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Dear Rachel

RE: Public consultation: Area of practice endorsements registration standard

The Australian Psychological Society (APS) is pleased to provide feedback to the Psychology Board of Australia on the draft *Area of practice endorsements registration standard* (AoPE standard) and the proposed draft of *Guidelines for the area of practice endorsements* (AOPE guidelines). As the largest professional organisation representing psychology in Australia, the APS welcomes changes to the registration standard to ensure the content and structure of the standard is relevant.

In principle, the APS supports the proposed changes to the AoPE standard and prefer option 2 (proposed standard and guidelines). The clear advantage of the proposed model is that it aligns with the APAC standards from 01.01.2019. The advantage of moving details from the AoPE standard to the guidelines is that it reduces duplication and fragmentation of guiding information.

Listed below are our suggested amendments to the AoPE Standard and the AoPE guidelines.

1. AoPE standard

Eligibility Requirements: The APS supports the removal of the specific details of the registrar program from the AoPE standard. This is important as the required professional development, psychological practice and supervision requirements vary according to the registrar's qualifications and training. The section outlining eligibility requirements contains specific details about the hours of 'supervised practice'. There is no added benefit to including these requirements, especially as the term 'supervised practice' is only one requirement of the registrar program. Accordingly, we recommend that the details regarding the number of supervised practice hours be removed as below:

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 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 (page 6).

Other eligibility: The APS suggests that the other eligibility section of the standard be made clearer or moved to the guidelines.

The following sentence/paragraph in the AoPE standard on other eligibility requirements is unclear:

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 (page 7).

The phrase "if they met the requirements to maintain that endorsement while registered" is a source of potential confusion. An endorsement cannot be maintained if an individual no longer holds an endorsement. Psychologists who hold non-practicing registration are considered still registered: does this also apply to them? How will people returning to practice have been expected to maintain an endorsement while on leave? How might a psychologist interpret this if they had a continuing professional development (CPD) exemption while registered?

2. AoPE Guidelines

The APS acknowledges that the AoPE guidelines are not currently under review and were only included in the papers for the consultation on the AoPE standard because some of the content in the guidelines relates to the draft AoPE standard. Feedback is provided with this caveat in mind.

Section 4.5: The paragraph on page 10 of the guidelines last paragraph states:

Registrars undertaking the registrar program part time at 0.5 full-time equivalent or above and spreading the supervision and professional development fairly evenly over the course of the program will meet the CPD standard requirements easily, as the registrar program requires more CPD ~~that~~ than the minimum standard for general registration. If a registrar takes a leave of absence or reduces work hours for a period during the registrar program, they need to make sure that they are still completing the minimum CPD for general registration through the registrar program or separate CPD activities.

In addition to the flagged text error, the APS suggests this paragraph be amended to improve clarity and minimise any potential confusion. The annual CPD requirements may differ from the requirements for the registrar program in type, content and timing. For example:

- active CPD is required for the registrar program but is not required for meeting the annual CPD requirements (type variances),
- the content of CPD activities for the registrar program are required to be relevant to the area of practice and may differ from the requirements for meeting the annual CPD requirements (content variances), and
- there may also be differences in timing and confusion if the psychologist has had a CPD exemption, is returning to practice, or commenced the registrar program part way through the annual CPD cycle (timing variances).

The APS believes that it may be more helpful and educative for readers if the paragraph read:

The annual CPD requirements for psychologists is set at a minimum of 30 hours, 10 hours of which is peer consultation. The full-time equivalent annual requirement for CPD in a registrar program is set at 40 hours each for CPD activities (not supervision) and supervision. The total amount required for each year is 80 hours, which far exceeds the annual CPD requirements to maintain registration. Registrars can count the registrar related CPD and supervision hours towards their annual CPD requirements. Registrars who are completing the program part-time or have taken a leave of absence or commenced the program part way through the year will need to ensure they have completed the minimum CPD hours to maintain general registration either through the registrar CPD hours, other CPD activities or a combination of both.

Section 4.6: This section states that the registrar program must begin within 28 days of the date it is approved by the Board. The APS recommends that this be adjusted to when the communication to the registrar is deemed to be received. This allows adequate time for the registrar to make appropriate arrangements if required.

Section 6: With regards to the last paragraph in the AoPE guidelines under section 6, there is insufficient information provided about what steps a psychologist must take to ensure their competence before returning to practice after a period of leave. The APS believes that this ambiguity is likely to cause confusion and should be clarified in the AoPE guidelines document.

Finally, the APS notes that not all of the competencies listed in the AoPE Guidelines (as they appear in Attachment D of the Public Consultation Paper) reflect the content of the new APAC competencies.

Attachment A of the consultation paper: Member feedback has indicated to the APS that there is considerable potential for confusion as a result of the way pathways to AoPE are illustrated in the diagram provided in Attachment A of the consultation document (page 5). The APS strongly recommends the diagram be amended for clarity. The described pathways to endorsement for psychologists who already have general registration (but not an AoPE) have been misunderstood by many members. It needs to be clearer to these psychologists that they have two pathways: through an accredited postgraduate qualification or through a stand-alone pathway (a 6th year accredited degree). Please find a notated copy of this diagram overleaf for your reference. The APS is happy to work with the Board to redesign the diagram so that the potential for any misinterpretation is minimised.

If you would like further information on these issues, please contact me on 03 8662 3300.

Kind regards



Frances Mirabelli
CEO

Attachment A: Diagram of proposed pathways to endorsement

