

## **Response from the Heads of Department and Schools of Psychology Association (HODSPA) to Consultation paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination**

The Board has put forward three arguments as to why 6-year trained graduates should no longer be exempt from the National Psychology Examination (NPE). They are as follows:

1. It is inequitable that one group of trainees should be exempt from the examination.
2. Recent reforms of higher education have led to greater differentiation within the sector, meaning that we can no longer be sure of program outcomes.
3. Removing the exemption will allow greater differentiation of programs, allowing universities to be creative in the way that they deliver their offerings.

We will examine these arguments in turn. We will then look at the examination itself and the Psychological Board of Australia's claims for it. Finally, we will look at what the removal of the exemption might mean for accreditation.

### **1. It is inequitable that one group of trainees should be exempt from the examination.**

The Psychology Board of Australia argues that it is unfair for one group of trainees, namely those completing 6-year training at a university or registered private provider, to be exempt from the NPE. This argument fails because it does not acknowledge (1) that trainees come through different routes and (2) that those who have completed a 6-year program have been assessed many times, in many ways, by many different people. For example, a typical MPsych (Clinical) student will complete assessments, which may include five formal written exams, two vivas, produce at least 10 DVDs of interventions, 10 essays/reflections, three formal case presentations, four formal placement reports (written up as case studies) and an external thesis examination. This is not the case for those who come through the Supervised Practice (4+2) route. The Board should read the sections on assessment in the Australian Psychology Accreditation Council (APAC) Guidelines<sup>1</sup>. Indeed, given that those in 6-year programs are being trained in an area of Practice Endorsement, it is quite appropriate that they should *not* be subject to the NPE.

Importantly, the programs pursued by 6-year university-trained graduates undergo scrutiny at all stages. First, there are the internal processes of the university, with assessments and outcomes being scrutinised at several levels. Second, there is the overarching examination of the university's processes by the Tertiary Education Quality and Standards Agency (TEQSA.) Third, there is the Psychology-specific quality assurance provided by APAC. We would argue that this represents a far more comprehensive quality assurance process for the Board to rely on than one focused upon a single 3.5 hour examination. There is no equivalent process supporting the programs pursued by those in supervised practice, hence an argument based on equity fails.

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<sup>1</sup> The Board is part-owner of APAC and yet seems to treat it as irrelevant.

Again, the Board (p. 31) notes, *“The Board has no evidence or grounds to support the view that applicants for general registration who have a higher degree should not also demonstrate the minimum standard for registration through sitting the exam.”* The Board has clearly not sought evidence. Indeed, one could ask what evidence it would seek. One approach might be to examine whether in the last round candidates who had been through the 4+2 route scored less on the examination than those completing the 5+1 route. The only comparison is a crude chi-square on the numbers passing. The Board has the data and it should release it for others to examine and/or carry out the relevant analyses itself.

Incidentally, the NPE will not be applied to all trainees because if you graduate from a program in New Zealand, you will not be required to take the exam. Given that it is quite possible for an Australian national to pursue a program in New Zealand, we can ask whether such a candidate is required to do the exam because they are Australian, or exempt because they passed their program in New Zealand<sup>2</sup>?

## **2. Recent reforms of higher education have led to greater differentiation within the sector.**

The Board argues that recent reforms have encouraged greater differentiation within the Higher Education sector. To use their words (p. 4), *“...to greater differentiation between institutions in the types and format and specialised focus of these programs. The Board is of the view that this diversity is perpetuating an additional risk to the regulation of psychologists from this training pathway.”* And, later in the document (p. 7), *“Some universities and private providers are investing heavily in online and distance teaching, some are conducting effort in smaller face-to-face classes of high quality, while others are focusing on postgraduate and research outcomes.”* Clearly, the implication is that if you are focusing in online or distance education, your programs are not of high quality! This is ignorant at best, libel at worst. Indeed, there are no APAC accredited Masters programs that are offered externally. All require on-campus attendance, although this may be in compressed blocks of time. Importantly, we thought that completing Master’s or Doctoral training in Psychology was postgraduate?

Given that almost all Australian universities offer at least one professional program in Psychology, there is not much differentiation here. This might be a concern, but again the Board should read the APAC Guidelines, which place significant constraints on how 6-year programs can be delivered. These have not changed, although they are currently being revised. Indeed, one can mount the argument that it is more likely that universities in Australia are becoming less diverse as they chase international rankings. The criteria that make up the rankings are very explicit and woe betide a university that ignores them. Importantly, the Board provides no evidence that the differentiation that they see has had any impact on the quality of programs offered. Indeed, if this were the case across the sector at large, then the Federal Government might reasonably expect TEQSA to do something about it.

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<sup>2</sup> We also note that while New Zealand has an overarching QA system (and had one before Australia), it does not have the equivalent of APAC.

### **3. Removing the exemption will allow greater differentiation of programs, allowing universities to be creative in the way that they deliver their offerings.**

Despite 2 above, the Board makes the argument that if all trainees have to do the NPE, then universities can become much more creative in how they deliver their programs. Unfortunately, this is unlikely to be the case because, once again, the Board seems to have forgotten about APAC. The APAC Guidelines place various constraints on the way that programs are delivered. Unless the Board is prepared to engage in a significant discussion about program accreditation, then extending the NPE to all trainees will have no impact on program differentiation whatsoever.

The above are the arguments in favour of *removing the exemption* for 6-year trained graduates from doing the NPE. There are some further minor arguments that we will examine as we look at other aspects of the paper.

#### **The National Psychology Examination and the claims made for its use.**

Perhaps the most disheartening aspect of the document is the claims made for the NPE. Reading the document makes it clear that the Board believes it to be a perfect predictor of performance. Again, to quote the paper (p. 8), *"- it is possible that an individual may pass an approved program of study but not be an appropriately qualified candidate for registration. The National Psychology Examination is a competency-based assessment of the integration of knowledge and skills in psychology and passing the exam assists the Board in being confident of a person's ability to practise safely."* And (p. 10), *"The Board is of the view that the Introduction of the National Psychology Examination would assist in ensuring that entry level psychologists have demonstrated to the Board the minimum professional standard to keep the public safe."* And (p. 11), *"...to provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered."*

If we unpack these statements, they suggest that a 3.5 hour examination is a better predictor of performance than all of the different forms of assessment that a candidate has been subject to during their program. Further, if people can emerge from a program that has been the subject of university/TEQSA/APAC accreditation without meeting the minimal professional standard, what does this say about the value of accreditation? Finally, what does it say about all of those professionals around the country who design assessments with practice in mind? Clearly, they are wasting their time: The Board knows best.

Importantly, the Board can make these claims for the NPE if they wish, but they provide no evidence to support them. There is no evidence to demonstrate predictive validity. Further, any claims for face validity would not stand up compared to those that could be put forward for the professional Psychology programs run by universities. To put it bluntly, the Board is fortunate that no one has mounted a legal challenge around the use of the NPE.

Perhaps the least defensible aspect of the paper is to be found on page 4 and we quote *"At this stage, the Board anticipates a minimal impact on practitioners from the proposal and expects all suitably qualified candidates for registration to be able to pass the exam."* The

meaning of this statement is somewhat ambiguous, but let us assume that it means that everyone exiting from a 6-year program should pass the exam. If this is the case, then why should such students be subject to the exam in the first place? We note that only one out of 50 (5+1) candidates has failed the exam at the first sitting<sup>3</sup>.

The Board argues that there is minimal cost associated with the exam, namely \$450 per sitting to be borne by the candidate. However, if the examination does not add value to the registration process and we contend that it does not, then any cost is too much. In fact, if all 6-year prospective registrants are required to take the NPE, then income from the examination will rise significantly. In the Board's April 2015 Newsletter, some 247 candidates have sat for the examination in 2014, which equates to \$111,500. We would anticipate some 1000+ graduates from the various 6-year (and doctoral) programs being required to sit the NPE, which would mean an additional \$450,000<sup>4</sup>.

### **The role of APAC and accreditation**

One of the most telling statements in the report appears on Page 8, "*Accreditation does not however assure competence to practice as a registered psychologist for individual candidates from these programs.*" The obvious retort to this statement is that the Board has provided no evidence beyond mere assertion that the NPE fulfils this role.

Indeed, the paper released by the Board is replete with sections that call into question the value of APAC accreditation, as set out above. Accreditation is a very expensive business for universities, costing well over \$100,000 for each episode. If accreditation of a program does not guarantee that applicants will be registered, then we would argue that the burden of accreditation should be reduced significantly. We would also point to the recent report "Independent Review of the National Registration and Accreditation Scheme for health professionals", by Mr. Kim Snowball. There is a significant focus on the value of accreditation in this review, although Snowden does note that overall accreditation costs in Australia are much higher than in the UK, being some 19.4% of costs compared with 6.0%.

Despite the above, the Board appears to ignore the benefits provided by accreditation and seeks to further burden individuals and the sector with another cost/process. The cost to

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<sup>3</sup> The Board seems to have forgotten that there is a role for chance in any assessment process. The Board produced a paper in April 2015, which notes that some 247 candidates sat the examination in 2014. This will increase significantly if the exemption is removed. Let us assume that now some 1,000 candidates will sit the examination. It is likely that one or two of these candidates will fail as a result of chance, not because they are likely to be incompetent practitioners. This will call into question their perfectly adequate training and impact their confidence in their own ability. Thus, there must be strong reasons for removing the exemption and the Board has failed to provide these.

<sup>4</sup> If the examination can be run sustainably with some 250 applicants, it should be possible to make significant savings with an additional 1,000+ applicants.

the individual may be relatively small at \$450, but when multiplied by the number of likely applicants, it becomes another significant cost on an already expensive system.

## **Bibliography**

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