

Submission to the Psychology Board of Australia's Consultation Paper 9 – Guidelines for the National Psychology Examination

APS contacts:

David Stokes

d.stokes@psychology.org.au

(03) 8662-3324

Prof Lyn Littlefield OAM FAPS

l.littlefield@psychology.org.au

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ABOUT THE AUSTRALIAN PSYCHOLOGICAL SOCIETY

The Australian Psychological Society (APS), incorporated in 1966, is the preeminent body representing the discipline and profession of psychology in Australia, with 20,000 members supported within 9 professional Colleges, 27 Interest Groups and 40 Branches across Australia. The Society has had a role in setting national standards for psychology education and training for close to forty years and has close ongoing relationships with the 40 Schools and Departments of psychology across Australia's higher education sector, including a longstanding and close working relationship with the Head of Department and School of Psychology Association (HODSPA). The APS has also established relationships with senior practitioners in public employment, private employment and private practice sectors across health, schools, public sector agencies and industry. Their views and expertise are accessed through established committees and forums. Their input is also regularly sought on papers and submissions.

The Australian Psychological Society (APS) welcomes the opportunity to make a submission to the Psychology Board of Australia (PBA) regarding Consultation paper 9 – National Psychology Exam (the Paper).

RATIONALE FOR A NATIONAL EXAMINATION

Little rationale is provided in the Paper for the introduction of a national psychology examination. Beyond a brief comment in Section 5 (Frequently Asked Questions) which alludes to measurement of a minimum level of "applied professional knowledge", there is little indication as to why the PBA considers it necessary to add an examination to the training pathways which the profession has in place. Considering the magnitude of the impact which such a measure is likely to have on provisional psychologists applying for registration, educators and supervisors, it is remarkable that a more considered explication of the Board's intentions behind the proposal was not provided. In the absence of further information, it is assumed that the PBA's motivation is grounded in a perception that there is a need for more consistent assurance that provisional psychologists reaching the end of their six year training pathway meet a minimum standard of competence in each of the four domains listed in section 2 (D1-D4).

The APS is certainly supportive of the notion that psychology as a profession would benefit from an increased emphasis on assuring competency outcomes in its education and training pathways. However, **the level of emphasis on assuring competencies and the extent of related quality assurance processes are not the same among the four pathways to registration which now exist. The pathways therefore require different approaches**, for the reasons detailed in the section which follows.

DIFFERENCES BETWEEN EDUCATION AND TRAINING PATHWAYS LEADING TO REGISTRATION

Setting aside for the time being the question of the pathway for overseas-trained psychologists (dealt with later in this Submission), the remaining three education and training pathways require that all candidates complete a fourth year undergraduate program accredited by the Australian Psychology Accreditation Council (APAC) and approved by the PBA before undertaking a final two years of education and training. These final two years of training are however, substantially different across the pathways. The first of the pathways, which has postgraduate professional training at the Master or Doctoral level at the fifth, sixth and subsequent years, is an accredited pathway which

must meet the accreditation Standards of the Australian Psychology Accreditation Council (APAC). Accreditation is fundamentally a quality assurance process and therefore the profession has a quality control process in place for the education and training of provisional psychologists exiting this pathway including assessment of the extent to which graduates meet the core competencies and attributes listed in the APAC Standards. These competencies match closely those set down by the PBA in its provisional registration standard and are by agreement under the National Law approved as the appropriate Accreditation Standards by the PBA and Ministerial Council. It is noteworthy that the APAC Standards (June 2010 version 10) explicitly require higher education providers to demonstrate how each of the core competencies are formally examined and require that each student must pass each of these examinations before he or she can be permitted to graduate. To require graduates of this pathway to be required to be re-examined by a National Exam on each of these core competencies following graduation would be an unnecessary and very unfair imposition. This imposition includes the potential for an additional financial burden on students who might be required to take any such examination.

The second pathway to registration, which has as its final two years of training a program of supervised and PBA-approved practice, currently has no quality assurance process for the final two years of training except for the oversight and approval of the PBA (the so-called “4+2” pathway). This oversight process does not assure the quality of the standard of training by requiring external scrutiny of the assessment of competency undertaken by the supervisor and comparison against a benchmark as happens in the accreditation assessment process. Rather, it is more akin to a process of monitoring that a set of hurdle requirements are met and entrusts the supervisor with responsibility for ensuring that sufficiently rigorous assessment of competence is undertaken. Without any consistent benchmarking the quality and consistency of supervision provided can be highly variable and it is therefore not a quality assured pathway. For this pathway the right kind of national examination before registration could provide a level of assurance that provisional psychologists completing this pathway have met an equivalent benchmarked level of competency in core areas.

The third pathway is a new pathway introduced at the start of the National Registration Scheme by the profession. This pathway requires that the final two years of training consist of the completion of an accredited fifth year Graduate Diploma of Professional Psychology, followed by a final year of PBA-approved supervised practice. Although such provisional psychologist will have an additional year of accredited higher education with an emphasis on laying the foundations for the final year of supervised training, the final year itself suffers from the same problem as the final two year component of the 4+2 route; insufficient quality assurance. It could therefore also benefit from the addition of an appropriate national examination at the point of registration.

Regardless of the pathways into which any national examination is introduced it is important to recognise the potential influence that any national examination could exert on the curricula of accredited four year undergraduate as well as postgraduate professional courses, and therefore essential that there is extensive consultation with higher education providers and APAC before any such examination is developed.

Finally, the existence of the standardising capacity of an examination at the completion of the supervision programs for four- or five-year graduate programs should allow for some increased flexibility around requirements for provisional psychologists in such programs. The current

procedures are having significant workforce implications as both employers and supervisors are finding the onerous demands unreasonable and are abandoning their commitment. If reduced procedural demands are a consequence of the examination, then this certainly adds to its justification.

DESIGN OF NATIONAL EXAMINATION AND METHODOLOGY

There is a danger that the creation of an examination by the registration board will set up different standards of skill and knowledge to be attained by probationary psychologists for different pathways. **The design of any national examination should ensure that the minimum required standard of performance needed to pass is consistent with that required by accredited postgraduate professional Master and Doctoral level courses for those core skills and knowledge which are common to both pathways.**

Reflecting the commitment of the psychology profession to its roots as a scientific discipline, **it is imperative that the establishment of any national competency examination process is based on the published empirical literature on the assessment of professional knowledge and competency.** The proposal to adopt only a multiple choice question design for the examination is not consistent with the research on competency assessment in psychology which has concluded that multi-modal forms of assessment provide the highest levels of validity and reliability of competency measurement (ref). While it is, as the PBA has suggested on page 13 of the Paper, possible to construct multiple choice questions which can test knowledge and demonstrate reasoning, this method of assessment is best suited to the assessment of knowledge and by itself is a poor choice for any assessment designed to assure competency since many skills components cannot be adequately measured by multiple choice questions (Veloski et al 1999). There are a multitude of methods available which would be better suited to a skills assessment and which could be added to a multiple choice knowledge and reasoning test so as to provide a more complete picture of competence to practice (Kaslow et al 2009).

The Paper proposes that a national examination could be used for multiple purposes (assessing competence of provisional psychologists before registration, assessment of overseas-trained psychologists and perhaps testing psychologists who are ready to return to practice after a (voluntary or enforced break). **To design one assessment instrument employing only one method (despite its division into four domains) and expect it to be a valid and reliable approach for such a diverse set of purposes runs counter to what principles of assessment in psychology.** For example, overseas trained psychologists would need a more comprehensive assessment process given the lack of international mutual recognition arrangements in psychology. The pathway to registration for overseas trained psychologists cannot assume the common accredited four year undergraduate foundation which the other pathways in Australia all have in common. Further, the assessment process for overseas trained psychologists requires one which is designed to take account of their lack of local knowledge such as the Australian legal system and of cultural differences. Multiple assessment systems will be required, each tailored to, and fit for, their purpose.

The curriculum proposals in the Paper for the examination are quite narrow in focus and excessively oriented toward the health sector considering the diversity of psychology as a profession. The APS recognises that the National Law has imposed a health-practitioner oriented focus on the regulatory

systems which the PBA must manage, however **the PBA has a responsibility to recognise the breadth of the profession wherever possible and one way in which it could do so would be to broaden the curriculum beyond a narrow group of highly health-centric topics. To fail to do so risks devaluing many diverse aspects in the discipline's education and training pathways.** The APS strongly recommends that the PBA undertakes much more extensive consultation with the profession and with educators before finalising the curriculum for any national examination.

The shift of the focus of the provisional psychology program from progressive learning from experience and supervision, from formal assessment via case studies and Supervisors reports to a formal examination certainly risks unhealthy exam-focused behaviours and strategies such as the emergence of exam coaching bodies. It is assumed that 'passing' for provisional psychologists will still include the other aspects and be taken into consideration with the formal examination to ensure a balanced evaluation.

PROVISION OF A NATIONAL EXAMINATION

While the APS recognises the responsibility which the PBA must exercise in setting standards for registration, including minimum competencies in any set of core capabilities required of general registrants, **the APS believes that the task of developing the type of national examination proposed in this Paper is more properly one for the accrediting authority (APAC).** APAC monitors quality and standards of education and training in the postgraduate pathways, thereby being in a very strong position to design an examination which is equivalent in nature to the assessments conducted by higher education providers at the same level in the other (postgraduate professional) pathways. APAC would also be in a strong position to ensure it is benchmarked with the same level of competence as that required by APAC's core competencies assessment Standards. APAC also has the expertise in advanced assessment of the knowledge and skills of practitioners trained at the 5th year and beyond, and in systems of quality control, given its role as a quality and standards organisation. Further, **having the examination designed and administered by the accreditation body would introduce a level of independence of the examination process from the PBA's registration decisions which would also be highly desirable.** Most other professions have such an arrangement, since transparency of process is more easily achieved.

RECOMMENDATIONS

1. A national examination of the type foreshadowed in the Paper is not introduced into the professional postgraduate (Masters and Doctoral degree) pathways to registration, so as to avoid the double assessment and further financial burden of higher education students.
2. The design of any national examination should ensure that the minimum required standard of performance needed to pass is consistent with that required by accredited postgraduate professional Master and Doctoral level courses for those core skills and knowledge which are common to both pathways.
3. It is imperative that the establishment of any national competency examination process is based on the published empirical literature on the assessment of professional knowledge and competency.

4. To design one assessment instrument employing only one method (despite its division into four domains) and expect it to be a valid and reliable approach for such a diverse set of purposes runs counter to what principles of assessment in psychology.
5. The PBA has a responsibility to recognise the breadth of the profession wherever possible and one way in which it could do so would be to broaden the curriculum beyond a narrow group of highly health-centric topics. To fail to do so risks a devaluing of many diverse aspects in the discipline's education and training pathways.
6. The APS believes that the task of developing the type of national examination proposed in this Paper is more properly one for the accrediting authority (APAC). Having the examination designed and administered by the accreditation body would introduce a level of independence of the examination process from the PBA's registration decisions – a separation of powers that would also be highly desirable.

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