

Committee Secretary  
Senate Standing Committees on Community Affairs  
PO Box 6100  
Parliament House  
Canberra ACT 2600  
Australia

Monday, 1 August 2011

To the Senate Standing Committee on Community Affairs,

**RE: Senate Community Affairs Reference Committee inquiry into Commonwealth Funding and Administration of Mental Health Services**

We write to you in response to the proposed changes to the two-tiered Medicare rebate system, following the Senate Community Affairs Committee concluding that “there are no grounds for the two-tiered Medicare rebate system for psychologists and recommends the single lower rate for all psychologists including Clinical Psychologists.....”

We have strong concerns about this proposed change given the advanced training, clinical experience, and level of expertise provided by Clinical Psychologists in the treatment of complex mental health conditions and co-morbidities. Clinical Psychologists are trained at a minimum of a Masters level but usually a Doctoral level through speciality training University programs to assess, formulate, diagnose, and treat the most complex of scenarios in mental health. The access to advanced level psychological assessment and treatment provided by Clinical Psychologists is of great value to field of child, adolescent, adult and family psychology and psychiatry. Clinical Psychologists also provide invaluable mental health consultancy to GPs. Removal of the two-tiered system is by no means client-centered, and will limit the opportunity for clients with complex mental health issues to access treatment services from those psychologists who have the highest level of training in child, adolescent and adult psychopathology. Additionally, it will create consumer and referrer confusion regarding the level of expertise in mental health of the psychologist being consulted.

The distinguishable skills and attributes for Clinical Psychologists is recognised internationally, namely by the American Psychological Association and the British Psychological Society. The American Psychological Association agrees that: *“what distinguishes Clinical Psychology as a general practice specialty is the breadth of problems addressed and of populations served. In addition, Clinical Psychology has a special focus on the areas of personality and its development and course, and psychopathology and its prevention and remediation”*.

Based on definitions provided by the Management Advisory Service to the National Health Service (NHS), Clinical Psychologists maintain skills that are commensurate with Level 3 psychological treatment and maintain a skills set that is clearly differentiated from Level 1 or Level 2 treatments. Specifically, Clinical Psychologists engage in “activities which require specialist psychological intervention, in circumstances where there are deep-rooted underlying influences, or which call for the discretionary capacity to draw on a multiple theoretical base, to devise an individually tailored strategy for a complex presenting problem. Flexibility to adapt and combine approaches is the key to competence at this level which comes from a broad, thorough and sophisticated understanding of the various psychological theories.” According to the Management Advisory Service to the NHS, “it is the skills required for Level 3 activities, entailing flexible and generic knowledge and application of psychology, which distinguishes Clinical Psychologists...”

Clearly, the advanced level of training and expertise in psychological assessment, diagnosis and treatment provided by Clinical Psychologists for complex mental health conditions and co-morbidities is invaluable in the provision of mental health services and needs to be both remunerated at a commensurate level and be able to be distinguished from generalist mental health practitioners. As such, in the interests of public health, we urge you to retain the two-tiered Medicare rebate system.

Yours sincerely,

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