain an endorsement that ensures consumers can be confident about the education and training of psychologists who have endorsements. The guidelines support and further clarify the requirements of the standard.

D. Whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved

The Board has considered the overall costs of a revised *Area of practice endorsements registration standard* and a revised *Guidelines on area of practice endorsements* to members of the public, registrants and governments. It is concluded there are not likely to be any significant costs involved in the revision and implementation of these documents.

The Board does not anticipate there will be any impact on registration/renewal fees (which the Board does not apply to endorsement) or on the application for endorsement fee which is not proposed to change if the proposed revised standard is approved.

E. Whether the requirements are clearly stated using 'plain language' to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants

The Board considers the revised *Area of practice endorsements registration standard* and the *Guidelines on area of practice endorsements* are both written in plain English that will help practitioners and the public to better understand the requirements of the standard. The Board has proposed changes to the current structure and reviewed the wording of both documents to make them easier to understand.

F. Whether the Board has procedures in place to ensure that the proposed registration standard, code or guideline remains relevant and effective over time

If approved, the Boards will review the revised *Area of practice endorsements registration standard* at least every five years, including an assessment against the objectives and guiding principles in the proposed National Law and the COAG principles for best practice regulation. The Board will also review the standard earlier, if it is necessary to ensure continued relevance and workability. Additionally, the Ministerial Council may, at any time, ask the Board to review the standard.

Additionally, when reviewing a standard the Board will also review relevant guidelines and other supporting documents – in this case the *Guidelines on area of practice endorsements*. The Board will also consider reviewing the guidelines independently if there are developments in the broader regulatory environment that affect the content of the guideline.