**Public consultation on revised area of practice endorsement registration standard**

To Whom It May Concern:

The premise of the current consultation is that AoPE are a valid and legitimate means of differentiating professional psychologists in Australia and their various competencies.

From the outset, my submission disputes this presumed legitimacy, and as such, also questions the legitimacy of any and all revisions and proposals which retain AoPE in their current form. As is well known, when AoPEs were introduced most APS college members obtained automatic endorsements, regardless of their training background or level of education. According to the Psychology Board of Australia’s latest statistics, one psychologist holds six areas of endorsement. The process of ‘grandfathering’ to non-APS college members is popularly viewed as having been corrupted by APS interests and biases. The Australian Clinical Psychology Association’s Dr Judy Hyde (<https://industry.gov.au/Office-of-the-Chief-Economist/SkilledOccupationList/Documents/2015Submissions/ACPA> ) stated in 2015 that ‘more than half of those clinical psychologists currently endorsed by the Psychology Board of Australia do not have qualifications in clinical psychology, although these are now required for endorsement going forward.’ ​ When the registration system for psychologists moved from the state-based systems to being federally managed by AHPRA, many members of the APS were automatically endorsed in areas of their choosing. Consequently, many endorsed psychologists hold the same level of training and qualifications as non-endorsed psychologists. A large portion of non-endorsed psychologists hold postgraduate psychology qualifications such as masters, doctorates, or specific training in particular evidence-based techniques. THESE PROCESSES HAVE SERIOUSLY CONTAMINATED THE RANKS OF ‘ENDORSEMENT’, MISLEADS THE PUBLIC AND THEREFORE MAKES THE WHOLE IDEA OF ENDORSEMENTS AS REDUNDANT AND INACCURATE. Many psychologists also have issue with the very few courses and qualifications that are deemed to be eligible for endorsement as APAC accredited. For example, I am aware of psychologists holding forensic endorsements who have only completed a 4-year degree in psychology, while I hold a 4-year degree in psychology, a Bachelor of Criminology and a Masters of Applied Science and I am not eligible for endorsement in forensic psychology as my Bachelor of Criminology does not count as it is not APAC accredited. I could provide dozens of examples of these falsehoods and injustices.

There is simply no evidence that Masters or Doctoral level studies result in competencies in the workplace which are associated with better outcomes for clients. As such, Masters and Doctoral level studies can legitimately be seen as primarily academic exercises, and not forms of training which result in competencies which make a difference to client outcomes. There is no evidence that those who have chosen the Masters or Doctoral level pathways obtain better outcomes for their clients when compared to those who did their 5th and 6th years of training in an internship. Australian psychologists as a cohort, including both 4+2 and masters graduates, have been found to achieve client outcomes which are impressive and up to best international standards (Pirkis et al 2011). The existing AoPE framework erroneously implies that those psychologists with endorsements have a higher level of competency than those without endorsements. Again, there is simply no evidence in support of this contention. As such, the entire AoPE framework needs to be called into question.

The fact that high ranking members of the APS and PBA were awarded multiple areas of endorsement, despite primarily having academic careers, simply undermines any possible legitimacy of AoPEs and demonstrates the problems described here. For example, prominent members of the PBA have a range of AoPEs, such as clinical, forensic, counselling, health, and community, etc. It has been stated that around 10 years of work is required to obtain one AoPE. How is it possible that psychologists who have focused the bulk of their career on university teaching could have achieved such high levels of competence in a range of applications of psychology which endorsement is meant to represent? Such psychology teachers have often been working at universities for most of the past 20-30-40 years, and yet within the one career in psychology, their multiple AoPEs are supposed to suggest that they have become highly skilled in multiple applications of psychology. These people were given automatic endorsements into multiple sub-fields of psychology just by virtue of their membership to multiple colleges of the APS. At the same time, there are many thousands of ‘generalist’ psychologists who will never be eligible for any endorsements, despite having spent many years developing actual competencies in applied fields of psychology. The prospect of having to undergo another year of study, or some other form of bridging program in order to become eligible for AoPE is ludicrous, and simply points to the faults in the current AoPE framework as well as the proposals for further development. The problems, contradictions, inconsistencies and automatic endorsements of APS members render the entire AoPE framework illegitimate to many applied psychologists.

Furthermore, the notion that non-endorsed psychologists should engage in further university studies in order to become competent in jobs which they have been capably performing in for many years is nothing short of insulting. The latest APS submission in which they have recommended to the government that non-endorsed psychologists be restricted from seeing approximately 90% of their current Medicare-funded clients is insulting, career-destroying and will seriously restrict access to mental health services for most consumers in Australia.

In summary, I suggest that nothing but a complete revision of the entire AoPE framework is required (and is overseen by officials with no self-interest in the outcomes). The system is a joke and misleads consumers. The historical wrongs which are perceived as having been perpetrated at the outset of the PBA and endorsements need to be rectified with a complete radical revisiting of the entire notion of competency and varied training options, which include the 4+2 pathway. No amount of revisions will alter the basic problems which are perceived as being at the heart of AoPE.

All AHPRA Registered Psychologists, regardless of endorsement, have attained the competency to provide psychological treatment under Medicare and there is no evidence to date of any difference in patient outcomes for endorsed clinical psychologists compared to other registered psychologists in clinical practice. Psychologists cannot be considered better trained than each other merely by virtue of holding the title clinical psychologist or any other endorsed area. The quality, skills and knowledge of a psychologist cannot be deemed by endorsement status alone.

Here is a link to a petition in relation to the AoPE process to demonstrate how many psychologists view this process as problematic and unjust: <https://www.communityrun.org/petitions/stop-changing-the-goal-posts-a-psychologist-is-a-psychologist>

Yours sincerely



Karen Donnelly

Psychologist (BBSc, BA (Crim Just), BPsych (Hons), MAppSci, MAAP)