

**Submission by the Australian Psychological Society to the  
Psychology Board of Australia**

# **Public Consultation Paper 18 on Guidelines for the National Psychology Exam**

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## **Introduction**

The Australian Psychological Society (APS) welcomes the opportunity to comment on the Psychology Board of Australia Consultation Paper 18 Guidelines for the National Psychology Examination (Paper 18).

The APS, as the largest national professional association for psychologists with over 21,000 members, has had a longstanding role in setting national standards for psychology education and training and has close relationships with the Schools and Departments of Psychology in Australia's higher education sector and with the Head of Department and School of Psychology Association (HODSPA). The APS also has established relationships with senior psychologists in the public and private sectors. It has also been working collaboratively with the Psychology Board of Australia and AHPRA since their inception.

This submission will draw on our past submissions and reaffirm the position of the APS in these areas. The APS has previously provided feedback to Consultation Paper 9 - Guidelines for the National Psychology Examination in May 2011. In preparing this submission, the APS has also carefully considered the feedback provided to Consultation Paper 13 (November 2011) as published on the PsyBA website.

This submission follows the sequence of Paper 18 for specific comments on selected sections of Paper 18, with a summary providing overall comments and recommendations.

## **Feedback on 1. Overview of the Exam**

### **Exemptions from sitting the examination**

The APS notes that graduates of accredited professional postgraduate (masters and doctoral degree) pathways to registration have been provided an exemption from sitting the national exam until 30 June 2016. In order to avoid double assessment and additional financial burden for students in higher degree pathways, the APS submits that a permanent exemption from sitting the national exam should be provided for graduates of accredited masters, doctorates, and combined masters/PhD programs.

### **Start date for the examination**

The APS is concerned about the requirement that provisionally registered psychologists following the 4+2 and 5+1 pathways who apply for general registration to sit and pass the exam from 1 July 2013. The July 1 2013 start date of the exam is only 15 months after the Psychology Board published the final curriculum on its website.

The APS posits that provisional registrants completing their supervised practice in full-time mode should have a minimum of 2 years after publication of the final curriculum before being required to sit the exam. For provisional registrants who are completing supervised practice part-time or who had career interruptions, the start date should be adjusted accordingly.

The APS recommends that the Psychology Board of Australia determine a later start date for the exam and allow full-time applicants at least two years from publication of the curriculum to be examined. The requirement to sit the exam should only apply to applicants for general registration who become provisionally registered on or after 1 April 2012.

## **Transition provisions for the examination**

It is not clear from Paper 18 whether the 12-month transition provision - that "registrants who are eligible to apply for general registration prior to 1 July 2014 are not required to sit the national examination" - would address the APS recommendation above.

## **Feedback on 2. Content of the examination**

### **Curriculum and recommended readings for the examination**

In its May 2011 submission, the APS raised concerns about the content of the National Exam. Further submissions relating to the content of the exam were also made by other groups, including the Psychology Foundation of Australia, the Heads of Departments and Schools of Psychology Association (HODSPA), and the APS' College of Organisational Psychologists. A common concern was that the focus of the exam seemed to be predominantly on clinical areas of psychological practice and not sampling adequately all relevant areas of practice of generally registered psychologists.

The APS notes that the documentation about the exam available on the AHPRA website, including the recommended readings and the assessment domain additional resources, does not clarify to what extent these earlier concerns about the content of the exam have been addressed. Rather, materials on the AHPRA website would suggest that the exam remains overly focused on clinical practice. It is not unreasonable to expect that provisionally registered psychologists may focus on the readings recommended by the PsyBA in the first instance and thus not achieve the breadth of knowledge desirable for generally registered psychologists. The APS is concerned that provisional psychologists might focus their readings and study too narrowly on the content areas of the exam and not develop nor demonstrate competence in other, less clinically focussed content areas.

It is also noted that provisional psychologists in the 5+1 pathway may already have been assessed on the applied knowledge of the National Psychology Exam.

### **Format of the National Psychology Examination**

The APS would like to re-iterate the concerns raised in its May 2011 submission and also reflected in other submissions about the use of a one-off multiple choice assessment as a key indicator of demonstrated competence for general registration as a psychologist. It is not clear from Paper 18 how the National Psychology Examination results will be weighed against other forms of assessment of competencies of a generally registered psychologist.

Graduates of 5+1 programs will already have been assessed in their university studies. The proposed exam does not allow for different exams versions for the 4+2 and 5+1 pathways.

The consultation paper does not specifically state whether the exam will be administered on-line (we could only find a reference to an online practice exam). The APS posits that an online version of the exam will be essential to facilitate sitting of the exam by applicants from non-urban areas.

### **Proportion of questions testing domains of the curriculum**

The APS has no concerns about the proportion of questions relating to the four components of the curriculum. However, as noted above, the APS believes that the content in the ethics, assessment, intervention and communication components should

draw from all areas of content relevant to general registration and not focus too narrowly on clinical area content.

### **Pass grade for the examination**

Paper 18 states: "The Psychology Board of Australia proposes to apply a scaled passing score of 70. The scaled passing score is the Board's view of the minimum level of applied knowledge required for independent psychology practice."

The rationale for a scaled passing score of 70 could be expanded. It is not clear if this score is based on conventional university marks or grades (e.g., some universities set a score of 70 as equivalent to a grade of "distinction", other universities use a mark of 75 as their cut-off) or conceptually and psychometrically-driven.

The APS recommends that a further rationale for this passing score be provided and also that the proposed passing score be monitored relative to the number of examinees who pass at or above this level. Such information is made available for exams in other countries, such as the Association of State and Provincial Psychology Boards in the United States (<http://www.asppb.net/i4a/pages/index.cfm?pageid=1>).

## **Feedback on 3. Sitting the Examination**

### **Examinations timetable, location and fee**

Paper 18 proposes that examinations be scheduled at least twice per year and up to four times a year, and made available in the capital city of each State and Territory of Australia. Paper 18 also notes that Board aims to keep the examination fee "as low as possible (below \$500) to allow candidates from all parts of the country to attend their regional testing centre". The APS supports the Psychology Board's goal to contain costs of the exam.

The APS is concerned, however, that applicants from regional and rural parts of Australia will be disadvantaged compared to applicants from capital cities, because of the additional burden of travelling to capital cities, and the higher overall cost of sitting the exam (travel and accommodation costs, loss of income).

The APS strongly recommends provision of the exam in an on-line format to permit both a more frequent exam timetable but above all more equitable access to the exam by provisional psychologists from outside capital cities. Online exams could be monitored either in local, approved testing centres or by National Psychology Exam Invigilators approved by the Psychology Board.

This section did not specify an appeals policy or other supports for unsuccessful candidates such as counselling with an experienced psychologist. The APS notes that the Australian Pharmacy Council has such a policy.

<http://pharmacycouncil.org.au/content/index.php?id=9>

## Summary

In summary, the APS has these main concerns about the exam:

1. Need for a permanent exemption for graduates of accredited postgraduate professional degrees
2. Introduction of the exam from 1 July 2013
3. Content of the exam and current resources to takers of the exam
4. Design of the exam
5. Examination timetable and location
6. Appeals policy

## Recommendations

1. Provide for a permanent exemption from sitting the national exam for graduates of accredited professional postgraduate (masters and doctoral degree) pathways to registration in order to avoid double assessment and additional financial burden for students in higher degree pathways.
2. Set the start date of the exam for at least two years post publication of the final exam guidelines on the Psychology Board of Australia website, and clarify transition provisions for provisional psychologists in the 4+2 and 5+1 pathways.
3. Assure that the exam content reflects applied knowledge across the range of areas of practice that reflects the diversity of practice and work settings for generally registered psychologists and provide candidates with more detail about the content of the exam, including a more extensive and up-to-date reading list.
4. Design of the exam
  - a. Provide information on the relative weighing of the exam as a key source of assessment for competence to practice as a general psychologist.
  - b. Clarify the rationale for a scaled pass score of 70, on the basis of modern test theory and psychometric principles. Monitor evidence from future exam results on whether this pass score is too high.
5. Provide online examination option to improve access to and contain examination related cost for candidates from regional, rural and remote areas.
6. Provide an appeals policy for unsuccessful candidates.