

Your Ref:

Our Ref: D2015/241689



FACULTY OF HEALTH SCIENCES

PROF ANNA CHUR-HANSEN, FAPS, FHERDSA
Head of School

School of Psychology
Level 4, Hughes Building
The University of Adelaide SA 5005
Australia

Telephone: +61 8 8313 5738
Facsimile: +61 8 8313 3770
Email: anna.churhansen@adelaide.edu.au
CRICOS Provider Number 00123M

30 September 2015

Professor Brin Grenyer
Chair
Psychology Board of Australia
psychconsultation@ahpra.gov.au

Dear Professor Grenyer,

Re: Submission regarding consultation paper “Ending the higher degree exemption from sitting the National Psychology Examination”

In response to the invitation from the Board to comment on the consultation paper, we provide this submission. We have made specific comments concerning questions 1 and 4 provided in the consultation paper.

1. *From your perspective, are you in support of the Board ending the exemption for provisional psychologists undertaking the higher degree pathway (i.e. Masters/DPsych) from sitting the National Psychology Examination?*

We do not support ending the exemption for provisional psychologists undertaking the higher degree pathway (i.e. Masters/DPsych) from sitting the National Psychology Examination. We are therefore in favour of Option one.

In our opinion, the concerns raised in the consultation paper regarding quality of programs will not be addressed adequately by requiring higher degree students to undertake the National Psychology Examination. These concerns would be addressed more adequately by strengthening requirements and processes of accreditation for higher degree programs.

4. *Do you have any other comments on the proposal?*

Our additional comments follow, with reference to the numbering of points in the consultation paper.

5. *“Whilst accreditation assures quality of programs, it is constrained in its ability to regulate or oversee individuals within those programs.”*

Accreditation standards set out what higher education providers must do to meet minimum standards, and those higher education providers do oversee individuals in their programs. Higher education providers who gain accreditation are trusted by the accrediting authority to the training of individuals according to the guidelines. If those providers cannot be trusted to do this, they should not be accredited. Concerns regarding quality of programs may be addressed by strengthening accreditation processes, rather than adding an additional layer of regulation in the form of a once-only national examination.

If accreditation is constrained in its ability to oversee individuals by virtue of a lack of direct contact with individuals, the same cannot be said of accredited higher education providers, who have regular and continuing contact with individuals undertaking professional training in Psychology. This regular and continuing contact includes ongoing assessment and assessment in a variety of forms, including exams, assignments, and observation of practice. It may be argued that reliance on a National Psychology Examination to regulate or oversee individuals is considerably more constrained than oversight by accredited higher education providers, as the exam provides oversight on one occasion with one form of assessment only.

7. The Board believes that it is particularly inequitable to have some Australian-trained provisional psychologists required to demonstrate competence through sitting the exam and others who do not. A single national standard met by all applicants is the fairest and most consistent approach.

46. The higher degree exemption from sitting the exam could be seen to discriminate against the groups who are required to sit the exam and those who are not required to sit. The Board believes that it is particularly inequitable to have some Australian-trained provisional psychologists required to demonstrate competence through sitting the exam and others who do not.

Provisional psychologists in higher degree programs are required to demonstrate competence by passing multiple forms of assessment. This is a more comprehensive assessment suite of assessment methods and occasions than assessment by a single exam and therefore could also be regarded as inequitable. Conversely it could be argued that all provisional psychologists should be required to undergo the costs and forms of assessment present in higher degree programs. The least restrictive option is the current arrangement.

Unlike the USA, we have a single national Board, a relatively small number of accredited programs and a strong accreditation system – in this context the need for a National exam for all registrants has not been demonstrated.

29. Recent reforms in the higher education sector are leading to greater differentiation between institutions in the types and format of their programs. Some universities and private educational providers are investing heavily in online and distance teaching, some are concentrating effort in smaller face-to-face classes of high quality, while others are focusing on postgraduate and research outcomes.

It is difficult to understand what this differentiation as described might mean for the central focus of the consultation paper. Is it being suggested that some of this differentiation is likely to lead to poorer training? If so, these issues should be elaborated. Given that all accredited postgraduate programs comply with stringent and comprehensive guidelines, significant diversity or divergence in quality between accredited programs may be best addressed by strengthening accreditation processes.

37. Accreditation does not however assure competence to practice as a registered psychologist for individual graduates from those programs. APAC's role is to accredit institutions and the Board's role is to register individuals – it is possible that an individual may pass an approved program of study but not be an appropriately qualified candidate for registration.

If individuals pass an approved program of study which has been accredited by APAC, then they are arguably appropriately qualified for registration, and are likely to pass a written exam, based on their knowledge of professional matters. It could also be argued that one could pass the national exam but not be appropriately qualified in terms of personal skills and qualities to practise as a psychologist. This issue is not resolved by imposing a national examination on potential registrants who have completed an accredited higher degree program. Alternative assessment approaches (e.g. OSCE's) should be adopted in order to address limitations in the assessment of psychology trainees.

37. *The National Psychology Examination is a competency-based assessment of the integration of knowledge and skills in psychology and passing the exam assists the Board in being confident of a person's ability to practise safely.*

The national examination is not the only possible form of competency-based assessment and does not involve assessment of practical skills. Other forms of competency-based assessment such as OSCEs could be promoted and required as part of accreditation guidelines.

48. *The Board recognises that close oversight by the Board of interns in the fifth and sixth year of a higher degree is less necessary in accredited (higher degree) verses [sic] unaccredited pathways (internship pathway) to registration.*

If the Board recognises this, why does it propose the imposition of an additional examination on graduates of higher degree programs? Surely the Board's concerns could be addressed by strengthening accreditation guidelines and processes.

65. *Increasingly, 'output' oriented competency-based training and regulation is replacing older 'input' defined curricula that had required the more passive incorporation and testing of defined knowledge. The approach and design of the National Psychology Examination reflects this trend towards competency-based certification.*

As noted, the national examination is not the only possible form of competency-based assessment. Other forms of competency-based assessment such as OSCEs could be promoted and required as part of accreditation guidelines.

Requiring applicants for general registration via the higher degree pathway to demonstrate competence though sitting a national psychology exam will ensure that education providers will include these competencies as part of their training because of the obligations they have towards their students and the accrediting authority.

The content of accreditation guidelines could include increased focus on competency-based assessment, and accredited providers would have to demonstrate this. In practice, conscientious higher education providers do take note of and include the competencies addressed by the national examination. Imposition of a national exam on graduates of accredited higher education programs is not the only method of motivating higher education providers to include competencies which are addressed in the national exam. These competencies may also be included in requirements for accreditation.

Transition Provisions

Basing transition provisions on an enrolment date (rather than a completion date) is safer and more equitable. All enrolled candidates are aware from the outset of what they will be required to do, and that they cannot avoid it (e.g. by hastening completion).

Basing the deadline on a completion date is unequitable in that some candidates are delayed by circumstances beyond their control. Basing the deadline on a completion date is also potentially counter-productive or even harmful. We are already identifying cases where candidates reject supervisors' advice to delay or defer completion (e.g. to take medical or maternity leave) because they wish to submit before the current exemption deadline.

Yours sincerely,



Professor Anna Chur-Hansen

Head of School

On behalf of staff involved in Masters Clinical, Health and Organisational & Human Factors programs