



## Public consultation

### National psychology exam: Guidelines and candidate manual

9 April 2019

The Psychology Board of Australia (the Board) is releasing this public consultation paper to seek feedback on the review of the [Guidelines for the national psychology examination](#) (the guidelines).

The purpose of this consultation is to obtain comments and suggestions about the proposal from the profession, the community, governments, employers, and other stakeholders. You may choose to provide feedback on any aspect of this consultation.

The Board reviews its registration standards and guidelines at least every three to five years in keeping with good regulatory practice. The most recent reviews of the guidelines have been targeted to specific areas, with consultation focused on the proposal to update the national psychology exam curriculum (2017), and the proposal to end the higher degree exemption from sitting the exam (2015). A full review of the guidelines has not occurred since their publication in October 2013. The following public consultation paper is a comprehensive review of the guidelines in their entirety.

This public consultation outlines the Board's proposal to separate the guidelines into two documents. The proposal is for a revised guideline - the *draft Guidelines for the national psychology exam* (the guideline) - that outlines the Board's policies in relation to the exam, and a new document - the *National psychology exam candidate manual* (the manual) – that outlines the operational rules and requirements of sitting the exam.

The Board also proposes in this consultation to clarify a policy approach regarding the higher degree exemption from sitting the exam, and to review the policy for when a candidate fails the exam three times. The Board proposes to make the higher degree exemption from sitting the exam permanent. This means that graduates from higher degree programs will not be required to sit the exam. Candidates seeking registration through the non-accredited pathways (4+2 and 5+1 internship pathways) and overseas-trained applicants will continue to be required to pass the exam.

The paper includes specific questions about the Board's proposal that you may wish to address in your response (see p. 11).

#### You are invited to provide feedback on this public consultation

To provide feedback, please provide written submissions:

- In Word format document to help us meet international web accessibility guidelines<sup>1</sup>
- by email, with the subject title marked '**Consultation –National psychology exam: Guidelines Review.**
- to [psychconsultation@ahpra.gov.au](mailto:psychconsultation@ahpra.gov.au)
- by close of business on **Friday 31 May 2019.**

<sup>1</sup> See [www.ahpra.gov.au/About-AHPRA/Accessibility.aspx](http://www.ahpra.gov.au/About-AHPRA/Accessibility.aspx) for more information.

## How your submission will be treated

Submissions received are generally published on the Board website under [Past consultations](#) after the consultation closes.

The Board publishes submissions on its website to encourage discussion and inform the community and stakeholders. However, the Board retains the right not to publish submissions at its discretion and will not place on the website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the consultation. The views expressed in the submissions are those of the individuals or organisations who submit them and their publication does not imply any acceptance of, or agreement with, these views by the Board.

Before publication, the Board may remove personally-identifying information from submissions, such as contact details. The Board will also publish submissions anonymously if requested by the respondent, in which case all identifying information, including name and organisation, will be removed before publication.

The Board also accepts 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. The Board and the Australian Health Practitioner Regulation Agency (AHPRA) will take all reasonable steps to preserve confidentiality; however, submissions may be disclosed if this is required by law or by a committee of a parliament. Any 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.

## More information

For more information about the consultation process please refer to the document *Consultation process of National Boards* available at [www.ahpra.gov.au/Publications/Procedures.aspx](http://www.ahpra.gov.au/Publications/Procedures.aspx).

The Board does not provide individual responses to submissions. Individuals and organisations seeking a personal reply to specific policy or operational questions raised by this consultation paper are invited to write a separate letter to the Chair of the Board at [psychologychair@ahpra.gov.au](mailto:psychologychair@ahpra.gov.au).

Individuals and organisations seeking advice on making a submission to this consultation, such as advice about the format and submission deadline, should send their queries to [psychconsultation@ahpra.gov.au](mailto:psychconsultation@ahpra.gov.au). This inbox will be monitored regularly while the public consultation is open.

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](#).

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## Overview of consultation

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### 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.
2. The [General registration 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, with a revised and updated standard approved in May 2016. The *General registration standard* states that in addition to holding the minimum qualification, applicants for general registration as a psychologist in Australia must provide evidence of having passed the national psychology exam (unless exempt)<sup>2</sup>. The exam is one regulatory tool that the Board may use to ensure that all applicants for general registration have obtained a minimum level of applied professional knowledge of psychology.
3. The [Guidelines for the national psychology examination](#) (the guidelines) were developed to support the *General registration standard* by setting out the requirements for the exam. The guidelines describe the general content of the exam, the process of its development, exam exemptions, instructions for sitting the exam, and provide a basic outline of the exam curriculum.
4. The guidelines were first published in October 2013 after extensive consultation, as follows:
  - a) Consultation #9 on the *Guidelines for the national psychology examination* (April 2011)
  - b) Consultation #13 *Exposure draft on the examination curriculum* (November 2011), and
  - c) Consultation #18 on the *Guidelines for the national psychology examination* (April 2013).
5. Since publication there have been two targeted consultations focusing on specific areas of the guidelines, as follows:
  - a) Consultation #25 on *Ending the higher degree exemption from sitting the national psychology exam* (August 2015), and
  - b) Consultation #28 – the *National psychology exam curriculum review* (July 2017).
6. In February 2016 the Board published the [Policy and procedure for candidates who fail the exam three times](#) (exam failure policy).

### Current consultation

7. To ensure continued relevance in a dynamic regulatory environment, the Board regularly reviews its registration standards, guidelines and policies. A full review of the guidelines has not occurred since their publication in October 2013. The guidelines and exam failure policy have never been reviewed at the same time. The Board has determined that it is timely to undertake a comprehensive review of the guidelines and policies related to the national psychology exam (the exam).
8. The Board has carefully considered the objectives and guiding principles of the National Law and the [Regulatory principles for the National Scheme](#) in deciding whether it should propose changes to the existing guidelines and policies for the exam.

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<sup>2</sup> Refer to the Psychology Board of Australia's [Guidelines for the national psychology examination](#) for information on exemptions.

9. The Board has adopted a risk-based approach to the review; with the aim of ensuring that the exam supports the Board's decision-making so that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered to provide protection of the public.
10. In this consultation the Board is seeking input from stakeholders on the proposals resulting from a complete review of the guidelines and the policies related to the exam. This comprehensive review of the guidelines and policies for the exam comprises the following proposals:
  - a) some minor changes and improvement to all documents, and
  - b) two substantive changes.
11. This consultation does not include a review of the *General registration standard*. The *General registration standard* was previously reviewed and updated in May 2016.

### Two substantive changes

12. The Board proposes two substantive changes in this proposal:
  - a) to separate the guidelines into a guideline and a manual, and
  - b) to determine to make the higher degree exemption from sitting the exam permanent.

### Separate the guidelines into a guideline and a manual

13. The Board proposes to separate the guidelines into two documents. One document, a guideline, that outlines the Board's policies relating to the exam; and a new document, a manual for candidates that outlines the operational information, rules and requirements for sitting the exam.
14. The current (2018) guidelines are available on the [Board's website](#). The proposed *revised draft Guidelines for the national psychology exam* (the guideline) is at [Attachment A](#). The proposed new *National psychology exam candidate manual* (the manual) is at [Attachment B](#).
15. The proposal is that the guideline would include the following regulatory and policy information:
  - a) the purpose of the exam in the regulatory context
  - b) the groups of people required to sit the exam
  - c) exemptions from sitting the exam
  - d) competency standards assessed by the exam
  - e) eligibility to sit the exam, and
  - f) policies relevant to the exam, including the exam failure policy.
16. The proposal is that the manual would include the following operational information, requirements and rules:
  - a) exam format and structure
  - b) exam content and resources for study
  - c) tips for candidates on how to prepare for the exam
  - d) logistics in registering for the exam, including booking and paying for the exam
  - e) requirements and approval processes for special accommodation, special consideration, and reviews
  - f) what to expect on the day of the exam, including security processes, information about the testing environment, and expectations of professional conduct throughout the exam sitting, and
  - g) receiving results.
17. The manual has been developed by:
  - a) collating into one document existing operational information about sitting the exam from: the current version of the guidelines, the [exam FAQ](#) currently located on the Board's website, and written information sent to exam candidates when they successfully register for the exam, and
  - b) developing new information that the Board noted was missing from existing exam information to increase transparency and clarify expectations. New information has been developed on:
    - how to study and prepare for the exam

- the expectations for candidates' professional conduct throughout the exam process, and
- clarification about the application and approval processes for special consideration, special accommodation, and appeals.

18. The rationale for separating the guidelines into two documents includes the following:

- a) increased clarity through separating policy documentation from operational information
- b) increased simplicity in the presentation of information making it easier for candidates to find information and therefore making it easier to prepare for the exam
- c) ensuring that all policy information is in the one place by adding the exam failure policy into the guidelines. The aim is to make policy documents easier to access, and to allow the review of guidelines and the exam failure policy to be conducted at the same time both now and in the future, and
- d) ensuring that all operational information is in the one place by collating information from the current guidelines, handouts for candidates and [exam FAQ](#) from the Board's website. Since there is no requirement under the National Law for Ministerial approval or public consultations on operational procedures as there is for standards and guidelines, changes to the manual could be made in a more timely and agile manner. This would ensure that candidates have access to the most up-to-date information to assist their study, preparation, and exam performance.

### **Determine to make the higher degree exemption from sitting the exam permanent**

#### **Background**

19. When the guidelines were first published in October 2013 the Board applied an exemption from sitting the exam to graduates from a higher degree program<sup>3</sup> until 30 June 2016. This exemption reflected the Board's view at the time that the internal examination and assessment processes in these accredited degree programs met the Board's standard for general registration.
20. In August 2015, the Board proposed to end the higher degree exemption in [Consultation Paper 25](#) with a proposed transition date of either 1 July 2016, 1 July 2017 or 1 July 2018. The rationale for ending the exemption included the following:
  - a) Reforms in the higher education sector since publication of the guidelines in 2013 were leading to greater differentiation between higher education providers in the types and format and specialised focus of their programs. The Board was of the view that this diversity was perpetuating an additional risk to the regulation of psychologists from this training pathway.
  - b) While the Australian Psychology Accreditation Council (APAC)<sup>4</sup> accreditation process assured the quality of programs, the Board was of the view that it was constrained in its ability to regulate or oversee individuals within those programs. The APAC standards were published in 2010<sup>5</sup>, before the start of the National Registration and Accreditation Scheme (National Scheme) and were not developed within the framework of the National Law.
  - c) The view that a single national standard met by all applicants for general registration (regardless of training pathway<sup>6</sup>) would be the fairest and most consistent approach.
21. The proposal to end the higher degree exemption was not supported by stakeholders at that time and the exemption was extended for another three years, until 30 June 2019, as a result of [Consultation paper 25](#).

<sup>3</sup> Higher degree programs include: an accredited six-year professional master's qualification, an accredited doctorate, or a combined Masters/PhD qualification.

<sup>4</sup> The [Australian Psychology Accreditation Council](#) (APAC) is the [accreditation authority](#) responsible for accrediting education providers and programs of study for the psychology profession.

<sup>5</sup> See [www.psychologycouncil.org.au/standards\\_2010](http://www.psychologycouncil.org.au/standards_2010) for a copy of the standards.

<sup>6</sup> The training pathways include: the 4+2 internship, the 5+1 internship, the higher degree pathway (master's and doctoral degree), and the overseas pathway.

The Board agreed to consult widely with the profession and the community before 30 June 2019 to clarify a policy approach regarding the higher degree exemption from sitting the exam.

22. On 10 August 2018 the Board announced a further extension of the exemption until 31 December 2019 to allow for a thorough evaluation of the higher degree exemption as part of the current consultation process.

#### What has changed since 2015?

23. Since [Consultation paper 25](#) was published in 2015, the following has occurred:
- a) APAC has reviewed the [APAC Accreditation Standards \(2010\)](#). The review has been conducted within the framework of the National Law and has followed the [Procedures for development of accreditation standards](#) as established under the National Law<sup>7</sup>, the [COAG principles for Best Practice Regulation](#), and the *Principles for the development of accreditation standards* developed by the Forum of Health Professions Accreditation Councils. The new standards came into effect on 1 January 2019.
  - b) The new [APAC accreditation standards for psychology programs \(2019\)](#) now include:
    - a specific domain on public safety
    - a requirement for higher education providers to meet the Board's standards (see Appendix 1) to gain and maintain APAC-accreditation
    - the inclusion for the first time the requirements for professional competencies for area of practice endorsement, and
    - a focus on an outcomes-based approach that emphasises competencies for safe practice rather than an input-driven approach focusing on numbers of hours, required courses, etc.
  - c) The International Project on Competence in Psychology (IPCP) published the [International declaration of core competencies in professional psychology](#) (the Declaration)<sup>8</sup> in July 2016. The Declaration outlines international benchmarks for general competence for all psychologists providing services to clients at the time of entry into the profession. The Board is a signatory to the Declaration, and has aligned the national psychology exam, the 4+2 internship program and the 5+1 internship program with core competencies outlined in the Declaration. The new APAC Standards are also aligned with the Declaration. This ensures that all applicants for general registration, regardless of training pathway, are required to demonstrate the same core competencies for the safe practice of psychology in Australia.
  - d) The proposal to retire the 4+2 internship pathway has led to clarified thinking about the differences between 'accredited' and 'non-accredited' pathways. The 4+2 and 5+1 internship pathways are considered to be non-accredited pathways, as they include one (+1) or two (+2) years of internship (supervised practice) that do not fall under the APAC accreditation standards. The Board is increasingly using the exam as a regulatory tool to assist them to ensure that practitioners with training in non-accredited pathways, overseas qualifications, or people intending to return to practice as psychologist after a period of extended leave, can demonstrate that a similar level of competence to a Board-approved six-year sequence of study (that has been accredited by APAC) has been achieved.

#### The current proposal

24. In this consultation paper the Board proposes to clarify a policy approach regarding the higher degree exemption from sitting the exam. Graduates from higher degree programs delivered in Australia that are accredited by APAC and approved by the Board as a qualification for registration are currently exempt from sitting the exam until 31 December 2019. The Board proposes to make this exemption permanent. This means that graduates with a board approved post-graduate qualification accredited at the fifth and sixth year of study will not be required to pass the exam before applying for general registration.

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<sup>7</sup> For more information see: [www.ahpra.gov.au/Publications/Accreditation-publications.aspx](http://www.ahpra.gov.au/Publications/Accreditation-publications.aspx)

<sup>8</sup> For more information on the IPCP see: [www.psykologforeningen.no/foreningen/english/ipcp](http://www.psykologforeningen.no/foreningen/english/ipcp)

25. The rationale to make the higher degree exemption from sitting the exam permanent includes the following:
- a) Increased confidence that the public is adequately protected. The new [APAC accreditation standards for psychology programs \(2019\)](#) have been developed within the framework of the National Law. They include specific domains on public safety, require the Board's standards to be met, have clear competency standards for each level of training, including area of practice endorsement, and provide increased mechanisms to ensure that diversity in training programs will not adversely affect the ability of graduates to practice safely on the public.
  - b) A single national standard has been achieved by benchmarking to the Declaration. The adoption of the Declaration by both the Board and APAC means that all applicants for general registration, regardless of training pathway, are required to demonstrate the same core competencies for the safe practice of psychology in Australia. While the manner of demonstrating competencies may be different (completion of an internship and the exam, or completion of a six-year higher degree for example), the core competencies are now matched across pathways in Australia for the first time.
  - c) The Board's stance is to reduce unnecessary regulation and to streamline the training pathways. The Board's program of education and training reform, including the proposal to retire the 4+2 internship pathway, is focused on reducing unnecessary regulation and targeting the use of regulatory tools (such as the exam) where they are needed most. With the new [APAC accreditation standards for psychology programs \(2019\)](#) coming into force and the adoption of the Declaration, the Board's view is that requiring higher degree graduates to sit the exam would be unnecessary regulation.
  - d) The higher degree exemption has been in place since 2013, and no issues have been identified by the Board during the temporary exemption period.
  - e) Transparency, predictability and practicality. A permanent exemption would remove the need to periodically consult on extending the exemption and would provide higher degree students, education providers and supervisors with clarity about the requirements for registration.
26. The current proposal only refers to making the higher degree exemption from sitting the exam permanent. The requirement to pass the exam will remain for the non-accredited pathways (the 4+2 internship, 5+1 internship), overseas-trained applicants, and those returning to practice as a psychologist who have not practised for more than ten years. The exam for these groups is essential to ensure the core competencies for general registration have been demonstrated.

#### Minor changes

27. In addition to the two major changes listed above, the Board is also seeking input from stakeholders on a general review of the [Guidelines for the national psychology examination](#) (the guidelines) and the [Policy and procedure for candidates who fail the exam three times](#) (exam failure policy).
28. The Board considers that the requirements for the exam as outlined in the guidelines and in the exam failure policy are largely appropriate and working well and has not proposed major changes to these documents. Some minor changes and improvements to all documents are listed below.

#### Review of the guidelines

29. The following proposed changes are recommended for the new version of the guidelines (see [Attachment A](#)):
- a) removing the section of the document outlining the transition provisions. The transition period has ended making this section obsolete.
  - b) removing the attachment describing the development of the exam and publishing this on the Board's website instead. The guidelines are primarily a policy document, not a historical document.
  - c) updating the document to focus on the use and importance of the exam as a regulatory tool to protect the public, rather than focusing on the historical development or professional aspects of the exam
  - d) clarifying the use of the exam when individuals are returning to practice after a period of leave to be consistent with the [Registration standard: Recency of practice](#) and the [Policy for recency of practice](#)

- [requirements](#). Individuals intending to return to practice as a psychologist who have not practised for more than ten years are required to pass the exam before applying for general registration (unless exempt). Individuals returning to practice after five years *may be* required to pass the exam
- e) adding some additional content on the test administrator and testing centres
  - f) adding in a section on definitions to improve clarity and meaning
  - g) adding the exam failure policy as an attachment to the guidelines to ensure that all policy documents are located in the one place and can be reviewed together in the future, and
  - h) conducting a plain English review to improve readability. This includes simplifying some of the language and updating terms (e.g. replacing the term 'examination', with the term 'exam').

#### Review of the exam failure policy

30. The exam failure policy was published in February 2016. In the few instances where it has been needed, this policy has been working well. The draft new exam failure policy is at [Attachment A](#). The following proposed changes are recommended for the new version of the exam failure policy:
- a) adding the exam failure policy as an attachment to the guidelines to ensure that all policy documents are in the one place and can be reviewed together in the future
  - b) conducting a plain English review to improve readability. This includes simplifying some of the language and updating terms (e.g. replacing the term 'examination', with the term 'exam').

#### No change

31. As part of the comprehensive review, the Board proposes that there is no change to the following:
- a) The 70% pass mark. This is the minimum level of applied knowledge required for independent psychology practice. The pass mark has been working well, with some score adjustments (scaled scores) to ensure that candidates are not penalised if one exam is harder, or given an unfair advantage if one exam is easier.  
  
The Board recently conducted an exam quality assurance project<sup>9</sup> which has confirmed the appropriateness of the benchmark of 70% as the pass rate requirement.
  - b) The requirement for candidates to pass the exam overall. There is no requirement to pass each of the four curriculum domains separately in addition to achieving a passing score on the overall exam. The Board's quality assurance project<sup>10</sup> showed that there is considerable overlap between the four exam curriculum domains with evidence of a general factor rather than four separate factors in the exam. This is not surprising since, for example, the communication domain would be expected to overlap with the ethics domain, the assessment domain, and the intervention domain. The Board considers that requiring candidates to pass all four domains in addition to an overall pass is unnecessary regulation and proposes to continue to only require an overall pass.  
  
The benchmark of 70% as the required pass rate further supports requiring candidates to pass the exam overall.
  - c) When candidates are eligible to sit the exam (e.g. interns sit in their sixth year). Candidates who sit the exam too early in their internship are more likely to have difficulties passing. The core competencies for general registration are more likely to be demonstrated towards the end of the six-year training program. The Board considers the timeframe for eligibility to sit the exam to be optimal and allows candidates sufficient time to develop and demonstrate the core competencies.

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<sup>9</sup> The purpose of the quality assurance project was to evaluate the quality and functioning of the exam to ensure that it is fair, reliable, effective and fit-for-purpose, and to identify any areas of the exam, or any exam items, that should be improved. The quality assurance project investigated the item difficulty, item discrimination, exam dimensionality, and exam performance across variables. Results of the exam quality assurance project will be published on the Board's website when the project is finalised. This project is currently in progress, with early results mentioned here. More detailed feedback about the utility of the exam will be available on the completion of the project.

<sup>10</sup> See footnote 8 (above).

- d) Exam fee. Despite increases in the cost of delivering the exam through nationally available testing centres, the Board is committed to keeping the exam fee as low as possible. Now that the exam is embedded into practice the Board has been able to adjust its governance of the exam to streamline costs of developing and maintaining the exam. The Board proposes to keep the exam fee the same as it was in 2013. The Board will continue to monitor the costs of running the exam and associated fees aligned with best practice regulation principles.

### Options statement

32. The Board has considered two options in developing this proposal.

#### Option 1 – Status quo

33. Option 1 proposes to continue with the current guidelines, last updated in 2018, with no changes.
34. There would be no changes to the guidelines or the exam failure policy, and no development of an exam candidate manual. The benefits outlined in this paper in moving to the proposed revised guidelines and new manual would not be realised.
35. The higher degree exemption from sitting the exam would be extended, as it was in the previous consultation, for another three years (until 31 December 2022).

#### Option 2 – Proposed changes (revised guidelines)

36. Option 2 proposes to:
- a) separate the guidelines into two documents: a guideline and a manual
  - b) make the higher degree exemption from sitting the national psychology exam permanent
  - c) make other minor revisions to the guideline and the exam failure policy so these documents remain relevant in a dynamic regulatory context, and
  - d) make no changes to the current pass grade, overall pass mark, when candidates are eligible to sit the exam, or the exam fee.
37. The proposed guideline and manual would separate policy and operational information and collate all relevant information in one place to make it easier for candidates to understand their requirements and to prepare for the exam.
38. Making the higher degree exemption from sitting the exam permanent would take into account recent changes in accreditation processes, acknowledge the adoption of the Declaration, aim to reduce regulation, and to create certainty for higher degree students and education providers about the Board's requirements.

#### Preferred option

39. The Board prefers Option 2.

### Relevant sections of the National Law

40. Relevant sections of the National Law relating to this review are:
- Section 3
  - Section 38-40
  - Section 52, and 54

### General questions for consideration

41. The Board invites feedback on the following questions:
1. Which option do you prefer – the status quo or option 2 (proposed changes)?
  2. Are you in support of separating the guidelines into two documents: a guideline and a manual? Please provide a rationale for your view.
  3. Are you in support of making the higher degree exemption from sitting the exam permanent? Please provide a rationale for your view.
  4. Is there any content that needs to be changed, deleted or added into the guidelines?
  5. Is there any content that needs to be changed, deleted or added into the exam failure policy?
  6. Is there any content that needs to be changed, deleted or added into the manual?
  7. Are you in support of the areas where the Board proposes no change (pass grade, overall pass mark, when to sit the exam, exam fee)?
  8. Are there other specific impacts (positive or negative) arising from the proposal for practitioners, higher degree providers, employers, clients/consumers that need to be considered?
  9. Is the content and structure of the proposed standard helpful, clear, relevant and workable?
  10. Do you have any other comments on the proposal?

### Next steps

42. The Board will consider the feedback from this public consultation before finalising the proposal.

## Attachment A: draft revised Guidelines for the national psychology exam

This document has been attached separately alongside this consultation paper.

This document includes the draft *revised Policy and procedure for candidates who fail the exam three times* (exam failure policy).

## Attachment B: Proposed National psychology exam candidate manual

This document has been attached separately alongside this consultation paper.

# Attachment C: Statement of assessment

## Guidelines for the national psychology exam

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](#) (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 [Guidelines for the national psychology examination](#) (the guidelines) and the [Policy and procedure for candidates who fail the exam three times](#) (exam failure policy), and the proposal to develop a *National psychology exam candidate manual* (the manual) 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 the proposed revised guideline, proposed revised exam failure policy and new manual meets the objectives and guiding principles of the National Law.

The proposed changes, if approved, will:

- Provide for the protection of the public by ensuring that only those practitioners who are suitably trained and qualified to practise psychology in a competent and ethical manner are registered.
- Assist the Board in the rigorous and responsive assessment of overseas-trained psychologists. Overseas qualified practitioners are required to sit the exam under Part 7 of the National Law to demonstrate that a similar level of competence to a board-approved six-year sequence of study has been achieved.
- Promote transparency and accountability by providing registrants, higher education providers, supervisors and the public with increased clarity of information about the requirements for sitting the exam and applying for general registration for each of the various training pathways.
- Assist the Board to effectively use accreditation as a mechanism for efficient regulation by making the higher degree exemption from sitting the exam permanent. This allows for the minimum regulatory burden necessary to ensure that graduates holding a six-year approved program of study are qualified for safe and independent psychology practice.
- Support the setting of reasonable fees for the exam to ensure the efficient and effective operation of the National Scheme. The proposed revisions to the guideline will not require any new fees to be charged. The cost of the exam is expected to remain the same as when it was introduced in 2013.
- Support the continuous development of a flexible, responsive and sustainable Australian psychology workforce by not placing restrictions on the practice of psychologists.

### 2. The consultation requirements of the National Law are met

The Board considers that 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](http://www.ahpra.gov.au). This process includes preliminary consultation with internal stakeholders (including AHPRA and other National

Boards) and government. The process also involves adherence to the requirements of the Office of Best Practice Regulation.

Following an initial six-week preliminary consultation process, the Board will ensure that there is public exposure of its proposals and opportunity for public comment, by undertaking an eight-week public consultation. This process will include the publication of a consultation paper (and attachments) on the Board's website, 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.

### 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 purpose of the [Guidelines for the national psychology examination](#) (the guidelines) is to:

- support the [General registration standard](#) by setting out the exam requirements
- protect the public by ensuring that only those practitioners who are suitably trained and qualified to practise psychology in a competent and ethical manner are registered
- assist the Board in the rigorous and responsive assessment of overseas-trained psychologists, and
- provide information and guidance to candidates preparing for the exam.

The Board considers that the proposal to update the guidelines and exam failure policy, and to develop a *National psychology exam candidate manual* (the manual) is the best option for achieving the stated purposes.

The proposal seeks to improve clarity and transparency and make it easier for candidates to understand their requirements and to prepare for the exam by separating policy and operational information and by collating all relevant information in one place.

The proposal to make the higher degree exemption from sitting the exam permanent, would use accreditation processes more effectively, reduce regulation, and create certainty for higher degree students and education providers about the Board's requirements.

Proposed improvements to the structure and language of the guideline and the [Policy and procedure for candidates who fail the exam three times](#) (exam failure policy) are aimed towards improving clarity and ensuring the documents are easy to understand.

The Board considers that a revised guideline, revised policy, and new manual would have a positive impact on the profession. The proposal allows the Board to continue to provide the same high standard of public protection by 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 guidelines and exam failure policy and to develop a manual would not result in any unnecessary restriction of consumer choice.

The proposal supports consumer choice by ensuring that individual applicants for general registration have been assessed for their competence and ability to safely practice the profession. Consumers can be confident about the education and training of psychologists regardless of whether they have completed a six-year approved program of study, a 4+2 or 5+1 internship, have obtained their qualification overseas, or have applied to return to practice after a period of leave.

Consumers can also be confident that the Board is using the accreditation mechanisms under the National Law effectively, and that all training pathways have been benchmarked to accepted international standards<sup>11</sup>.

### 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 guideline, revised exam failure policy and new manual 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 proposed revisions to the guideline will not require any new fees to be charged. The fee for the exam is expected to remain the same as when it was introduced in 2013.

### 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 guideline, revised exam failure policy and new manual are written in plain English that will help practitioners and the public to better understand the requirements.

The Board has proposed changes to the current structure and reviewed the wording of the guideline and exam failure policy documents to make them easier to understand.

The purpose of developing the manual is to increase clarity through separating policy documentation from operational information. It is also intended to simplify the way information is presented to make it easier for candidates to find information and to prepare for the exam.

### 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 Board will review the revised guidelines and exam failure policy 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.

Since there is no requirement under the National Law for Ministerial approval or public consultations on operational procedures as there is for standards and guidelines, changes to the manual can be made in a more timely and agile manner. This would ensure that candidates have access to the most up-to-date information to assist their study, preparation, and exam performance. The Board will review and update the manual as required, with a review occurring at least every five years.

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<sup>11</sup>For more information see the [International declaration of core competencies in professional psychology](#) (the Declaration), published by the International Project on Competence in Psychology (IPCP) at: [www.psykologforeningen.no/foreningen/english/ipcp](http://www.psykologforeningen.no/foreningen/english/ipcp)