

## Public consultation

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March 2018

### Reducing regulatory burden: Retiring the 4+2 internship pathway to general registration

#### You are invited to provide feedback

The Psychology Board of Australia (the Board) is releasing this public consultation paper on the proposal to reduce regulatory burden by retiring the 4+2 internship pathway to general registration.

The purpose of this consultation is to obtain comments and suggestions about the proposal from the profession, the community, governments, employers, and other stakeholders. You may choose to provide feedback on any aspect of this consultation.

It is good regulatory practice to periodically review registration standards, codes and guidelines, and the pathways to registration as a health practitioner to ensure registration requirements remain current and relevant for the profession and to ensure a sustainable regulatory environment that balances protection of the public with maintaining workforce supply.

The 4+2 internship pathway has a long history of serving the profession and employers well. For many years, the Board has received feedback that psychology training is unnecessarily complex, fragmented, lengthy and burdensome. The 4+2 internship pathway has increasingly become more unwieldy. Stakeholders have communicated to the Board that the 4+2 internship pathway no longer fit-for-purpose as a pathway to registration going forward, and is no longer the preferred training model.

This paper outlines how the 4+2 internship pathway to general registration is unsustainable both now and into the future for employers, universities, supervisors, psychology interns, and the regulator. This paper illustrates the regulatory burden, high costs, and training difficulties associated with this pathway, and describes the Board's proposal to retire the 4+2 internship pathway to general registration in favour of the existing 5+1 internship pathway.

This paper includes specific questions about the Board's proposal that you may wish to address in your response (see p. 43).

#### You are invited to provide feedback on this public consultation

To provide feedback, please provide written submissions:

- In Word format document to help us meet international web accessibility guidelines<sup>1</sup>
- by email, with the subject title marked '**Consultation – Reducing regulatory burden: Retirement of the 4+2 internship pathway to general registration**'.
- to [psychconsultation@ahpra.gov.au](mailto:psychconsultation@ahpra.gov.au)
- by close of business on **Friday 1 June 2018**.

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<sup>1</sup> See [www.ahpra.gov.au/About-AHPRA/Accessibility.aspx](http://www.ahpra.gov.au/About-AHPRA/Accessibility.aspx) for more information.

## How your submission will be treated

Submissions received are generally published on the Board website under [Past consultations](#) after the consultation closes.

The Board publishes submissions on its website to encourage discussion and inform the community and stakeholders. However, the Board retains the right not to publish submissions at its discretion and will not place on the website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the consultation. The views expressed in the submissions are those of the individuals or organisations who submit them and their publication does not imply any acceptance of, or agreement with, these views by the Board.

Before publication, the Board may remove personally-identifying information from submissions, such as contact details. The Board will also publish submissions anonymously if requested by the respondent, in which case all identifying information, including name and organisation, will be removed before publication.

The Board also accepts submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. The Board and the Australian Health Practitioner Regulation Agency (AHPRA) will take all reasonable steps to preserve confidentiality; however submissions may be disclosed if this is required by law or by a committee of a parliament. Any requests for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence.

Please let the Board know if you do not want your submission published, or want all or part of it treated as confidential.

## More information

For more information about the consultation process please refer to the document *Consultation process of National Boards* available at [www.ahpra.gov.au/Publications/Procedures.aspx](http://www.ahpra.gov.au/Publications/Procedures.aspx).

The Board does not provide individual responses to submissions. Individuals and organisations seeking a personal reply to specific policy or operational questions raised by this consultation paper are invited to write a separate letter to the Chair of the Board at [psychologychair@ahpra.gov.au](mailto:psychologychair@ahpra.gov.au).

Individuals and organisations seeking advice on making a submission to this consultation, such as advice about the format and submission deadline, should send their queries to [psychconsultation@ahpra.gov.au](mailto:psychconsultation@ahpra.gov.au). This inbox will be monitored regularly while the public consultation is open.

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# Reducing regulatory burden: Retirement of the 4+2 internship pathway to general registration

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## Introduction

1. The Psychology Board of Australia (the Board) considers education and training reform an important next step in the development of a sustainable regulatory environment for the psychology profession in Australia. Any proposed reform must ensure that it balances protection of the public with maintaining workforce supply.
2. The Board often receives feedback that psychology training is unnecessarily complex, fragmented and lengthy. The minimum general registration requirements are detailed in the Board's [General registration standard](#). The psychology profession in Australia has multiple pathways to general registration. All pathways consist of a six-year sequence of education and training (except the doctoral pathway which takes longer) but vary in the proportion of training undertaken outside the tertiary education sector. The four training pathways that lead to general registration as a psychologist include:
  - a. doctoral higher degree pathway (including the Doctorate of Psychology; and the combined master's and PhD degree)
  - b. standard higher degree (master's degree) pathway
  - c. 4+2 internship pathway (a four- year accredited sequence of study followed by a two year Board-approved internship), and
  - d. 5+1 internship pathway (a five-year accredited sequence of study followed by a one year Board-approved internship).
3. A fifth pathway applies to overseas trained psychologists.
4. Accreditation of programs of study in psychology in Australia is carried out by the Australian Psychology Accreditation Council (APAC). APAC is an external accreditation entity exercising functions under the Health Practitioner Regulation National Law, as in force in each state and territory (the [National Law](#)).
5. All training is in the tertiary education sector for the master's and doctoral training pathways. Student registration is not required for the undergraduate study component (the first four-year accredited sequence of study). Provisional registration is required throughout the fifth and sixth year for all registrants in the higher degree (post-graduate degree) or internship pathways.
6. Those registrants undertaking the 4+2 or 5+1 internship pathways, and all applicants with overseas qualifications must also complete the national psychology exam before they are eligible for general registration. In addition, overseas applicants must successfully complete a Board-approved transitional program (unless exempt) demonstrating ethical, legal and professional competence relevant to working in the Australian context, including working with people from diverse groups commonly represented in Australia.
7. A diagram of the training pathways to general registration as a psychologist is at [Attachment A](#).
8. The Board's registration data increasingly shows that the preferred pathway to general registration favoured by 'psychologists in training' is the standard higher degree (master's) pathway. The alternative pathway to general registration has traditionally been the 4+2 internship pathway – a two-year supervised practice program (internship) after the completion of a four-year accredited qualification.
9. The 4+2 internship pathway has a long history of serving the profession and employers well. This pathway has many positive aspects and has produced high quality psychologists in the past.

10. Increasingly, more questions are being asked about the suitability of the 4+2 internship pathway in a contemporary training context. Key stakeholders and the Board agree that the 4+2 internship pathway to general registration is unsustainable both now and into the future due to the high administrative and regulatory burden of this pathway on employers, supervisors, interns and the regulator. Additionally, the 4+2 internship pathway does not compare well with international benchmarks. The Board's proposal to retire the 4+2 internship pathway will not affect psychologists with general registration, but rather a future date of retirement is proposed.
11. The 5+1 internship pathway is a relatively new pathway that began at the transition to the National Registration and Accreditation Scheme (the National Scheme) with the publication of the APAC accreditation standards in 2010, and Ministerial Council approval of the Board's [General registration standard](#) in 2009, which also took effect in 2010. The 5+1 internship program consists of completion of a five-year accredited qualification, and a one-year supervised practice program (internship). Over the last seven years, this pathway has steadily replaced the 4+2 internship pathway as the training option of choice for provisional psychologists and employers of psychologists where an area of practice endorsement has not been desired or required<sup>2</sup>.
12. The psychology workforce continues to grow strongly<sup>3</sup> and make a very positive contribution to the health and welfare of the community across multiple sectors. From this strong foundation, the time is now right to examine the current training model for psychology with a view to address the concerns raised about the 4+2 internship pathway.
13. The Board's proposal is to reduce the regulatory and administrative burden of psychology training by retiring the 4+2 internship pathway as a pathway to registration in favour of the other available pathways, particularly the 5+1 internship program. There are no proposed changes to the other training pathways recommended at the current time.
14. This education and training reform initiative, which includes the proposal to retire the 4+2 internship pathway to general registration, is a priority project in the Board's regulatory work plan (2016-2020)<sup>4</sup>. The program of work will align with the new accreditation standards for the psychology profession, which have been developed by the APAC and recently approved by the Board, and the recent publication of the [International declaration of core competencies in professional psychology](#) (the Declaration) by the International Project on Competence in Psychology (IPCP).<sup>5</sup>
15. In line with the consultation requirements of the National Law, as well as the request from the Australian Health Workforce Ministerial Council (Ministerial Council)<sup>6</sup>, the Board is undertaking wide-ranging consultation on the proposal to reduce the regulatory burden of the training pathways to general registration as a psychologist in Australia.
16. The first part of this consultation paper proposes that psychology training must be reformed to prepare psychologists for general and advanced practice and to sustain a skilled psychologist workforce for the future. The need to reduce regulatory burden is explored along with principles of reform. The Board's proposal to retire the 4+2 internship pathway is introduced, with an explanation of why the time is now right to consider retirement.
17. The Board considers that the case for retirement of the 4+2 internship pathway at this time is favourable with:
  - a. a growing workforce

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<sup>2</sup> Application for an area of practice endorsement has traditionally been made by graduates of the standard higher degree or doctoral higher degree pathways. For more information see the [Area of practice endorsements registration standard](#). The new APAC Accreditation standards for psychology programs (August 2017) allow for the development of stand-alone area of practice endorsement qualifications. See the APAC website for more information at: [www.psychologycouncil.org.au](http://www.psychologycouncil.org.au)

<sup>3</sup> For data on workforce numbers see the Board's [registration statistics](#)

<sup>4</sup> The Board's regulatory work plan is noted in the [Health Professions Agreement \(HPA\) 2016-2020](#)

<sup>5</sup> For more information on the IPCP see: [www.psykologforeningen.no/foreningen/english/ipcp](http://www.psykologforeningen.no/foreningen/english/ipcp)

<sup>6</sup> The ministerial council requested the Board hold further consultation and discussion with key stakeholders about any major reforms to psychology training pathways in their letter of December 2016 approving the new provisional registration standard. See the [news](#) section of the Board's website for more information.

- b. a viable training alternative (the 5+1 internship program)
  - c. the decline of interest in the 4+2 pathway by both interns and employers, and
  - d. general agreement among key stakeholders to explore streamlining the pathway to general registration.
18. The second part of this paper outlines the challenges with the 4+2 internship pathway, including:
- a. the regulatory and administrative burden of this pathway
  - b. the effects of this pathway on the labour market, employers, supervisors, and interns in the contemporary environment
  - c. the complexity, red tape and costs associated with compliance with the 4+2 requirements, and
  - d. the risks associated with managing the complexities of multiple pathways to registration.
19. This section of the paper also gives an overview of the 4+2 internship pathway and provides a comparison with international standards expected by psychology regulators in New Zealand, the United States of America (USA), the United Kingdom (UK) and the European Union (EU).
20. The third part of the paper describes the 5+1 internship pathway as the viable training alternative should the 4+2 internship pathway be retired. The 5+1 internship pathway has significant advantages, including an administrative and regulatory advantage, the advantage of accreditation, and it provides a better model for training and learning to develop the competencies for general registration. The Board argues that the increasing availability and preference for the 5+1 internship pathway has superseded the need to have a 4+2 internship pathway.
21. The fourth part of the paper outlines the options available to the Board to manage the current challenges with the 4+2 internship pathway to general registration. The options are evaluated based on the risks associated with each policy alternative, including the short and long term advantages and disadvantages, the costs and benefits, and impacts of each option. The Board's preferred option is to retire the 4+2 internship pathway to general registration.
22. The paper concludes with a discussion of how the 4+2 internship pathway could be retired should this option be favoured by stakeholders. The tasks and timing of retirement are discussed and evaluated, with three models of transition proposed.
23. Specific questions have been included at the end of the paper (see p. 43) to focus feedback from stakeholders about the Board's proposal to retire the 4+2 internship pathway to general registration in favour of the 5+1 pathway.



## The case for education and training reform

### The need to reduce regulatory burden

24. In 2015 the Psychology Board of Australia (the Board) announced its intention to undertake a program of work to review the education and training model to become a psychologist in Australia with the aim of reducing regulatory burden.
25. To help scope the options for a future education and training model that would balance protection of the public with preparing psychologists for practice and sustain a skilled psychologist workforce into the future, the Board brought together leaders across government, education, workforce, regulation and the profession to consider challenges with the existing arrangements at a national forum in December 2015. A green paper was presented by the Board for comment and discussion<sup>7</sup>.
26. It was clear from this meeting, that psychology training is generally seen as unnecessarily complex, fragmented, lengthy and burdensome. One of the pathways to general registration, the 4+2 internship pathway, came under particular scrutiny from stakeholders.
27. Since the beginning of the National Registration and Accreditation Scheme (National Scheme) in 2010, the Board has worked towards developing one nationally consistent 4+2 internship pathway. The Board has continually refined the internship program to strike a balance between the management of the regulatory risks inherent in this pathway and minimising the administrative and regulatory burden and red tape of the pathway. The most recent consultation on refining the 4+2 internship pathway occurred in 2014 where the Board sought to increase the flexibility of meeting the program requirements while still ensuring that psychologists undertaking this pathway are suitably trained and qualified to practise in a competent and ethical manner<sup>8</sup>.
28. Despite these continual improvements, feedback from the forum indicated that the 4+2 internship pathway is not fit-for-purpose in the current context or in the future training and labour market. The administrative and regulatory burden on employers, supervisors, and the regulator to ensure all professional training is completed during the two year internship is making this pathway increasingly unsustainable. Interns themselves are concerned about the costs and red tape associated with the program and their ability to meet the competency and administrative requirements of the internship in a timely manner. The 4+2 internship pathway is below any other international standard for psychology training and differs markedly from the training model of all other regulated health professions in Australia.
29. For these reasons, one outcome of the stakeholder forum in December 2015 was the recommendation to retire the 4+2 internship pathway to general registration. The [communiqué](#) from this meeting can be found on the Board's website.

### Developing a streamlined pathway model: The proposal to retire the 4+2 internship pathway

30. The Board determined that the first step in the review of the education and training pathways was to undertake a detailed review of the training model to attain general registration as a psychologist in Australia and to explore a new streamlined pathway model.
31. If the Board was to follow the recommendation of the forum, and propose to retire the 4+2 internship pathway to general registration, then a clear picture must to be developed that includes the following:
  - a. a full understanding of the challenges of the 4+2 internship pathway to general registration in the contemporary and future contexts

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<sup>7</sup> Psychology Board of Australia Green paper (2015). *Reviewing the psychology education and training model: Preparing psychologists for practice and sustaining a skilled psychologist workforce into the future.*

<sup>8</sup> For more information please see [Consultation Paper 24 – Provisional registration standards and Guidelines for the 4+2 internship program](#) (2014). [Past consultations](#) can be found on the Board's website at: [www.psychologyboard.gov.au/News/Past-Consultations.aspx](http://www.psychologyboard.gov.au/News/Past-Consultations.aspx)



- b. an exploration of viable alternatives to retiring the 4+2 internship pathway
  - c. an analysis of the impacts of any retirement of the 4+2 internship pathway on workforce, employers, training, supervision, health services and consumers
  - d. availability of a viable training alternative, and
  - e. a clear argument about why now is the right time to consider retirement of the 4+2 internship pathway.
32. The aim of this paper is to explore and develop a clear response to each of these five topic areas.

**Principles of reform: The foundation of any proposal to retire the 4+2 internship pathway**

33. The Board considered the following principles as the foundation for the reform agenda to propose to retire the 4+2 internship pathway to general registration:
- a. any proposal must result in a training and education model that is more streamlined than the current model
  - b. in order to maintain workforce supply, a proposal to retire the 4+2 internship pathway could only occur in the context of a favourable (stable) environment with a growing workforce
  - c. if the 4+2 internship pathway is recommended for retirement, there must be a viable training alternative to ensure a flexible, responsive and sustainable workforce
  - d. any proposal should be aligned with the objectives and guiding principles of the Health Practitioner Regulation National Law, as in force in each state and territory ([National Law](#)), in particular, any policy changes must:
    - i. 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
    - ii. facilitate the provision of high quality education and training of health practitioners
    - iii. continue to facilitate access to services provided by health practitioners in accordance with the public interest, and
    - iv. enable the continuous development of a flexible, responsive and sustainable Australian health workforce and to enable innovation in the education of, and service delivery by, health practitioners.
  - e. any proposal would be closely aligned with the objectives of the Australian Qualifications Framework (AQF)<sup>9</sup>. In particular it should:
    - i. support the development and maintenance of pathways, which provide access to qualifications and assist people to move easily and readily between different education and training sectors and between those sectors and the labour market, and
    - ii. support and enhance the national and international mobility of graduates and workers through increased recognition of the value and comparability of Australian qualifications, and
  - f. stakeholder views about the proposal must be further explored and general agreement for retirement obtained.

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<sup>9</sup> [www.aqf.edu.au](http://www.aqf.edu.au)

## The context for change: Why consider retiring the 4+2 internship pathway now?

### Then and now: A previous proposal to retire the 4+2 internship pathway

34. In 2009 during the development of the first registration standards, codes and guidelines for the National Registration and Accreditation Scheme (National Scheme), the Psychology Board of Australia proposed to phase out the 4+2 internship pathway as part of the transition to the National Scheme.<sup>10</sup> Even at that time, the Board took the view that the 4+2 internship pathway was no longer fit-for-purpose in a contemporary environment.
35. The option of immediately retiring this pathway was not supported by government in 2009 due to workforce concerns and the lack of availability of alternative programs of education. At the time of transition to the National Scheme, there were eight state and territory psychology regulators with eight different 4+2 internship pathways. Due to different data management systems it was difficult to know exactly how many psychologists there were, however, it was thought there was a workforce shortage. The majority of psychologists were trained via the 4+2 internship pathway, and the only alternative training was the master's degree, with limited availability for additional higher education places expected. In 2009 the time was not right to retire the 4+2 internship pathway, and the 4+2 internship pathway was retained for the purposes of national registration<sup>11</sup>.
36. In exploring the options towards a new streamlined pathway model, the Board notes that the current environment is very different to when the idea of retiring the 4+2 internship pathway was first considered by Health Ministers in 2009. [Attachment B](#) outlines the differences in the workforce, training and regulatory context between 2009 and now.
37. In the current context there is:
  - a. a growing workforce
  - b. a viable alternative program of education in the 5+1 internship pathway, and
  - c. most psychologists are no longer trained via the 4+2 internship but rather via the higher degree pathway.
38. In addition, there is increasing stakeholder agreement that reducing regulatory burden by retiring the 4+2 internship pathway to general registration is warranted for the future sustainability of the profession.

### A favourable environment with a growing workforce

39. The Board considers that the current growth in the workforce creates a favourable environment to revisit the option to retire the 4+2 internship pathway.

### Current training pathways volume data

40. The Board regularly publishes [registration data](#) on its website.
41. In December 2017, there were 35,369 registered psychologists, 28,973 held general registration and 4,564 held provisional registration. Table 1 shows the jurisdiction where these psychologists work.
42. The number of provisional psychologists is broadly proportional to the total number of psychologists in each jurisdiction. Most psychologists and provisional psychologists work in New South Wales, Victoria or Queensland.

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<sup>10</sup> Consultation paper on registration standards and related matters, Psychology Board of Australia 2009

<sup>11</sup> Correspondence to the Board from the Australian Health Ministers' Advisory Council, NRAS Implementation project (16 November 2009).

Table 1 Registration type by principal place of practice

Registration Type	ACT	NSW	NT	Qld	SA	TAS	VIC	WA	No PPP	Total
<b>General</b>	793	9,579	196	5,116	1,456	507	7,978	2,987	361	<b>28,973</b>
<b>Provisional</b>	108	1,470	25	886	185	69	1,266	545	10	<b>4,564</b>
<b>Non-practising</b>	43	626	2	297	102	31	363	163	205	<b>1,832</b>
<b>Total</b>	<b>944</b>	<b>11,675</b>	<b>223</b>	<b>6,299</b>	<b>1,743</b>	<b>607</b>	<b>9,607</b>	<b>3,695</b>	<b>576</b>	<b>35,369</b>

\* PPP is principal place of practice (registrants with no PPP are either: taking a short break such as parental leave or an extended overseas holiday; moving house; or have their application pending)

### Growth of the psychology workforce

43. There are just over 35,000 psychologists who hold some form of registration in Australia, making psychology the third largest health profession after nursing and midwifery and medicine<sup>12</sup>.
44. The Board's data on registrant numbers shows that registrations are increasing consistently. Overall, this equates to approximately 700-1,000 psychologists entering the workforce each year - reflecting a growth rate of between three to six per cent per year. This increase is significantly higher than the growth of the Australian population, which is currently around 1.5 per cent<sup>13</sup>.
45. Of the 35,000 psychologists, more than 4,500 are in training as provisionally registered psychologists. In addition, the Board's registrant data shows an upward trend in the number of registered provisional psychologists entering the profession each year. For example, in February 2014 there were 3,771 provisional psychologists, and in the December 2017 data (Table one of this paper) there were 4,564 provisional registrants<sup>14</sup>. The highest number of provisional registrants since the National Scheme began was recorded in June 2017<sup>15</sup>.
46. At the same time, Australia's psychology workforce remains largely 'home grown', in contrast to a number of other health professions that rely on overseas-trained practitioners to meet workforce demand.
47. This continuous growth in the workforce provides an ideal context in which to engage in a review of the training and education pathways without any unintended impacts on workforce supply. In addition, the workforce growth has been significant in recent times. Figure 1 (below) shows that the psychology workforce is relatively young, and peaks at age 30-34. This means that there is likely to be a continued healthy supply of psychologists in the community for the next two-three decades.

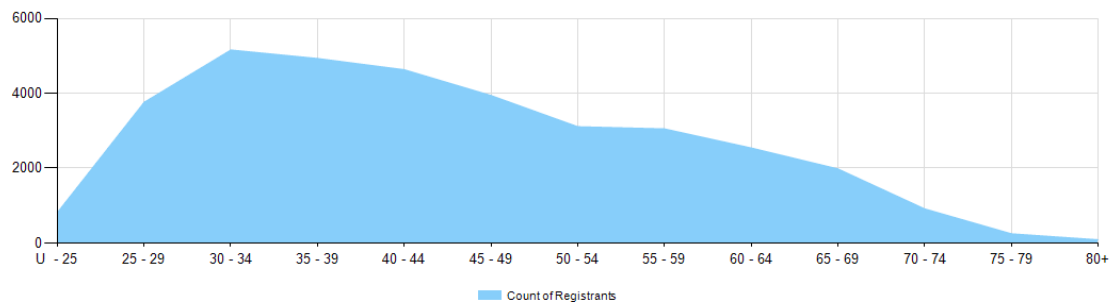
<sup>12</sup> [AHPRA Annual report 2015/2016](#). Table R1, p.38. See also the National Board Annual report summary for psychology: [Psychology regulation at work in Australia 2015-2016](#).

<sup>13</sup> ABS <http://www.abs.gov.au/ausstats/abs@.nsf/mf/3101.0>

<sup>14</sup> See [www.psychologyboard.gov.au/About/Statistics.aspx](http://www.psychologyboard.gov.au/About/Statistics.aspx) for registrant data.

<sup>15</sup> Please note that the December data of each year always shows less provisional psychologists. This is because higher degree students have graduated and applied for general registration, and the next cohort of higher degree students do not register as provisional psychologists until February of the following year.

Figure 1 Registrants by age group



### Meeting the increased community demand for psychologists

48. The demand for psychologists in Australia continues to grow in concert with the widespread acceptance of their importance to community and individual wellbeing. Along with a growing community focus on reducing the incidence of domestic and family violence, and reducing the suicide rate, there has been increased public awareness of mental health issues. This has led to an increase in referrals to psychologists from GPs, with a resulting increase in demand for psychological services and services becoming more accessible.<sup>16</sup>
49. Despite the demand for psychologists, the growth rate of psychologists has been meeting the workforce and community demand for some time. There is no indication that this situation is likely to change in the short-to-medium term. Recent advice from the Department of Education<sup>17</sup> confirms that the labour market rating for psychologists is 'no shortage', whereas in 2011 the rating was 'shortage'. Government employers report they are filling a high proportion of vacancies for psychologists and attracting large numbers of suitable applicants per vacancy<sup>18</sup>.
50. The popularity of psychology courses by school leavers over the last decade has helped in meeting the demand for the services of registered psychologists in Australia.
51. Enrolments in undergraduate psychology programs at Australian universities have been increasing – in some cases rapidly – for the past five years. Psychology subjects and majors are popular with undergraduates and universities have capitalised on this in the wake of higher education reforms allowing for greater access to university places. There has also been an increase in places in Honours programs in psychology in the same period<sup>19</sup>.
52. The availability of masters programs and the number of places in the programs has also been increasing over the last decade. In New South Wales for example, courses have recently become available at the University of Technology (UTS) Sydney and at the Australian College of Applied Psychology (ACAP)<sup>20</sup>.
53. Qualifications in psychology are offered at 40 different educational institutions nationally, including in every state and territory, and offer in excess of 420 approved programs of study which qualify graduates for either provisional or general registration. There are numerous options for both training and work to sustain a viable workforce into the future.
54. With a steady growth in the profession and community demand being met, the time is right for review and change without any unintended impacts on workforce supply.

<sup>16</sup> Psychologists in Focus, Health Workforce Australia, March 2014 ([www.hwa.gov.au](http://www.hwa.gov.au))

<sup>17</sup> Department of Education, ANZSCO 2723 Psychologists February 2015 <https://www.employment.gov.au/>. Note that workforce data is now held by the Department of Employment, at [www.employment.gov.au/SkilledMigrationList](http://www.employment.gov.au/SkilledMigrationList).

<sup>18</sup> Feedback from stakeholders at the December 2015 forum and in later meetings.

<sup>19</sup> HODSPA 2015. Personal communication

<sup>20</sup> See APAC at [www.psychologycouncil.org.au](http://www.psychologycouncil.org.au) for more information.

### The 4+2 internship pathway is no longer the pathway of choice

55. Unlike in 2009 when the Board first proposed to retire the 4+2 internship pathway, when around 50 per cent of the workforce was trained via the 4+2 internship pathway, the pathway of choice is now the higher degree pathway (53 per cent). Never before has the training environment been more ready for workforce reform than it is at this time. Retiring the 4+2 internship pathway to general registration is possible in the current context, without a major impact on the workforce, in a way that it never has been previously.

#### Current training pathways volume data

56. Table 2 shows the number of provisional psychologists in each of the five pathways by principal place of practice<sup>21</sup>.
57. The number of provisional psychologists training via the 4+2 internship pathway is declining. Currently 29 per cent of provisional psychologists (1,390 of 4,723) are undertaking the 4+2 internship pathway. This trend is in contrast to 2,009, where around 50 per cent of the psychology workforce was trained via the 4+2 internship – a reduction of 21 per cent<sup>22</sup>.
58. The higher degree pathway is the program of choice based on the availability of programs and the popularity of enrolment. This pathway accounts for 53 per cent of provisional psychologists (507 registrants) overall. As a percentage of the total number of provisional registrants, registrant data for the higher degree training pathway has remained stable for some time.
59. The 5+1 internship pathway however, is becoming increasingly popular. In 2015 only 9.5 per cent of provisional registrants were undertaking the 5+1 internship<sup>23</sup>. Between December 2016 and June 2017, for example, there were over 160 new enrolments in the 5+1 internship program. Currently there are over 700 provisional registrants (16 per cent) currently undertaking this pathway.

Table 2 Number of provisional psychologists in each of the five pathways<sup>24</sup>

Provisional registration pathway	ACT	NSW	NT	Qld	SA	Tas	Vic	WA	No PPP*	Total
4+2 Internship	34	662	17	290	40	21	121	203	2	1,390
5+1 Internship**	6	220	4	137	6	13	273	114	2	775
Higher Degree program***	73	547	5	531	137	38	896	273	7	2,507
Transitional Program	0	12	2	7	6	0	18	3	3	51
<b>Total</b>	<b>113</b>	<b>1,441</b>	<b>28</b>	<b>965</b>	<b>189</b>	<b>72</b>	<b>1,308</b>	<b>593</b>	<b>14</b>	<b>4,723</b>

\*PPP = Primary place of practice

\*\* This number includes registrants in both the fifth-year accredited program and the internship year (sixth year).

\*\*\*Higher degree program includes both two-year master's degree and doctoral degree programs

<sup>21</sup> Updated in February 2018 with more recent data

<sup>22</sup> Grenyer et al - The Australian Psychology Workforce 2: A national profile of psychologists' education, training, specialist qualifications and continuous professional development. *Australian Psychologist*, 45: 3, 168-177

<sup>23</sup> Psychology Board of Australia Green paper (2015). *Reviewing the psychology education and training model: Preparing psychologists for practice and sustaining a skilled psychologist workforce into the future.*

<sup>24</sup> Source: AHPRA at February 2018

### Growth of the 5+1 internship program makes for a viable alternative

60. Even though over half the new psychology workforce is being trained through the higher degree pathway (53 per cent), there remains around one third of the new psychology workforce that is undertaking 4+2 training. Despite the increase in undergraduate and honours places, and the increased popularity and availability of psychology master's courses, university training places for postgraduate psychology places remain limited in certain states and territories in Australia<sup>25</sup>.
61. As noted earlier, if it is recommended that the 4+2 internship pathway be retired, there must be a viable training alternative. The Board is confident that the development and steady growth of the 5+1 internship program is a viable training alternative to the 4+2 internship pathway. Currently 16 per cent of provisional psychologists (775 of 4,723) are undertaking the 5+1 internship pathway. This trend is in contrast to 2009, where none of the psychology workforce was trained via the 5+1 pathway. The increasing availability of fifth year programs in the last seven years, and increasing preference for this pathway over the 4+2 for psychologists in training is evident.

### Increasing stakeholder requests to retire the 4+2 internship pathway to general registration

62. To fully inform the preparation of this paper, the Board has consulted widely over some time on the proposal to retire the 4+2 internship pathway to general registration. The proposal is grounded in the views and feedback of key stakeholders about the training pathways to general registration.
63. Since 2010, stakeholders have used the following mechanisms to provide feedback to the Board about the viability of the 4+2 internship pathway for the future:
  - a. as noted earlier, in December 2015 the Board brought together leaders across government, education, workforce, regulation and the profession to consider challenges with the existing arrangements at a forum. One outcome of this forum was the development of the Collaborative Working Party (CWP). The CWP has been meeting over the last two years to work towards viable solutions to the challenges raised in the green paper and forum. Members of the CWP are the Board, the Australian Psychology Accreditation Council (APAC), the Australian Psychological Society (APS), and the Heads of Departments and Schools of Psychology Association in Australia (HODSPA). The Board publishes information about the CWP meetings in its communiqués on the Board's website<sup>26</sup>
  - b. throughout 2016-2017, the Board has been holding meetings with key stakeholders who are large employers of 4+2 interns across the country (e.g. Department of Health, Department of Education, Department of Corrections) to better understand the context, issues and impacts of the current pathways to general registration and possible improvements, and
  - c. public consultations about the 4+2 and the 5+1 internship pathways, including:
    - i. [Consultation Paper 1 - Registration standards and related matters](#) (2009)
    - ii. [Consultation Paper 9 – Guidelines for the National psychology examination](#) (2011)
    - iii. [Consultation Paper 10 - Proposed amendment to the Provisional registration standard to account for the 5+1 program](#) (2011)
    - iv. [Consultation Paper 13 – Exposure draft: National psychology examination curriculum](#) (2011)
    - v. [Consultation Paper 18 - Guidelines for the National psychology examination](#) (2013)
    - vi. [Consultation Paper 19 - Guidelines for the 5+1 internship program](#) (2013)
    - vii. [Consultation Paper 24 – Provisional registration standards and Guidelines for the 4+2 internship program](#) (2014).

<sup>25</sup> HODSPA 2017. Personal communication

<sup>26</sup> See the first [communiqué](#) from December 2015.

64. There is considerable concurrence in feedback from the Board's key stakeholders about the importance of simplifying the pathways to general registration, the importance of managing risk, and the value in reducing the administrative and regulatory burden.
65. In particular, APAC, the APS and HODSPA have been supportive of the proposal to retire the 4+2 internship pathway, and worked with the Board through the CWP to explore viable options.
66. Interestingly, feedback to the Board from employers note that in some cases employers are no longer employing 4+2 interns, while others have already begun moving towards employing interns from the 5+1 internship pathway. For example, the Department of Education in Western Australia has announced a shift in the qualifications of school psychologists in their February 2017 newsletter.<sup>27</sup> The School Psychology Service is now partnering with both Murdoch and Curtin University to realise the opportunities provided by the 5+1 internship training pathway.
67. Feedback from consultation papers highlights consistently the administrative and regulatory burden of the 4+2 internship pathway. Submissions to the Board's [past consultations](#) are published on the Board's website.
68. Overall, there is a strong and increasing recognition among key stakeholders and the Board that change to the training model is welcomed.

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<sup>27</sup> For more information view the [School Psychology Services Newsletter Volume 65](#) (February 2017)



## What are the challenges with the 4+2 internship pathway?

69. Feedback from the various forums, stakeholder conversations, reviews and public consultations indicate numerous challenges, risks and issues with the 4+2 internship pathway. The concerns are listed below:
- a. While many high quality psychologists have previously trained via the 4+2 internship pathway, the 4+2 internship training model is embedded in the past and **is not fit-for-purpose in the current and future training and labour market.**
  - b. The **4+2 internship pathway is unsustainable** both now and into the future, with a high regulatory and administrative burden for employers, supervisors, interns, the Board, and the Australian Health Practitioner Regulation Agency (AHPRA). Increasing red tape and costs associated with compliance requirements renders this pathway obsolete in the contemporary training, workforce and regulatory environments.
  - c. The **risks associated with multiple unaccredited pathways** to registration are increasing. There are concerns about the Board's ability to effectively manage the risks to the public adequately given the inherent variability in internship experiences and quality of training due to multiple internship providers and supervisors, with small numbers of interns across different sectors.
  - d. The **4+2 does not meet international standards** and is no longer recognised across the world as meeting requirements for registration. Australian psychologists with 4+2 internship training would not be able to register and practice overseas unless they undertook significant remediation. Not only does this affect the credibility of Australian psychology training, it limits opportunities for international mobility for these psychologists in a world where there is increasing need for health practitioners to be flexible and responsive internationally.
70. In addition to these concerns, there is a clear viable alternative to the 4+2 internship pathway:
- a. the preference for the higher degree pathway since 2000 and introduction of the 5+1 internship pathway in 2010 has **superseded the need to have a 4+2 internship pathway** in the contemporary training context and labour market, and
  - b. the **5+1 internship pathway has significant advantages** over the 4+2 internship pathway.

71. The details of each of the four concerns with the 4+2 internship pathway will be outlined below, and the viability of the 5+1 internship pathway will be outlined in the next section.

### **The 4+2 internship pathway is not fit-for-purpose in the current and future training and labour market**

#### **The 4+2 internship pathway is embedded in the past: A brief history of the 4+2 internship pathway**

72. The 4+2 internship pathway was developed in the 1950s and 1960s as a traditional apprenticeship model for psychologists wanting to work in the health department, education department, and defence force. The 4+2 internship pathway was developed in an era where there was no postgraduate training available in psychology. Every state and territory developed their own 4+2 internship program, leading to considerable differences between jurisdictions in the required number of practice hours, supervision and expected competencies for registration.
73. As the depth and breadth of knowledge encompassed by the science and practice of psychology increased, the challenge of training psychologists for safe practice in only four years at university became apparent. In the 1980s there was a move in the psychology profession towards postgraduate training as a preferred training model. Such degrees became widely available across Australia.

74. From as early as 1990, leaders in regulation and the psychology profession endorsed the higher degree pathway as the minimum qualification for both registration and for membership<sup>28</sup> of the Australian Psychological Society (APS).
75. Before the National Registration and Accreditation Scheme (National Scheme) began, each state and territory had separate legislation for registration of psychologists. While legislation for the regulation of psychologists was first introduced in Victoria in 1965, the final jurisdiction to introduce legislation (the ACT) did not do so until 1994/1995. The APS was the de-facto regulator before legislation was introduced in all jurisdictions. The Council of Psychologists Registration Boards (CPRB) was developed in the mid-1980s to work towards consistency in professional standards and procedures for the regulation of psychologists. The CPRB membership included representatives from every Australian jurisdiction and New Zealand. Like the APS, the CPRB also supported the higher degree pathway, but noted the legislative complexities of moving to a higher degree qualification for registration<sup>29</sup>.
76. From 2000, both the APS and CPRB promoted that the minimum educational standard for psychology should be a six year higher education approved program. The 4+2 internship pathway has not been aligned with this standard since that time.<sup>30</sup>
77. Over the last decade, there has been a concurrent increase in demand for psychologists with advanced skills, particularly clinical psychologists. As a result of the Australian Government's *Better access to mental health care* initiative and the introduction of Medicare rebates for psychological services in 2006, there has been increased public awareness of mental health issues, and an increase in demand for psychological services as services became more accessible.<sup>31</sup> This has led to increased opportunities for psychologists to work in private practice, and an increased motivation for psychologists in training to prefer the higher degree pathway. In addition, market forces in the employment field (including workers compensation schemes and insurance providers) have seen an increasing preference for hiring postgraduate trained psychologists, leading more to pursue higher degree training. Since 2006, the higher degree pathway has been steadily gained prominence as the preferred training model for psychologists in training, over the 4+2 internship pathway.
78. These contextual factors and market forces led the new National Board, in 2009 during the development of the first registration standards, codes and guidelines for the National Scheme, to take the view that the 4+2 internship pathway was no longer fit-for-purpose in a contemporary environment. The Board proposed to phase out the 4+2 internship pathway as part of the transition to the National Scheme.<sup>32</sup> As noted earlier, the option of immediately retiring this pathway was not supported by government at that time due to workforce concerns and the lack of alternative programs of study.

#### The regulation of psychology and the psychology profession has evolved

79. In preparation for the National Scheme to begin, having retained the 4+2 internship pathway, the Board consulted on a nationally consistent model of 4+2 internship training. The transition from eight different 4+2 programs (each state and territory had different programs and requirements) into one nationally consistent program was a multifaceted and major task for the Board and AHPRA to undertake, and resulted in a complex transition for employers, supervisors and interns.
80. Since the beginning of the National Scheme in 2010, all psychologists have been registered under the same legislation for the first time, and titles for psychologists at various levels of training and employment are now the same (provisional, general, non-practicing). This has led to increased clarity and understanding about the psychology workforce and greater awareness for consumers.

<sup>28</sup> Cooke, S. (2000). *A meeting of minds: The Australian Psychological Society and Australian psychologists 1944-1994*. APS Imprint Books.

<sup>29</sup> the CRPB resolution book of decisions and actions 1985-2009.

<sup>30</sup> Waring, T. (2008). The regulation of psychology in Australia. In J. Hall & E. Altmaier (Eds.), *Global promise: Quality assurance and accountability in professional psychology* (Ch. 8, pp. 164-185). Oxford University Press: New York.

<sup>31</sup> Psychologists in Focus, Health Workforce Australia, March 2014 ([www.hwa.gov.au](http://www.hwa.gov.au))

<sup>32</sup> Consultation paper on registration standards and related matters, Psychology Board of Australia 2009

81. In addition, since the introduction of the 5+1 internship program in 2010, there is now an alternative internship pathway to general registration, in addition to the various higher degree pathways. Provisional psychologists now have several alternative training options available to them.
82. The number of provisional psychologists enrolling in the 4+2 internship pathway is steadily decreasing, and is being superseded, if not in the higher degree pathway, then by growing enrolment in the 5+1 internship pathway<sup>33</sup>. Employers and supervisors increasingly report that they prefer both 5+1 trained interns, and psychologists who trained via the 5+1 internship pathway to either 4+2 trained psychologists or 4+2 interns. Registrant data shows that students themselves prefer to complete the 5+1 internship program rather than the 4+2 internship pathway.
83. In many ways, the Board's proposal to retire the 4+2 pathway is mirroring the changes in the training and employment sectors that are already underway. The 4+2 internship pathway is no longer fit-for-purpose in the current and future training and labour market.

#### The diversity of experiences in the 4+2 internship pathway

84. The 4+2 internship pathway has developed organically over time in response to historical requirements, and has increasingly become unwieldy for students, universities, employers and regulators. In addition, there is considerable diversity in internship experiences.
85. A deeper dive into the 4+2 internship data (from that presented in Table 2) was conducted in June 2017 in preparation of this paper. It shows that this training pathway involves a variety of possible experiences.
86. The number of 4+2 interns is not evenly spread across Australia. Attachment C shows that there is considerable diversity in where 4+2 interns are working. The 4+2 internship pathway remains very popular in New South Wales, with almost half of the interns working in that jurisdiction (47 per cent), followed by Queensland and Western Australia. It should be noted that the high proportion of 4+2 interns in New South Wales in comparison to other jurisdictions is likely a factor of pathway choice being constrained by the number of training institutions and higher degree places available.
87. Four states have less than five per cent of all interns in the 4+2 pathway working in that jurisdiction, suggesting that the 4+2 pathway is already being phased out in those areas. While there are only 20 interns undertaking the 4+2 in the Northern Territory, it is the most popular training pathway in that jurisdiction accounting for over half of the 34 provisional psychologists.
88. Interestingly, Attachment C shows that the vast majority of 4+2 interns work in major cities (over 65 per cent). Approximately 20 per cent work in inner regional areas (such as Geelong, Newcastle, and Toowoomba) and only a small number of interns (12 per cent) work in outer regional areas.
89. The data show that there is considerable diversity in the employers of 4+2 interns. Attachment C shows that nationally, approximately 35 per cent of employers are government (e.g. education, health, corrections), 23 per cent are community-based not-for-profit organisations, and 20 per cent undertake internships in private for profit companies (e.g. rehabilitation and employment services). There are considerable differences in employment opportunities and preferences across jurisdictions.
90. Most enlightening is the number of employers overall. For the 4+2 internship pathway there are over 500 individual employers providing internships, with most (470 or 90 per cent) having only one to three interns at any one time. Having 500 employers means that developing an accreditation process for the two-year internship would result in an unnecessarily expensive and complex program to run. Employers of less than three interns could not be expected to provide the resources necessary for an accreditation and compliance process. With 90 per cent of employers in this category, any accreditation process could be expected to result in major reduction in the psychology workforce.
91. One aim of reviewing and simplifying the training model is to facilitate provision of consistently high quality education and training of psychologists regardless of the training pathway<sup>34</sup>. This is very difficult

<sup>33</sup> See Table 2 for details on registrant data.

<sup>34</sup> See the objectives and guiding principles of the [National Law](#), s3

to accomplish for the 4+2 internship when there are significant jurisdictional differences, a large number of employers of interns, and internships in so many different work sectors.

### **The 4+2 internship pathway is unsustainable now and into the future**

92. In the 2014 Health Workforce Australia paper, *Psychologists in Focus* (HWA, 2014), stakeholders identified the administrative burden of the 4+2 internship pathway and issues with the current training pathways as presenting barriers to entry to the profession, which in turn were predicted to impact on future workforce sustainability.<sup>35</sup>
93. The high regulatory and administrative burden associated with the 4+2 internship pathway renders this pathway unsustainable. The red tape, costs associated with compliance with the requirements and challenges managing the risks associated with this pathway has significant impacts on employers, supervisors, interns and the regulator. Removing an unsustainable pathway to general registration would reduce this burden.

### High regulatory burden of the 4+2 internship pathway: Challenges for regulation

94. The 4+2 internship pathway continues to present numerous challenges for the Board as the national regulator.
95. Although the four-year academic component of the pathway is accredited by APAC and approved by the Board as a qualification for registration, further academic standards for entry to the internship program are not imposed by the Board. While a pass (or equivalent) in the academic component is sufficient to apply for registration as a provisional psychologist and enter supervised practice; it is likely that education providers will require a higher academic standard from those wishing to continue their training with a master's or doctoral degree.<sup>36</sup> The entry requirements for the 4+2 internship pathway are not monitored by the accreditation agency, and they are considered to be generally out of step with current expectations.
96. While the Board has no oversight of academic entry standards to the two-year internship, it is responsible for assuring a single minimum standard of competency for all psychologists. Because the internship is not monitored by the accreditation agency, the Board oversees this program. However, the Board is not an education provider, nor is it privy to the detail of entry standards or quality of the training programs of the 500 plus employers of interns.
97. The arrangements for each two-year internship must be assessed and approved by the Board. Every internship is individualised, and each one is different. The approval processes are broad stroke (rather than applying specific accreditation standards), complex and time-consuming and this represents a considerable administrative burden. The resourcing costs to approve internships and work places, as well as to review supervisor reports and case reports throughout each registrant's two-year (or longer) internship are resource and time intensive and are borne by the Board and AHPRA. The National Scheme is funded by registrant fees. The administrative burden of the 4+2 internship pathway results in higher cost to all registrants in administering a large and complex program across Australia.
98. Despite the standards established by the Board for the internship and the development of supervisor guidelines and training requirements, it cannot guarantee the equivalence of the quality of all two-year internships or of intern's readiness to practise.
99. To mitigate the associated risk, the Board introduced the [national psychology exam](#) in 2013 for all applicants for general registration via the 4+2 or 5+1 internship pathways. The pass rate for 4+2 interns in the first two years of the exam was 85 per cent and 83 per cent respectively – or 362 out of a total of 433 candidates<sup>37</sup>. This supported the Board's position that further safeguards were needed. While this pass rate might seem high, it means that over 15 per cent of applicants who successfully completed their training under the 4+2 pathway were demonstrably below the minimum standard expected of registered psychologists.

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<sup>35</sup> Psychologists in Focus, Health Workforce Australia, March 2014 ([www.hwa.gov.au](http://www.hwa.gov.au))

<sup>36</sup> Geffen, G. M. (2005) Raising the minimum standard for registration as a psychologist in Australia. *InPsych*, 27 3: 29-30.

<sup>37</sup> Source: AHPRA national psychology examination data. Note. The pass rate for 5+1 interns was 86% and 95% for the same time period.

100. Despite the high regulatory burden of the 4+2 internship pathway, the variable nature of training experiences continues to lead to challenges for the Board in ensuring consistent competency development for psychologists choosing this training pathway.

#### Burden on employers

101. There is also some concern that the 4+2 internship pathway places a considerable burden on industry. Training and supervision of interns rests solely with employers, many of whom are small organisations or private practices. This means that the cost of training these provisional psychologists is shifted, in part, from the individual and the tertiary education sector onto employers.
102. There is a considerable amount of work and resourcing for employers to assess and train interns. Employers must conduct their own assessment for each intern at each stage of training, and provide graded training experiences of increasing difficulty that cover the depth and breadth of the required competencies. In smaller organisations, the employer is often also in the role of supervisor, creating resourcing challenges. In larger organisations the employer must train and resource key staff to undertake supervisory roles.
103. Interns commencing their supervised practice program have never seen a client before. They have no practical experiences, and are not expected to possess the competencies for independent practice. This is inconsistent with the expectations of an employer wanting to recruit staff that are ready to work. Interns require a specific training program embedded within a risk-management framework. The burden of this falls on the individual supervisor or employer. In the 5+1 internship pathway and higher degree pathway, the provisional psychologist's first interactions with clients are provided safely within a structured training environment with both simulations and real-world client experiences.
104. Developing the training program, and supervising 4+2 interns is resource intensive. It takes time, skill, and resources for senior staff, and takes these staff away from their other primary duties. The fact that employers and supervisors are willing to undertake this resource intensive task is a testimony to their commitment to the future of the profession and dedication to mentoring new staff. While it does allow senior staff to 'train up the new generation' of professionals to their specifications relevant to the needs of the job site, it does cost-shift the training from the university to the workplace. With other models for training psychologists becoming more available (the 5+1 and higher degree pathways), as time goes on, there is less and less enthusiasm for the level of investment this training model demands.

#### Burden on supervisors

105. For supervisors, the time commitment to train, observe and supervise an intern is considerable. While there is no evidence to suggest that the required hours of supervision are not being achieved, the reality of maintaining a professional practice while supervising trainees means that priorities may shift over the course of an internship. This raises questions about consistency of training across the course of a two-year internship.
106. The two-year internship must cover the same content and competences of an APAC-accredited fifth and sixth year qualification. Supervisors (and workplaces) are responsible for providing training in the core competencies:
- a. knowledge of the discipline
  - b. ethical, legal and professional matters
  - c. psychological assessment
  - d. intervention strategies
  - e. research and evaluation, and



- f. communication and interpersonal relationships, working with people from diverse groups, working across the lifespan<sup>38</sup>.
107. For a higher education provider, several staff teach in their area of expertise to cover all these competencies and therefore the responsibility for training is shared across multiple staff. A higher education provider is responsible for the provision of training, and delegates this role to the relevant training program. However, in an internship training model, the quality of training is dependent on the knowledge and skills of the individual supervisor.
  108. Supervisors and/or workplaces need to provide access to reading materials, testing materials and resources and a range of practice environments for interns to learn. For example, the national psychology examination curriculum documents lists the six tests that interns should know well and the more than 20 tests they should be familiar with. While the requirement for direct supervision is one hour of supervision to every 17 hours that the intern is engaged in psychological practice, supervisors set aside extra hours (typically double these hours) for preparation, reporting writing and training activities, particularly in the early stages of the internship when interns are not yet ready to work independently with members of the public.

#### Burden on interns

109. For interns themselves, the processes that the Board has in place to ensure safe practice in the unaccredited two-year internship has increased the regulatory burden of this pathway. It is a complex and challenging pathway - interns are effectively studying the equivalent content of a higher degree while working, often full time. Completing the internship within the two years is rare because of the demands, with many 4+2 interns taking three to four years to complete. This leads to an unpredictable workforce flow of provisional psychologists moving to general registration and independent practice.
110. There is a recognition that the focus of a workplace is primarily on their service delivery rather than training of interns. Interns are often undertaking high stress roles at the same time as working with clients for the first time, and being responsible for ethical and evidence-based practice while developing and integrating their own knowledge and competencies.
111. Provisional psychologists are aware of the complexities of this 'sink or swim' model of training and their need for increased support, and are moving towards enrolling in two-year 'internship registration courses'. Some training providers<sup>39</sup> offer a two-year internship registration course where formal training (such as how to administer an intelligence test), supervision, and assistance finding an internship are provided for a fee, generally between \$24,000 and \$32,000 over the two-year internship. For the intern, this can offer more support than working alone, and can provide more choice of internship and supervisor. However, it can add considerably to the cost of working towards general registration.
112. While the burden of supervision provided within a workplace lies with the employer, many employers (especially employers of small numbers of interns, and those in the private sector) are increasingly not providing supervision on-site. Interns are required to pay for off-site supervision themselves. The APS recommended fee for supervision is \$246 per hour, with most interns paying between \$120 and \$180 per hour for the required minimum of 160 hours of supervision. This means that many 4+2 interns pay between \$19,000 and \$30,000 for supervision over the course of the internship. Those interns who have to pay the full APS recommended fee, or who take longer than the two years to complete their internship, will pay considerably more.
113. In addition to supervision costs, there is also the cost of continuing professional development (CPD). The required CPD for the 4+2 internship is 120 hours, typically charged at \$300-\$500 per day. While some CPD is low cost, or provided by the workplace, it is not uncommon to pay between \$6,000 and \$10,000 for CPD across the course of the internship.

<sup>38</sup> Competencies are listed in the Board's [General registration standard](#), and detailed in the [Guidelines for 4+2 internship program](#). See also *APAC Accreditation Standards for Psychology Programs* (August 2017) at: [www.psychologycouncil.org.au](http://www.psychologycouncil.org.au)

<sup>39</sup> Example training providers include: the [Cairnmillar Institute](#), [College of Professional Psychology](#) and [Learning Links](#).

114. There is anecdotal evidence that interns are increasingly undertaking unpaid internships, due to the costs for workplaces to deliver training and/or supervision, and apparent internship shortages<sup>40</sup>. There is some evidence that up to twenty per cent of internships are unpaid, and eight per cent of 4+2 interns are required to pay to undertake an internship.<sup>41</sup>
115. Once an intern secures an internship, the burden of the 4+2 internship pathway has meant that it is not an easy task for interns to move jobs during their internship, or to find a new employer willing to take them on part-way through their training. Employers are beginning to prefer 5+1 to 4+2 interns and graduates, meaning that 5+1 trained psychologists have access to increased workforce flexibility.
116. A number of real-life experiences from 4+2 interns are presented in the following table (names of interns have been removed).

**Table 3 Real-life experiences of 4+2 interns**

<p><i>I undertook an unpaid internship for 18 months due to the difficulty finding an approved paid employment for a provisional psychologist in the 4+2 internship pathway. I estimate that my total salary loss is over \$65,000 for the 18 months.</i></p>
<p><i>I completed the 4+2 pathway. It was a costly process as I completed my first year in a non-paid full-time role. I was unable to claim Centrelink payments as it was not a recognised apprenticeship. I was lucky to have a partner who could provide during this time as well as family, otherwise it would not have been possible.</i></p>
<p><i>I needed to pay my supervisor \$125 x 2 hours, every week, for the approximately 2.5 years has taken me to complete internship (around \$18,000) it as well as cost for other Professional Development activity which was 60 hours (\$12,000) per year.</i></p>
<p><i>I have been completing the 4+2 pathway for almost 3 years and all together this pathway has cost at least \$74 000. This includes \$50 000 of lost annual income for first year (I had an unpaid internship) and \$24 000 for the 2 years following (when I had a paid internship) for supervision and professional development.</i></p>
<p><i>For the first year I was undergoing the unpaid internship. This included free supervision; however there was no income for living expenses. To counter this I worked part time in the retail sector in addition to the fulltime internship. This helped a little bit but still not enough income to live on, and it eventually became too stressful.</i></p>

117. Despite the standards established by the Board for the internship and the development of supervisor guidelines and training requirements, as mentioned above, it cannot guarantee the equivalence of the quality of all two-year internships. There is no certainty and no equity for a 4+2 intern about possible costs or quality of training experience. Ultimately, 4+2 internships are leading to varying levels of expertise and skill for those entering the workforce. Some interns have comprehensive internship experiences, while other interns develop the required competencies despite (not because of) the training experiences provided by the workplace. Not all internships are 'equal' and the Board is aware of the inequity of training experiences provided to psychologists in training, as well as the inequity of the cost-burden for 4+2 interns.

<sup>40</sup> The Board does not collect data from employers or details of industrial awards as part of its role under the National Law.

<sup>41</sup> This data is from a recent survey of APS members who recently completed or who are currently undertaking an internship. There were around 200 respondents to the survey (Personal communication to the Board).



### No clear advantages for consumers

118. Despite the high regulatory and administrative burden associated with the 4+2 internship pathway for employers, supervisors, interns and the regulator, there are no clear advantages of this training model for consumers going forward.
119. This training model is expensive, lengthy, and provides variable training experiences for interns. There is no cost benefit for consumers to receive services from a 4+2 intern, and 4+2 interns are less work ready at the beginning of their internship than trainees from any other pathway.

### Managing risk associated with multiple unaccredited pathways

120. There is increasing recognition that psychology practice is high-risk. After medicine, nursing, dentistry, and pharmacy, psychology has the highest number of notifications (complaints) in the National Scheme<sup>42</sup>. This is particularly interesting when considering that psychology provides 'talking therapy' and does not involve prescribing medication (the most common reason for complaints across the scheme) or include physical interventions or manipulation. In 2015-2016, more psychologists were notified (528 practitioners) than chiropractors (146 practitioners), midwives (103 practitioners) and physiotherapists (102 practitioners) put together. Almost as many psychologists were notified as pharmacists (570 practitioners).
121. Psychology practice is most often conducted in a private practice, either a solo practice or a group practice with other psychologists. Most psychology interventions occur behind closed doors where only the psychologist and client are present. This is different to many other health interventions that are delivered in hospitals or clinics, where staff are around to witness or participate in the treatment. Due to the nature of psychology practice, psychologists frequently work with people who are vulnerable and suffering from mental health disorders. Increasingly new graduates are choosing independent private practice as their workplace of choice. The high risk nature of the profession was acknowledged in the Regulation Impact Statement (RIS) that preceded the implementation of the [National Law](#)<sup>43</sup>.
122. Given the nature of psychology work, it is not surprising that the Board deals with a high volume of notifications. In addition to complaints from consumers, a recent study<sup>44</sup> showed that psychology attracts the highest rate of mandatory notifications<sup>45</sup> from other health professionals than any registered health profession.
123. While the Board has a role to prepare practitioners for practice, accreditation is the key mechanism in the National Scheme to ensure that practitioners have the knowledge, skills and professional attributes to start practice in their profession. While the four year academic component of the 4+2 internship pathway is accredited by APAC, the crucial final two years are not. Instead these two years are based on supervised practice undertaken in a range of settings and services.
124. Because there are over 500 employers of 4+2 interns, there are numerous unique training experiences for interns. Every internship is individualised, and each one is different. Not only are interns working in different work places, they are undertaking training with variable requirements for selection, training milestones, and expectations for performance. While the Board has minimum requirements outlined in the [Guidelines for the 4+2 Internship program](#), specific supervision requirements (e.g. on site or off site; group or individual supervision), and mechanisms to assess competency development are different depending on the workplace or employer. The risks of running multiple un-accredited and lengthy (a minimum of two years) internships within a framework of multiple pathways to registration are high.
125. The Board is of the view that this diversity in training experiences is perpetuating an additional risk to the regulation of psychology. While the Board's registration standards and guidelines outline the minimum standard of competency for registration, it is increasingly difficult to ensure that all

<sup>42</sup> [AHPRA Annual report 2015/2016](#). Table N2, p.49

<sup>43</sup> AHMAC (2009) Regulatory Impact Statement for the decision to implement the Health Practitioner Regulation National Law.

<sup>44</sup> Bismark, M.M., Spittal, M.J., Plueckhahn, T.M., & Studdert, D.M. (2014), Mandatory reports of concerns about the health, performance and conduct of health practitioners. *Medical Journal of Australia*, 201(7) 399-403.

<sup>45</sup> Mandatory notifications are notifications made by registered health practitioners, employers or education providers about registered health practitioners under sections 141-143 of the National Law.

internships offer comparable training experiences and all interns are consistently meeting the standards. The Board's view is that this situation hinders its ability 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<sup>46</sup>.

126. In order to manage risks, the National Scheme has enabled the Board to establish one national 4+2 internship pathway designed to ensure that provisional psychologists receive safe, supervised training according to defined core areas of practice, knowledge and expertise within the profession of psychology.
127. The Board continues to refine the internship program in order to strike a balance between the management of the regulatory risks inherent in this pathway, the continued access to psychological services and the growth of a flexible, responsive and sustainable Australian psychology workforce<sup>47</sup>.
128. Although the supervision requirements for internships are considered onerous by some stakeholders, the Board is reluctant to further reduce the minimum requirements without evidence that doing so will not increase the risk to an interns' clients or result in premature applications for general registration from interns who have not yet reached the minimum competence requirements and lead to an increase in the number of applications being refused.

### **The 4+2 internship does not meet international standards**

129. It has long been acknowledged by the psychology profession that the 4+2 internship pathway to general registration is set below commonly accepted international standards<sup>48</sup>.

#### **The 4+2 internship pathway**

130. The four-year APAC-accredited study sequence is generally a three-year bachelor degree (typically in arts or science), followed by a one-year honours degree in psychology. The accredited study sequence is approved by the Board as a qualification for provisional registration. The four-year degree focuses on the development of competencies related to the scientific knowledge of psychology, and does not include practical or professional training. Once provisional registration is granted, the practitioner then completes a two-year Board-approved supervised practice program (or internship).
131. The training of intern psychologists is based on the acquisition of psychological knowledge, and skills under clearly defined competency requirements. These core capabilities and attributes are the same as those required in any accredited higher degree program in the fifth and sixth year, as outlined in the *APAC Accreditation Standards for Psychology Programs* (August 2017).<sup>49</sup> However, the internship is not accredited through APAC, and is not completed through a higher education provider (in most cases<sup>50</sup>).
132. The eight core competencies are listed in the Board's [Provisional registration standard](#) and are consistent with the [International declaration of core competencies in professional psychology](#) (the declaration). A board-approved internship program must be designed to meet these competencies and assessment of each competency is mandatory. Competencies are primarily assessed by the Board-approved supervisor in the course of monitoring and observation of the intern, including six-month reports of progress, and assessment and feedback of case reports. Some oversight assessment is conducted by the Board and AHPRA through review of case reports and progress reports, and the requirement to pass the [national psychology examination](#).
133. The supervised practice program requires interns to learn through supervised 'hands on' experience, performing tasks of increasing complexity over time, with opportunities for reflecting on and refining performance. Ultimately, it is designed to equip interns for independent psychology practice.

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<sup>46</sup> See the objectives and guiding principles of the [National Law](#), s3

<sup>47</sup> The Board published [new guidelines for the 4+2 internship program](#) on 1 June 2017.

<sup>48</sup> Consultation paper on registration standards and related matters, Psychology Board of Australia 2009

<sup>49</sup> See: [www.psychologycouncil.org.au](http://www.psychologycouncil.org.au)

<sup>50</sup> Some higher education providers offer a two-year internship registration course where formal training (such as how to administer an intelligence test), supervision, and assistance finding an internship are provided for a fee.

134. Detailed requirements of the supervised practice program (internship) are set out in the Board's [Guidelines for 4+2 internship program](#).

#### International comparisons

135. The minimum level of education and training required for the independent practice of psychology varies across countries. As can be seen in [Attachment D](#), in every country other than Australia postgraduate training to at least master's level is required for general/initial registration as a psychologist.
136. In European Economic Area (EEA) member states<sup>51</sup>, the minimum level of education and training of psychologists required for general registration (or equivalent) is five years of university study plus a one year workplace internship. This training is similar to the 5+1 internship pathway in Australia. This minimum level has been recognised in the European Certificate in Psychology (EuroPsy), established by the European Federation of Psychologists' Associations (EFPA)<sup>52</sup>. EuroPsy has gradually been implemented throughout Europe since 2010 and is awarded to European psychologists who meet the educational and professional requirements of the certificate. It is an adjunct to, not a replacement for, the national standards that apply in individual member states and aims to facilitate mobility and cross-border services of European psychologists.
137. In New Zealand, the minimum level of education for general registration as a psychologist is a master's degree.
138. In the USA and most provinces of Canada, a professional doctorate is the minimum qualification for registration and all applicants must pass a common professional exam. Certain specialties in the UK (clinical psychology; educational psychology in England, Wales and Northern Ireland) also require a three year professional doctorate; while all other specialties require at least a master's degree.
139. South African psychologists must complete at least five years of study and at least one year of internship to register as psychologists. The accepted qualification is a recognised masters degree in psychology followed by a practicum involving a full year internship at a recognised training institution. Applicants must also pass an examination set by the Professional Board for Psychology before they can register with the Health Professions Council of South Africa. This training is similar to the 5+1 internship pathway in Australia

#### The 4+2 does not enable the continuous development of an internationally flexible, responsive and sustainable health workforce

140. There are no equivalent international standard equivalents to the 4+2 internship pathway, leading directly to a lack of recognition by international regulators of a significant number of Australian-registered psychologists. While internationally trained psychologists can be granted registration to practice in Australia through the Board's [transitional program](#), Australian psychologists with 4+2 internship training would not be able to register and practice overseas unless they undertook significant remediation.
141. Not only does this affect the credibility of Australian training of psychologists, it limits opportunities for international mobility for these psychologists in a world where there is increasing need for health practitioners to be flexible and responsive internationally. This responsiveness might include development and disaster-relief work and providing services through digital technologies.
142. Continued reliance on the 4+2 internship pathway is contrary to multi-national work on the development of an agreed set of international core competencies for the psychology profession. The International Project on Competence in Psychology (IPCP) published the [International declaration of core competencies in professional psychology](#) (the Declaration) in July 2016<sup>53</sup>. The Board recently adopted the international core competencies for the psychology profession, designed to develop international benchmarking for competence as a common language for the professional identity and

<sup>51</sup> For the purpose of this comparison, only EEA Member States (European Union Member States and Norway, Iceland and Liechtenstein) have been considered. The UK is included. This information also applies to Switzerland.

<sup>52</sup> EuroPsy – the European Certificate in Psychology EFPA Regulations on EuroPsy and Appendices - EFPA

<sup>53</sup> For more information on the IPCP see: [www.psykologforeningen.no/foreningen/english/ipcp](http://www.psykologforeningen.no/foreningen/english/ipcp)

international recognition of psychologists, as well as to facilitate international mobility for psychologists in an increasingly global workforce.

143. These developments reinforce the importance of ensuring that psychology regulation in Australia takes into account international standards, as reflected in the core competencies leading to general registration. Further, the Board's contribution to this project and adoption of the competencies aligns with a number of the objectives and guiding principles of the National Law, such as facilitating the provision of high quality education and training of health practitioners and enabling the continuous development of a flexible, responsive and sustainable health workforce<sup>54</sup>.

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<sup>54</sup> See the objectives and guiding principles of the [National Law](#), s3

## A viable alternative: the 5+1 internship pathway

### The 5+1 internship pathway has superseded the need to have a 4+2 internship pathway

144. The preference for the higher degree pathway since 2000 and introduction of the 5+1 internship pathway in 2010 has superseded the need to have a 4+2 internship pathway in the contemporary and future training context and labour market. Increasingly, psychologists in training and employers are moving away from 4+2 internship training in preference for the 5+1 (or higher degree) training.
145. There is both availability and other options for training and workforce development. For those students wishing to become registered psychologists who choose not to obtain, or are unable to attain, postgraduate places, the 5+1 internship pathway is the alternative option.

### The 5+1 internship pathway: An overview

146. For the 5+1 internship pathway, training consists of a five-year APAC-accredited study sequence, which is generally the same four-year honours degree in psychology as mentioned above for the 4+2 internship pathway, with an additional one year of accredited fifth-year psychology study at a higher education provider. The fifth year focuses on professional training and includes the development of practical skills through supervised placements. Until recent Australian Qualifications Framework (AQF) changes, this qualification was known as a Graduate Diploma in Psychology Professional Practice. It is now commonly called a Master of Professional Psychology, and is more closely aligned with a master's degree than the 4+2 internship pathway.
147. The five-year accredited study sequence is approved by the Psychology Board of Australia as a qualification for registration. The practitioner must hold provisional registration throughout both the fifth year of psychology study and the one-year Board-approved supervised practice program (internship) that follows.
148. The training of intern psychologists is based on the acquisition of psychological knowledge and skills under clearly defined competency requirements. The core competencies to be achieved by the end of the one year Board-approved supervised practice program (internship) are the same as those for the two-year internship; however they must be completed in a minimum one-year program. The fifth year qualification specifically addresses many of the core competencies, giving the 5+1 interns a solid grounding in psychological knowledge as well as opportunities for skill development before beginning the one-year internship. It is therefore expected that the level of skill and experience in the competencies of provisionally registered 5+1 applicants will be commensurately higher than those of provisionally registered 4+2 applicants at the commencement of the internship. This enables the 5+1 interns to complete the internship in only one year. In addition, having a one-year rather than two-year internship effectively halves the burden on employers and supervisors, and the additional year of accreditation training lessens supervisor requirements for on-the-job training.
149. As with the 4+2 internship pathway, competencies for the 5+1 internship program are primarily assessed by the Board-approved supervisor with some oversight conducted by the Board and AHPRA including review of case reports and progress reports, and the requirement to pass the [national psychology examination](#).
150. Detailed requirements of the supervised practice program (internship) are set out in the Board's [Guidelines for the 5+1 internship program](#).

### Cementing the availability of the 5+1 internship pathway

151. The 5+1 internship program is a relatively new pathway that began with the publication of the APAC standards in 2010, and approval of the Board's [General registration standard](#) in 2009. The 5+1 internship pathway was introduced at the transition to the National Registration and Accreditation Scheme (National Scheme) as an alternative to the 4+2 internship pathway.
152. The [Guidelines for the 5+1 internship program](#) were published in 2013. As the 5+1 internship program was a new pathway at the beginning of the National Scheme in 2010 there were very minimal

enrolments in the either the fifth year program or the one year internship program. The take up of this pathway has grown rapidly with 407 provisional registrants in December 2015, 552 in December 2016, and over 700 provisional registrants currently undertaking this pathway.

153. Data for the 5+1 internship essentially replicates the data for the 4+2 internship. For example, data for the 5+1 internship program shows similar demographics to the 4+2 data in terms of where interns are working, and the diversity of employers. For the 5+1 internship program there are just less than 200 individual employers providing internships, with most (95 per cent) having only one to three interns at any one time.

#### The growing number of fifth year programs

154. Prior to the National Scheme there were no educational institutions offering a fifth year qualification of a Graduate Diploma in Psychology Professional Practice or Master of Professional Psychology. Most programs were in development awaiting release of the Board’s registration standards, [Guidelines for the 5+1 internship program](#), and the APAC Accreditation Standards. Over the last seven years there has been exponential growth in the number of educational intuitions offering the fifth year qualification. Table 4 below shows the number of programs available across the country since the beginning of the National Scheme.

Table 4 Number of fifth year programs available nationally (February 2018)

Year	Number of programs	Number of students per year*
2009/10	0 programs	0
2011	3 programs	75-150
2012/13	5 programs	125 - 250
2015	10 programs	250 - 500
2016	12 programs	300 - 600
2017	16 programs	400 - 800
2018	24 programs expected	600 - 1200

\*Note: Based on 25 – 50 students per program

155. Availability of the fifth year qualification has almost tripled since 2012 with the availability of training places increasing over 300 percent.
156. The number of programs is continuing to increase. The Heads of Departments and Schools of Psychology (HODSPA) regularly surveys all psychology training programs across Australia for their current and future offerings. This data is based on real projections of programs in development provided by Heads of Schools to HODSPA and made available to the Board<sup>55</sup>.
157. Not only is the 5+1 internship program now the preferred internship pathway for interns, supervisors and employers, the availability and projected growth of fifth-year accredited courses easily allows for enough training places to cover the typical enrolment of both the 4+2 and 5+1 registrants per year if the 4+2 was retired.
158. For example, based on current registration data, it would be expected that between 800 – 1,000 new interns would seek placement in a fifth year approved program of study if the 4+2 internship pathway was retired. This would include around 500 4+2 interns (the average yearly intake) and 350 5+1 interns. Table 4 shows that there are currently sixteen training institutions nationally delivering a fifth year program offering a maximum of 800 places. At minimum, the expected future enrolment could be met with the current number of training institutions delivering the fifth year approved program of study. Around 1,000 places could be offered if an additional five training institutions deliver the fifth year approved program of study, particularly if these programs were matched with jurisdictions of high intern numbers (such as New South Wales and Queensland), or offered in distance-learning mode.

<sup>55</sup> Collaborative Working Party (CWP) meeting in March, August and December 2017. The members of the CWP are: the Board, APAC, the APS, and HODSPA.



159. Table 4 indicates that eight additional fifth year training programs are currently projected, suggesting that the training need would be adequately met. There is some evidence that higher education providers who have fifth-year programs in development are waiting for assurance that the retirement of the 4+2 internship pathway to general registration is confirmed, and that the need for programs is certain, before committing to progressing the accreditation process and opening up programs<sup>56</sup>.
160. Table 5 outlines the education providers who currently provide an approved fifth year qualification<sup>57</sup>. The take up of the 5+1 internship pathway has been solid across the larger states. Currently there are no accredited 5+1 postgraduate courses offered in the ACT, the Northern Territory, or South Australia. The states with a higher number of provisional psychologists have understandably led the way in developing postgraduate courses. A majority of the education providers offer fifth-year programs in both full-time and part-time mode.
161. Several higher education providers offer off-campus or distance learning with attendance at intensive residential schools, and some schedule classes on the weekend to facilitate and encourage workforce participation<sup>58</sup>.

Table 5 Educational providers currently approved to provide a fifth year qualification (February 2018)

Location	Educational provider
ACT	Nil
NSW	Australian College of Applied Psychology Charles Sturt University Macquarie University University of New England University of Wollongong Western Sydney University
NT	Nil
Qld	Australian Catholic University University of Southern Queensland University of Sunshine Coast
SA	Nil
Tas	University of Tasmania
Vic	Australian Catholic University Cairnmillar Institute Deakin University Monash University Victoria University
WA	Curtin University Murdoch university

<sup>56</sup> HODSPA 2017, Fifth-year program questionnaire to higher education providers. Presentation at CWP meeting August 2017.

<sup>57</sup> See: [APAC course search](#) for more information.

<sup>58</sup> For example: Charles Sturt University, University of New England and University of the Sunshine Coast.



## The 5+1 internship pathway has significant advantages over the 4+2 internship pathway

162. The 5+1 internship pathway has significant advantages over the 4+2 internship pathway, rendering the 4+2 pathway increasingly obsolete. Four advantages are discussed below.

### Advantage one: The accreditation advantage

163. Accreditation is the key mechanism in the National Scheme to ensure that practitioners have the knowledge, skills and professional attributes for independent practice in their profession.
164. The core competencies presented in the Declaration are those expected of all psychologists providing services to clients at the time of entry to the profession. The Board has more confidence that registrants in the 5+1 and higher degree pathways will meet these competencies, than those in the 4+2 pathway. In the additional one year accredited program (or higher degree program) there is:
- independent assessment of the quality of education and training experiences through the accreditation standards and assessment processes
  - a shared model of competency assessment where several supervisors and lecturers are involved in comparative and formative assessments to enhance the validity and reliability of competency assessments (while 4+2 interns may have several supervisors, they have a primary supervisor who is responsible for the majority of assessments)
  - a variety of different assessment mechanisms to ensure intern competency, including both formative and summative assessment, as well as formal and observational assessment (in the 4+2 internship pathway competencies are assessed only through case reports, supervisor reports every six months, and the national psychology examination)
  - a formal quality assurance process for review of governance processes and training standards
  - supervised placements before the internship begins to ensure the intern is more work-ready at the beginning of the internship year, and
  - a primary focus on education and training (whereas a workplace is necessarily focused on service delivery, with education and training as secondary).

### Advantage two: A better model for training and learning

165. The 5+1 internship program is sometimes erroneously described as half of the 4+2 internship pathway (i.e. the +1 is half of +2). This does not tell the whole story. While the 5+1 internship is effectively half of the time period of the 4+2 internship, the model of learning and training of the two pathways are very different. The *accredited fifth year* higher degree in the 5+1 internship pathway is completely different from the first year of the 4+2 internship pathway. Likewise, the sixth year of both internships is not the same. This results in vastly different experiences for both the fifth and the sixth year of training.
166. The fifth year of the 5+1 internship pathway provides interns, supervisors, employers, consumers and clients with the advantages of:
- an additional year of formal scientific, professional and skills training for the intern before commencing internship
  - additional support, training and resources for the intern in the fifth year to engage in learning experiences before working with clients full-time. The solid grounding of an accredited one-year program assists interns being more work-ready (both knowledge and skills) at the beginning of the internship. While this is important for all interns, it is particularly salient for the increasing number of new graduates who choose to work in independent private practice. An adult-learning model that focuses on knowledge first followed by skill development provides an enhanced and streamlined learning process that leads to a less stressful and more effective learning environment for the intern, and

- c. by focusing interns to learn the bulk of the competencies (knowledge) for general registration in the fifth year masters program, more time is allowed for focusing on the delivery of best-practice assessment and intervention with clients in the second year (integrating knowledge with skills). Ultimately, it is a safer training model for the public.

#### Advantage three: The administrative and regulatory advantage

167. A one-year rather than two-year internship reduces the burden and costs for employers, supervisors and interns.
168. For employers, the training, supervision and staff resourcing requirements are effectively halved. For supervisors, the time spent outside of the direct 'supervision hour' for preparation, report writing and developing training activities is considerably less with a 5+1 intern because of the additional one year accredited educational training. Additional training results in interns being more work-ready at the start of their internship. It is less burdensome on employers or supervisors to commit to a one-year internship training program than a two-year program, with an intern who has only undergraduate training and has never worked with a client before.
169. For interns, the advantage lies in that the 5+1 internship program is more streamlined, and the Board's requirements are less cumbersome due to the additional one year of accredited training. A simpler program and greater work-readiness means that interns are more likely to complete requirements in the minimum timeframe (one year), which often does not happen with the two-year internship. Despite the cost of one year of additional university training<sup>59</sup>, the 5+1 internship program creates considerable cost savings from the reduced requirements for paid supervision and CPD.
170. For the Board, administering only a one-year internship program effectively reduces the administrative burden. Additional accreditation gives the Board confidence in academic entry standards, and the quality of training for the fifth year. It means that the diversity in internship experiences (number of employers, the variety of work sectors and any jurisdictional differences) has a lessened effect on provision of quality education and training of psychologists than it has in the 4+2 internship pathway.

#### Advantage four: The advantage of competency development

171. The Board's confidence that registrants in the 5+1 pathway are consistently more likely to meet the competencies, than those in the 4+2 pathway is evidenced in the comparative pass rates of each group on the national psychology examination.
172. The pass rate for 5+1 interns in the first two years of the exam was 86 per cent (first year) and 95 per cent (second year) respectively<sup>60</sup>. On average the pass rate for 5+1 interns is 91 per cent. This is higher than the pass rate for 4+2 interns (85 per cent and 83 per cent respectively). In 2017, the pass rate for 4+2 interns overall was 86 percent, and the pass rate for 5+1 interns was 92 percent. This suggests that the 5+1 internship pathway is a training model that is more likely to result in a consistent demonstration of competence for safe practice.
173. In addition, education providers are in an ideal position to quickly identify registrants who demonstrate competency deficits or any impairment issues that affect learning and performance. Education providers have experience in overseeing a number of provisional psychologists, and have processes, policies and systems in place to measure and monitor competency development as a matter of core business. Education providers are generally better resourced than most individual supervisors or small organisations to manage such issues systematically within a teaching and learning model.

#### Advantage five: The advantage for consumers

174. For consumers, the additional year of an accredited program of study, means that clients can receive treatment by a work-ready intern for the same fee as before, knowing that the Board facilitates consistently high quality education and training of psychologists.

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<sup>59</sup> Most higher degree providers charge between \$18,000-\$26,000 for the Master of Professional Psychology.

<sup>60</sup> Source: AHPRA national psychology examination data.

## Guiding principles for developing options to reduce regulatory burden

175. For the Psychology Board of Australia, the time is right to consider retiring the 4+2 pathway to general registration, with minimal impact expected. Psychology training must be reviewed and improved to prepare psychologists for general and advanced practice and to sustain a skilled psychologist workforce for the future.
176. In exploring possible policy options to reduce regulatory burden, and deciding the nature of the proposed changes to the existing pathways to general registration, the Board has carefully considered the objectives and guiding principles of the [Health Practitioner Regulation National Law, as in force in each state and territory \(National Law\)](#), the [Regulatory principles for the National Registration and Accreditation Scheme \(National Scheme\)](#), and the Council of Australian Governments (COAG) [COAG principles for best practice regulation](#).
177. The Board has adopted a risk-based approach to the proposal with the aim of ensuring that any changes to the training pathways to general registration are the best option to achieve the purpose of reducing regulatory burden while still protecting the public.

### The National Law

178. The [National Law](#) sets out the objectives and guiding principles of the National Scheme.<sup>61</sup> The Board considers that this proposal is consistent with the objectives and guiding principles of the National Law. In particular, the proposal to simplify the training pathways to registration as a general psychologist will:
  - a. 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
  - b. facilitate workforce mobility across Australia by reducing the administrative and regulatory burden for health practitioners wishing to move between participating jurisdictions or to practise in more than one participating jurisdiction (including internationally)
  - c. facilitate the provision of high quality education and training of health practitioners
  - d. continue to facilitate access to services provided by health practitioners in accordance with the public interest, and
  - e. enable the continuous development of a flexible, responsive and sustainable Australian health workforce and to enable innovation in the education of, and service delivery by, health practitioners.

### Regulatory principles for the National Scheme

179. The [Regulatory principles for the National Scheme](#) underpin the work of the Board in regulating psychologists in the public interest. The regulatory principles encourage a responsive, risk-based approach to regulation across all regulated professions. The following principles in particular, have shaped the direction of the Board's policy thinking and proposal to retire the 4+2 internship pathway to general registration:
  - a. principle 5 - a strong adherence to a risk-based approach to regulation of psychologists that informs any proposal
  - b. principle 7 - community confidence in health practitioner regulation is important and the Board's response to risk considers the need to uphold professional standards and maintain this public confidence. There is an obligation on the Board to protect the public through ensuring that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered, and
  - c. principle 8 - the Board sets registration standards which are approved by the Ministerial Council and issues codes and guidelines so that there are nationally consistent requirements and clear expectations of psychologists – no matter where they practise in

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<sup>61</sup> See the objectives and guiding principles of the [National Law](#), s3

Australia and to whom they provide health services. We work with our stakeholders, including the public and professional associations, to achieve good and protective outcomes.

### **Principles for best practice regulation**

180. The Board has developed the proposal to retire the 4+2 internship pathway to general registration in line with AHPRA's [Procedures for the development of registration standards, codes and guidelines](#). The proposal:
- a. takes into account the objectives and guiding principles of the National Law<sup>62</sup>
  - b. meets the consultation requirements of the National Law<sup>63</sup>, and
  - c. takes into account the [COAG principles for best practice regulation](#).
181. The Board's assessment of the proposal against these principles for best practice regulation is outlined in [Attachment L](#).

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<sup>62</sup> See subsections 3(2) and 3 (3)

<sup>63</sup> See section 40 (1)

## Options statement

182. The Psychology Board of Australia (the Board) has considered two options in developing this proposal to reduce regulatory burden and risk.

### Option one – Status quo

183. Option one would involve retaining the 4+2 internship pathway to general registration.

#### Rationale

184. The 4+2 internship pathway is the only pathway that does not require the completion of higher education for general registration. Retaining the 4+2 internship pathway would allow provisional psychologists to continue to have this training option available to them.

#### Advantage

185. The status quo would continue to allow provisional registrants to begin working after completing a four-year approved program of study. There are no transition arrangements required for this option.

#### Disadvantage

186. The disadvantage of this option includes the following:

- a. the challenges of this pathway on the labour market, employers, supervisors and interns would remain
- b. the high administrative and regulatory burden for employers, supervisors, interns, and the regulator would persist
- c. there would not be any reduction in the high costs (training, supervision, CPD, administration) or red tape associated with compliance with the requirements of this pathway for employers, supervisors, interns or the regulator
- d. the risks associated with continuing to have multiple unaccredited pathways means that the quality of training will remain variable and the resulting challenge to adequately protect the public would not be addressed
- e. the misalignment with international training standards means this pathway is no longer recognised across the world and graduates would not be able to practice overseas unless they undertook significant remediation. This limits opportunities for Australian psychologists training via this pathway to be responsive internationally for both development and disaster-relief work and providing services through digital technologies, and
- f. all of the concerns, problems and risks identified with the 4+2 internship pathway as noted earlier in this paper, remain.

### Option two – Retire the 4+2 internship pathway to general registration

187. Option two would involve the Board retiring the 4+2 internship pathway. This option would require Ministerial Council approval to remove the 4+2 internship from both the provisional and general registration standards.

188. This option would include a program of stakeholder consultation and development of a communications and transition plan for retirement. It is proposed that current fourth year students and 4+2 interns would be permitted to complete the internship in the maximum allowable period. After the end of the transition period, all future provisional registrants would be required to undertake the 5+1 (or higher degree) pathways.

189. Option two would also involve continued support and development of the 5+1 internship pathway including ensuring adequate availability of fifth year programs offered by higher education providers.

190. While APAC and HODSPA could continue to support the current fifth year programs and development of new programs, the Board would continue to streamline the 5+1 internship program. The Guidelines for the 5+1 internship are due for review in the next year, and the Board proposes to consult on reducing the regulatory burden and red tape of the one-year internship even further as part of this upcoming review.
191. If this option was chosen, it is important to be aware that psychologists who hold general registration, who had previously gained general registration on the basis of completing the 4+2 internship pathway, would continue to be eligible for general registration under section 53(d) of the National Law. If a psychologist was previously registered on the basis of holding a 4+2 qualification, then such a person can remain registered, even if, for example, they have had a period of non-practicing registration or have let their registration lapse for a period of time. The aim of option two is to retire the 4+2 internship as a pathway for *future* new registration only. Psychologists who are four-year trained (and even those who gained registration, for example, in the 1950s and 1960s with three years of training) would not have their registration status affected if option two is chosen.

### Rationale

192. This option would address all of the challenges, concerns, problems and risks with the 4+2 internship pathway as noted by employers, supervisors, interns and the regulator, and outlined in this paper, particularly in the section entitled 'What are the challenges with the 4+2 internship pathway?'.
193. In addition, by reducing the administrative burden and compliance costs for employers and supervisors, and though the advantage of accreditation for an additional year for interns, this option has significant positive impacts and benefits for stakeholders.
194. Looking at the situation from a different perspective, if the Board was seeking to introduce the 4+2 internship pathway for the first time under the National Registration and Accreditation Scheme (National Scheme) today, the Board considers that it is unlikely that the proposal would be successful. The costs, burden and associated risks would be considered too high. Retiring the 4+2 pathway promotes right-touch regulation, aligns Australian training with international standards, ensures that psychology training is sustainable, and prepares psychologists to provide health care aligned to the current and future needs of the Australian public.

### Advantage

195. Retiring the 4+2 internship pathway in favour of the 5+1 internship pathway would include the following advantages:
- a. simplifying the training model to become a general psychologist in Australia
  - b. reducing regulatory burden and increasing sustainability of psychology training
  - c. reducing regulatory risk, red tape, administrative burden, and cost associated with managing multiple un-accredited internships within a framework of multiple pathways to registration, which would benefit employers, supervisors, the regulator, and ultimately all registered psychologists
  - d. a more effective use of the accreditation mechanisms and processes already available under the National Scheme through the fifth year qualification
  - e. alignment of training to become a psychologist in Australia across all pathways with international training standards and requirements
  - f. there is no impact on competition:
    - i. the overall number of psychologists in training and the number of general psychologists is not expected to change with this proposal
    - ii. there is no effect on pricing, availability, location or promotion of health services from option two



- iii. clients can be eligible to receive Medicare rebates when being treated by both 4+2 and 5+1 trained psychologists
  - iv. 5+1 and 4+2 interns are both trained as 'generalist' psychologists who are not traditionally eligible to apply for area of practice endorsement. This proposal does not recommend any addition of an area of practice endorsement, and
  - v. moving from a two-year internship requirement to a one-year internship requirement reduces the resourcing requirements and training time for employers and supervisors. Those employers offering the +2 are likely to continue to offer +1 internships, and many employers already prefer 5+1 trained interns and psychologists.
- g. There is minimal to no impact on the labour market:
- i. there is no additional time required for psychologists in training to obtain general registration (remains at six years)
  - ii. there are no restrictions on education and training providers that would reduce the number of available places to study (in fact the number of places is increasing)
  - iii. the proposal is not expected to alter the volume of newly registered professionals entering psychology
  - iv. for many interns, the cost of one additional year of higher education training (and the one-year internship) would be equal to or less than the current costs of CPD and supervision over the two years (or more) it takes to complete the 4+2 internship. For those 4+2 interns enrolled in a paid 'internship registration course', or who are undertaking unpaid internships, the fifth-year of study may have financial benefits in addition to the training advantages, and
  - v. for overseas trained psychologists the requirements to be registered in Australia would be more aligned to the international requirements from where these applicants have been trained (e.g. New Zealand, South Africa and the UK). This option does not propose any changes to the transitional program requirements<sup>64</sup>.

### Disadvantage

196. The impacts of this option are considered to be minimal. The primary consequences of this option include:
- a. Replacing one year of internship with one year of an approved program of study delivered by a higher education training provider. While this training would incur a fee, for most provisional psychologists this will be offset by the reduction in one year of supervision and CPD costs as described in the case studies in Table 3 of this paper.
  - b. At the time of transition, for approximately one year, there may be a lag of provisional psychologists going into the workforce. The Board expects that a similar number of provisional psychologists who would normally start an internship in the fifth year would instead enrol in a program of study for the fifth year, and therefore not go into the workforce until the subsequent year. The following would help mitigate against any short-term disruption in intern flow:
    - i. the lag would only be for one year only. Communication about the transition to retirement of the 4+2 internship pathway, along with a long transition period, would help employers, supervisors and educational institutions plan for any disruption in intern flow

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<sup>64</sup> The requirements for the Board's transitional program can be found at: [www.psychologyboard.gov.au/Registration/Overseas-Applicants/Transitional-program.aspx](http://www.psychologyboard.gov.au/Registration/Overseas-Applicants/Transitional-program.aspx)



- ii. as noted above, larger employers are already starting to move away from employing 4+2 interns in favour of 5+1 interns suggesting that transition is already happening, and that any lag will be minimised
  - iii. workforce participation is encouraged through the higher education programs that permit fifth year students to study in distance-learning mode or undertake weekend classes
  - iv. many 4+2 interns currently take three or more years to complete their internship leading to a staggered transition. The increase in provisional psychologists undertaking the 5+1 internship pathway means the transition has effectively already begun, and
  - v. overall the psychology profession does not have a labour shortage for the general registration workforce. Retirement of the 4+2 pathway is not expected to alter the numbers of people interested in joining the psychology profession.
197. A summary of the impacts of retirement of the 4+2 internship pathway to general registration is at [Attachment E](#). This table shows that the effects of this option are rated as having minimal impact, no impact, or having a positive impact. There are no ratings of moderate or major impact for this option.

### Discussion of preferred option

#### Preferred option

198. The Board prefers Option two – retire the 4+2 pathway to general registration.
199. The Board's preferred option is to adopt a streamlined pathway to general registration where all professional training before an intern year is located within the higher education sector, consistent with international standards for psychologists and Australian standards for all other regulated health professions.
200. A streamlined pathway would incorporate a modern education and training architecture designed to prepare psychologists for practice and sustain a skilled psychology workforce aligned with current and future health care needs of the Australian public.
201. In this model the period of supervised practice would strike a better balance than current 4+2 internship pathways to ensure the practitioner, regulator, education providers and employers have shared responsibilities, and achieve mutually desired outcomes.

### Considerations for decision making

202. On balance, the Board considers that retiring the 4+2 internship pathway to general registration is the best option to achieve the stated purpose of reducing regulatory burden, and to facilitate the provision of high quality education and training of psychologists in the public interest. The Board considers that this is the only option that would be to sustainably balance protection of the public with maintaining workforce supply.

#### Potential costs and benefits of retiring the 4+2 internship pathway

203. The benefits of retiring the 4+2 internship pathway far outweigh the minor impacts identified in this paper (see [Attachment E](#)), and are listed above when discussing the advantages of retirement (paragraph 195).
204. The Board believes that the overall costs of the proposal to retire the 4+2 internship pathway to consumers, registrants, governments, employers, educational providers and supervisors are reasonable in relation to the benefits to be achieved.
205. For consumers, this means receiving treatment by a work-ready intern for the same cost (consultation fee) as before, knowing that the Board facilitates consistently high quality education and training of psychologists.

206. For governments, public and private sector employers (businesses), and supervisors there would be considerably less administrative and regulatory burden after the retirement of the 4+2 internship pathway, and noteworthy accreditation and training advantages in replacing this pathway with the preferred 5+1 internship pathway.
207. For educational providers, there is an opportunity to develop and strengthen the approved programs of study offered.
208. For current fourth year students and 4+2 interns, a clear transition period with the maximum allowable period for completion of the internship allows for a transparent and reasonable change management process towards retirement of the 4+2 internship pathway.
209. For future provisional psychologists there remain alternative and available pathways to general registration. It is expected that for many new provisional psychologists the benefits of undertaking a 5+1 internship pathway (or a higher degree pathway) far outweigh the changes associated with any retirement of the 4+2 internship pathway.
210. For psychologists with general registration who previously trained via the 4+2 internship pathway, there is no change to their eligibility to continue being registered with this option.
211. There are minimal regulatory or administrative costs associated with the retirement of the 4+2 internship pathway, with no additional impost on registrant fees. The transition would involve minor changes being proposed for approval by Ministers to the provisional and general registration standards, and removal of 4+2 internship guidelines and forms from the Board's website.

#### **Risk assessment of the two options**

212. The Board has a strong commitment to a risk-based approach to the regulation of psychologists that informs the education, training and registration requirements. The status quo option results in higher risks than retiring the 4+2 internship. Attachment F provides a detailed risk assessment of the two options.
213. The status quo (option one) comprises significant regulatory, administrative and compliance risks.
214. In comparison, retiring the 4+2 internship pathway (option two) manages these risks. Retirement of the 4+2 internship pathway reduces regulatory and administrative burden, has no or minimal impact on competition or the labour market, and provides for 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. In addition, retiring the 4+2 internship pathway to general registration is expected to have many positive benefits on employers, supervisors, interns and consumers.

#### **Timing and transition**

215. Should stakeholders support the retirement of the 4+2 internship pathway to general registration, the Board would develop transition provisions for registrants applying for general registration via the 4+2 internship pathway. This would include a clear and agreed transition timeframe for retirement to ensure that stakeholders are not impacted.
216. The Board is aware the registrants, educational providers, supervisors and employers would need time to prepare for the retirement of the 4+2 internship pathway. The Board would develop an extensive communication plan, and through the Board's newsletter, communiqué and key stakeholder groups, would help ensure that provisional psychologists and their employers are aware of the transition arrangements and timeframes.
217. It is important to be aware that psychologists holding general registration, who had previously gained general registration on the basis of completion of the 4+2 internship pathway, would continue to be eligible for general registration under section 53(d) of the National Law. This group is not affected by transition requirements or timeframes, as retirement of the 4+2 internship as a pathway for general registration is for *future* registration only. Psychologists, who hold registration now on the basis of completion of the 4+2 internship pathway at some time in the past, would not have their registration

affected or impacted by retirement of the 4+2 internship, even if they applied to re-register after a period of non-practicing registration, or a period of lapsed registration.

218. The Board has considered three options for transition - all of the options include:

- a future date for retirement of the 4+2 internship pathway - to ensure that current fourth-year students are not affected by any retirement
- a clear deadline for enrolment into the two-year internship, and
- allowing for the maximum time permitted in the [Guidelines for the 4+2 internship program](#) (five years) for the internship to be completed – to ensure equity.

219. The options are as follows:

**Option a) Last enrolment in the 4+2 internship pathway is 30 June 2019**

220. The last date to enrol in the two-year internship would be 30 June 2019. This means that students enrolled in a fourth year program must have graduated by the end of 2018, received their transcripts, found an internship and had their paperwork approved by AHPRA by no later than 30 June 2019 in order to be included in the final cohort of the two-year internship.

221. The [Guidelines for the 4+2 internship program](#) allow five years to complete the two-year internship. Interns would need to have completed their internship and applied for general registration by 30 June 2024. Consistent with the Board's [Extended leave provisions for provisional psychologists](#), the Board would consider extension to the five-year maximum on a case-by-case basis for a maximum of twelve months from the date of renewal of registration.

222. The advantage of this option is that the 4+2 internship pathway is retired in a timely fashion, and it allows for one more entry of students into a fourth year psychology program before the 4+2 internship pathway to general registration is closed.

223. The disadvantage of this option is that the last intake of fourth year students would be Semester 1, 2018. This is an extremely short transition, and does not allow for adequate notice or any part-time enrolments in the fourth year.

**Option b) Last enrolment in the 4+2 internship pathway is 30 June 2020**

224. The last date to enrol in the two-year internship would be 30 June 2020. This means that students enrolled in a fourth year program must have graduated in the next two years - by the end of 2019, received their transcripts, found an internship and had their paperwork approved by AHPRA by no later than 30 June 2020 in order to be included in the final cohort of the two-year internship.

225. The [Guidelines for the 4+2 internship program](#) allow five years to complete the two-year internship. Interns would need to have completed their requirements and received general registration by 30 June 2025. Consistent with the Board's [Extended leave provisions for provisional psychologists](#), the Board would consider extension to the five-year maximum on a case-by-case basis for a maximum of twelve months from the date of renewal of registration.

226. The advantage of this option would include:

- a. allowing for two further intakes of fourth year students
- b. students would be permitted to enrol in 2019 and complete their fourth year part-time, providing additional flexibility and equity
- c. educational providers would have more time to develop and implement an accredited fifth year training program to more easily manage the expected higher enrolments in the 5+1 internship pathway, and

- d. employers would have additional time to prepare for organisational changes relevant to recruiting and training 5+1 interns.
227. The disadvantage of this option is that it is a slower transition timeframe.
- Option c) Last enrolment in the 4+2 internship pathway is 30 June 2021**
228. The last date to enrol in the two-year internship would be 30 June 2021. This means that students enrolled in a fourth year program must have graduated in the next three years – by the end of 2020, received their transcripts, found an internship and had their paperwork approved by AHPRA by no later than 30 June 2021 in order to be included in the final cohort of the two-year internship.
229. The [Guidelines for the 4+2 internship program](#) allow five years to complete the two-year internship. Interns would need to have completed their requirements and received general registration by 30 June 2026. Consistent with the Board's [Extended leave provisions for provisional psychologists](#), the Board would consider extension to the five-year maximum on a case-by-case basis for a maximum of twelve months from the date of renewal of registration.
230. The advantage of this option would include:
- a. allowing for three further intakes of fourth year students
  - b. students who are currently undertaking an undergraduate program would be able to complete a fourth year, and enrol in the two-year internship before the retirement date
  - c. students would be permitted complete their fourth year part-time, providing additional flexibility and equity
  - d. educational providers would have more time to develop and implement an accredited fifth-year training program to more easily manage the expected higher enrolments in the 5+1 internship pathway, and
  - e. employers would have additional time to prepare for organisational changes relevant to recruiting and training 5+1 interns.
231. The disadvantage of this option is that it is a very slow transition timeframe, effectively allowing the current regulatory and administrative burden and risks associated with the 4+2 internship pathway to continue for another nine years.

## Discussion of preferred transition option

### Preferred transition option

232. In preparation of this paper, stakeholders have reported to the Board a desire for a clear transition period should there be wider agreement to retire the 4+2 internship pathway though this consultation process. However stakeholders differ in their preferred transition time period. Some stakeholders prefer a short transition ('get it done now') and others a longer transition ('a couple years').
233. The Board's preferred transition option is b) Last enrolment in the 4+2 internship pathway is 30 June 2020. This option offers a middle ground.

### Considerations for decision making

#### Rationale for timeframes

234. Please note that all three options use a *deadline of enrolment into the two-year internship*, rather than a deadline for enrolment in the fourth year training or a deadline of graduation from the fourth year training. This is because:
- a. there is no student registration for psychology, and the Board does not hold data on enrolment and graduation of students. The Board has no way of knowing which fourth

year students are planning to undertake the two-year internship, or which students are planning to choose the 5+1 internship or higher degree pathway, and

- b. using a deadline of graduation may have the result of extending the 'effective end date' of retirement of the two-year internship. For example, someone may graduate, travel for eight years, then enrol in the two-year internship, and take five years to complete – effectively extending the retirement date of the pathway<sup>65</sup>.

#### Transition of Board documents

235. Because retiring the 4+2 internship pathway would involve removing a pathway, not adding new regulation, the transition would not require development and approval of additional codes or guidelines. Small changes to the general and provisional registration standards would be required and would need Ministerial Council approval. Primarily, transition would involve removing '4+2 content' from the currently existing standards, guidelines, policies, fact sheets, forms and from the Board's website after they are no longer required. [Attachment G](#) lists the documents that would need to be altered or removed should option two be supported.
236. The Board proposes that all 4+2 internship documentation would remain available on the Board's website for the purposes of transition until the last date to apply for general registration through this pathway. To illustrate - if option b) was preferred by stakeholders, this would mean that all 4+2 documentation would remain available on the Board's website for use by those registrants approved in the 4+2 internship pathway (only) between 30 June 2020 and 31 December 2025 (including the grace period).
237. During this transition period, it is proposed that a *notice of change* be added to both the provisional and general registration standards to clarify that only those registrants approved in the last cohort of 4+2 interns (i.e. by 30 June) are eligible for provisional registration through that pathway, or eligible to apply for general registration through the 4+2 pathway. [Attachment H](#) provides the proposed wording for this *notice of change*.
238. In addition, it is proposed, that the *notice of change* remains in operation for a limited period of time after the last date to be granted general registration. This would allow for any unexpected delays in finalising and/or processing applications for general registration at the 31 December deadline. This would also ensure that provisional registrants who have successfully completed the 4+2 internship pathway by the deadline have the opportunity to be registered as a general psychologist before the pathway closes. A 'grace period' of a maximum of twelve months is proposed.
239. [Attachment I](#) shows the minor changes that would need to be made to the provisional registration standard at the end of this grace period. These changes would require Ministerial Council approval. It is proposed that even though these changes would occur in the future, that they could be agreed upon on the basis of this consultation paper. It is proposed that these updates could be published independent of the usual review cycle for the provisional registration standard, or alternatively, if the timing of publication coincides with a scheduled review of the standard, could be included in the review cycle as an approved change.
240. [Attachment J](#) shows the minor changes that would need to be made to remove the 4+2 internship from the general registration standard at the end of this grace period. These changes would require Ministerial Council approval. It is proposed that even though these changes would occur in the future, that they could be agreed upon on the basis of this consultation paper. It is proposed that these updates could be published independent of the usual review cycle for the general registration standard, or alternatively, if the timing of publication coincides with a scheduled review of the standard, could be included in the review cycle as an approved change.

#### Advantage of option b)

241. [Attachment K](#) outlines and compares the three transition options.

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<sup>65</sup> For more information please see the [Guidelines for the 4+2 internship program](#) (Appendix C: Policy on recency of qualifications)

242. The Board prefers option b ) Last enrolment in the 4+2 internship pathway is 30 June 2020, as it has the following advantages:
- a. this option balances the preference to retire the 4+2 internship in a timely fashion – to reduce regulatory burden and the costs of administration – with the priority of providing fairness and transparency to any fourth year students who are planning on undertaking the 4+2 internship pathway to general registration
  - b. it allows educational institutions, employers, and supervisors plenty of lead time to prepare for the retirement of the 4+2 pathway to general registration
  - c. it allows employers additional time to prepare for organisational changes relevant to recruiting and training 5+1 interns, and
  - d. in addition, this option balances the need for consumers to have access to work-ready interns in a timely fashion, with a fair, equitable, and transparent period of transition.

### Relevant sections of the National Law

243. Every Board decision must support the objectives and guiding principles of the National Scheme<sup>66</sup>. The first consideration in every Board decision is the health and safety of the Australian public and all actions taken by the Board must fall within the functions assigned to National Boards under the National Law. Board decisions must often find a balance between two objectives or principles, such as facilitating high quality education and training of health practitioners while reducing regulatory burden.
244. To download the full version of the National Law that applies in your state or territory please visit [www.ahpra.gov.au/About-AHPRA/What-We-Do/Legislation.aspx](http://www.ahpra.gov.au/About-AHPRA/What-We-Do/Legislation.aspx).
245. Relevant sections of the National Law relating to this proposal are listed below. Please take a few minutes to read them and take them into account when providing your feedback.
- Section 3
  - Section 35
  - Section 38
  - Section 39
  - Section 40
  - Section 41
  - Section 52
  - Section 53
  - Section 54
  - Section 62

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<sup>66</sup> [Health Practitioner Regulation National Law](#), as in force in each state and territory, Section 3



## Questions for consideration

246. The Psychology Board of Australia (the Board) is inviting feedback on the following questions:
1. Do you agree with the Board's proposal to consider education and training reform, including focusing on reducing regulatory burden, as an important next step in the development of the regulatory environment for psychology?
  2. Which do you consider is the best option for reducing regulatory burden? Please provide reasons for your stated preference:
    - option one - status quo
    - option two - retirement of the 4+2 pathway to general registration
    - none of these options, or another option.
  3. Are there any specific impacts (positive or negative) or advantages/disadvantages for each of the two options that have not been outlined in the paper?
  4. Are there any specific risks (for each of the two options) that have not been outlined in the paper?
  5. If you prefer option two, do you support the Board making the changes (update/delete) to the standards, guidelines, fact sheets and forms as outlined in [Attachment G-J](#) to retire the 4+2 internship pathway?
  6. If you prefer option two, which transition option do you prefer and why?
    - option a): last enrolment in the 4+2 internship is 30 June 2019
    - option b): last enrolment in the 4+2 internship is 30 June 2020
    - option c): last enrolment in the 4+2 internship is 30 June 2021
    - none of these options or another option (please specify)
  7. From your perspective, can you identify any practical issues in retiring the 4+2 internship pathway?
  8. Is the content and structure of the consultation paper helpful, clear, relevant and understandable? If not, what needs to change?
  9. Is there anything else the National Board should take into account in its proposal, such as impacts on workforce or access to health services that have not been outlined in the paper?

## Statement of assessment

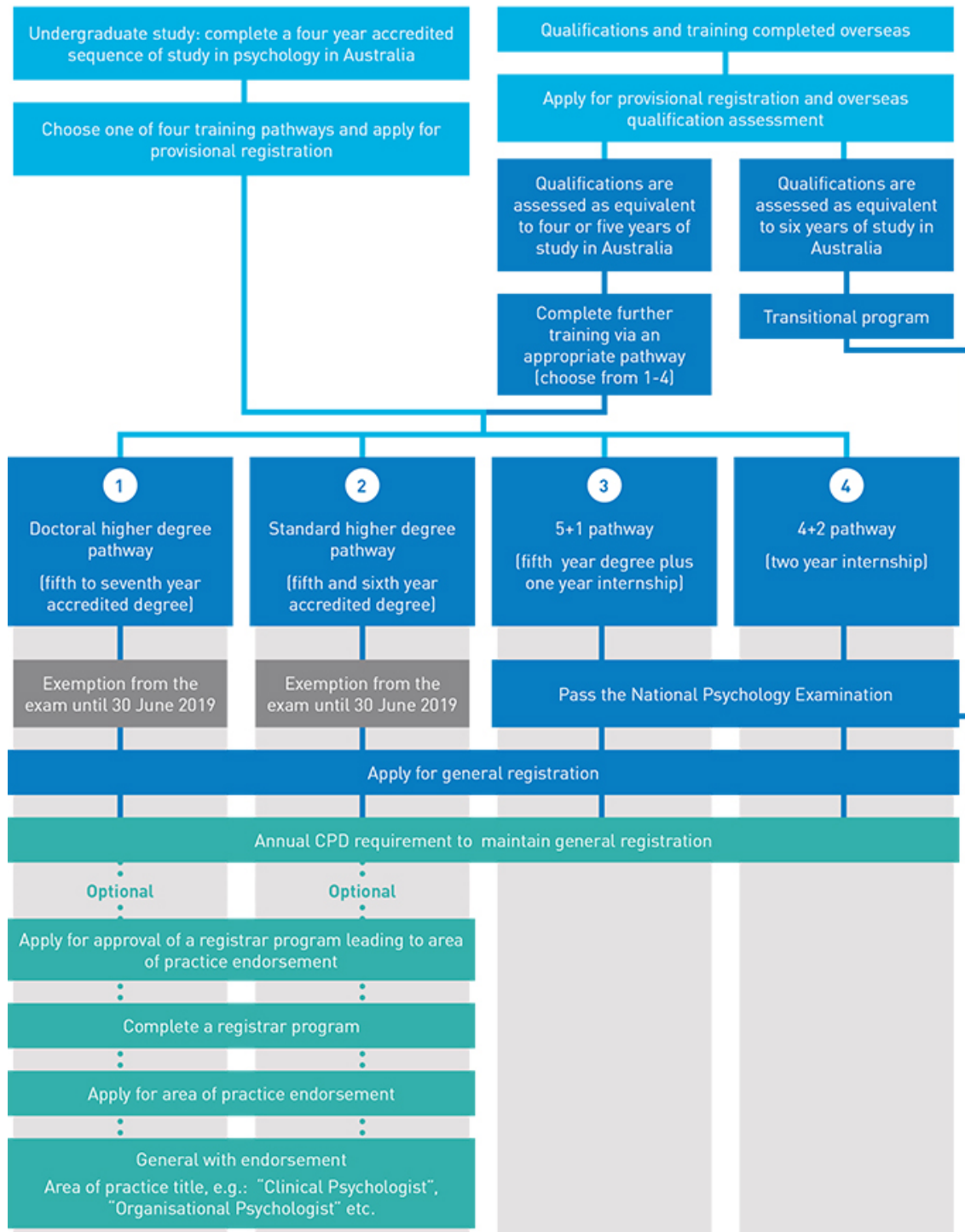
247. The Board's [Statement of assessment against AHPRA's Procedures for development of registration standards and COAG principles for best practice regulation](#) is included in this consultation paper at [Attachment L](#).

## Next steps

248. The Board will consider feedback on the proposal to retire the 4+2 internship pathway to general registration before finalising the proposal.

## Attachment A – Training pathways to general registration as a psychologist in Australia

### Training pathways to general registration



## Attachment B –The Board’s proposal to retire the 4+2 internship pathway: Contextual differences between 2009 and 2017

Context	2009	2017
<b>Number of regulators</b>	<ul style="list-style-type: none"> <li>Eight registration boards in each Australian state and territory</li> <li>Eight different acts of parliament to regulate the psychology profession</li> </ul>	<ul style="list-style-type: none"> <li>One national Psychology Board of Australia</li> <li>One substantially consistent National Law</li> </ul>
<b>Number of 4+2 internship pathways</b>	<ul style="list-style-type: none"> <li>Eight different internship programs – one in each jurisdiction</li> <li>Programs were very different in each jurisdiction</li> </ul>	One national 4+2 internship pathway
<b>Number of provisional psychologists</b>	<ul style="list-style-type: none"> <li>Unclear</li> <li>Data from the eight registration boards not centralised</li> <li>Different titles used for various registration types</li> </ul>	Data since 2010 have been centralised and quarterly statistics on the number of registrants is published on the Board’s website
<b>Workforce</b>	Shortage*	No shortage*
<b>5+1 internship</b>	<ul style="list-style-type: none"> <li>5+1 programs not available</li> <li>No 5+1 (fifth year) in APAC standards</li> <li>No 5+1 internship guidelines or standards from any of the eight registration boards</li> <li>No accredited training programs</li> </ul>	<ul style="list-style-type: none"> <li>5+1 programs available</li> <li>APAC standards have included fifth year programs since 2010</li> <li>Board has had 5+1 internship guidelines since 2013; 5+1 in Provisional and General registration standards</li> <li>16 active 5+1 programs; over 8 programs in development and approval process</li> </ul>
<b>Preferred training pathway</b>	<ul style="list-style-type: none"> <li>Evidence suggested the 4+2 internship pathway was the preferred training model, particularly in NSW</li> <li>50% of the workforce was trained by the 4+2 internship pathway**</li> </ul>	<ul style="list-style-type: none"> <li>Higher degree pathway preferred (53% of registrants choose this pathway)</li> <li>Board statistics indicate that 5+1 intern numbers are steadily increasing (15% of registrants in the 5+1)</li> <li>Only 29% of interns are being trained by the 4+2 pathway</li> <li>Employers increasingly prefer psychologists trained via the 5+1 internship or higher degree pathways</li> </ul>
<b>Transition to retirement of 4+2</b>	<ul style="list-style-type: none"> <li>Any decision to retire the 4+2 must retire eight different internship programs</li> <li>Transition to the National Scheme would occur at same time as transition to 4+2 retirement leading to substantial changes in the operating environment</li> </ul>	<ul style="list-style-type: none"> <li>Only one 4+2 internship pathway to retire</li> <li>Transition to retirement of the 4+2 would happen outside of complexity of transition to the National Scheme</li> </ul>

\*Department of Education, ANZSCO 2723 Psychologists February 2015 at [www.employment.gov.au](http://www.employment.gov.au)

\*\* Grenyer et al - The Australian Psychology Workforce 2: A national profile of psychologists’ education, training, specialist qualifications and continuous professional development. *Australian Psychologist*, 45: 3, 168-177

## Attachment C – Internship data (June 2017)

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Number of 4+2 internships by geographic location	
Location	Percentage
Remote	3
Outer regional	12
Inner regional	19
Major city	66

Number of 4+2 internships by jurisdiction	
Jurisdiction	Percentage
ACT	2.5
NSW	47
NT	1.5
QLD	22
SA	3
TAS	1.5
VIC	7
WA	15

4+2 internship by Employer type	
Employer	Percentage
Community based organisation/not-for-profit	20
Education provider	5
Private/for profit company	23
Private practice	14
Government (including corrections)	35

Number of 4+2 interns for each employer			
Jurisdiction	Number of unique employers	Number of employers with 1-3 interns	Number of employers with more than 4 interns
ACT	19	17	2
NSW	213	186	27
NT	13	13	0
QLD	101	84	17
SA	23	22	1
TAS	11	10	1
VIC	69	66	3
WA	75	72	3
Total	524	470 (90%)	54 (10%)

## Attachment D – Minimum regulatory requirements for general registration

Country	Undergraduate	Postgraduate	Practical	Other requirements
<b>Australia</b>	Four year undergraduate (Honours) degree with a major in psychology		Two year supervised internship	National Psychology Examination
<b>New Zealand</b>	Four year undergraduate (Honours) degree with a major in psychology	Master of Science or Master of Arts in Psychology	1500 hours of supervised practice	Practising certificate (annual)
<b>South Africa</b>	Three year undergraduate degree	master's degree	One year internship	Exam set by Professional Board for Psychology
<b>UK</b>	British Psychological Society accredited undergraduate degree or non-accredited degree plus conversion course (four years)	master's degree (forensic, health, occupational, counselling and sport psychologists) doctoral degree (clinical and educational psychologists)	1-2 years supervised practice	
<b>Europe(10)</b>	Three year undergraduate degree	Two year master's degree	One year of supervised practice	
<b>USA</b>	Four year undergraduate degree	Four year doctoral degree	1500 – 6000 hours of supervised practice (depending on state)	EPPP – the Examination for Professional Practice in Psychology administered by Association of State and Provincial Psychology Boards
<b>Canada</b>	Four year undergraduate degree	Two year master's degree <sup>1</sup>	One year supervised practice	EPPP

<sup>1</sup> In some Canadian provinces the title Psychological Associate is used to denote registrants with a master's (as opposed to a doctoral) degree. In Quebec, a doctoral degree is the minimum qualification. See [www.cpa.ca](http://www.cpa.ca)



## Attachment E – The impacts of retiring the 4+2 internship pathway to general registration



Positive impact or no impact



Minimal impact, requiring some behavior change



Moderate impact

Topic	Impact	Solution	Cost	Benefit	Data source
Regulation and compliance impact	Less registrants being monitored in the 4+2 internship pathway by the Board, AHPRA	Nil	Nil	Less risk; less AHPRA resources required; less regulation; less compliance costs	AHPRA registrant numbers See Table 1
Students in progress (Fourth year students)	Students will be affected by the transition to close the 4+2 internship pathway	Clear transition guidelines  A future transition timeframe  Students would be allowed the maximum timeframe to complete their internship	Nil	Clear and transparent communications	NA
Future +2 interns	Less choice - three pathways not four pathways to registration psychologist	There remain several pathways to becoming a psychologist  The increase in 5+1 places mitigates against choice loss	Both the 5+1 and higher degree pathways incur less supervision and CPD costs for interns	Training takes the same length of time (six years)  Remaining pathway options provide clear advantages to the 4+2 internship pathway  Additional accredited training - more work ready	There are an increasing number of 5+1 programs in operation  Increasingly students and employers are moving to 5+1 and higher degree pathway as preference

Topic	Impact	Solution	Cost	Benefit	Data source
					See Table 4 and 5
	Requirement to enroll in higher degree	HECS-HELP or FEE-HELP available	Cost neutral (or cheaper) for many future interns  Cost of university mitigated by less supervision and CPD costs, and less cost for any two-year internship registration course	Benefits of accreditation  5+1 training model has significant advantages – in training, learning and competency development  Administration and regulatory burden reduced  5+1 interns are more work ready  Employers prefer 5+1 interns  Training takes same length of time ( six years)	See Attachment F on costs of 4+2 and 5+1
General psychologists who previously gained registration with 4+2 internship training	Nil. Can remain registered under section 53(d) of the National Law and re-apply if registration lapses.	NA	NA	Can remain registered under section 53(d) of the National Law. Eligibility for registration on the basis of qualification is not impacted.	
General psychologists with higher degree training	No change to requirements. Nil impact.	NA	NA	NA	NA

Topic	Impact	Solution	Cost	Benefit	Data source
Overseas trained psychologists seeking registration in Australia	No change to transition program or application process.  Requirements will be more aligned with registration in their home country.	NA	NA	NA	NA
Accreditation	APAC Standards have included accreditation of the fifth year programs since 2010.	NA	NA	More higher education providers are accredited or seeking accreditation to deliver fifth-year programs  Students will have increased choice of higher education provider	See Table 4 and 5
Availability of internships	Replacing 4+2 internship pathway with the 5+1 result in increased availability of internships (more one-year and less two-year internships required)	NA	NA	Interns would no longer have to accept unpaid or poor internships due to competition	NA
Educational training providers	Increased opportunity for training providers to add fifth year training, or to transition an internship registration course into an accredited fifth year qualification	NA	Short-term (recoverable) costs for program development	Students will have more options for training institutions  Opportunity for educational providers to develop training reputation and attract students	APAC and HODSPA
Businesses – Government, public and private sector employers	Less administrative and regulatory burden	NA	Less cost - one year less on-the-job supervision required  No additional training required for supervisors to supervise 5+1 interns.	Less risk in supervising work ready psychologists  Free up senior psychologists for work other than supervising 4+2 interns	Feedback from stakeholder consultation
Supervisors	Less administrative and	NA	Private supervisors would need to transition from	The struggle to get supervisors for the 4+2 program (as time	Feedback from

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Topic	Impact	Solution	Cost	Benefit	Data source
	regulatory burden		<p>supervising 4+2 interns to 5+1 interns. While there would be less +2s to supervise there will be more +1s.</p> <p>Less out of session unpaid preparation for 5+1 interns - to engage in other paid work</p> <p>No additional training required for supervisors to supervise 5+1 interns.</p>	<p>consuming and challenging) would be removed</p> <p>Less risk in supervising work ready interns</p>	stakeholder consultation
Consumers/clients	<p>Nil; 4+2 interns roll-over to being a 5+1 intern</p> <p>There is no expected impact on supply or demand</p>	NA	<p>No change</p> <p>Cost of seeing a 4+2 or 5+1 trained psychologists is the same</p> <p>Medicare rebates are the same for 4+2 and 5+1 trained psychologists</p>	<p>5+1 psychologists are more work ready at the commencement of internship</p> <p>No effect on access to clinical psychologists or psychologists with any other area of practice endorsement</p> <p>Several pathways to registration remain, allowing for trainee and consumer choice</p>	NA
Workforce	Retiring the 4+2 internship pathway will result in less 4+2 interns entering the workforce	Offset the loss of psychologists being trained via the 4+2 pathway with those being trained via the 5+1 pathway (or higher degree pathway)	No cost to retire 4+2 pathway	<p>Less regulation</p> <p>Less red-tape</p> <p>Several pathways to registration remain, allowing for trainee and consumer choice</p> <p>More work ready interns</p> <p>Retirement of the 4+2 pathway is not expected to alter the numbers</p>	Table 1-5

Topic	Impact	Solution	Cost	Benefit	Data source
				of people interested in joining the psychology profession.	
Effect of transition	One year pause in intern flow-through to the workforce during the transition as they enroll in a fifth year higher education program rather than a fifth year internship	<p>Early publication of the transition to retirement of the 4+2, combined with a long transition period, to allow planning</p> <p>The increase in provisional psychologists undertaking the 5+1 internship pathway, and employers moving away from employing 4+2 interns, means the transition has effectively begun.</p> <p>Many 4+2 interns take longer than two years to complete an internship leading to a staggered transition</p>	Nil	Retirement of the 4+2 pathway is not expected to alter the numbers of people interested in joining the psychology profession	NA

## Attachment F – Risk assessment for the two options



Low risk (likelihood x impact)



Moderate risk (likelihood x impact)



High risk (likelihood x impact)

Risk	Option 1: status quo	Option 2: retire 4+2 internship (in favour of the 5+1 internship)
<b>Regulatory impact</b>	The 4+2 internship pathway to general registration carries significant burden and is unsustainable in the current context and into the future.	Reduces regulatory burden.
<b>Administrative burden</b>	Current system creates an administrative burden and cost for AHPRA, businesses, employers, supervisors, and provisional psychologists.	After a transition period, resources would no longer be required to administer the 4+2 internship pathway.
<b>Accreditation</b>	Four- year higher degree program currently accredited by APAC. Two-year internship is not accredited. Multiple unaccredited pathways with variable quality of training. Does not meet international benchmarks.	Five - year higher degree program currently accredited by APAC One-year internship is not accredited. Meets international benchmarks for training in the Euro-zone.
<b>Availability</b>	Over 500 individual workplaces providing two-year internships in the current 4+2 cohort. Anecdotal evidence of an undersupply of internships	Increasing preference for the 5+1 internship pathway to general registration by employers and students. There has been a dramatic increase in the number of higher degree providers offering fifth-year places in the last 7 years. There is adequate capacity in fifth-year programs to more than cover the number of registrants currently in the 4+2 pathway.

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Risk	Option 1: status quo	Option 2: retire 4+2 internship (in favour of the 5+1 internship)
<b>Conflicts with core business</b>	The core business of the Board is regulatory, not monitoring training. AHPRA is spending considerable resources providing a non-core service.	<p>The core business of the Board is regulatory, not monitoring training. The Board will continue to have a conflict with core business with the 5+1 internship program.</p> <p>However, AHPRA would spend half of its current resources providing a non-core service. (<i>Note: the +1 is half of the+2; the 5+1 internship is more streamlined, and has increasing flexibility making it easier to administer than 4+2 internship</i>).</p> <p>The Board plans to propose consulting on reducing the regulatory burden of this pathway further in the upcoming scheduled review of the 5+1 internship guidelines.</p>
<b>Compliance</b>	<p>Six month progress reports (minimum of three).</p> <p>Eight case reports.</p> <p>Final assessment of competence report.</p>	<p>Six month progress report (one required).</p> <p>Four case reports/case studies.</p> <p>Final assessment of competence report.</p>
<b>Challenges for employers of interns</b>	High administrative and regulatory burden; high resourcing needs for training, supervision and compliance.	Reduces burden on employers and supervisors by at least half. Employers would have sufficient time to prepare for organisational changes relevant to recruiting and training 5+1 interns instead of 4+2 interns.
<b>Costs</b>	<p>Employers: high costs associated with training and supervising interns for 2-3 years.</p> <p>Intern: 160 hours of supervision (\$120-\$246 per hour); 120 hours of CPD (\$300-\$500 per day/6 hours); paid internships or internship registration course for 2-3 years (\$24,000-\$30,000).</p> <p>Regulator: high costs associated with administering two-year internships.</p>	<p>Employers: costs of training and supervising an intern are effectively halved; senior staff have more time for other duties.</p> <p>Intern: 80 hours supervision (less than 4+2); 60 hours CPD (less than 4+2); paid internships (less likely than in 4+2) or internship registration course for 1 year (\$12,000-\$15,000); cost of fifth year qualification (\$18,000-\$26,000).</p> <p>Regulator: lower costs associated with administering a one-year internship.</p>

Risk	Option 1: status quo	Option 2: retire 4+2 internship (in favour of the 5+1 internship)
<b>Inadequate competency development</b>	<p>Due to the number of partnerships with employers, and a lack of control over training, it is difficult for the Board to ensure that core competencies are being met consistently for all interns.</p> <p>This is mitigated to some extent by the national psychology examination.</p>	<p>Core competencies are more likely to be met due to additional university training (fifth year), and the accreditation of this training.</p> <p>Any variability in the one-year internship is mitigated to some extent by the national psychology examination, and minimised through the additional year of an accredited program.</p>
<b>Poor access to appropriate work internships</b>	<p>Provisional psychologists must find their own workplaces. Some must undertake more than one internship to meet the core competencies.</p> <p>There is a lack of internships that focus on provision of psychology services (many internships are for generic allied health services or case management).</p>	<p>Core competencies are more likely to be met due to placements being required in the fifth year accreditation training.</p> <p>Provisional psychologists would continue to find their own workplace for the +1. There should be increased internship availability (employers could employ an intern every year for the +1, not every two to three years, as for the +2).</p> <p>There is increasing employer preference for 5+1 trained interns.</p>
<b>Inadequate provider quality assurance</b>	<p>Under the current model there is no formal requirement for workplaces to meet a certain standard of training, or to engage in quality assurance systems.</p> <p>The Board has control over standards for general registration, and approval of supervision plans, but not of delivery of training.</p> <p>There is variable quality of internship experiences based on the nature of the workplace training and support, and skill of the supervisor.</p>	<p>Quality assurance is improved through the accreditation of the fifth year accredited training.</p> <p>However, there is no formal requirement for workplaces to meet a certain standard of training for the +1, or to engage in quality assurance systems.</p>
<b>Viability of this option</b>	<p>Some employers prefer psychologists who have trained via the 5+1 internship pathway or the higher degree pathway.</p> <p>Psychology Board statistics indicate that more provisional psychologists are choosing to train via the 5+1 pathway and the higher degree pathway indicating that registrants are choosing to move away from the 4+2 pathway.</p> <p>There is no equivalent international standard to the 4+2 pathway.</p>	<p>There is movement towards employers and students preferring the 5+1 to the 4+2.</p> <p>The higher degree pathway remains the pathway of choice, and allows the eligibility to apply for an area of practice endorsement.</p> <p>The 5+1 internship pathway compares favorably with international standards.</p>

Risk	Option 1: status quo	Option 2: retire 4+2 internship (in favour of the 5+1 internship)
<b>Equity issues</b>	Due to the increasing preference for hiring 5+1 interns, 4+2 interns are increasingly being required to pay for their internships, for supervision external to their workplace, and there is an increase in unpaid intern positions.	Removal of the 4+2 pathway would remove the issue of unpaid positions in the two-year internship. There is no certainty and no equity for a 4+2 intern about possible costs or quality of training experience.  Accreditation of the fifth year means that provisional psychologists would be more likely to receive similar (fair, equitable, of a consistent standard) training during that year.
<b>Client safety</b>	Provisional psychologists training via this pathway are the least work-ready at the beginning of their internship of all training pathways.  The first four years of training focus on scientific basis of psychology and core knowledge areas only. There are no placements or practical work before the two-year internship begins.	The fifth year accredited training is a better model for training and learning, and includes skill training and placements.  Provisional psychologists undertaking the 5+1 pathway are more work-ready when they begin the internship.
<b>Effect on workforce</b>	There is anecdotal evidence that suggests there is an undersupply of internships.  This is leading to provisional psychologists paying for their internships, and to having several part-time jobs or short-term contracts throughout their two-year internship.  Inconsistency, breaks in training, and switching supervisors negatively impacts the quality and duration of the internship training.	There is currently no shortage of psychologists in the workforce.  Retirement of the 4+2 internship pathway is not expected to alter the volume of newly registered professionals entering psychology
<b>Competition</b>	Internships are competitive to land.  Employers are shifting towards a preference for employing psychologists trained via the 5+1 pathway, and higher degree pathway.	Retirement of the 4+2 pathway removes some of the pressure for provisional psychologists to compete with 5+1 interns to obtain an internship. This means that it is less likely that interns would be required (due to competition) to pay for their internship.
<b>Transition</b>	No transition with this option.	Retiring the 4+2 pathway would be removal of regulation not adding new regulation, making any transition process more straight-forward.  A forward date would need to be determined for retirement of the 4+2, allowing current interns to complete their agreed pathway.

Risk	Option 1: status quo	Option 2: retire 4+2 internship (in favour of the 5+1 internship)
		<p>Minimal changes would need to occur for some standards (e.g. removing 4+2 from the General registration standard), retirement of the 4+2 forms and removal of 4+2 information from the Board's website.</p> <p>Changes to the provisional and general registration standard would require Ministerial Council approval.</p>

\*Note: APS = Australian Psychological Society; APAC= Australian psychology Accreditation Council; HODSPA= Heads of Departments of Schools of Psychology Australia.

## Attachment G – List of documents requiring alteration or removal should the 4+2 internship pathway be retired

Document type	Documents name or location	Remove/retire/update	Approval
<b>Standard</b>	General registration standard	Remove 4+2 internship content	Ministers
	Provisional registration standard	Remove 4+2 internship content	Ministers
<b>Guidelines</b>	Guidelines for the 4+2 internship program for provisional psychologists and supervisors	Retire	Board
	Guidelines on CPD	Remove 4+2 internship content	Board
	Guidelines for the national psychology examination	Remove 4+2 internship content	Board
<b>Policies</b>	Policy on refusing or revoking Board-approved supervisor status	Remove 4+2 internship content	Board
	Policy on the revocation of Board-approved supervisor training provider status	Remove 4+2 internship content	Board
<b>Fact Sheets</b>	Extended leave provisions for provisional psychologists	Remove 4+2 internship content	Board
	Provisional registration for higher degree students July 2012	Remove 4+2 internship content	Board
<b>FAQ</b>	<a href="http://www.psychologyboard.gov.au/Standards-and-Guidelines/FAQ/Psychology-FAQ.aspx">www.psychologyboard.gov.au/Standards-and-Guidelines/FAQ/Psychology-FAQ.aspx</a>	update	Board/AHPRA
	<a href="http://www.psychologyboard.gov.au/Standards-and-Guidelines/FAQ/Supervision-FAQ.aspx">www.psychologyboard.gov.au/Standards-and-Guidelines/FAQ/Supervision-FAQ.aspx</a>	update	Board/AHPRA
	<a href="http://www.psychologyboard.gov.au/Standards-and-Guidelines/FAQ.aspx">www.psychologyboard.gov.au/Standards-and-Guidelines/FAQ.aspx</a>	update	Board/AHPRA
<b>Forms</b>	<a href="http://www.psychologyboard.gov.au/Registration/Forms.aspx">www.psychologyboard.gov.au/Registration/Forms.aspx</a>	Retire all 4+2 internship forms	Board/AHPRA
	Application and renewal form for Board-approved supervisor status (BAS) (ABAS-76/MBAS-76)	Remove 4+2 internship content	Board/AHPRA
	Application for provisional registration (APRO-76)	Remove 4+2 internship content	Board/AHPRA
	Application for general registration (AGEN-76)	Remove 4+2 internship content	Board/AHPRA
	Application for renewal under section 64 (ARRP-76)	Remove 4+2 internship content	Board/AHPRA
<b>Website</b>	<a href="http://www.psychologyboard.gov.au/">www.psychologyboard.gov.au/</a>	Remove 4+2 internship content	Board/AHPRA

## Attachment H – Notice of change to the provisional and general registration standard (draft provided for consultation purposes)

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The decision to retire the 4+2 internship pathway to general registration was recommended by the Psychology Board of Australia and approved by the Ministers on **Day Month Year**.

The last cohort of 4+2 interns permitted to be registered as a provisional psychologist was on 30 June XXXX (e.g. 30 June 2020). From this date, no new applications for provisional registration through the 4+2 internship pathway will be received.

The last day for a person to apply for general registration through the 4+2 internship pathway is 31 December XXXX (e.g. 2025).

To allow for administration and processing times, a grace period will be applied. This grace period will be no more than twelve months until 31 December XXXX (e.g. 2026).

From 1 January XXXX (e.g. 2027), the new approved registration standards will no longer refer to the 4+2 internship program.

Applications for general registration from applicants who have successfully completed the 4+2 internship cannot be accepted once the new standard is in force.





## Registration standard: Provisional registration

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Effective from: **Date Year**

### Summary

This registration standard sets out the Psychology Board of Australia's (the Board) requirements for provisional registration for psychology.

Provisional registration may be granted to enable an individual to complete a period of supervised practice that the individual requires to be eligible for general registration as a psychologist.

### Does this standard apply to me?

This standard applies to all applicants for provisional registration and applicants for renewal of provisional registration.

### Qualification

The minimum qualification necessary to be qualified to apply for provisional registration is a four-year accredited sequence of study in psychology completed in the last ten years, or a sequence of study that, in the Board's opinion, is substantially equivalent to an approved qualification.

### Eligibility

Applicants must meet the following eligibility requirements, in addition to being qualified to apply for provisional registration:

- a. the individual must be a suitable person to hold provisional registration as a psychologist under the Health Practitioner National Law, as in force in each state and territory (the National Law)
- b. the individual must not be disqualified under the National Law or the law of a co-regulatory jurisdiction from applying for registration, or being registered in the psychology profession
- c. the individual must meet all other requirements stated in an approved registration standard for the psychology profession that apply to provisional registration<sup>68</sup>, and

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<sup>68</sup> Refer to section 38(1)(a)-(e) of the National Law and the Psychology Board of Australia's registration standards at [www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards).

- d. the individual needs provisional registration in order to complete one of the following programs of supervised practice:
  - i. enrolment in a Board-approved qualification<sup>69</sup> accredited as a fifth and sixth, or fifth to seventh year of study, or
  - ii. a Board-approved 5+1 internship program – comprising a Board-approved qualification accredited as a fifth year of study, followed by a Board-approved internship in accordance with the requirements of a Board-approved 5+1 internship program plan<sup>70</sup>, or
  - iii. ~~a Board-approved 4+2 internship program in accordance with the requirements of a Board approved 4+2 internship plan<sup>71</sup>~~, or
  - iv. a Board-approved transitional program as specified by the Board<sup>72</sup>.

A provisional psychologist is not allowed to undertake dual pathways; that is, mixing components of two different pathways to make up a six year sequence of study. In addition, further training will not be accepted as having completed the requirements of an approved pathway leading to general registration.

### Maintaining provisional registration

Provisional registration must be maintained for the entire duration of the supervised practice program. This is applicable for all pathways, including while awaiting the outcome of an application for general registration.

Higher degree candidates must maintain provisional registration from the start of enrolment and for the duration of enrolment in any component of an accredited qualification. This includes coursework, practical and research thesis, unless granted general registration before completion of the doctoral thesis.

Provisional registration must be renewed annually. When renewing registration, provisional psychologists need to declare that they are completing a program of study or supervised practice that requires provisional registration.

### Definitions

~~**4+2 internship program** means a supervised practice program that is undertaken in accordance with a 4+2 internship plan approved by the Board, over a minimum of two years and a maximum of five years, during which the core competencies are developed.~~

~~**4+2 internship plan** means a supervised practice plan on a form approved by the Board that details how the core competencies will be achieved and includes the following components:~~

- ~~• 3000 hours of internship including:
 
  - ~~— 2720 hours of supervised psychological practice in a work role approved by the Board consisting of sufficient opportunity to develop the core competencies~~
  - ~~— 1000 hours of direct client contact~~
  - ~~— 160 hours of psychological supervision with a Board-approved supervisor where at least one hour of supervision is received for every 17 hours of psychological practice, and~~
  - ~~— 120 hours of professional development activities.~~~~

<sup>69</sup> Refer to the Psychology Board of Australia's *List of approved programs of study* at [www.psychologyboard.gov.au/Accreditation](http://www.psychologyboard.gov.au/Accreditation).

<sup>70</sup> Refer to the Psychology Board of Australia *Guidelines for the 5+1 internship program*

<sup>71</sup> ~~Refer to the Psychology Board of Australia *Guidelines for the 4+2 internship program*~~

<sup>72</sup> Refer to the *Guidelines for transitional programs* for overseas-qualified applicants and the *Policy for recency of practice requirements* for re-entry to practice applicants.

Guidelines and policies are available at [www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx).

- ~~• completion of case reports that demonstrate satisfactory development and attainment of the core competencies, and~~
- ~~• submission of six-monthly supervisor reports on progress towards achievement of the core competencies.~~

**5+1 internship program** means a supervised practice program comprising an accredited fifth year qualification followed by an internship undertaken in accordance with a 5+1 internship plan approved by the Board. The full program of both the qualification and the internship is carried out over a minimum of two years and a maximum of five years, during which the practitioner's core competencies are developed.

**5+1 internship plan** means a supervised practice plan, on a form approved by the Board that details how the core competencies will be achieved in the internship and includes the following components:

- 1500 hours of internship including:
  - 1360 hours of supervised psychological practice in a work role approved by the Board consisting of sufficient opportunity to develop the core competencies
  - 500 hours of direct client contact
  - 80 hours of psychological supervision with a Board-approved supervisor where at least one hour of supervision is received for every 17 hours of psychological practice, and
  - 60 hours of professional development activities.
- completion of case reports that demonstrate satisfactory development and attainment of the core competencies, and
- submission of six-monthly supervisor report/s on progress towards achievement of the core competencies.

**Accredited sequence of study** means a program of study including one or more qualifications that have been assessed by the accreditation authority for the profession as meeting the requirements of the accreditation standards developed and approved under Part 6 of the National Law, and subsequently approved by the Board as providing a qualification for the purposes of registration in the psychology profession.

**Approved qualification** means a qualification obtained by completing an approved program of study which appears on the Board's *List of approved programs*.

**Board** means the Psychology Board of Australia established under section 31 of the National Law.

**Core competency** means the range of applied knowledge and skills common to all areas of psychology practice that are necessary for entry-level general registration. There are eight core competencies that must be achieved in the supervised practice component of psychology training which are:

1. knowledge of the discipline
2. ethical, legal and professional matters
3. psychological assessment and measurement
4. intervention strategies
5. research and evaluation
6. communication and interpersonal relationships
7. working with people from diverse groups
8. practice across the lifespan

**National Law** means the Health Practitioner Regulation National Law as in force in each state and territory in Australia.

**Provisional psychologist** means an individual registered as a provisional psychologist under section 62 of the National Law.

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**Transitional program** means a period of supervised practice stipulated by the Board and any other requirements in order to meet the general registration standard.

### **Authority**

This registration standard was approved by the Australian Health Workforce Ministerial Council on 22 November 2016.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

### **Review**

This registration standard will be reviewed at least every three years.

**Next review date:** 1 June 2020

**Last reviewed:** 1 June 2017

This standard is effective from 1 June 2017 and replaces the previously published registration standard dated 1 June 2012.



## Registration standard: General registration

Effective from: **Date Year**

### Summary

This registration standard sets out the Psychology Board of Australia's requirements for the general registration of psychologists. General registration as a psychologist may be granted to individuals who meet requirements set out in this registration standard and in the Health Practitioner Regulation National Law, as in force in each state and territory (the National Law).

### Does this standard apply to me?

This standard applies to all applicants for general registration and applicants for renewal of general registration as a psychologist.

### Qualification requirements

The minimum qualification required to be qualified to apply for general registration is:

- a) a ~~four-year~~ **five-year** accredited sequence of study in psychology that has been approved by the Board as providing a qualification for registration in the profession, that has been completed within the last ten years, or
- b) an overseas qualification that in the Board's opinion is substantially equivalent to a).

To be eligible for general registration as a psychologist, in addition to the minimum qualification applicants must have completed a postgraduate degree accredited as fifth and sixth year of study in psychology, or another approved program of supervised practice and training as detailed in the eligibility requirements part e) below.

### Eligibility requirements

In order to apply for general registration a six year sequence of education and training is required.

In addition to holding the minimum qualification, applicants must meet the following eligibility requirements:

- a) the individual must be a suitable person to hold general registration as a psychologist under the National Law
- b) the individual must not be disqualified under the National Law, or the law of a co-regulatory jurisdiction, from applying for registration, or being registered, in the psychology profession

- c) the individual must meet all other requirements stated in approved registration standards for the psychology profession that apply to general registration<sup>73</sup>
- d) the individual must provide evidence of having passed the National Psychology Examination (unless exempt)<sup>74</sup>
- e) the individual must have successfully completed a Board-approved supervised practice and training program while registered as a provisional psychologist.

The Board has determined that the supervised practice program requirement must be met by successfully completing one of the following:

- i. a Board-approved postgraduate qualification accredited as a fifth and sixth year of study, or
- ii. all fifth and sixth year-level coursework and practicum of a Board-approved postgraduate qualification accredited as a fifth, sixth and seventh year of study, and having made sufficient progress in the research thesis, or
- iii. a Board-approved qualification accredited as a fifth year of study followed by successful completion of a Board-approved 5+1 internship program<sup>75</sup>, or
- ~~iv. a Board-approved 4+2 internship program<sup>76</sup>, or~~
- v. an overseas qualification and supervised practice assessed by the Board as substantially equivalent to either i), or iii), ~~or iv)~~ and successful completion of a Board-approved transitional program (unless exempt).

### Maintaining general registration

General registration is required to be renewed annually. When renewing their registration, psychologists are required to meet the requirements set out in sections 107 and 109 of the National Law.

### Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on 6 November 2015 and takes effect from 2 May 2016.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

### Definitions

**Accredited sequence of study** means a program of study, comprising one or more qualifications that have been assessed by the accreditation authority for the profession as meeting the requirements of accreditation standards developed and approved under Part 6 of the National Law, and subsequently approved by the Board as providing a qualification for the purposes of registration in the psychology profession.

**Approved qualification** means a qualification obtained by completing an approved program of study which appears on the Board's *List of approved programs*.

**Board** means the Psychology Board of Australia established under section 31 of the National Law.

<sup>73</sup> Refer to section 38(1)(a)-(e) of the National Law and the Psychology Board of Australia's registration standards [www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards.aspx).

<sup>74</sup> Refer to the Psychology Board of Australia's *Guidelines for the National Psychology Examination*.

<sup>75</sup> Refer to the Psychology Board of Australia's *Guidelines for the 5+1 internship program*.

~~<sup>76</sup> Refer to the Psychology Board of Australia's *Guidelines for the 4+2 internship program*.~~

**National Law** means the Health Practitioner Regulation National Law as in force in each state and territory of Australia.

~~**Successful completion of a Board-approved 4+2 internship program** means the individual has completed a 4+2 internship program in accordance with a supervised practice program that was approved by the Board in accordance with the *Guidelines for the 4+2 internship program*. To be considered to have successfully completed the program the individual must have achieved the following during the program:~~

~~1.— Demonstrated competence in the following areas:~~

- ~~• knowledge of the discipline~~
- ~~• ethical, legal and professional matters~~
- ~~• psychological assessment and measurement~~
- ~~• intervention strategies~~
- ~~• research and evaluation~~
- ~~• communication and interpersonal relationships~~
- ~~• working with people from diverse groups~~
- ~~• practice across the lifespan~~

~~2.— Completed a minimum of 3000 hours of the approved internship over a minimum of two years and a maximum of five years of which at least:~~

- ~~• 2720 hours are supervised psychological practice in a work role approved by the Board consisting of sufficient opportunity to develop the required competencies, including 1000 hours of direct client contact~~
- ~~• 160 hours are psychological supervision with a Board-approved supervisor where at least one hour of supervision is received for every 17 hours of psychological practice, and~~
- ~~• 120 hours are professional development~~

~~3.— Completed and submitted to the Board four case reports that the Board assesses as meeting the requirements of case reports set out in its guideline and demonstrating the attainment of the required competencies, and~~

~~4.— Completed all the internship requirements set out in the *Guidelines for 4+2 internship programs*.~~

**Successful completion of a Board-approved 5+1 internship program** means: the individual has completed a 5+1 internship program in accordance with a supervised practice program that was approved by the Board in accordance with the *Guidelines for the 5+1 internship program*. To be considered to have successfully completed the program the individual must have achieved the following during the program:

1. Demonstrated competence in the following areas:

- knowledge of the discipline
- ethical, legal and professional matters
- psychological assessment and measurement
- intervention strategies
- research and evaluation
- communication and interpersonal relationships
- working with people from diverse groups
- practice across the lifespan

2. Completed and graduated from a Board-approved qualification accredited as a fifth year of study, and completed a minimum of 1500 hours of the approved internship over a minimum of one year and a maximum of five years of which at least:

- 1360 hours are supervised psychological practice in a work role approved by the Board consisting of sufficient opportunity to develop the required competencies, including 500 hours of direct client contact



- 80 hours are psychological supervision with a Board-approved supervisor where at least one hour of supervision is received for every 17 hours of psychological practice, and
  - 60 hours are professional development
3. Completed and submitted to the Board two case reports that the Board assesses as meeting the requirements of case reports set out in the *Guidelines for the 5+1 internship program* and demonstrating the attainment of the required competencies, and
  4. Completed all the internship requirements set out in the *Guidelines for the 5+1 internship program*.

**Successful completion of a Board-approved transitional program** means the individual has completed a transitional program that was approved by the Board. To be considered to have successfully completed the program the individual must have achieved the following during the program:

1. Demonstrated competence in the following areas to a Board-approved supervisor through direct observation of practice and/or discussion in supervision sessions:
  - ethical, legal and professional matters as relevant to the Australian context
  - working with people from diverse groups as relevant to the Australian context
2. Completed a minimum of 210 hours of psychological practice in an approved work role over a minimum of three months/12 weeks and for at least 17.5 hours per week, and
3. Completed a minimum of six hours of individual supervision with a Board-approved supervisor focussing on Australian ethical, legal, professional, and cultural matters, provided at a rate of at least one hour per fortnight

**Sufficient progress in the research thesis** means that work on the doctoral thesis has progressed to the point where the Head of Psychology School at the educational institution at which the individual is undertaking a Board-approved qualification accredited as a fifth to seventh year of study, is satisfied that the thesis writing is equivalent to a sixth year thesis in size and scope.

## Review

This registration standard will be reviewed at least every three years.

**Next review date:** 2 May 2019

This standard replaces the previously published general registration standard from 1 July 2010.

## Attachment K – Comparison of the three transition options

	Option a)	Option b)	Option c)
<b>Consultation period</b>	2017/2018	2017/2018	2017/2018
Current fourth-year students	can enrol in two-year internship	can enrol in two-year internship	can enrol in two-year internship
Communication with fourth-year students and other stakeholders	2017-2018	2017-2000	2017-2021
Last fourth-year cohort who can enroll in 4+2 internship program	must graduate 2018	must graduate 2019	must graduate 2020
4+2 internship pathway retired	30 June 2019	30 June 2020	30 June 2021
Last opportunity to begin two-year internship*			
Phase out period ends	end 2024	end 2025	end 2026
No more applications for general registration via the 4+2 internship pathway permitted**			
Advantages	<ul style="list-style-type: none"> <li>• 4+2 retired in a timely manner</li> <li>• allows one more intake of students into a fourth-year program</li> </ul>	<ul style="list-style-type: none"> <li>• allows two more intakes of students into a fourth-year program</li> <li>• allows for part-time enrolment or a semester leave of absence (LOA)</li> <li>• gives educational providers more</li> </ul>	<ul style="list-style-type: none"> <li>• allows three more intakes of students into a fourth-year program</li> <li>• allows for part-time enrolment or a semester leave of absence</li> <li>• students currently studying undergraduate psychology would be able</li> </ul>

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		time to develop and implement an accredited fifth year training program	to begin the 4+2 internship pathway
			<ul style="list-style-type: none"> <li>gives educational providers more time to develop and implement an accredited fifth year training program</li> </ul>
Disadvantages	<ul style="list-style-type: none"> <li>last intake of students into a fourth year program who can enroll in the 4+2 internship pathway is first Semester 2018</li> <li>This is a short timeframe for change.</li> <li>This option does not allow for a part-time enrolment or LOA</li> </ul>	<ul style="list-style-type: none"> <li>a slower transition timeframe</li> </ul>	<ul style="list-style-type: none"> <li>a very slow transition</li> <li>cost and risk of 4+2 internship pathway effectively continue for another nine years</li> </ul>
Risk assessment	<ul style="list-style-type: none"> <li>Regulation – low risk due to fast transition</li> <li>Stakeholders - medium to high risk; fast transition compromises fairness and transparency</li> </ul>	<ul style="list-style-type: none"> <li>Regulation – medium risk; the high administrative and regulatory burden of the 4+2 internship pathway remains for another eight years</li> <li>Stakeholders – low risk; timeframe sufficient for communication and transition</li> </ul>	<ul style="list-style-type: none"> <li>Regulation – high risk due to very slow transition</li> <li>Stakeholders –medium risk; the high administrative and regulatory burden continues</li> </ul>

\*Note: A June retirement date allows for November graduates from the previous year to obtain university results, and for interns to find a placement, a supervisor, and submit completed AHPRA paperwork well before the deadline. It also allows AHPRA time to process any last minute increase in applications due to retirement.

\*\* Note: [The Guidelines for the 4+2 internship program](#) allow a maximum of five years for completion of the program. Consistent with the Board's [Extended leave provisions for provisional psychologists](#), the Board would consider extension to the five-year maximum on a case-by-case basis for a maximum of twelve months from the date of renewal of registration.

## Statement of assessment against AHPRA's *Procedures for development of registration standards* and COAG principles for best practice regulation

### Reducing regulatory burden: Retirement of the 4+2 internship pathway to general registration

249. The Australian Health Practitioner Regulation Agency (AHPRA) has *Procedures for the Development of Registration Standards* which are available at: [www.ahpra.gov.au](http://www.ahpra.gov.au)
250. These procedures have been developed by AHPRA in accordance with section 25 of the Health Practitioner Regulation National Law as in force in each state and territory (the [National Law](#)) which requires AHPRA to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme (the National Scheme) operates in accordance with good regulatory practice.
251. Below is the National Board's assessment of the proposal reducing regulatory burden by retiring the 4+2 internship pathway to general registration against the three elements outlined in the AHPRA procedures.

<p><b>1. The proposal takes into account the National Scheme's objectives and guiding principles set out in section 3 of the National Law</b></p>
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#### Board assessment

252. The Board considers that this proposal to retire the 4+2 internship pathway to general registration is consistent with the objectives and guiding principles of the National Law.
253. The proposal to simplify the training pathways to registration as a general psychologist would facilitate workforce mobility across Australia by reducing the regulatory and administrative burden for health practitioners wishing to move between participating jurisdictions or to practise in more than one participating jurisdiction.
254. The proposal to retire the 4+2 pathway to general registration, if approved, would 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. Removing multiple un-accredited pathways to general registration would provide the Board and the community with more confidence that every psychologist consistently meets the required competencies.
255. In particular, the proposal to retire the 4+2 pathway to general registration in favour of the 5+1 internship pathway would facilitate the provision of high quality education and training of health practitioners through the accreditation of the fifth year qualification. Accreditation is the key mechanism in the National Scheme to ensure practitioners have the knowledge, skills and professional attributes to practice in their profession. A streamlined accreditation process provides a more effective training and learning model, and at the same time removes the red-tape and compliance requirements associated with the 4+2 internship pathway.
256. Reducing regulatory burden and risk through proposing to retire the 4+2 internship pathway would continue to facilitate access to services provided by health practitioners in accordance with the public interest through the four alternative pathways to registration as a general psychologist.

257. The Board's proposal would support and enhance the international mobility of graduates and workers through increased recognition of the value and comparability of Australian qualifications. This would enable the continuous development of a flexible, responsive and sustainable Australian health workforce and enable innovation in the education of, and service delivery by, health practitioners.

## 2. The consultation requirements of the National Law are met

### Board assessment

258. The National Law requires wide-ranging consultation on proposed registration standards, codes and guidelines. The National Law also requires the Board to consult other National Boards on matters of shared interest.
259. The Board has consulted widely in preparation of this paper and has embarked on the review of the education and training model grounded in the views and feedback of key stakeholders. In particular, the Board has sought the views of the Australian Psychology Accreditation Council (APAC), the Australian Psychological Society (APS) and the Heads of Departments and Schools of Psychology Association in Australia (HODSPA) through the Collaborative Working Party (CWP) to explore the issues surrounding multiple un-accredited training pathways to registration and any viable solutions. In addition, the Board has specifically consulted with the larger employers of 4+2 interns across the country to understand any impacts, either positive or negative, of the proposal to retire the 4+2 internship pathway to general registration.
260. Following preliminary consultation, the Board would ensure that there is public exposure of its proposals and opportunity for public comment, by undertaking an eight-week public consultation. This process would include the publication of a consultation paper (and attachments) on its website, notifying stakeholders and inviting feedback.
261. The Board would take into account the feedback it receives via preliminary consultation and public consultation when finalising its proposals.
262. Should stakeholders support the retirement of the 4+2 internship pathway to general registration, the Board would undertake an extensive communication process to ensure that provisional psychologists and their employers and supervisors are aware of the transition timeframes.

## 3. The proposal takes into account the COAG principles for best practice regulation

### Board assessment

263. In developing the proposal to reduce regulatory burden and risk by retirement of the 4+2 pathway to general registration, the Board has taken into account the Council of Australian Governments' (COAG) [COAG principles for best practice regulation](#).
264. As an overall statement, the Board has taken care not to propose unnecessary regulatory burdens that would create unjustified costs for the profession or the community. In fact, the aim of the proposal is to reduce regulatory burden, administrative burden and compliance costs.
265. The Board makes the following assessment specific to each of the COAG principles expressed in the AHPRA procedures:

## COAG principles

### A. Whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

#### Board assessment

266. The Board has adopted a risk-based approach to the proposal; with the aim of ensuring that any changes to the training pathways to general registration are the best option to achieve the purpose of reducing regulatory burden and protecting the public.
267. The Board considers that its proposal is the best option for achieving the stated purposes. All other options contain significant risks, costs and burden.
268. The Board considers that the proposed retirement of the 4+2 internship pathway would have considerable positive impacts on the psychology profession, employers, consumers and interns if adopted. It would considerably reduce the risks, burden and compliance costs associated with this pathway to registration.
269. The proposal would primarily affect those practitioners who are currently or preparing to undertake the 4+2 internship pathway in the near future. Using a future effective date for the retirement of the 4+2 internship and a clear transition period, if approved, would mitigate the effect on practitioners.
270. Any perceived negative impacts of retiring the 4+2 internship pathway, would be outweighed by the benefits of continuing to protect the public, the benefit of undertaking an accredited qualification, and ensuring that an up-to-date training pathway supports the continuous development of a flexible, responsive and sustainable Australian workforce.

### B. Whether the proposal results in an unnecessary restriction of competition among health practitioners

#### Board assessment

271. The Board considered whether its proposal could result in an unnecessary restriction of competition among health practitioners. Retiring the 4+2 pathway to general registration in favour of the 5+1 pathway is not expected to impact on the current levels of competition among health practitioners.
272. Removing one pathway to general registration in psychology would still leave four other training pathways available. With a 300 per cent increase in the availability of fifth year accredited courses of study in the last five years, there are sufficient training places available to mitigate against the closure of one pathway. There is opportunity (not restriction) for education and training providers to increase the number of available places offered in accredited programs.
273. Moving from a two-year internship to a one-year internship requirement increases the availability of internship places for provisional psychologists. In addition, the proposal does not recommend any change in the length of time to complete training (remains six years for psychologists for all five training pathways except the doctoral pathway). Clients can be eligible to receive Medicare rebates for psychological services when being treated by psychologists trained under both pathways.

### C. Whether the proposal results in an unnecessary restriction of consumer choice

#### Board assessment

274. The Board considers that the proposal to retire the 4+2 pathway to general registration would support consumer choice by ensuring confidence that interns, having an additional year of accredited training, are more work ready at the beginning of their internship. Replacing one year of internship with one year of accredited training supports consumer choice by ensuring that individual applicants for general registration have been adequately trained, supported and assessed for competency and ability to safely practice on

the profession. By ensuring that training is in line with the [International declaration of core competencies in professional psychology](#) (the Declaration), and comparable with international training benchmarks, consumers can know that the Board supports the continuous development of a flexible, responsive and sustainable psychology workforce.

**D. Whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved**

**Board assessment**

275. The Board considered the overall costs of the proposal to retire the 4+2 internship pathway to general registration to members of the public, registrants and governments and concluded that any costs of retirement are appropriate when offset against the benefits of accredited training, managing the risks associated with multiple-un-accredited pathways to registration, and the reduction in regulatory burden, compliance costs and administrative requirements.
276. The proposal to retire the 4+2 internship pathway to general registration would not impact on psychology registration fees. It is possible that the reduced administrative burden for the regulator, may lead to reduced costs.

**E. Whether the requirements are clearly stated using 'plain language' to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants**

**Board assessment**

277. The Board has expressed its proposals as clearly and simply as possible using plain English to reduce any uncertainty and to enable stakeholders to understand the proposal.
278. If retirement of the 4+2 internship pathway is supported, the Board has committed to developing clear communications about the retirement process and timeframes. The Board would ensure that any transition documents would be clearly and plainly stated to help practitioners, employers and consumers to understand the relevant timeframes and requirements.

**F. Whether the Board has procedures in place to ensure that the proposed registration standard, code or guideline remains relevant and effective over time**

**Board assessment**

279. If approved, retiring the 4+2 internship pathway to general registration would involve reducing regulation, not adding regulation. Retiring the 4+2 internship pathway would not require the development or approval of any additional standards, codes or guidelines. But rather, transition would involve removing '4+2 content' from the currently existing standards, guidelines, fact sheets, forms and from the Board's website. [Attachment G](#) lists the documents that would need to be altered or removed should option two be supported.
280. A *notice of change* has been proposed for both the provisional and general registration standards for the five-year transition period to ensure clarity about the eligibility requirements for registration during the transition.
281. Changes to both the provisional and general registration standards have been proposed to remove the 4+2 content from these documents at the end of the transition and grace periods. Ministerial Council approval is required for this change. If approved, the Board would continue to review the provisional and general registration standards as required, which would generally be at least every five years, including an assessment against the objectives and guiding principles in the National Law and the COAG principles for best practice regulation.