

The Australian Psychological Society Ltd

The Australian Psychological Society's submission on

Psychology Board of Australia's Exposure Draft: Guidelines on Area of Practice Endorsements

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Executive Summary

The Australian Psychological Society (APS) welcomes the opportunity provided by the Psychology Board of Australia (PBA) to provide comment on this Exposure Draft. The APS values the opportunity for constructive and progressive collaboration and is appreciative of the positive elements of this Draft, in particular efforts to provide detailed procedural guidelines which clarify how the Standard is to apply.

There are nonetheless major areas of concern, which mainly relate to the quality, standardisation and overlap of the proposed competencies. The Society questions the inclusion of these competencies within this Exposure Draft and strongly advises that these be further developed in a separate process set apart from these important Guidelines. Specifically, the APS urges that a more cautious and thorough consideration of the competencies is imperative and that a specific process of review and collaboration with the APS Colleges, APAC and education providers is needed to develop competencies which best support the profession for the future. As support for these concerns, the Society has included responses from some of its nine APS Colleges regarding both the Guidelines and the competencies which were included by the PBA in the Exposure Draft. It has also included a copy of the recently revised College Course Approval Guidelines (Nov 2010).

The Society seeks further clarity about various aspects of the Registrar program outlined in the Draft and provides comment about issues such as "use of titles" and the health sector-oriented focus of some of the terminology and standards. Finally, the APS seeks considered changes to the supervision arrangements and to the core competency aspects of the Guidelines.

Summary of Recommendations

Recommendation 1. That the recognition of the addition of the Health and Community areas of practice endorsement occur throughout the Guidelines.

Recommendation 2. That a careful review of the “use of title” section and particularly the “any other title” concept be conducted including an intention to attempt the retention of the right to “specialist” title for Western Australian psychologists beyond the transition period.

Recommendation 3. That a set of more precise criteria regarding “partial completion” of a thesis be drafted so as to ensure all situations can be clearly assessed and candidates are provided equal access to this provision.

Recommendation 4. That the CPD requirements for Registrars are reviewed and a clearer statement of the requirements be provided regarding the duration of psychological practice required and the basis of the 176 hours.

Recommendation 5. That measures be instituted to increase the opportunity for contiguity of processes following completion of coursework and placements and to reduce the potential for disadvantageous delays for candidates in the Registrar program.

Recommendation 6. That the notion of the assessment by supervisors of “core competencies” as the focus of the registrar program be abandoned as duplicative and unnecessary and be replaced by a supervision program based upon similar parameters as specified but relying on mentoring and supervision of individual cases with specific specialist skills and knowledge to be attained set out for each specialisation (practice endorsement competencies).

Recommendation 7. That the document is reviewed to ensure it better reflects the breadth of the profession and the full extent of the professional practice it encompasses.

Recommendation 8. That the difficulties experienced by registrants in accessing supervisors for the Registrar supervision program be acknowledged and that it prompts added measures to accommodate these difficulties.

Recommendation 9. That the examination process be subject to consultation with the profession and a trial period be implemented prior to any endorsement.

Recommendation 10. That practice endorsement competencies for the profession be made the focus of a separate paper and be based on collaborative work between APS, APAC, the education providers and the PBA.

Introduction

The Australian Psychological Society (APS) welcomes the additional detail and clarification provided in the Exposure Draft with regard to the complex but important area of practice endorsement. Some of the more useful aspects of the Guidelines are the attempts to clarify the meaning of terms such as "psychological practice", the explicit detail around "active continuing professional development" and the inclusion of reasonable transitional provisions with regard to Board approved supervisors.

Alongside these positive elements are a number of issues about which the Society holds deep concerns and the focus of this submission will mainly be on those issues. This focus should not take away from the positive aspects of the proposed Guidelines as a basis for clarification and constructive progress in the profession.

The APS is obviously delighted that the two areas of practice endorsement previously excluded by the Health Ministers Council – Health and Community – are now to be included and would welcome their incorporation into this document and their inclusion in discussions and collaborations with regard to the development of competencies.

Recommendation 1. That the recognition of the addition of the Health and Community areas of practice endorsement occur throughout the Guidelines.

1 **Use of Specialist Titles.** Section 1 limits the use of titles associated with areas of practice endorsement to those deemed to be eligible to use them, and in so doing attempts to include under its provisions "any other title that may lead the public to believe that the person holds such an endorsement". This is a very loose approach to prohibition which stands in marked contrast to that of the *Health Practitioner Regulation National Law Act 2009* regarding use of the term "psychologist". While that Act prohibits the use of the term "psychologist", it does not refer to any of the large range of related terms closely associated, or used in conjunction with, the term psychology. This omission was felt at the time to be not only unhelpful to the profession but clearly disadvantageous in limiting unqualified and unregistered practitioners from placing the public at risk. The essential concern with the approach adopted is that while wishing to support the embargo beyond the title, the APS fears that if its preciseness and soundness fails to achieve success should it be challenged legally, then professional titles remain only partially protected. Are there more precise processes including naming specific options that would achieve a sound outcome?

Also at the centre of the Society's concern is the highly subjective and loose basis on which this catchall principle is being applied. For example, it is not clear on what basis it could be determined that the public has been "led to believe"; who would make that judgment on behalf of the public?

The phrase "any work" with regard to the work that may be undertaken by registered psychologists might give the impression of unrestricted practice and may be better

substituted with “the work of a registered general psychologists” (See Page 4, paragraph 5, line 4.)

It is appropriate at this point to raise the issue of specialist registration and the use of specialist title about which both the Society and the Board share convictions. The retention of the right to the term specialist which has been retained during the transition phase for Western Australian psychologists should be retained beyond the transition phase and may provide a precedent basis for adoption in other States.

Recommendation 2. That a careful review of the “use of title” section and particularly the “any other title” concept be conducted including retention of the right to “specialist” title for Western Australian psychologists beyond the transition period.

2 Progression with Thesis. Section 3 deals in detail with the Registrar program and, in dealing with both doctoral and combined Masters/PhD candidates, it provides the opportunity for such students to apply for full registration and the Registrar supervision program while still completing a thesis. The stated criterion for such students to be eligible under this provision is "that the thesis has progressed sufficiently as to be equivalent to a Masters thesis". This is a vague criterion which would be quite hard to operationalise in practice, since the research work from which some doctoral theses are derived is not always structured and progressed in such a way as to make it possible to assess equivalence against the APAC Masters thesis requirements, which allow considerable diversity in the nature of the professional postgraduate Masters research requirements. In situations where the nature of the research program forming a doctoral thesis does not easily equate, there may well be an implicit injustice for the student, with serious consequences considering that some 12 months or more deferment of the right to apply could eventuate. It has been suggested by some of the APS Colleges that this could be operationalised by a set of tasks to be completed but with options that provide a sensible level of flexibility. The relevant APAC Standards relating to 5th and 6th year Masters research (5.3.12 and 5.3.13, June 2010) are instructive in this regard.

Recommendation 3. That a set of more precise criteria regarding “partial completion” of a thesis be drafted so as to ensure all situations can be clearly assessed and candidates are provided equal access to this provision.

3 Periods of Psychological Practice. Section 3.1.2 refers to the content of the Registrar program. Whereas Masters students are required to complete two years FTE of psychological practice, for the combined Masters/Ph.D. degree the requirement is 1.5 years FTE. First, this seems to be at variance with the note at the end of Section 2.1 which states that Masters/PhD programs will be treated as if Masters programs, and second implies that all extra PhD years include placements or practica as part of the additional requirements over and above the Masters 5th and 6th years. This is not always the case.

The stated Registrar program requirements in terms of hours for area of practice endorsement are not clear and should be redrafted to more explicitly spell out what the Board intends. Does it intend, for example, that in the case of a DPsych candidate completing one year full time that the candidate completes only 176 hours of direct client contact out of 1540 hours of practice?

Some of the Colleges raised the question as to why the CPD requirements in terms of hours per year for registrars were higher than for fully registered and endorsed psychologists. It appears anomalous that their hours should be greater when they are less able to fund access to active CPD, particularly when located in regional and rural settings. Both the reduction of the percentage of “active” CPD required and the removal of the obligation to seek supervisory approval is suggested. The latter may well limit the options for the Registrar in a way not experienced by full registrants.

Recommendation 4. That the CPD requirements for Registrars be reviewed and a clearer statement of the requirements be provided regarding the duration of psychological practice required and the basis of the 176 hours.

4 **Potential for Delays.** Section 3.1.2 details the requirements for the application procedures for the Registrar program. There seems to be considerable potential for delays in this sequence as set out in this section.. The following are the potential points at which significant delay could occur, and which will be largely outside the control of the aspiring Registrar:

- obtaining a transcript or letter from a higher education provider;
- gaining approval for general registration;
- achieving acceptance into a supervision setting (possibly employment);
- achieving agreement of an appropriate supervisor;
- Registrar application.

The potential for delay in each of these five stages could be discussed at length. Needless to say, the potential for a significant injustice (“justice delayed...etc”) for a graduate in achieving an area of practice endorsement is significant indeed and deserves careful consideration and review. Measures to allow for contiguity of the process are certainly needed. For instance, permission for graduates to lodge a general registration application within three months prior to the end of their coursework and placement requirements thereby only requiring the transcript to complete that process would be one possibility. Allowing candidates’ supervised experience program to commence from the date of the lodgement of their application for the Registrar program and only allowing revision if there are unsatisfactory elements in their application, might be another of a number of ways to reduce the potential for injustice.

Recommendation 5. That measures be instituted to increase the opportunity for contiguity of processes following completion of coursework and placements and to reduce the potential for disadvantageous delays for candidates in the Registrar program.

5 **Core Competencies.** Section 3.2 makes a sound and fair attempt at defining “psychological practice” in a broad and operationalisable way. The same cannot be said for Section 3.1.3 and the issue of core competencies. It is essential for all parties to be clear about the distinction between the “core competencies” identified in Section 3.1.3 and the specialist competencies elaborated in the areas of practice endorsements competencies and added as appendices. With regard to the core competencies, there are a number of reasons for concern. The first is the lack of a sufficiently clear definition of what constitutes a core

competency; the second is the considerable overlap between the components of these core competencies and the content of the original training course upon which the professional registration – particularly endorsed area of practice – is based.

Despite the significant problems inherent in attempting to apply the notion of "competency" to outputs in professional training in the tertiary/academic domain, the APS is committed to moving the profession toward the incorporation of true competency-based frameworks of assessment into professional training standards in Australia. The benchmark for the development of specialist practice competencies standards is likely to be the EuroPsy competencies, which, for mainly structural reasons, is the only influential international standard to which Australia can practically look. EuroPsy's competencies should provide the building blocks for the development of Australian specialist competencies, which should in turn build on the core capabilities set out for all postgraduate programs in the APAC Standards. The competencies set out in the Draft do not fit well with these existing frameworks.

Further, the competencies set out in the Exposure Draft include large overlaps between the specialisations. For these to serve a useful purpose as the basis for defining and assessing post-graduate training programs, these overlaps need resolution or the concept of specialisation is seriously weakened.

In addition, distinct from the specialist competencies, the notion of the assessment of "core competencies" as central to the Registrar program appears to be a transplant from the provisionally registered psychology supervision program without careful analysis, justification or reasoning. The rationale for this inclusion in the provisional psychologists program rests upon the need to mirror the goals and standards of training in the post-graduate professional training programs. It would appear to the APS that at least all of the core competencies specified in Section 3.1.2 are encompassed and examined by APAC-accredited Masters or Doctoral programs and would be the focus of assessment against proficiency benchmarks in the placements and practica already completed by applicants. Therefore, to specify assessment of core competencies - and the onerous paperwork and monitoring that it entails - is an unnecessary burden on the supervision program. The focus of supervision and paperwork should be a log of cases for which expert supervision was provided and which encompass the "competencies" for that specialty. This is not to suggest that supervision should not involve explicit assessment of proficiency in key areas of knowledge and skill, but that these areas or competencies must build on rather than repeat the core generic ones which are required to be in every APAC accredited postgraduate course.

It remains to be asked: why is the PBA requiring registrars to repeat what has already been covered, explored and assessed in a course of training that has been rigorously accredited and investigated?

Recommendation 6. That the notion of the assessment by supervisors of "core competencies" as the focus of the registrar program be abandoned as duplicative and unnecessary and be replaced by a supervision program based upon similar parameters as specified but relying on mentoring and supervision of individual cases with specific specialist skills and knowledge to be attained set out for each specialisation (practice endorsement competencies).

6 **Persistent Health Focus.** While much of what has been conveyed in this Exposure Draft is applicable to all areas of psychological practice there are points at which the clinical and health perspectives still dominate. In Section 3.2 under psychological practice, the terms "assessment, intervention and prevention" as the essence of direct client contact are an example of this. It may be helpful to include additional terms such as "management planning" and "consultation" so as to capture the work of psychologists operating in other sectors of the workforce. The Society is keenly aware that many of its members both do not, and do not perceive themselves as, working in the health sector.

Recommendation 7. That the document is reviewed to ensure it better reflects the breadth of the profession and the full extent of the professional practice it encompasses.

7 **Supervisors.** It was highlighted in Point 4 above that there are potential difficulties in various aspects of the Registrar program which are capable of producing unjust delays. It was briefly mentioned that one of these might be the access to an appropriate supervisor. The APS comments on Section 3.3 highlights the possible difficulties in finding an appropriate supervisor. While it is acknowledged that Section 4 provides for transitional provisions which will mitigate against some of these problems, it is still going to be very difficult in some specialist areas to access appropriate supervision. In some settings, the problem will appear in those areas of endorsement which have low numbers of psychologists; in most others it will be quite challenging in regional and remote situations. While the introduction of alternatives to face-to-face supervision will assist this, the fact remains that many highly qualified and experienced senior practitioners are declining to continue involvement in supervision partly as a result of past problems in dealing with registration boards. It may be that in combination with Point 5 above, some of the impositions applied to this Registrar supervision need to be reviewed. It is clear that the PBA needs to engage in a strong program of recruitment and promotion to persuade practitioners that the supervision process is not as unrewarding as many have recently found it to be.

Recommendation 8. That the difficulties experienced by registrants in accessing supervisors for the Registrar supervision program be acknowledged and that it prompts added measures to accommodate these difficulties.

8 **Examinations.** As pointed out by one APS College, although the APS encourages the continuing promotion of a highly skilled professional psychology workforce, it can foresee a number of potential issues which need to be addressed before a Registrar examination process can be effectively implemented. For example, many Registrars/clinicians may specialise within their registrar program (for example, a paediatric focus), and as such may struggle to complete an exam which covers the sort of broad curriculum generally associated with training programs, particularly given the potential five year lapse between graduating and completing the exam. As a result of this and many more potential issues that will come to light as the final proposal is developed, the APS requests a consultation period where the features and approach of any proposed examination program be put to the profession for opinion and recommendation. It may be of interest to note that another APS College is well advanced in the development of an examination and is approaching readiness to trial it.

Recommendation 9. That the examination process be subject to consultation with the profession and a trial period be implemented prior to any endorsement.

Areas of practice endorsement competencies

Although this issue has been touched on in a previous section of this Submission, the depth of concern expressed by the Colleges of the APS to the draft competencies signals a strong need for more time to carefully examine and consider the competencies needed, and so warrants a separate section of this Submission dedicated to it. As has been noted, there is considerable dissatisfaction with the quality of the identified competencies as experienced by the experts from the different Colleges. It must be acknowledged that the senior members of these APS Colleges are experienced and well informed. Their understanding and contribution to the standards of the profession must be accessed and utilised.

These are the issues to be considered:

- the quality of these competencies is extremely varied;
- there appears to be insufficient standardisation;
- their importance cannot be underestimated as creating a basis for defining areas of endorsement, expressing standards and influencing accreditation programs;
- the whole issue of competencies and how they are developed as a tool in the evaluation of professional education and registration needs careful consideration and review;

1 **The Quality of the Standards.** The PBA's inclusion of the Western Australian specialist "competencies", given they were developed and used for the purpose of specialist recognition by their Registration Board, is understandable. It is noted that they are arrayed in such a way that they could broadly fit with the structure of the core capabilities now in the APAC Standards. However, they have significant weaknesses, are confused and problematic. Many of the APS Colleges highlighted this in their analyses of the Draft. First, they are not in the internationally recognised form of professional competencies. Second, there are some distinct deficiencies in the areas covered by the document. The APS would welcome a much more developed competency framework (see Voudouris, 2010).

Previously in both PBA and APS documents there has been an acknowledgement of the high degree of common or generic knowledge and skill across the "specialised areas of practice". There is a failure in the Draft to acknowledge the high degree of commonality which exists across endorsed areas of practice, a failure that does not serve the public well, and has in the past created much unnecessary intra-professional rivalry. It should be acknowledged in a preamble that there is a high degree of generic knowledge and skill which crosses the boundaries of endorsement. As evidence of this, reference can be made to the generic competencies developed by APAC for all Masters and Doctoral professional postgraduate courses and approved by the PBA.

2 **Consistency.** There is a lack of consistency of detail across the specialties and much of this documentation involves circular reasoning inappropriate to the verbal precision

required, and is not about competencies, capabilities or output skills but seems to define the content of a course of training. The APS is not necessarily critical of that fact and would welcome that acknowledgement as an agreed basis for the PBA to collaborate with the accreditation authority (APAC) and the professional Society (APS) on a set of course content standards and competencies for endorsed areas of practice.

3 The Role of the Regulator, the Profession and Standards. It is commonly understood that the Regulator sets standards for the protection of the public and the profession should provide advice as to what constitutes high standards of education and training of psychologists. The APS Colleges have recently revised and updated their College Course Approval Guidelines, as part of the peer review system focusing on the adequacy of specialist training components of postgraduate professional courses, a process which has occurred over decades. Colleges of the APS are already engaged in an exercise to convert these Guidelines into sets of specialist competencies and would be pleased to consult with the PBA about the nature of the competencies to be developed and the process. The APS strongly urges the importance of retaining College input to the approval process for specialist components of post-graduate training pathways.

4 Progress of APS Colleges with Competency-based standards. The APS has been working with the Colleges to move from skills and knowledge standards to the competency-based processes referred to above. A number of the Colleges have made significant progress and have tabled first drafts. These are:

- Organisational
- Forensic
- Clinical

The other Colleges have been making significant progress and the APS will be assisting them in adopting the appropriate models and terminology.

The extent of the need for development beyond the Practice Endorsement Competencies attached as an appendix to the Guidelines (Exposure Draft) is very evident and each College has expressed concern that they do not reflect well the specialisations.

Concluding Statement on Competencies

A fundamental question that needs to be considered is why the practice endorsement competencies were included here. In a program designed to specify the processes and procedures for the Registrar program, the standards for the areas of endorsement seem out of place. This discussion and analysis needs to be the subject of a separate document and piece of work.

Recommendation 10. That practice endorsement competencies for the profession be made the focus of a separate paper and be based on collaborative work between APS, APAC, the education providers and the PBA.

References

Voudouris, N. (2010). Towards assessment of professional competence in Australian Psychology. *InPsych*, 32(6), Dec, p 24-26.

Appendix One

**College Course Approval Guidelines for
Postgraduate Specialist Courses
November 2010**

See Attached