Submission to:

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

From: The Heads of Department and Schools of Psychology Association (HODSPA)

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Psychology is a regulated profession. The accreditation system is designed to support the registration board, the Psychology Board of Australia (PsyBA), which sits within Australian Health Practitioners Regulatory Agency (AHPRA). Registration is designed with several factors in mind, the most important being the protection of the public.

When the PsyBA was first established, accreditation was carried out by a board belonging to the Australian Psychological Society (APS). Given the need to establish policy and processes within a short space of time, the PsyBA contracted the APS to run the accreditation system, which became known as the Australian Psychology Accreditation Council (APAC).

When the first contract came to an end, the PsyBA was concerned that it, as a government body, was contracting a professional association, the APS, to run accreditation. Discussions then took place between the PsyBA, the APS, and the Heads of Department and Schools of Psychology Association (HODSPA), which represented the providers. It was agreed that the three bodies would set up a new organization, still called APAC, which would report to a Board that included four members from each of the PsyBA, APS, and HODSPA.

Recently, APAC has released a draft of a new set of accreditation guidelines. These guidelines highlight some of the tensions that exist within an accreditation system and we will focus on the new draft guidelines where possible. Importantly, the new guidelines were written to emphasize outputs over inputs, as suggested by the Discussion Paper¹.

Currently, there are three basic routes to registration in Psychology. These are tabulated below.

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<tr>
<th>Masters 6 years</th>
<th>Masters 5+1 years</th>
<th>Workplace 4+2 years</th>
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Figure 1: The training sequences for Psychology Registration. There is also doctoral training, which is typically combined with the ‘specialist’ 6 year Masters.

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The 6 year Masters training involves a 3-year Pass degree, followed by a one year Honours degree, then a 2-year Masters program. A graduate is able to apply for registration as a ‘generalist’ psychologist upon graduation, but can also enter a registrar’s program and gain a ‘specialist’ qualification, such as ‘clinical’, or ‘organizational’. There are currently nine such specialisations.

The second more recent route requires a 3-year Pass degree, a one year Honours degree, a one year Masters degree, followed by a one year internship. Upon completion of the program, the graduate is able to register as a ‘generalist’ psychologist.

The final route is known as the 4+2 pathway. It comprises a 3-year Pass degree, a one year Honours program, followed by a two-year internship program that has to be approved and managed by the PsyBA. At one time, this was the way most psychologists were trained. However, it is in decline as shown in Figure 2. Further, it falls well short of current international standards and all three bodies agree it should be phased out. It creates significant problems for accreditation as we will see below.

Note that at this point, only people completing the 5+1 and 4+2 routes are required to complete the National Psychology Examination (see 6. below).

**Figure 2:** Number of provisional registrants in Psychology associated with different modes of training, across years. (Note the overall numbers were 4,494 in 2008 and 4,364 in 2016. This shows that as the numbers in the 4+2 have declined, they have been replaced by those in Masters/Doctoral programs. The shift from 4+2 to Masters/Doctoral training also reflects a shift from training ‘generalist’ psychologists to ‘specialist’, most notably clinical psychologists.)
1. **What is the practical impact of professional accreditation on institutions?**

Accreditation is expensive and time-consuming. This is the most frequent complaint from our members. Some members of HODSPA indicate that it costs some $150,000 to go through the process of accreditation, not including staff time. Further, accreditation in Australia is more expensive than, for example, the United Kingdom. Thus, Snowball (2014)\(^2\) estimated that the costs of accreditation in Psychology in Australia were 16% compared to the UK, where it was 6%.

Currently, there are some 23,538 Equivalent Full Time Student Load (EFTSL\(^3\)) in Pass degrees in Psychology, 2,250 EFTSL in Honours, 1,632 EFTSL in research degree programs, and 2,318 EFTSL in professional programs. Accreditation/registration is designed to protect the public. Enrolments in professional programs, which lead to full registration, represent less than 8% of the load in Psychology. We will discuss the issue of the accreditation of the undergraduate program below.

To put this in context, if there are 40 institutions offering accredited programs, then there are eight institutions being accredited each year, on average. If each of these accreditations costs $150k, this is a total cost to institutions of at least $1,200,000 a year. The intake into the professional programs is approximately 1,100 students per year (2318/2=1159). Thus, each of these students has cost approximately $1,000 in accreditation alone when they enter their program.

2. **Are there advantages and/or disadvantages to professional accreditation processes as they are currently managed? What are they?**

There are significant advantages to accreditation in psychology. Some of these are set out in Appendix 1. Importantly, an institution that did not offer an accredited program would have few students. Hence, in order to ‘compete’, institutions seek accreditation. This is true at both the undergraduate level and the postgraduate level. Indeed, it has been suggested that if you do not have an accredited professional postgraduate program this could mean a reduction in your undergraduate numbers of between 30-50%.


\(^3\) An EFTSL refers the load taken by a full-time student across one year. This is the metric that the Federal Government employs to fund universities.
Accreditation also ensures some comparability across institutions. This makes it easier for students to move between institutions and to get credit for the work that they have already done.

In contrast, while this may be the case with undergraduate programs, the APAC guidelines make transfer between institutions very difficult at the postgraduate level, even requiring that some placements be repeated, which is absurd. There are three placements in each ‘specialist’ Masters program. These are difficult to obtain and the requirements placed on supervisors can be quite onerous. There is also a move to require institutions to pay for outside placements, especially within the State Health systems, e.g., Victoria. Paradoxically, this would mean the Federal Government paying Universities to pay State Health authorities to train the next generation of workers in the State Health authorities. HODSPA is working with Universities Australia to draw this incongruity to the attention of the Federal Government.

3. Are there trends emerging in professional accreditation that you are aware of and are the bodies you are associated with adopting them? What new approaches are emerging?

As noted previously, the new draft guidelines focus upon outputs rather than inputs. However, it is interesting to note that many institutions favour the maintenance of inputs such as student: staff ratios. This, despite the fact the current ratios required of professional programs almost certainly mean that it is impossible to run such programs at current funding levels (see 4. below).

At this stage, it is difficult to tell whether the move to outputs will be an improvement or not. Many institutions have experience of over-zealous assessors, employing the current guidelines. For example, we have an example where a none self-accrediting institution had a program approved by TEQSA at a particular level in the Australian Qualifications Framework (AQF), only to have that judgment challenged by APAC assessors. Similarly, two large self-accrediting institutions were told that the presence of students doing a non-accredited degree in the same class as students doing an accredited degree, meant that the program must be at a lower AQF level than that approved by the institutions. In the latter cases, one program was shut as a result. Thus, an opportunity to spread the costs of training was lost. We doubt that the Australian Medical Association would de-register a program because biology students were sitting in the same class as medical students doing biochemistry. Importantly, this also closes off routes to the inter-professional training that the review document highlights as important in the future.

The version of the new draft guidelines that we have seen is quite vague and thus we may expect even more variability in assessments, unless this is attended to very carefully and assessors are trained properly.
We do believe that the new accreditation guidelines will be an improvement on the old ones. However, we have not seen the version that has been submitted by APAC to the PsyBA and when we requested a copy, our request was refused.

4. Does accreditation make innovation in course design more difficult, or does it encourage innovation?

It does both. Some institutions ‘use’ the guidelines to avoid certain activities. For example, they claim a sharp distinction between the ‘scientist’, which is the focus of the undergraduate program, and the ‘practitioner’, which is the focus of the postgraduate program. The current accreditation guidelines do not make such a clear-cut distinction, nor do the new draft guidelines. Importantly, many institutions now include ‘pre-professional’ skills training and internships that enable undergraduate students to understand how the skills acquired during their degree fit them for work in a variety of areas that they may not have considered. Likewise, while the accreditation boards in their various guises took a while to embrace the existence of the online learning environment, many institutions have forged ahead, delivering programs online, up to and including Honours.

However, they do have a significant impact at the postgraduate level. There are restrictions on content, firm student: staff ratios, and supervisory requirements that are extremely onerous. This will change somewhat under the new guidelines. Significantly, there is space for employing simulation and e-therapy in the training regime.

However, it is now almost impossible for an institution to run an accredited program off-shore. Previously, a supervisor needed to be registered in the country they resided in. Now they have to be registered with the PsyBA. This change has seen a prestigious program run between two highly ranked universities closed down. We all know that international collaboration is a significant plus, but it is becoming much harder for members of HODSPA to do this at the professional postgraduate level.

Importantly, the current funding of postgraduate programs through the Commonwealth Grants Scheme, does not cover the costs of professional training and this results from the APAC requirements. For example, we do not understand why people teaching on an accredited Masters program need to be registered themselves. This is not the case with Medicine, but it increases costs and places a significant burden on the small number of staff who are registered. Almost all programs that rely on CGS funding rely on subsidies from elsewhere in the Dept./School, or the institution, to meet the current APAC requirements. Given that almost all ‘specialist’ professional programs at the Masters level are CGS supported, or a hybrid of CGS and full-fee paying, professional training in psychology is a ‘loss leader’. A more flexible approach to aspects of accreditation would ease this burden.
5. **How do international professional recognition requirements impact on course design in your discipline(s)?** Do these requirements mesh easily with internal academic quality assurance, the HESF and the TEQSA process? What, if any, are the problems?

The current APAC guidelines specify that an institution must meet the requirements of TEQSA. The specific guidelines required for accreditation of the various psychology programs then build on this. Where the guidelines differ from those of TEQSA, the APAC guidelines are to be adhered to. In practice, this means that the APAC guidelines are tougher than those of TEQSA. The current guidelines fit reasonably well with the TEQSA requirements, but it remains to be seen how much overlap there is between the new draft guidelines and those of TEQSA. We are concerned that while there is a shift from inputs to outputs, the APAC working party has not come to grips with how to measure outputs. They have suggested that at the undergraduate level, the use of benchmarking and external advisory committees can fulfil this role. We doubt this and have suggested that the use of external examiners might be considered, along the lines of those employed in the United Kingdom.

We are not aware of any professional programs in psychology that are subject to international accreditation. The United States and the United Kingdom both require qualifications at the Doctoral level for registration as a clinical psychologist, which means that training in these jurisdictions takes longer than in Australia. However, we do note a hardening of the attitude towards students who are undertaking an Australian accredited program overseas. PsyBA has now said that an undergraduate program can be accredited by APAC, but its students will not be able to apply directly for provisional registration in Australia. Given the contribution that education, particularly tertiary education, makes to export earnings in Australia, this seems short-sighted at best.

6. **The National Psychology Examination (NPE)**

Recently, the Psychology Board of Australia (PsyBA) put out a paper supporting a requirement that students graduating from specialist Masters programs should be required to complete the National Psychology Examination (NPE). The paper was based upon notions of equity, differentiation of programs following changes in the higher education sector, and providing new opportunities for training. We dealt with

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4 Consultation paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination. Psychology Board of Australia.
these in our submission to the PsyBA. The requirement that specialist Masters students take the NPE was deferred. Here we look at the claims for the NPE.

Perhaps the most disheartening aspect of the document was the claims made for the NPE. Reading the document makes it clear that the Board believes it to be a perfect predictor of performance. To quote the paper “it is possible that an individual may pass an approved program of study but not be an appropriately qualified candidate for registration. 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.” And, “The Board is of the view that the Introduction of the National Psychology Examination would assist in ensuring that entry level psychologists have demonstrated to the Board the minimum professional standard to keep the public safe.” And “…to provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered.”

If we unpack these statements, they suggest that a 31/2 hour examination is a better predictor of performance than all of the different forms of experience and assessment that a candidate has been subject to during their university program. Further, if people can emerge from a program that has been the subject of university/TEQSA/APAC accreditation, but supposedly not qualified to practice, what does this say about the value of accreditation? Finally, what does it say about all of those professionals around the country who design assessments with practice in mind.? Clearly, they are wasting their time. The Board knows best.

Importantly, the Board can make these claims for the NPE, but they provide no evidence to support them. There is no evidence to demonstrate predictive validity and any claims for face validity would not stand up compared to those that could be put forward for the professional psychology programs run by universities.

Perhaps the silliest feature of the paper is to be found on page 4 and we quote “At this stage, the Board anticipates a minimal impact on practitioners from the proposal and expects all suitably qualified candidates for registration to be able to pass the exam.” The meaning of this statement is somewhat ambiguous, but let us assume that it means that everyone exiting from a 6-year program should pass the exam. If this is the case, then why should these students be subject to the exam in the first place? We note that only one out of 50 (5+1) candidates has failed the exam at the first sitting. The Board seems to have forgotten that there is a role for chance in any assessment process. The Board produced a paper in April 2015, which notes that some 247 candidates sat the examination in 2014. This will increase significantly if the exemption is removed. Let us assume that now some 1,000 candidates will sit the examination. It is likely that one or two of these candidates will fail by
The Board argued that there is minimal cost associated with the exam, namely $450 per sitting to be borne by the candidate. However, if the examination does not add value to the registration process and we contend that it does not, then any cost is too high. In fact, if all 6-year prospective registrants are required to take the NPE, then income from the examination will rise significantly. In the Board’s April 2015 Newsletter, some 247 candidates have sat for the examination in 2014, which equates to $111,500. We would anticipate some 1000+ graduates from the various 6-year (and Doctoral) programs being required to sit the NPE, which would mean an additional $450,000.

In sum, we believe that the NPE in its present form, should only be used to assess overseas candidates. When the 4+2 is retired, we would argue that no domestic student should be subject to the examination. 5+1 students also complete a Masters degree that includes significant and varied forms of experience and assessment. Likewise, it should be possible to agree on a set of criteria relating to the +1 internship, so that the PsyBA can remove itself from the ‘training’ regime altogether and leave it to the members of HODSPA to provide professional training in psychology.

7. What could be done to streamline the various regulatory, quality assurance and professional accreditation processes to reduce the burden on institutions?

The Psychology Board of Australia takes the view that all 3-year undergraduate programs leading to Psychology Honours degrees need to be accredited, as well as Honours degrees themselves, and professional Masters and Doctorate degrees.

At this stage, we agree that the undergraduate program should be accredited. If it were not, then students pursuing the 4+2 pathway would not undertake any accredited program prior to entering the +2 internship program. Thus, we understand the need to accredit the undergraduate program while the 4+2 pathway exists. The problem arises because APAC and its assessors examine the undergraduate program with the same zeal that they approach the professional postgraduate programs, indeed probably more so. After all, if there are many more students in the undergraduate program, surely it must be subject to greater scrutiny? chance, not because they are likely to be incompetent practitioners. This will call into question their perfectly adequate training and impact their own confidence in their ability. Thus, there must be strong reasons for removing the exemption and the Board failed to provide these.

6 If the examination can be run sustainably with some 250 applicants, it should be possible to make significant savings with an additional 1,000+ applicants.

7 We should point out that a number of our members would argue that the undergraduate program should not be the subject of accreditation.
This is silly. These programs do not lead to registration and should be subject to a much lighter touch. The accreditation process, by virtue of scrutinizing programs that are separate from professional pathways, is unnecessarily burdensome and expensive. Charges are levied by program, but detailed accreditation information is required at the course and major level, and requires substantial redundant information that is of little relevance to the acquisition of professional competencies that are indicated by accreditation standards (for example, the listing of academic papers published by staff, regardless of their quality or relevance, the library holdings in Psychology etc.)

Our colleagues have suggested some other ways in which the burden could be reduced, as set out in Appendix 1.

HODSPA has only recently begun to assert itself in this space. This has led to robust discussions with our colleagues, the PsyBA, APAC, and the APS, as is evidenced above. However, we are working together with these groups on extensive workplace reform. Thus, we have agreed that the 4+2 route falls well short of international standards, as noted above. We have also agreed that growth in numbers in the 5+1 program should provide the route by which 4+2 aspirants can gain ‘generalist’ registration. At the same time, we are looking at ways in which people who were trained through the 4+2 pathway might acquire a ‘specialty’.

We understand that the 4+2 pathway presents the PsyBA with a problem. Because they have to approve the +2 internships, they have moved beyond their role as a registration board into ‘training’. The demise of the 4+2 will sharpen the distinction between the PsyBA, APAC, and HODSPA. Thus, we believe that re-working the status quo to ensure that each of the parties, HODSPA, APAC, and the PsyBA understands its role in the system, namely ‘training’, ‘accreditation’, and ‘registration’ is the best outcome of the current review.
Appendix 1: The positives and negatives of accreditation

(This reflects the views of HODSPA members re the best and worst of accreditation)

Positives

Examination of the positives suggested that they could be grouped into six categories as listed below:

- Staff: student ratio – most respondents highlighted the value of having a staff: student ratio requirement. Many pointed to the fact that this had helped them in arguments with their central administration about staffing levels.
- Resourcing – this covers everything from space, test library holdings, levels of staffing, and research support, e.g., for Honours students. Almost all respondents highlighted an example where an accreditation visit had helped them access a resource that they had previously been denied.
- Consistency and quality – respondents noted the value of an external process in ensuring quality. They also noted that the standards meant that no institution could ‘game’ the system by providing an accredited program on the cheap. They valued the external rigorous process that underpinned accreditation.
- Emphasizing the discipline of Psychology – a number of respondents noted that the accreditation process ensured the continued existence of psychology as a separate self-managing entity in some institutions.
- Benchmarking – respondents valued the opportunity provided to bench-mark their offerings against the external accreditation process. It allowed them access to innovative ideas about program delivery and to identify areas that needed improvement. Most (but not all) noted that the accreditation process was more rigorous than their internal processes.
- Students – Respondents noted that students valued the fact that programs were accredited. Accreditation ensured that the program they completed was equivalent to other psychology programs. It assured the public that programs in psychology were rigorous. Importantly, it allowed students easier movement between institutions because the latter could be assured of the standard of the program that the student had completed.

Negatives

- Cost – This was highlighted by a number of respondents. They also noted ways in which the process was needlessly cumbersome, the removal of which would save money. These included:
  - Using previous accreditation documentation and only asking for what had changed.
  - Not requiring every undergraduate program to be separately accredited when they all contained the same approved sequence.
  - Ensuring that the documentation requested was consistent with TEQSA requirements.
  - Avoiding duplication of material that has already been provided.
  - Only asking for what the panel will read.
- Remove focus on undergraduate training when the vast majority of undergraduates will not become practicing professionals.

- Consistency and professionalism – a number of respondents noted that the panels went beyond the written standards and engaged in conversations that were outside of their remit. These included:
  - Standards are unclear, leading to anxiety about whether an AOU is meeting them
  - Arguing about the AQF level of a program that TEQSA had approved at that level. This was also the case for two self-accrediting institutions.
  - Requesting additional documentation that was not used.
  - Asking for a position that is not set out in the standards.
  - Not all Heads are convinced that the standards are applied consistently. They are dubious about some programs at other institutions.
  - Stating that something meets the standards in one context, but saying that it does not in another.
  - Ignoring the processes of natural justice when dealing with student comments.
  - Incorrect material on the APAC web-site.

- Standards are unduly restrictive – Respondents noted how long it seems to take to change the standards, viz. the current imbroglio:
  - This means that institutions are unable to be creative and innovative in their offerings.
  - Concern about the one-size-fits-all model of professional training. The new supervision requirements will see the demise of some of the other specialties, including the second most popular, namely organizational.
  - They help maintain an old-fashioned approach to education and training rather than helping forge new innovative approaches.
  - Requiring separate lectures on topics that are better integrated,
  - Discourages inter-disciplinary and cross-institutional training.
  - Process seen as punitive rather than collegial.
  - Bench-marking, but at the lowest common denominator.
  - Requiring that academics who teach be registered, which is not the case in other disciplines ranging from engineering to medicine. This particularly problematic for research-intensive universities.
  - Standards are leading to closure of programs at a time when there is increased demand.
  - The standards have little to do with public safety, particularly at the undergraduate level.