Heads of Departments and Schools of Psychology Association (HODSPA)

Submission on behalf of HODSPA to the Australian Psychology Accreditation Council (APAC) in response to the Draft Accreditation Standards for Programs of Study in Psychology released in September 2012.

HODSPA welcomes the opportunity to contribute to the proposed revision of the accreditation standards. The membership of HODSPA consists of the Heads of the Departments and Schools of Psychology that currently offer accredited programs in Psychology at both undergraduate and postgraduate levels. As well as including all such University-based programs, the membership also includes all non-University-based programs. HODSPA therefore represents all relevant education providers in Australia.

The present submission enumerates the principal concerns expressed by the members of HODSPA in response to the draft standards. It complements but does not replace any submissions made by individual members on behalf of their respective Departments and Schools of Psychology.

HODSPA agrees that it is timely that the accreditation standards be reviewed in the light of the advent of the National Law that places the registration and regulation of professional psychologists under the Australian Health Practitioner Agency (AHPRA). As education providers, the members of HODSPA are concerned that the accreditation standards be so designed that they can be effectively and practically integrated into the goals of a tertiary education as implemented in Australian Universities now and into the future.

General remarks

The draft accreditation guidelines are complex with multiple pathways available for both general registration and preparation for endorsement in one (or more) areas of practice. It would appear that these exist primarily for historical reasons and little attempt has been made, in the present revised standards, to provide a justification for this state of affairs or to propose an alternative. In the view of HODSPA, the accreditation standards should articulate and implement the following four goals:

1. **Consistency.** A registered psychologist in Australia must be assumed to possess the same set of specifiable and examinable competencies.

2. **Competence.** Pathways of training should be designed to produce professionals with the highest levels of competence and range of skills.

3. **Capacity.** Training programs should deliver an appropriate number of trained professionals to meet workforce demands.

4. **Cost-effectiveness.** Training programs should be constructed to be cost-effective and to allow education providers to balance professional training against other academic goals.

It is apparent that while the present draft standards pay considerable attention to specifying a set of competencies, relatively less attention has been paid to the questions of consistency, capacity and cost-effectiveness. As a result, it is arguable that they fail to maximise any of the above goals. HODSPA recommends that, in the process of revising and
discussing the present draft standards, APAC should work closely with HODSPA to effectively integrate the goals of professional training with the requirements of education providers in Australia.

Specific remarks

In the following sections, issues of particular concern to HODSPA are discussed. No specific comment is made with respect to content with which HODSPA is in general agreement.

Domain 1 Education Provider Standards

1.4.2 The student:academic staff ratio calculated across all Programs of Study using the specified APAC calculation method is never greater than 22:1.

HODSPA welcomes the specification of a maximum student:staff ratio. The value of 22:1 appears to have been based (perhaps) on historical factors. There is a real question as to the appropriate student:staff ratio to mount effective undergraduate and postgraduate programs in the light of the progressive decrease in funding to Psychology programs. In lieu of any likely prospect of increased funding, a stipulated maximum student:staff ratio is central to the effective provision of training in the context of building and maintaining active and productive research of the highest international standards. HODSPA therefore proposes that a mechanism be developed to determine a maximum ratio that is relevant to all education providers. Alternatively, rather than mandating a fixed number, the standards may also incorporate the possibility that the relevant maximum may change over time as determined by an agreed mechanism.

1.7.1 All Programs of Study offered:
   (i) teach psychology as a science-based discipline drawing on an evidence-based approach;
   (ii) are based on the Scientist-Practitioner model;
   (iii) employ approaches to teaching and learning which are informed by the most recent relevant published evidence, and
   (iv) support all elements of the Program with up-to-date publications

HODSPA wishes to affirm its commitment to the philosophy expressed in Section 1.7.1.

Domain 2 Standards for Programs of Study at AQF Level 7

2.1.2 The stated learning outcomes of the Program of Study:
   (i) are derived from each of the Graduate Attributes listed in Appendix A;
   (ii) include the achievement of a high level of psychological literacy;
   (iii) include acquiring of foundational knowledge and skills in interviewing;
   (iv) include acquiring foundational knowledge and skills in basic counselling, and
   (v) include acquiring knowledge of the guiding principles of the current version of the National Practice Standards for the Mental Health Workforce (2002, Commonwealth Department of Health and Ageing).

HODSPA has a number of serious concerns in relation to Section 2.1.2.

   (i) Graduate Attributes
The Graduate Attributes specify the expected knowledge and skills of a student who has graduated from a 3-year undergraduate degree majoring in Psychology. The aim of this training is to provide the student with a solid grounding in the content and methods of the discipline of Psychology. These, in turn, equip the student with the knowledge and skills to work in a variety of different occupations and to embark on a number of further educational pathways. Professional training in Psychology is only one such pathway. While HODSPA agrees that undergraduate training in the discipline of Psychology at AQF Level 7 is a necessary precursor to professional training at the postgraduate level, it is not of the view that professional training should form a necessary part of undergraduate training in the discipline of Psychology.

For this reason, HODSPA takes issue with the following elements of the Graduate Attributes (Appendix A).

Graduate Attribute 1: Discipline knowledge and its application
The discipline topics listed in Sections A1.1 and A1.2 are arbitrary, overly prescriptive, and lacking in justification. While it is appropriate that, in so far as an undergraduate major in Psychology serves as a prerequisite for postgraduate professional training, it is necessary that students gain a sound understanding of the fields of Psychology, broadly defined, it is not appropriate to prescribe a list of arbitrary topics. This militates against the natural development of the discipline in the light of scientific advances and limits the nature of the staffing profile within Departments and Schools of Psychology. HODSPA suggests that the Graduate Attributes include only broadly-defined areas that would be considered essential to any program of study in Psychology.

Graduate Attribute 2: Research methods in psychology
This attribute should also include knowledge and understanding of research ethics.

Graduate Attribute 3: Critical and creative thinking skills in psychology
This attribute suffers from the same problems as Graduate Attribute 1 as it consists of a similar list of arbitrary and unjustified elements. Of these, A3.1 belongs in a course on Philosophy rather than Psychology. HODSPA recommends that it be deleted as it is subsumed by A3.2.

Graduate Attribute 4: Critical and creative thinking skills in psychology
A4.5 Demonstrates knowledge of the current Australian National Practice Standards for the Mental Health Workforce.
In light of HODSPA’s view that professional training should not form a necessary part of undergraduate training in the discipline of Psychology, there is no justification for A4.5. To paraphrase these standards, they outline the knowledge, skills and attitudes required when individual members of five different mental health professions (Psychiatry, Nursing, Social work, Psychology, and Occupational Therapy) work in a mental health service. While knowledge of these standards is obviously essential to a person practising one of the nominated professions, there is no justification for its inclusion in an undergraduate program of Psychology apart, perhaps, from some discussion of the roles of different professions and the kinds of standards they may be expected to adhere to (see also Graduate Attribute 6 below).

Graduate Attribute 5: Communication and interpersonal skills in psychology
A5.2 Listens and speaks effectively including demonstrating effective oral presentation and basic interviewing skills, and the ability to use flexible techniques to communicate sensitively with diverse ethnic and cultural backgrounds.
In light of HODSPA's view that professional training should not form a necessary part of undergraduate training in the discipline of Psychology, there is no justification for the second part of A5.2. The inclusion of interviewing and communication skills (apart from oral presentation skills) introduces significant philosophical and implementation problems that are detailed more fully below. As a consequence, HODSPA recommends that A5.2 be replaced by:

A5.2* Listens and speaks effectively including demonstrating effective oral presentation skills.

**Graduate Attribute 6: Learning and the application of psychology**

HODSPA agrees with the broad intent of Graduate Attribute 6 although it notes that it might be difficult for any individual at the start of his or her learning career to “demonstrate a responsibility and capacity for lifelong independent learning to sustain personal and professional development in the changing world of the science and practice of psychology”.

HODSPA also believes it is appropriate to include, as part of Graduate Attribute 6, a goal in relation to Psychology's role underpinning mental health professions, e.g.:

A6.4* Understands the role of psychology in contributing to mental health care and delivery and has an awareness of the current Australian National Practice Standards for the Mental Health Workforce.

(ii) **Psychological literacy**

The program of study is required to “include the achievement of a high level of psychological literacy”. No definition of a “high level of psychological literacy” is offered. HODSPA recommends that such a definition be provided in a form that would allow education providers to know what is required to be included and how a high level of it could be assessed.

(iii) **Knowledge and skills in interviewing**

(iv) **Knowledge and skills in basic counselling**

These two outcomes will be discussed together. They are both innovations added to the current draft standards and represent an additional impost on undergraduate programs. Their inclusion appears also to have led to the following section,

2.2.2 The Program of Study requires completion of no less than 84 APAC Credit Points (105 ECTS) in psychology.

Most current programs of study (i.e. majors in Psychology) consist of 60 APAC Credit Points. Since a year’s undergraduate study consists of 48 APAC Credit Points, Section 2.2.2 requires that an additional 0.5 annual load be allocated to Psychology. HODSPA views this requirement as unnecessary, impractical, and detrimental to training in both the discipline and profession of Psychology. HODSPA strongly recommends that Sections 2.1.2 (iii) and (iv) be deleted from the draft standards and that Section 2.2.2 be replaced by:

2.2.2* The Program of Study requires completion of no fewer than 60 APAC Credit Points (105 ECTS) in psychology.

The reasons for these recommendations are as follows.
Professional training should form no part of an undergraduate program of study. As noted above, HODSPA is of the view that the educational goal of undergraduate training in Psychology is to provide students with the knowledge and skills of the discipline of psychology. Essential to this are skills in understanding and evaluating research, data presentation and analysis, logic and reasoning, and written and oral communication. Skills relevant to the practice of the profession of psychology are irrelevant and inappropriate. Although knowledge of the discipline of psychology is essential to postgraduate training in the profession of psychology, only a small minority of psychology graduates will go onto such training. To require that they acquire some professional skills before so doing is an arbitrary and unjustifiable impost.

In response, it could be argued that interviewing and basic counselling skills are relevant to other career pathways besides professional psychology and should be endorsed for that reason. However, even if this were true, such an endorsement cannot form part of an accreditation standard. Accreditation serves the purpose of guaranteeing the minimum level of professional competency in order to protect the public. Unless a component of training can be shown to be essential to achieve this goal, it should not and cannot be mandated as part of the accreditation standards.

It is self-evident that interviewing and basic counselling skills are relevant to professional practice. It follows that they should be part of any accredited postgraduate program of study aimed at professional training. And, as it turns out, they do. Such topics are taught in the various professional Masters programs delivered by the Departments and Schools of Psychology. In contrast, formal instruction in these topics do not form part of the intern program (2 years supervised practice) of the so-called 4+2 pathway. If such formal instruction is determined to be necessary for the safe practice of professional psychology, the obvious solution is to require this to form part of the intern program, perhaps through the mechanism of an AQF Level 8 Graduate Diploma. HODSPA has no objection to and indeed recommends such a course of action.

The capacity of undergraduates to obtain a broad-based tertiary education will be compromised. The requirement of a total of 84 APAC points for a program of study will, in most cases, prevent students completing a double major or, short of this, having sufficient capacity to undertake alternative, broadening, courses. Most universities are now moving to explicit policies to discourage a narrow focus of study concentrating on a limited career pathway. The present proposal stands directly counter to this trend and, in the long run, is likely to have detrimental consequences for both the discipline and the profession. Psychology is a hub discipline which benefits from contact with a wide range of other disciplines, such as philosophy, English literature, gender studies, physiology, medical sciences, neuroscience, computer science, engineering, and economics (to name just a few), which in turn benefit from contact with it. Research and teaching in psychology is enhanced through its interaction with related disciplines and professional training benefits from having students exposed to an eclectic mix of disciplines and forms of knowledge. Replacing such experience with 24 APAC points of interviewing and counselling which will then be applied and developed by only a small minority of students seems a poor trade indeed.

Professional skills training in undergraduate psychology undermines practice standards. What will become of the majority of undergraduate students who have been trained in interviewing and basic counselling as part of their program of study in psychology but who do not go on to postgraduate professional training? Although they will never be registered as Psychologists, they will nevertheless feel that they possess marketable skills in interviewing and counselling which they may wish to deploy in different ways. This may well blur the distinction between registered psychologists and other kinds of psychology practitioners whose levels of competency are unknown and unregulated.
**Significant cost implications.** Thirty-nine universities and one private provider currently offer accredited undergraduate psychology programs most of which graduate hundreds of students each year. Under the proposed standards, each student would have to complete an additional 0.5 EFTL of Psychology. The cost of implementing the proposed training is likely to be considerable. Given that the nature of the subject is not conducive to large-scale didactic lectures, the costs of delivery are likely to be very high if not prohibitive. The proposed requirements therefore pose an additional and unnecessary impost on Departments and Schools of Psychology that are already struggling to deliver existing courses with a limited funding base and infrastructure.

(iv) include acquiring knowledge of each of the guiding principles of the current version of the National Practice Standards for the Mental Health Workforce (2002, Commonwealth Department of Health and Ageing).

As discussed earlier, while awareness of the guiding principles of the National Practice Standards is desirable, knowledge of these standards is not for the reason that the majority of students will never go onto a career as a professional psychologist. HODSPA recommends that this requirement be replaced as follows:

(iv)* include awareness of the guiding principles of the current version of the National Practice Standards for the Mental Health Workforce (2002, Commonwealth Department of Health and Ageing).

Similarly, HODSPA recommends that Section 2.3.3 below,

2.3.3 Each of the guiding principles of the current version of the National Practice Standards for the Mental Health Workforce is integrated into the core curriculum and its assessments.

Be replaced by the following:

2.3.3* The core curriculum and its assessments be informed by the guiding principles of the current version of the National Practice Standards for the Mental Health Workforce.

**2.4 Assessment**

The foregoing discussion necessarily leads to the following recommended changes to Section 2.4. That is,

2.4.1* The Program of Study requires the successful completion of a range of formative and summative assessments which, at a minimum, focus on the achievement of the Graduate Attributes set out in Appendix A.

There is no need for sub-sections because HODSPA recommends that the achievement of foundational knowledge in basic counselling and interviewing be removed and that knowledge of each of the guiding principles of the current version of the National Practice Standards for the Mental Health Workforce be subsumed under the new Graduate Attribute A6.4* (see above).

**Domain 3 Standards for Programs of Study at AQF Level 8**

3.3.3 (iii) leads to the award of a Bachelor Honours Degree.
According the chart in Appendix E of the Draft Accreditation Standards, a program of study at AQF Level 8 may consist of a 4th year Honours program or a 1-year Graduate Diploma. Accordingly, the above Section should be replaced by the following:

3.3.3* (iii) leads to the award of a Bachelor Honours Degree or a Graduate Diploma.

3.4.2 The Program of Study incorporates assessed work at the advanced level based on each of the guiding principles of the current version of the *National Practice Standards for the Mental Health Workforce* (Commonwealth Department of Health and Ageing).

Because all students, on successful completion of the program of study at AQF Level 8, will be eligible for entry to a pathway of professional training, it is appropriate that some knowledge of the *National Practice Standards for the Mental Health Workforce* be assessed. However, because students entering this level may only be expected to have an awareness of the contents of these standards (based on the recommendations above), a more appropriate wording of this section is as follows:

3.4.2* The Program of Study incorporates assessed work based on each of the guiding principles of the current version of the *National Practice Standards for the Mental Health Workforce* (Commonwealth Department of Health and Ageing).

**Domain 4 Standards for Programs of Study at AQF Level 9 – Masters Coursework Degrees**

4.1 **Entry requirements**

The draft standards envision that graduates of a 3-year undergraduate program (AQF Level 7) will be accepted directly into a Level 9 Masters degree. The two years of study for this degree will incorporate the Level 8 Honours (or Graduate Diploma) program outlined in Domain 3 and a program of study designed to achieve the set of foundation competencies for psychology interns (Appendix B of the Draft Standards). In essence, this pathway corresponds to the current so-called 5+1 pathway.

HODSPA sees enormous if not insurmountable difficulties in selecting students directly into this program after completion of a Level 7 degree. The number of students that can be admitted will be limited principally by the availability of suitable placements. The current practice is to base selection on (a) results achieved in the Honours year, and (b) some assessment of personal suitability to become a professional psychologist. If this practice were applied to the present program, a cohort of students may well be excluded at the end of the first year. In order not to disadvantage them, in all likelihood they would be awarded a Level 8 degree (e.g. Honours). This is equivalent to undertaking Honours in the first place and then seeking entry into the second year of the Masters Degree. Therefore, no purpose is served by constructing the program as a two-year Masters Degree. A further disincentive to students to undertake the first year of the Masters, instead of a separate Honours year, would be the requirement (4.5.10) that they obtain provisional registration.

The alternative to the above would be to select students for the two-year Masters based on (a) results achieved in one or more years of their 3-year undergraduate program and (b) some assessment of personal suitability to become a professional psychologist. The problem with this is that some of this cohort may perform less well than other students who, rejected for entry into the Masters program, elect to complete a separate Level 8 Honours or Graduate Diploma. One of two options would then be available: (a) the academically less able students are retained in the Masters program, or (b) they are excluded (with,
presumably an Honours degree or a Graduate Diploma) and the more able Honours students transferred into the program. In either case, there does not seem to be any benefit from selecting them into the program in the first place. It is therefore more efficient and less disruptive to students to maintain the separate Honours year.

Domain 5 Standards for Programs of Study at AQF Level 9 – Masters Extended Degrees

5.1 Entry requirements

The same considerations as discussed under 4.1 above apply to the Extended Masters program. In this case, the problems are more severe given that the this program is designed to achieve the core competencies of the entry level psychology practitioner (Appendix C of the Draft Standards) and thereby places even greater demands on (a) academic staff time and (b) placement availability.

5.5.14 The Program of Study requires each student to successfully complete a total of no less than 1200 hours of logged supervised Client Contact and Client-related Activities which are integrated into the Program’s practica and skills training components.

Extending the required training hours to 1200 is an extra burden that is not supported by an evidence base. It also directly contradicts the commitment by APAC to assessment of competencies (outputs) rather than features of the training regimen (inputs). HODSPA supports the principal of competency-based assessment and encourages APAC to consider allowing greater flexibility in the duration and nature placements coupled with greater emphasis on the assessment of competencies and abilities.

5.6.4 The Program of Study requires the successful completion of a range of formative and of summative assessments, including each of:
(i) written examinations;
(ii) viva voce examinations, and
(iii) observed structured clinical examinations (OSCEs),
designed to assess achievement, to a satisfactory level of mastery, of each of the competencies set out in Appendix C and in one of the endorsed areas in the APAC Standards for Programs of Study Supporting the Development of an Area of Practice Endorsement, and each of which requires the formal recording of a mark reflecting the assessed level of competence and professionalism achieved.

Requirements for specific forms of assessment (listed above) are unnecessarily prescriptive. There may be areas of specialization where some of these might be appropriate (e.g., clinical), but there are areas where many of them are not appropriate (e.g., organisational). It also represents an intrusion into the proper responsibilities of education providers. HODSPA recommends that points (i)-(iii) in 5.6.4 be deleted and replaced by the following:

5.6.4* The Program of Study requires the successful completion of a range of formative and of summative assessments designed to assess achievement, to a satisfactory level of mastery, of each of the competencies set out in Appendix C and in one of the endorsed areas in the APAC Standards for Programs of Study Supporting the Development of an Area of Practice Endorsement, and each of which requires the formal recording of a mark reflecting the assessed level of competence and professionalism achieved.
Domain 6 Standards for Programs of Study at AQF Level 10 – Doctoral Degrees with Professional Coursework

It is unclear whether the standards in Domain 6 refer to professional doctorates (e.g., DPsych programs) or combined Masters/PhD degrees. This is confusing because the goals of these two pathways are different; the former is designed to lead to enhanced and advanced training in an endorsed area of practice, the latter is designed to lead to advanced research training suitable for graduates to take on teaching roles in university training programmes.

With respect to PhD degrees with Masters level coursework, it is inappropriate for APAC to stipulate standards for the quality and quantity of the research component (i.e., the PhD) as these are the responsibility of the education provider. Further, for such programs, there is no justification of 1500 hours of logged Client contact (6.5.12) because there is no requirement that the coursework component should differ from that required for the Level 9 extended Masters.

Domain 7 Standards for Conversion Programs of Study

No comment.

Domain 8 Standards for Master of Advanced Practice (“Specialised Area”) Programs of Study

No comment.

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