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Professor Brin Grenyer
Chair, Psychology Board of Australia

Dear Professor Grenyer,

RE: Consultation paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination

We write on behalf of the School of Psychology, Flinders University, in relation to the proposal to end the higher degree exemption from sitting the National Psychology Examination. We are aware of a large number of submissions that already comprehensively articulate the reasons why the exemption should remain (e.g., submissions by Heads of Department and Schools of Psychology Association, by the Psychology Foundation) and that other bodies (e.g., the College of Clinical Psychologists) do not support the lifting of the exemption. **We similarly strongly support Option one – that is, to continue with the existing higher degree exemption from sitting the national psychology exam for another three years.** Indeed, we would strongly suggest that the exemption be made permanent as it is unlikely that anything will significantly change on the training or accreditation landscape to substantiate a national exam for psychologists trained at the postgraduate level, especially clinical psychology.

Our reasoning for retaining the status quo is as follows:

- 1. Current postgraduate training programs result in Masters/Doctorate graduates undertaking the highest level of training available in Australia to become registered psychologists.* There is already standardization of training in relation to APAC standards in terms of what students are taught and how they are assessed. This cannot be said for the other pathways, and certainly not for the 4+2 internship pathway, where there is far greater variability in content of training and less scrutiny. The Board has referred to the inequity of some sitting an exam and not others. What is truly 'inequitable' is for students who have undergone a more comprehensively regulated training program to undergo unnecessary and costly assessment. As our colleagues have highlighted elsewhere, it is additionally inequitable to exempt a clinical psychologist trained in New Zealand from sitting the exam, yet require Australian clinical psychologists to do so.
- 2. Competence and protecting the public.* We of course are strongly committed to training psychologists who are highly competent and the protection of clients is paramount. Despite the Board stating that "university training, even doctoral training, does not assure the minimum competence to pass an

examination for registration and to keep the public safe”, no evidence is provided to support how a 3.5 hour written exam guarantees competency. Indeed it is difficult to see how a one-off written examination is superior to the multiple competency based assessments that occur in current postgraduate training programs. Similarly, no evidence is presented that a single exam improves public safety or reduces risks – we would be most interested in documentation that shows the National Exam guarantees competence or lowers the risk of notifications of psychologists who have undertaken the exam. The typical postgraduate training program involves multiple tests, exams, competency-based assessment, and in clinical psychology, 3 clinical placements. Not only is this multiple assessment approach superior to a single exam, it means that students are comprehensively scrutinized by multiple professionals (clinical academics, multiple clinical supervisors etc.). When it comes to detecting concerns regarding competence or other important skills (e.g., ethical knowledge and behaviour), we would argue that current postgraduate training programs are much more likely to detect, address and improve these skills and qualities than a single exam (and other registration pathways).

While the Board presents figures on complaints and mandatory notifications for the profession, given these are reported on from 2011 onwards, there is no adequate mechanism for understanding how a national exam will directly impact on these rates, nor is there specific evidence that an exam will reduce current rates. The Board cites in the consultation paper that other countries have had an exam (e.g., Footnote 7 – USA since 1965) yet they do not indicate whether this meaningfully improves competency or reduces unethical or incompetent practice.

We do not share the Board’s confidence that a National exam will ensure all practitioners will meet a minimum professional standard. If the Board is serious about improving the quality and competence of psychology graduates, they should look to phasing out 4+2 internship pathways. We similarly do not share the optimism of the Board that the exam will be self-funding. As the consultation paper admits, there would be an increase in exam candidates; this is likely to result in increased administration, which unfortunately, always translates to increased costs.

3. *Concerns about accreditation processes.* The Board appears to have concerns about current accreditation processes and standards (“*While the Board acknowledges that accreditation is an important quality assurance mechanism for accredited programs, the introduction of the exam for the higher degree training pathway will address any issues about the comparability of programs and diversity of graduates that may emerge in the current evolving higher education landscape*”). Given that the Board is having an increasing role in the standards overseen by APAC and relevant APS Colleges, we would argue the Board is in an even stronger position than previously to regulate the profession. If the Board is truly concerned about accreditation standards, then it is the standards that need to be addressed, not the implementation of an examination on students undertaking the most rigorous path to registration. The Board also seems to be concerned that accreditation bodies are not able to regulate or oversee ‘individuals’ within a program. While that is true, that is why we have the Board, so that when there are concerns about the competency or fitness to practice of a provisional psychologists, the Board is there to ensure those concerns are dealt with.

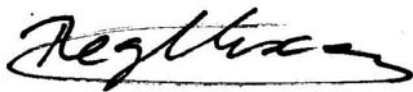
4. *The exam itself.* As detailed by others, the Board has failed to provide convincing evidence that the exam achieves what it is claimed to be capable of in relation to establishing competence. We note the Board states that all suitably prepared applicants are expected to pass the exam. Unless the Board believes that something has gone catastrophically wrong with existing postgraduate training in recent years, training which has been heavily scrutinized and assessed by APAC and APS Colleges for many years, then one would expect that this training remains as suitable preparation for graduates to become psychologists. The Board has certainly registered about 5 years’ worth of cohorts since it came into existence. Thus these graduates should be able to pass the exam. If they should be able to pass the exam with current training, why do they need to sit the exam at all? This is reinforced by the statement on p. 12 - *The exam assesses general competencies for registration that should reinforce already existing learning via the higher degree pathway. The National Psychology Examination is not designed to be tricky, or*

excessively onerous to prepare. Again, if the exam has no real ability to discriminate whether someone is able to practice psychology in a competent and ethical manner, and if current postgraduate training should be sufficient to pass the exam, the value of the exam is minimal. We would argue that evidence suggests that improved requirements regarding ongoing professional development post-graduation is a far better method of ensuring maintenance of standards, ethical knowledge etc. Indeed, it is clear from the current format of the exam, which does not require each curriculum component to be passed, just the overall exam to be passed, that an applicant could perform particularly poorly on the ethic component of the exam, yet still pass the overall exam.

5. *In a number of places the consultation paper refers to concerns that diversity in training programs is leading to an increased risk to the regulation of psychologists.* We find these statements perplexing and even contradictory to the fact that postgraduate programs must adhere to an accreditation framework, and there is core commonality across different specialties in relation to ethics. If anything, one could argue the content and structure of programs has become increasingly standardized. Again, no evidence has been provided to support the claim that this so called diversity and specialization is resulting in suboptimal competence or increased risks to the public.

6. *The Board should consult with students about the cost of studying to become a psychologist.* We believe they will hear directly from the students that \$450, for an unnecessary exam, after studying for between 6-8 years at university, is an extremely unwelcomed burden on becoming a registered health professional. It also lays the Board open to a damaging perception from trainees that the exam represents a cynical grab for cash.

In summary, while we applaud the Board in raising the standards of psychologists in Australia, we believe the focus at the postgraduate level is somewhat misplaced on this occasion. We would suggest that focusing on bringing up the standards of the lowest level pathways to registration is more appropriate. We have no objection to the National Exam being required for those who have been trained through those lower level pathways or where the type and level of training is unclear (e.g., those who have qualified overseas). If the Board is truly committed to raising the standards of psychological training in Australia, it would pursue vigorously ways to ensure that postgraduate level training becomes the only means to registration.



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