

**Contact:**

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**Submission to the Psychology Board of Australia**

**Consultation Paper:**

**Area of practice endorsements registration standard**

**December 2018**

***ACPA strongly urges the*** ***delay of inclusion of the standard for new programs until the necessary accompanying work is undertaken, the critical risks to current programs through the shortage of placements is addressed, and the review of the AoPEs is complete.***

ACPA fully supports the agenda of the Psychology Board of Australia (PsyBA) to raise standards of education and training for psychologists in Australia, and to ultimately align these with international standards. The role of the PsyBA in strengthening the foundation of education and training, ensuring better protection of the public and providing greater clarity and transparency is extremely important; we are aware of the level of work involved in this venture and appreciate the PsyBA’s dedication to the profession and public in undertaking this task.

The PsyBA’s primary focus to date on standards for registration for general practice has been a laudable and important first step in this process, given that the 4 + 2 pathway (four years of accredited education in the science of psychology, with two years of unaccredited supervised practice) “does not meet international standardsand is no longer recognised across the world as meeting requirements for registration” (Psychology Board of Australia, 2018, p. 16). As has been noted, “Australian psychologists with 4+2 internship training would not be able to register and practice overseas unless they undertook significant remediation. Not only does this affect the credibility of Australian psychology training, it limits opportunities for international mobility for these psychologists in a world where there is increasing need for health practitioners to be flexible and responsive internationally” (Psychology Board of Australia, 2018, p. 16). We approve of the initial focus of the PsyBA towards retiring the 4 + 2 pathway to registration. We agree that it is, “unsustainableboth now and into the future, with a high regulatory and administrative burden for employers, supervisors, interns, the Board, and the Australian Health Practitioner Regulation Agency (AHPRA)” (Psychology Board of Australia, 2018, p. 16).

It is pleasing to see that the PsyBA will conduct a comprehensive, systematic review of the Areas of Practice Endorsement (AoPEs), the associated unique and specific competencies of each, and the differentiation of each from the general registration standard. At the core of professional governance is the principle of transparency in, 'tailoring practitioner expertise to the type of service provided to meet consumers needs' (Grenyer, 2012). This is done by designating within professions areas of specialty, or practice endorsement, for which advanced levels of accredited training and professional governance are linked to types of services offered. ACPA looks forward to assisting in this review in whatever ways are deemed suitable, and to contributing our expertise in clinical psychology education, training, and practice as appropriate.

Furthermore, we applaud the work of the Australian Psychology Accreditation Council (APAC) in developing the new standards of education and training of psychologists incorporating a strong focus on the competencies acquired at each level of training and their examination, while supporting these with clear guidelines to ensure adequate development and resourcing of programs. The new standards are visionary and lead the world in delineating competencies to be acquired at each level of professional practice education and training.

**The proposal under consultation**

ACPA supports the proposed structural changes, language revisions, and the addition of key definitions to the standard. The standards continue to permit registration at the 4 + 2 or 5 + 1 level of training, classifying these as equivalent. The proposal of the PsyBA in this consultation to allow registrants via the 4 + 2 pathway, who have not undertaken any accredited post-graduate training in professional psychology, to apply for stand-alone programs in professional psychology leading to endorsement makes sense within this context, and ACPA ultimately supports this goal. Offering stand-alone programs of education and training in professional programs for endorsement of registrants who do not have accredited post-graduate education and training in professional psychology, and who are deemed equivalent to those who have undertaken the 5 + 1 pathway (with an additional year of education and training in the professional practice of psychology) to registration, would see a marked raising of standards within the profession.

However, **the addition to the standards of stand-alone programs is premature and currently poses grave risks to the profession and the public**. Clear accompanying guidelines to ensure appropriate entry requirements and selection processes do not currently exist; the content of such (brief) programs has not been assessed as meeting the standards of the AoPEs with assured equivalencies to the current pathways; and a serious shortage of available student placements exists for current AoPEs programs, making expansion of places unviable.

***ACPA supports the status quo (Option 1) until the necessary guidelines for the standard are developed under consultation with APAC and stakeholders***

The new APAC Accreditation Standards and Guidelines are broad and do not offer adequate protections for the public in relation to entry requirements for stand-alone programs, stating simply:

Criteria 4.2: Admission and progression requirements and processes are fair, transparent and equitable. The provider demonstrates that its student selection criteria and processes are intended to select students who are likely to succeed in the program of study (Australian Psychology Accreditation Council [effective January 2019], p. 13).

The guidance on the provision of evidence for this standard consists of, “policies and procedures for student admission and progression for programs of study and samples of admission and progression decisions” (Australian Psychology Accreditation Council [effective January, 2019], p.14).  However, the PsyBA proposed entry pathway into a stand-alone program assumes applicants hold equivalence to a 5th year qualification, with the associated breadth and depth of competencies. Higher education providers delivering AoPE programs have up until now guided and progressed students through the 5th year level into the 6th year via fully integrated two-year programs. The commencement of the 6th year, and hence the viability and efficiency of the training, has been predicated on relatively consistent and explicit competency levels at entry - competencies that have undergone vigorous training and evaluation throughout the 5th year. This same entry point cannot be guaranteed in the proposed entry pathway to stand-alone programs, and we consider this a potential risk.

Clear entry requirement guidelines are necessary prior to the inclusion of the standard for stand-alone programs of professional practice education and training. For example, entry to stand-alone programs should be subject to the same requirements for entry to other post-graduate programs, i.e. based on an appropriate undergraduate degree earned within the past ten years.

Further, leveraging existing processes that provide more standardised evaluation of competencies will be important. Over the past five years the PsyBA has established rigorous national standards and guidelines for registration, strongly supported by the National Psychology Examination. The public now has better assurances that new registrants who have undertaken the 4 + 2 pathway are adequately prepared for professional practice as generalist psychologists given the standardised evaluation of competencies that has been created by the exam process. Prior to the implementation of these changes, professional education and training via an unaccredited supervision program was largely unregulated, extremely variable, and not assessed in a standardised manner. While it might be assumed that earlier registrants, via this non-standardised pathway, have subsequently gained knowledge and understanding through experience, supervision, and ongoing professional development, this is not assured and is likely to have high between-individual variability.

Higher education providers may be quite eager to offer stand-alone programs, as they are likely to be financially viable and very popular, particularly in clinical psychology. However, the conflict of interest for higher education providers offering stand-alone programs is concerning. The new APAC Accreditation Standards and Guidelines devolve responsibility for standards of education and training to higher education providers who hold a conflict of interest with their business model focussed on profit. This conflict places the standards of training at risk if approved prior to the development of clear and stringent associated guidelines.

Assessment criteriaguidelines also need to be developed to ensure that academic and clinical assessment over a shorter period does not compromise the output competencies of graduates. Currently those applying for an AoPE have undertaken a two-year integrated program of assessments and examinations overseen by multiple academics and senior clinicians, plus a registrar program of supervision to best ensure optimal outputs. The reduction in the period of accredited education and training required under a stand-alone program reduces the inherent securities currently available and may lead to undetected inadequacies in graduate competencies.

The addition of new programs of education and training in areas of practice endorsement is very likely to further undermine the already critical situation of a severe shortage of placements fortrainees, leading to the collapse of standards of training. The current placement situation for higher education providers in many areas of practice endorsement, particularly in clinical psychology, is becoming critical. The reason for this very concerning situation is clear. In the past 10 years the number of clinical psychology programs has increased markedly. Alongside of this, the number of students accepted into many clinical psychology programs has increased and new 5+1 programs have been established, while the number of placements available has remained steady.

Furthermore, to include the new standard prior to the completion of the review of AoPE competencies for the different AoPEs may prove irresponsible in other ways. Australia has the largest number of recognised areas of specialised practice in psychology in the world. The proposed review will be invaluable in defining differences between AoPEs and may find value in combining AoPEs or reducing their number. Locking in structures for stand-alone programs prior to the review of AoPEs would require higher education providers to undertake considerable risk.

While it is most likely that stand-alone clinical psychology programs will be offered initially, hopefully followed by clinical neuropsychology and forensic psychology, the principle of the standard leaves open other possibilities that may not be well-served by a stand-alone program, that renders programs and their graduates obsolete, redundant, or not fit for purpose. The review of AoPEs may well lead to major changes within and between AoPEs. Some AoPEs may be rendered obsolete, redundant, or converted to sub-specialities of other areas of practice, while others may be extended in terms of the amount of education and training required to become fit-for-purpose. Furthermore, the achievement of the required competencies for practitioners in different AoPEs may be found to require differing lengths of time and intensity of education and training, as in the United Kingdom. Some AoPEs, such as clinical psychology, clinical neuropsychology, and forensic psychology may require more extensive additional training over the 5 + 1 standard to reach competency, while others may require less. For example, the United Kingdom model of licencing some practitioners at master level and others at doctoral level needs to be considered, as the current one-size-fits-all definition of AoPEs may, in fact, not be the most suitable model for education and training of the different types of specialisations.

ACPA would prefer to retain Option 1 until the dimensions and content of all AoPE training programs to produce the required graduate competencies are determined. Should Option 2 be implemented and stand-alone programs be permitted to be developed prior to the comprehensive review of the AoPE standards, ACPA strongly recommends that the PsyBA produce clear accompanying guidelines that address the issues outlined above (devolution of responsibility for standards to higher education providers with a conflict of interest, including entry requirements, selection criteria, and assessment of competencies for stand-alone programs) in consultation with stakeholders. The issue of the critical shortage of placements for training for new programs also needs to be addressed prior to placing further excessive pressure on the capacity of existing programs to meet the standards required.

**References**

Australian Psychology Accreditation Council (effective January 2019).  APAC Accreditation Standards for Psychology Programs: Evidence Guide.

Grenyer, B.F.S. (2012). Connections, Issue 6. http://www.psychologyboard.gov.au/News/Newsletters/November-2012.aspx downloaded 19/09/2017.

## Psychology Board of Australia (2018). Public Consultation paper on the proposal to retire the 4+2 internship pathway to general registration**.**