



Submission to the Psychology Board of Australia:
National Psychology Exam: Guidelines Review

Contact:
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Response to general questions for consideration

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

ACPA agrees with the Board and supports the proposed changes of option 2.

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

ACPA supports separating the guidelines into two documents: a guideline and a manual. This will provide greater clarity, simplicity and ease of access, and enable more efficient management of the documents as required.

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

ACPA strongly supports making the higher degree exemption from sitting the exam permanent. It is ACPA's view that proper and rigorous accreditation of higher degree programs leading to endorsement is preferable to increased regulation and associated demands and cost for these trainees. The new Australian Psychology Accreditation Council (APAC, 2019) standards for accredited degrees leading to eligibility for endorsement continue to uphold the competencies for general registration, and in addition, have provided greater assurances that competencies involving public safety are met.

Students undertaking the accredited higher degree pathway to endorsement are examined and assessed on their core and advanced knowledge and research skills, and their professional practice is closely supervised and directly observed by senior members of the profession. This is to ensure their core and advanced knowledge, skills and research understanding are applied in safe, evidence-based and efficient practice. To burden these students with the additional demands, costs, and delays to undertaking their registrar program through a requirement to sit the exam is unreasonable.

Rather, the exam is an essential tool to ensure those trained through unaccredited pathways meet the general registration standard core competencies.

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

There is a lack of clarity in the statement: "The exam is required for practitioners with training in non-accredited pathways to ensure they can demonstrate their achievement of a similar level of competence to a Board-approved six-year sequence of study (Guidelines for the National Psychology

Exam, p. 4).” Potential ambiguity inherent in this statement may give rise to misunderstanding and potential misuse of the level of competencies in different areas of psychology. This statement may be interpreted to imply that all psychologists are trained to the same competencies, i.e. clinical psychologists, community psychologists, organisational psychologists, and general psychologists have all achieved a “similar level of competence” in all areas of psychology.

The Guidelines document clarifies the specific competencies that the exam covers later in the Guidelines, “The exam is designed to test the *core competencies for general registration as a psychologist in Australia*” and, “The exam assesses the *core competencies for general registration (only) as a psychologist*” (Guidelines for the National Psychology Exam, p. 6). We recommend that this clear explication of the area of core competencies covered by the exam is extended to the ambiguous statement on page 4 to attenuate risk of misunderstanding or misuse of the Guidelines.

It would also be helpful to insert on page 6, “[APAC accreditation standards for psychology programs](#). The exam aligns with the APAC [**core**] professional competencies expected to be demonstrated by graduates from an accredited six-year program of psychology training.” Students of accredited degrees leading to eligibility for endorsement are required to develop more advanced competencies in professional practice specific to their area of endorsement.

ACPA is pleased to see the use of the national psychology exam in the context of notifications has been clarified. We agree that this as an essential tool for use where a practitioner’s competency is called into question.

While overall the document correctly applies the Australian spelling for the verb ‘to practise’ and the noun, ‘the practice’, this appears confused in the paragraph on ‘Return to practice’ (Guidelines for the National Psychology Exam, p. 5):

- a) “The exam is required for applicants intending to return **to practice as a psychologist** (emphasis added – ‘practice’ used as a verb? Replace with noun ‘to psychology practice?’) who have not practised for more than 10 (space missing) *years* (are these italics intended?) to ensure they can demonstrate the appropriate level of applied professional knowledge and competence to ensure effective protection of the public.”
- b) Applicants returning **to practice as a psychologist** (emphasis added – ‘practice’ used as a verb? Replace with noun ‘to psychology practice?’) who have not practised for more than five years *may be* required to pass the exam. This includes people who have let their registration lapse for more than five years, and practitioners who have held **non-practicing** (non-practising: <https://www.psychologyboard.gov.au/Registration/Non-Practising.aspx>) registration for more than five years and who are applying to for general registration. These applicants can use their passing grade on the exam to demonstrate a similar level of competence to a Board-approved six-year sequence of study.

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

It is essential that a registrant who fails the exam remain under supervision in the period leading up to re-sitting the exam. While all provisionally registered psychologists are required to be under supervision, and fully registered psychologists required to undertake the exam due to a requirement arising from a notification are most likely to have conditions on their registration that require supervision, it is important to make this explicit in the guidelines.

Page 14 of the Guidelines for the National Psychology Exam states, “Registrants who fail the exam are permitted to re-sit the exam after completing a further three-month period of supervised practice as a provisional psychologist or psychologist.” This does not explicitly exclude practice outside of this period without supervision if a registrant has failed the exam and holds full registration. This is an issue if the renewal/registration period is more than three months from the failed exam. A registered psychologist could possibly then choose to practise for several months without supervision prior to or after undertaking a further three months of supervision, if supervision is not required under conditions on their registration, thus placing the public at risk.

We recommend that all registrants who fail the exam be restricted to practice under supervision. This would require explicating this on page 13 under Registrant status.

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

It is not stated on page 5 of the manual whether there is any restriction on the number of times the practice exam can be taken.

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)?

We are in full agreement of the areas where the Board proposes no change: pass grade, overall pass mark, when to sit the exam, and 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?

Higher degree candidates will be highly relieved to have the issue of their sitting the national psychology exam resolved and removed from the Board’s agenda.

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

Other than the suggestions outlined above, the content and structure of the proposed standard is helpful, clear, relevant and workable.

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

We thank the Board for their ongoing work for the profession and their wide consultation on matters impacting the profession. ACPA is pleased to contribute whenever possible to further develop the profession and clarify policies and guidelines for the benefit and protection of the public.