

30 September 2015

Response from the School of Psychological Sciences, Monash University to Consultation paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination

Three key arguments have been proposed by the Psychology Board of Australia (Board) for why psychology higher degree graduates should no longer be exempt from the National Psychology Examination (NPE). We will critically analyse these arguments and demonstrate why Monash University strongly supports **Option one: Status quo; continue with the existing higher degree exemption from sitting the national examination.**

We acknowledge the vital role of the Board in the setting of professional standards to ensure psychologists from all training pathways have the necessary skills and qualifications to provide effective and safe practice to the public. We accept the use of a national examination to ensure competence in circumstances where the training pathway is unaccredited (4+2, 5+1 internships), for psychologists who have qualified overseas, and for psychologists returning from a lengthy absence; although we have some concerns regarding the limited range of competencies that can be assessed through the NPE.

We do not support the need for psychologists from an accredited higher degree pathway to sit the National Psychology Examination (NPE), for the reasons outlined below.

Board's Argument 1. It is inequitable that one group of trainees should be exempt from the examination.

- The higher degree programs already require extensive assessment of competencies; for example, assessments completed by students of our Doctor of Psychology (DPsych) programs include multiple clinical placement reviews, Objective Structured Clinical Examinations (OSCEs), therapy videos, role plays, presentations, essays, weekly short answer assignments, take home examinations, and written examinations, as well as their 70,000-word research thesis marked by two examiners. Notably, OSCEs were introduced following distribution of the APAC draft guidelines in which it was stated that OSCEs were preferred methods of assessment. The comprehensive assessment of competencies required by APAC within higher degree clinical training programs is far more extensive than what is required within 4+2 and 5+1 programs.
- As stated in the Board's Guidelines for the NPE, *'The examination is designed to test applied knowledge appropriate for the fifth and, in particular, the sixth year of psychology training.'* This is exactly what higher degree programs are set up to do, in a far more comprehensive manner than a single 3.5 hour examination like the NPE.
- The Board does not, and we believe cannot, provide any evidence that a 3.5 hour one-off assessment is superior as a means of quality control to the comprehensive assessment process in a higher degree program, as outlined above. To suggest that it undermines the huge amount of time and effort invested by academic and professional staff in designing, implementing and marking valid and reliable assessments which meet APAC criteria.
- There is no evidence to support the use of the NPE as an effective means of quality control regardless. In fact, our experience over more than 15 years of delivering our DPsych

programs is that the ability to pass a 3.5-hour written and oral examination does not at all guarantee the ability to demonstrate the full range of skills and competencies required for clinical practice. Further, the Board states that it expects all higher degree graduates to be able to pass the exam, which essentially indicates that it is an unnecessary extra assessment costing time, stress, and money to already pressured postgraduate students.

- The Board's position implies that some higher degree programs are not producing competent trainees. This is not based on any evidence and entirely undermines the accreditation process of APAC, which exists to ensure the quality of accredited training programs.
- Given this exam does not add anything to quality control for trainees, it places an unnecessary financial burden on trainees. The Board may consider that a \$450 cost of sitting the examination is low compared to other health profession examinations and assures the profession the examination will be self-funding so as not to increase registration fees. However, it disregards the burden of this cost on students, who are already struggling to support themselves while undertaking postgraduate programs.
- The Board's view that removal of the higher degree exemption will provide more equity across Australian registered psychologists is entirely contradictory with their position of maintaining the exemption for New Zealand psychologists applying for registration given that higher degree trainees do not sit a national examination in New Zealand.

Board's Argument 2. Recent reforms of higher education have led to greater differentiation within the sector, meaning that we can no longer be sure of program outcomes.

- The Board's claim that removing the exception for higher degree students will allow universities to be creative in the way that they deliver their offerings again ignores the role that APAC has in constraining and guiding the running of higher degree programs.
- Significant consultation between APAC and a range of stakeholders including clinicians, various governing bodies and providers of higher-degree clinical training is ongoing with regard developing accreditation guidelines to assess competencies for psychology clinical trainees. Compliance with these guidelines is then comprehensively assessed by APAC to ensure competencies of clinical trainees are assessed using the best methods available. We believe this to be the best method to ensure high-quality postgraduate psychology training standards in Australia.
- Recent reforms in higher education that implement technologies and teaching approaches in line with adult learning principles are designed to enhance the development of competencies, not undermine them. There is no evidence to suggest such educational advances put program outcomes at risk, and the Board provides no such evidence.
- As the Board describes, a major reform in higher education is to evaluate programs using competency-based assessments and outcomes. As mentioned above, our DPpsych programs have introduced OSCEs, which has been a substantial investment of time, effort and money for our School. It appears that competency-based outcomes are strongly supported by the Board. Well-designed competency-based assessments such as OSCEs ensure that all higher degree students meet a full range of competencies across their programs. If the Board and APAC both support such assessment techniques as the best way to evaluate competencies, why does it then suggest that such reforms put program outcomes at risk?

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

- Once again, this argument ignores the strict and comprehensive criteria determined by APAC and the College competencies that all higher degree psychology programs must meet. These constrain the coursework content and hours, assessment methods, nature of clinical placements, and extent of research thesis, among many other things. Removing the exemption would have extremely limited impact on the way that higher degree programs are offered.

At its heart, the Board's position outlined in Consultation Paper 25 indicates a lack of faith in the current accreditation process in place for higher degree programs. This position is extremely disappointing given that the Board provides no evidence to support these claims. Now that the Board is well represented within APAC, we would suggest that before introducing a potentially superfluous examination process, it would be prudent to first establish whether there are in fact any major issues with assessment of competencies within higher degree training programs. If the Board does have concerns with the current accreditation process, it seems unlikely that these issues can be solved by imposing a single 3.5 hour examination on higher degree students. It is vital that further evidence is obtained regarding the effectiveness of accreditation processes in ensuring higher degree programs are producing competent trainees and that if required the accreditation process is systematically reviewed.

Yours sincerely,

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