26th May 2019

Ms. Rachel Phillips

Chair, Psychology Board of Australia [psychconsultation@ahpra.gov.au](mailto:psychconsultation@ahpra.gov.au)

Dear Ms. Phillips and the consultation board,

**Re: Consultation – National Psychology Exam: Guidelines Review**

On behalf of the students enrolled in the University of Melbourne’s Clinical Psychology (CP) and Clinical Neuropsychology (CN) Masters level programs, we strongly support the board’s proposal to make the National Psychology Exam exemption permanent for graduates from higher degree programs. We are in agreement with the rationale for this proposal as outlined in the Consultation Paper.

Graduates of higher degree programs have completed a minimum of six years study, including a minimum two years of rigorous specialised training, in approved APAC courses at an Australian university. As outlined in the Consultation Paper, the new APAC accreditation standards for psychology programs (2019) incorporate specific domains on public safety and clearly outline competency standards for each level of training, which will help ensure that diversity across programs will not impair graduates’ abilities to engage in safe practice.

Through this specialised training, higher degree graduates complete coursework, research, and clinical placements enabling them to achieve the expected level of professional competence.

They are comprehensively assessed throughout their higher degree, as required by APAC. The sitting of an extra exam to review previously assessed competencies would constitute unnecessary regulation. Additionally, registered psychologists will partake in continued professional development as stipulated by the PsyBA. This ongoing opportunity for learning will further ensure higher degree graduates maintain safe and competent practice. Higher degree graduates have been exempt from sitting the National Psychology Exam since 2013, and as stipulated in the Consultation Paper, no associated issues have been identified.

In addition, completing the National Psychology Exam would place additional and unnecessary costs on higher degree graduates who may have been studying continuously for six or more years and have incurred significant student debt. As well as being an extra financial cost to graduates, the need to sit the exam may also delay graduates’ entry into the workforce by several months after graduation. This would deprive graduates of income as well as unfairly postpone career commencement.

In conclusion, we strongly endorse the PsyBA’s recommendation to permanently exempt higher degree graduates from the National Psychology Exam.

Thank you for your consideration of our feedback on this Consultation Paper.

Sincerely,

Clinical Psychology and Clinical Neuropsychology Masters students The University of Melbourne [neuropsychology.students.society@gmail.com](mailto:neuropsychology.students.society@gmail.com)

We, the undersigned, agree with the comments and suggestions outlined above.

