



**Independent Review of Accreditation Systems  
within the National Registration and  
Accreditation Scheme for health professions**

**Submission to the Discussion Paper**

*Cover Sheet*

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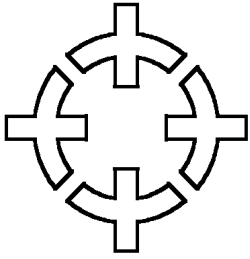
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# THE PSYCHOLOGY FOUNDATION OF AUSTRALIA

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The Psychology Foundation of Australia is a set of Schools of Psychology which advocates for and aim to deliver high quality training programmes in Psychology that provide students with a rigorous attention to the evidence base and its ongoing development, in addition to professional skills training. Psychology is unusual in having a distinct body of discipline knowledge that is applicable to a variety of professional and academic outcomes, not all of which are pertinent to the Health workforce, and for this reason has an accredited undergraduate programme prior to the separately accredited post-graduate training options. It is not possible to efficiently provide for all of these programmes in compressed sequences, unlike some other disciplines, and therefore we believe that distinct training and accreditation processes for different disciplines will continue to be required in the national registration framework.

We are, however, pleased to have this opportunity to comment on the current accreditation and registration practices as we believe the changes introduced subsequent to the national scheme have raised some important concerns that it would be desirable to alter. We do not have comments on all of the consultation issues and so will list responses against the specific issue number given in the Independent Review of Accreditation Systems within the National Registration and Accreditation Scheme for health professions Discussion paper.

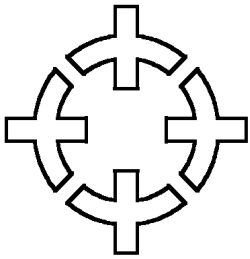
## Responses:

**Issue 1** *Benefits and cost of greater consistency and commonality in the development and application of accreditation standards*— as noted above we do believe that variation in the requirements will continue to be essential. Psychology students must train in the discipline first. It is a distinct body of knowledge, not accessible for most students prior to university, but essential to provide the knowledge base on normal psychological function on which professional practise is based. There are several different types of professional outcomes, some of which do not deal with individual people as the client, (e.g. Industrial and Organisational Psychology) and so accreditation requirements should sensibly vary. The most efficient way to accredit these programmes is also likely to vary. The current uniformity of requirements, even within Psychology, is a restriction that has seen many programme close in recent years.

**Issue 3** — perhaps a risk management approach could reduce costs. If a school significantly exceeds minimum standards in staffing, resourcing and rigour of training then a reduced schedule of visits or intensity of assessment could be warranted. However, there would still be a need to monitor currency of the curriculum.

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**Issue 7 Sources of accreditation authority income** - The implementation of the national accreditation system has dramatically increased the cost of accreditation to course providers. Psychology schools offering multiple accredited routes to distinct professional outcomes are now often charged between \$65,000 and \$100,000. This is separate from the considerable expenditure associated with staff time in preparing the complex submissions. Prior to the advent of the national scheme, accreditation was equally rigorous but the charge was a factor of 10 less than the current amount. This is an enormous impost on schools, who are all suffering under restricted budgets, and can lead to cancellation of training programmes contrary to increasing workforce needs.

It is not reasonable to transfer this impost to students, whose own support has been dramatically reduced in recent times in parallel with rapidly rising costs of study. This is particularly true in areas of Health where salaries are quite low and the long-term impact of student debt is a major disincentive to entering such programmes. There needs to be an overall reduction in compliance costs from current levels for both schools and students, however they are funded.

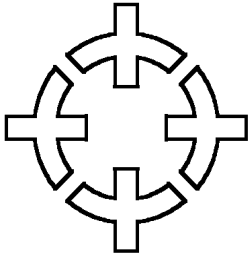
## **Issues 8 and 9 Input and outcome based accreditation standards**

i – a student entering an accredited course (at great expense) is making a life-time career choice and needs to know that successful completion of that course leads to registration. This certainty cannot be provided by a single examination at the end of the programme. The diverse and tailored assessments in an accredited programme are designed to best assess the differing aspects of the content. This intensive and nuanced evaluation of skill acquisition is spread over considerable time and requires demonstration of a wide variety of academic and professional workplace skills. That extensive assessment cannot be adequately replaced a single exam. This is especially true where placements are part of the accreditation sequence.

ii **Issues 8, 9 and also 7, 34 Input and outcome based accreditation standards, Sources of accreditation authority income, Assessment of overseas Health practitioners** – accredited programmes should be equivalent in meeting acceptable standards and breadth of coverage of required material and therefore they should all lead to registration for applicants who successfully complete the programme. That should not be affected by the country in which the accredited course is completed. If the course was accredited by the Australian accreditation agency as acceptable for registration then those students should be eligible to register with no additional charges or requirements relative to Australian-based students. If standards can't be guaranteed the offshore course shouldn't be accredited.

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iii – the current accreditation system is prohibitively restrictive. This reduces the ability for producers of courses to innovate, restricts the ability of those with requisite skills (but no professional requirement to register) to contribute to the training (as is often the case with academics teaching in the accredited programmes) and has come at a dramatically increased costs. For example, the accreditation standard for field supervisors in Psychology has become increasingly prescriptive and onerous resulting in many outstanding supervisors dropping out of the system. Education providers running programmes in which they oversee all of the supervised placements, should be given the authority to determine the suitability of those placements and the associated field supervisors. Justification of their choices may be required during accreditation visits but added flexibility would allow more programmes to be viable.

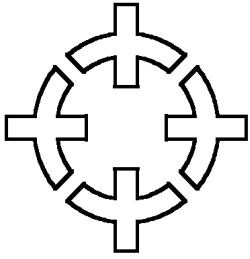
In programmes with an external internship following study at university it is reasonable for the registration body to ensure an adequate standard through supervisor registration as university schools are not ensuring the quality in those cases.

**Issue 18 National Examinations** – The Psychology Foundation member schools have many decades of involvement in the delivery of evidenced-based training in Psychology and are strongly in favour of rigorous accreditation of those training programmes, although the requirements should be sufficiently flexible to allow innovation in, and diversity of, programmes. The Foundation does not support the requirement for students who have successfully completed 6 or more years of academic training in accredited programmes to be further examined using a National Psychology examination. There are two major reasons for this position. First, the graduates have already been rigorously examined to ensure their adequacy for exactly the same role and second, a single, largely multiple choice examination, is an inferior form of assessment in comparison to the many and varied assessments they will have already completed. It therefore represents a further delay and financial impost without any useful purpose in reliably evaluating the competence of the successful course graduates for their intended roles. The requirement should be scrapped (not deferred) for those students who have completed 6 year university-based Masters and 6+ year DPsych and MPsych/PhD programmes.

In some shorter programmes where important aspects of performance are left to an internship training, unsupervised by course providers, there is a need for additional assessment to ensure competence. It is our view that that these pathways are undesirable and accreditation is the preferred option. A single form of examination is still unlikely to be an adequate alternative.

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Substitution of an exam for course accreditation requires students to take an unreasonable gamble that a sequence of study which may extend over 6 -9 years, depending on the programme, in which they pass all components will be deemed acceptable by an independent body for subsequent registration. There should be certainty in this. Good progress should not leave a successful student with a large debt and no ability to practise. Accreditation gives much more certainty and makes it clear that only acceptable performance will be adequate.

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