

30/5/2019

Ms Rachel Phillips

Chair, Psychology Board of Australia

By email: psychconsultation@ahpra.gov.au

Dear Rachel,

Re: Consultation – Review of the Guidelines for the national psychology exam

The Institute of Private Practising Psychologists (IPPP) is pleased to provide feedback to the Psychology Board of Australia (the Board) regarding proposals on changes to the National psychology exam process and guidelines. As a key organisation within the psychology profession, and with a thirty-six-year history of representing private practice, the IPPP welcomes the opportunity to comment on these proposals.

The IPPP agrees with the proposal to improve the guidelines by separating these into two documents as it would assist provisional psychologists and supervisors to better prepare for the National Psychology Exam. The IPPP agrees in principle with the proposal for a permanent exemption for higher degree students, however the IPPP proposes to delay consideration of a permanent exemption to 2022.

The Board previously maintained periodic risk reviews to assess whether higher degree should continue to be exempt from National Psychology Exam. The IPPP noted that the rationale for changing periodic risk review and making the exemption permanent is based on the observation that the new (2019) APAC standards are significant improvement on “old” (2010) APAC standards. The rationale is that higher degree professional programs will be better suited to the training of new psychologists entering a changing workforce. However, as the new (2019) APAC guidelines have not yet been implemented by most higher degree institutions, provisional psychologists will continue to

be trained in programs accredited under the dated 2010 APAC Standards. It is therefore not yet possible to objectively assess the impact of the new APAC standards on the reduction of risks to the public posed by individual practitioners graduating from these programs.

Safety of the public is a particular concern in private practice which has undergone significant expansion, and is now a major area of employment for young psychologists. The IPPP had previously stated concerns regarding additional risks to the public within private practice settings given the ethical and professional hazards for new practitioners entering private practice. The IPPP believes that private practice is an area of frequent notifications against psychologists; in part due to changing nature of reimbursement, differences in treatment delivery and structure of private practice organisations, which can be extremely challenging for new practitioners.

The primary focus of APAC standards is to accredit psychology programs delivered by higher degree institutions. However the Board is primarily concerned with ensuring safety of the public when seeing a psychologist. The IPPP therefore believes that a three year delay would allow sufficient time for the Board to assess the positive impact of the new APAC accreditation standards on practitioner competencies.

With the planned demise of the 4+2 pathway, the review of the National Psychology Examination in 2022 could also assess competencies of individuals completing the 5+1 pathway and whether they need to undergo National Psychology Examination to complete requirements for general registration.

IPPP provides specific feedback on the following questions posed by the Board:

1. Which option do you prefer – the status quo or option 2 (proposed changes)?

The IPPP to: a) supports proposal to separate the existing guidelines into two separate documents, b) disagrees with making higher degree exemption permanent at this time and (c) propose to delay this decision for three years to 2022 to enable objective assessment of how changes in the 2019 APAC accreditation standards improved practice of psychologists graduating from these programs and safety of the public.

2. Are you in support of separating the guidelines into two documents: a guideline and a manual? Please provide a rationale for your view.

The IPPP supports Option 2. We agree with the rationale for separating policy information from operational information. The IPPP also agrees with proposed minor changes as these will assist in reducing potential confusion by candidates and supervisors.

3. Are you in support of making the higher degree exemption from sitting the exam permanent? Please provide a rationale for your view.

As outlined above the IPPP proposes delaying this decision to 2022. IPPP accepts that the 2019 APAC Standards are a significant improvement on the 2010 APAC Standards, however to date very few higher degree institutions have had time to implemented these standards in practice. While many

institutions will be changing course structure to fit the new (2019) APAC standards, any changes will take some years before they are reflected in actual practice by individual psychologists.

4. Is there any content that needs to be changed, deleted or added into the guidelines?

No

5. Is there any content that needs to be changed, deleted or added into the exam failure policy?

A majority of IPPP members feel that a candidate should not be prevented from resitting the National Psychology Exam.

6. Is there any content that needs to be changed, deleted or added into the manual?

No

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)?

Yes

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?

The IPPP agrees in principle with removing additional obstacles for higher degree students. The IPPP believes that extending the current exemption for higher degree students to 2022 will enable the Board to review evidence regarding the positive impact of 2019 Standards on actual practice by individual psychologists graduating from these programs. Extending the current exemption to 2022 will not disadvantage current and future students as it continues policy implemented since the beginning of the National Psychology Exam. An additional review in 2022 may provide an opportunity to review the purpose and application of the National Psychology Exam in addressing current and future areas of regulatory risk.

9. Is the content and structure of the proposed standard helpful, clear, relevant and workable?

Yes

10. Do you have any other comments on the proposal?

No

The IPPP hopes that the feedback will assist the Board in its deliberations.

Yours sincerely

Mr Radek Stratil
President, Institute of Private Practising Psychologists

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