

## RE: Your Term of Reference (e)

### WORKFORCE QUALIFICATIONS AND TRAINING OF PSYCHOLOGISTS, AND WORKPLACE SHORTAGES AND TWO TIER MEDICARE REBATE SYSTEM

Discussed under the headings:

#### INTRODUCTION

#### CASE STUDY

#### AUSTRALIAN PSYCHOLOGICAL SOCIETY CONFLICT OF INTEREST

#### TWO OR EVEN THREE? TIER SYSTEM AND MEDICARE

#### ENDORSED AREA OF PRACTICE DISCRIMINATION, AND OTHER DIFFICULTIES

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#### NOTES: RE FORM AEAT-76

#### INTRODUCTION

#### **New Regulations and Processes Associated with Endorsed Area of Practice are Unfair and Will Lead to Workplace Shortages.**

The processes around Endorsed Areas of Practice (specialization), in the transitional period are grossly unfair. **Some experienced psychologists are being disenfranchised in their own area of expertise** with no genuine, traditional, grandparenting clause available to them. This will eventually lead to workplace shortages, especially should Medicare eventually refuse to rebate unendorsed counsellors, and Insurance Companies refuse Indemnity Insurance. Many workplaces may feel nervous about hiring unendorsed psychologists.

Trying to follow all that has gone on, and all of the ways many of us have been blocked and disenfranchised is quite complex, and listening to arguments from stakeholders can be confusing. But the following case study of my own situation, should highlight the quite unnecessarily unfair treatment some of us are suffering

#### CASE STUDY

I, like many others have a Bachelor of Arts (psychology), and Master of Arts (counselling) from Macquarie University. Because I wanted to be a counsellor (and not because of poor grades) I declined an Honours pathway in favour of the Counselling Masters. The particular Masters Course I did, was 3 years part time, and required that I be working simultaneously in the workplace with clients under the guidance of a supervisor. All up, this counted as 5 years university training. For registration as a psychologist I was then required to complete another year of supervised workplace practice. This I did, and became a registered psychologist. Since then, although for most of the years in question there was no statutory requirement to do so, I have variously had senior supervision, peer supervision, done courses, attended countless workshops and seminars - all in the interest of being a good counsellor, and all at my own expense in terms of time and money. And of course, I have gathered invaluable workplace experience. Since 1990, I have been operating a successful private practice which has Counselling in its Business name, and I have thought of, and described myself as a Counselling Psychologist.

Then, overnight, with the new Psychologists Board(PsyB), came a rule which said I could not use the title Counselling Psychologist unless I met some new criteria. There were, and are, serious blocks, and/or expenses to me in gaining the new endorsement. There is no genuine grandparenting clause for many experienced psychologists. (Though there has been automatic endorsement for Australian Psychological Society (APS) College members!) Quick to cite International standards when arguing for things they want, such as specialization, the PsyB and APS alliance has ignored the transitional Grandparenting arrangements currently in place in the United Kingdom. In the UK, any psychologist who has worked in their area of expertise for 3 years is automatically allowed the use of the appropriate (eg 'counselling psychologist') title.

At the same time as this happened to me, it was with enormous shock and outrage that I learned that **APS College members have been automatically endorsed into areas of practice from day 1 of the PsyB's installation**. This has workplace implications - see below, Two or Even Three? Tier System.

#### AUSTRALIAN PSYCHOLOGICAL SOCIETY - CONFLICT OF INTEREST

I believe this stems from an over reliance by the Psychologists Board of Australia (PsyB) on advice from, and an overly close relationship with, **the APS - an association to which thousands of psychologists cannot belong. For most professional associations, qualifying in the relevant profession is sufficient to enable membership of that association. Registration as a psychologist is not sufficient to gain membership of the APS or their Colleges. Thus the APS is a club, as well as a Company whose website talks about**

**plans for the promotion of the APS brand.** During earlier consultations between the PsyB and the APS, **nobody was looking after the interests of non APS members and they are suffering because of this.**

The PsyB has leaned heavily on the APS for advice but there is no way the APS can even begin to be seen as an unbiased advisor on standards. To my mind, no matter what motives lie behind any recommendations they may make on standards, the interests of fairness, transparency, and objectivity cannot be served. **THE APS HAS A CONFLICT OF INTEREST.** It is in the interests of that Company to increase standards in a way that causes psychologists to need to pay for courses run by APS colleges, or to have to obtain paid supervision from College members. This is easily hidden under the guise of 'public interest'. **THERE ARE POWER AND INFLUENCE ISSUES HERE FOR THE EXECUTIVE OF THE APS. THIS CONFLICT OF INTEREST HAS DAMAGED THE PROFESSION AND IS ABSOLUTELY UNTENABLE.**

True to its word on its website, the APS has been furthering its own brand and colleges, and the selling of its courses. And, under the guise of 'public interest' it does that much better than it actually represents psychologists. Some of its own members are disenchanted and angry - but, because they can see the power the APS is actually wielding, they are afraid to resign.

An examination of the 'Application for an area of practice endorsement under transition arrangements' - See Form **AEAT-76** (attached) will give some idea of the 'closed shop' that is operating. Many questions have the APS as a gateway - and remember, many psychologists cannot belong to that association, and, further, there is no law that says they should belong. The existence of this form can be used cosmetically, to suggest to the uninitiated, that experienced psychologists all have a reasonable pathway open to them. The obstacles that this Application Form places in the way of psychologists with years of specialized experience is outrageous. Please see below: **NOTES RE FORM AEAT 76**

#### TWO OR EVEN THREE? TIER SYSTEM AND MEDICARE

When Medicare Rebates were introduced, the APS campaigned for higher rebates for Clinical Psychologists. (Recent research tells us that they do not deliver a better service than other psychologists) and the two tier system was born. **Now it seems we will have three tiers. Clinical psychologists, Counselling Psychologists and, General Psychologists. Without a grandparent clause for experienced counsellors, thousands of us, in spite of many years of experience, will be in that latter class, which will suggest to the public that we are not adequately trained. I will be in this category in spite of having a Counselling Masters and over 20 years experience.**

Being 'unendorsed' in my own area of practice, has workplace ramifications, and credibility issues for any intending new client. It may ultimately lead to indemnity insurance problems. **But the main problem is the likelihood that before too long, Medicare will decide not to rebate for consultation with 'unendorsed' practitioners.** This will seriously disadvantage me by making the marketplace even more unequal. General Practitioners who have referred clients to me for years, will be dissuaded because of the financial disadvantage to their patients. It will also financially disadvantage clients who, because they and their family have a long and trusting relationship with me; or because of a 'word of mouth' recommendation; would like to choose me as their psychologist. Clients place a lot of value in having an established relationship with a counsellor who they can call on in times of distress. **They will have to accept financial disadvantage or find a new counsellor. This is where, and how, the available workforce, able to deliver medicare rebated consultations, may be diminished in the thousands,**

I am not against high standards. I have worked to achieve high standards. Recent research tells us we are delivering a good standard of service, as good as, and a trend towards better than, clinical psychologists.

#### **DISCRIMINATION AND OTHER DIFFICULTIES - ENDORSED AREAS OF PRACTICE (specialization)**

##### **Problems for experienced registered psychologists in gaining endorsements**

The new Board has adopted as a baseline qualification, upon which one can build a qualification for specialized endorsement, the qualification the APS has used for initial membership since the year 2000, and not the qualifications required for registration with Statutory State bodies (in my case the Psych Board of NSW). Thus when, in this so called transitional period, one comes to fill in an application for endorsement (in my case as a Counselling psychologist) thousands of experienced psychologists are blocked - in spite of having been registered to practice for many years. Those who have tried using this route have been fairly routinely denied.

Yet, at the same time, those psychologists who had chosen to pursue any extra education through an APS College were granted **AUTOMATIC** endorsement from day one of the new Board's installation. **THEY** did not

have to use this form. **The Board, in response to an enquiry of mine wrote.....** 'Under the NSW Psychologists Act (2001) there was no provision for the use of specialist title and the Psychologists Registration Board of new South Wales did not have a formalised policy. However, it was common at the time for a psychologist to use a title if he or she held recognised qualifications in that field, generally understood in the majority of cases to be post graduate higher training and supervision in that area of practice. There is a transition period for the use of titles to allow psychologists time to apply for endorsement.' This notion seems to have been used as a rationale for automatic endorsement of APS College graduates. **There was no general understanding, nor legal ratification of the studies of those psychologists. If there had been, many more of us would have followed that path. And if there had been, surely it would have been the responsibility of the NSW Psychologists Registration Board administer and advise on this? Once again we see the APS being the defacto authority.**

I took a different path to furthering my post graduate education (as I believe was my right) because I have philosophical differences with the APS when it comes to their efforts to split the profession into superior/ inferior categories. They continue to do this even though recent research into service delivery standards of clinical versus general psychologists does not support their contention, in fact quite the contrary. Their promotion of one psychologist over another is actually against their OWN code of ethics, which says one must not infer that one psychologist is superior to another.

If the APS College members are to be allowed to 'generally understand' themselves to be endorsed, then I should be also allowed to do so, because, I am a Registered Psychologist, I have Counselling Masters from Macquarie University, and private practice called whose name has Counselling Centre in it's name (operational since 1990). I have more than 20 years experience as a counsellor. My independent success (many years were prior to Medicare rebates), is testimony to public safety and satisfaction.

Authorities are trying to pretend we cannot have been unendorsed, when endorsement was not in place before 1 July 2010. However, in granting Automatic Endorsement for some psychologists - based on "general understandings" prior to that time - they cannot really support that argument.

When it comes to current standards for registration and endorsement, a lot of hours of workplace experience are required, presumably out of a recognition that the workplace provides important education and practice. However MY many years of experience are being given no value whatsoever, when it comes to an application for endorsement. It may look as though it is taken into account on Form AEAT-76, but if the APS standards cannot be met **first**, the rest is not considered.

## **POSSIBLE SOLUTIONS**

Much could be put right with:

-a genuine grandparenting clause which automatically endorses anyone with a Masters Degree in their specialized area of practice, and 3 years workplace experience.

a genuine grandparenting clause which automatically grants endorsement to Registered Psychologists who have worked for 5 years in their specialized area.

abandon the clinical/counselling dichotomy and abolish the two tier Medicare System.

an instruction to the PsyB about the Conflict of Interest under which the APS operates,

- a change such that the PsyB Chair position not be held by psychologist, especially one who is an APS member, but rather by an experienced full time Manager with knowledge of Change Management Practices. We are all paying for this service (which does not serve us as it happens) and we deserve nothing less.

[NOTES RE FORM AEAT-76 'Application for an area of practice endorsement under transition arrangements for psychologists.'](#)

### [Section C:](#)

[gives a list of eligibility criteria which is heavily biased towards APS members, including the Bridging plan option \(IBP\)](#)

[An \*\*accredited\*\* masters degree - rules out people \(such as me\) whose courses where undertaken before the approving authority APAC, was established in 2003.](#)

[Questions 13 and 14 and 15 - all about APS gatekeeping](#)

**Question 17** Again a request for an APAC (who didn't exist till 2003) accredited Course. AND with a minimum 6 years University study. I have 5; plus one year of supervision. Many have 4 plus 2 years of Supervision. Standards which are enough to gain Registration are replaced by APS entry standards.

Question 19 Notes to this question require supervision by a psychologist endorsed in the area of practice applied for. There have been no such endorsed psychologists in existence prior to 1 July 2010 when the PsyB automatically endorsed APS College members. So how could we have had such supervision? If we want to try and get it now, we will be paying this privileged group for it.

Question 21 And after all that! we are still barred unless we can find 2 area of practice endorsed psychologists to support our applications. Why on earth is this in here? Quite apart from the invasion of privacy involved in having to invite a couple of unknown psychologists (competitors in the marketplace) into one's practice to oversee it, are we seriously being led to believe that after completing onerous other obligations, a couple of individuals can say yea or nay?????

Thank you