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Appendix 1:

*First APS Submission to DoHA on the Better Access program (May 2006)*

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**The Australian Psychological Society Ltd**

**Proposal to  
The Australian Government Department of Health and Ageing**

**Process for selection and registration of  
mental health specialist psychologists providing  
Medicare-funded psychological services under the  
*Better Mental Health Services for Australia* initiative**

**May 2006**

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## Introduction

The *Better Mental Health Services for Australia* initiative in the recent Federal Budget introduced new Medicare rebates from November 1 2006 for people with mental illness to access services from psychologists. These Medicare-funded psychological services need to be provided by psychologists with specialised training, skills and/or experience in the provision of best practice mental health services. A system of identification and selection of such psychologists is therefore required. The following proposal outlines the necessary criteria for consideration as a mental health specialist psychologist, and provides a process of application and a methodology of selection and endorsement as an approved mental health specialist. This process would result in a certified list of mental health specialist psychologists to form a Register of Clinical Practice Psychologists.

## Criteria for admission to the Register of Clinical Practice Psychologists

The crucial competencies relevant to being considered a mental health specialist psychologist are:

- a thorough working knowledge of psychopathology, including diagnosis and case formulation
- sound theoretical knowledge of, and training in, at least one modality of psychotherapy
- skills in counselling
- an in-depth understanding of legal, ethical and professional issues associated with mental health.

To be considered a mental health specialist a psychologist should also have significant clinical practice experience in a mental health facility or in a setting providing the majority of services to clients with mental health issues. Psychologists who consider themselves to be mental health specialists also need to be deemed by their professional colleagues to hold such competency, and therefore applications for the Register will also need to be endorsed by two mental health specialist psychologists. These criteria and competencies will be explicitly stated to allow consistent processing of applications. The criteria and flow chart for admission to the Register of Clinical Practice Psychologists can be found at the end of this proposal.

It is envisaged that the Register of Clinical Practice Psychologists will comprise psychologists who are members of the APS College of Clinical Psychologists, but will also include other specialist psychologists with similar postgraduate qualifications in clinical specialties who have completed courses equivalent to those of APS College of Clinical Psychologists members. Also eligible for the Register would be other experienced practitioners who have worked extensively in the mental health field and who have achieved eligibility by professional development activities combined with this experience. All applicants will have to meet a range of requirements equivalent to those for eligibility to the APS College of Clinical Psychologists in order to be admitted to the Register. A number of categories of potential applicants have been identified and the criteria that each would have to meet for admission to the Register are set out in the flow chart at the end of this proposal.

## Process of application for admission to the Register

Psychologists who consider themselves eligible for classification as a mental health specialist will be invited to apply for admission to the Register of Clinical Practice Psychologists. The application for the Register will require applicants to fill out a form to indicate their compliance with a range of requirements as set out in the flow chart. Psychologists who are not members of the Clinical College will be asked to specify the postgraduate training and experience that underpins their proposed eligibility for the mental health speciality title. Where this is based upon extensive experience and continuing professional development, rather than Masters or Doctorate level qualifications, this will require detailed documentation by the applicant. The application forms would be lodged with the APS for processing. The APS has conducted such an approval/accreditation process for admission to the Clinical College for many years. Psychologists who are uncertain about their eligibility or are aware of specific gaps in knowledge or experience would also be encouraged to apply to for admission to the Register to determine what further training or experience would be necessary to meet the standards.

## Process of selection for admission to the Register

The application forms will be processed initially by clerical staff according to the criteria for admission to the Register and will be sorted into three categories:

Category 1: Clear eligibility on the basis of qualifications, experience and professional development

E.g. Current membership of the APS College of Clinical Psychologists or clear evidence of having completed postgraduate degree in clinical psychology and experience in a mental health setting

Category 2: Eligibility requires clarification of qualifications, experience and professional development

E.g. Postgraduate psychology degrees other than clinical psychology; experience in a mental health setting

Category 3: Eligibility requires clarification of experience and professional development

E.g. Registered psychologists (four-year degree) with extraordinary experience in mental health who meet criteria on the basis of professional development activities and experience

The latter two categories of applicants would have their applications assessed by an experienced clinical psychologist (preferably with high familiarity with APS College of Clinical Psychologists requirements) appointed by the APS. This clinical psychologist would also advise applicants in Category 3 on what is necessary to complete training or experience in order to gain future admission to the Register. In addition, a panel of three or four senior professional psychologists would be appointed to review particularly difficult cases and provide an appeal service.

## Process of identification by Medicare Australia

Once eligibility for admission to the Register has been established, whether by clear eligibility or subsequent to review or additional training, the names of psychologists will be submitted to the Department of Health and Ageing or Medicare Australia for inclusion on the Register. A Medicare Australia provider number will be issued and this will need to bear some indicator to discriminate registration as a Clinical Practice

Psychologist from those psychologists who have eligibility for registration under the MedicarePlus initiative.

## **Costs associated with administration of the Register of Clinical Practice Psychologists**

Funding is required for the establishment of the Register and processing of applications for admission to the Register. The following costs are associated with the funding of an administrative position for initial processing of applications, an experienced clinical psychologist to process non-standard applications, and the review panel to process complex applications or those on appeal. All administration will be carried out within the APS National Office in Melbourne and associated administrative costs are included in these estimates. The costs are based on the first 12 months of operation of the Register.

### **Costs for processing applications (initial 12 months)**

Estimated costs are based on an analysis of time spent on the current processing of applications for admission to a specialist College of the APS. The following costs are based on the estimated time for processing applications in the three different categories outlined above under 'Process of selection for admission to Register'. Costs are estimated according to the number of applications in each of the three categories in the first 12 months of operation of the Register.

Experience with processing applications for College membership has suggested that the average processing time will vary depending on the three categories: Category 1 applications being the quickest at an average of 45 minutes each; Category 2 applications the next longest at an average of 75 minutes each; and Category 3 applications including the most complex at an average 90 minutes each case.

It is assumed that the first year of operation of the Register will experience the highest demand, and that the first five months between June 2006 and November 1 2006 will have the largest need for processing staff. Given the volume that will suddenly be imposed on the system, it will be vital to fund a skilled person in the administrative position and a senior clinical psychologist to provide an efficient and viable processing service.

#### Category 1 applications

(E.g. psychologists who are members of the APS College of Clinical Psychologists or with a postgraduate degree in clinical psychology)

Based upon figures for current membership of the APS College of Clinical Psychologists (1090 full members), it is estimated that 650 of these members would be immediately available in primary care private practices. The current estimated number of similarly qualified and available clinical psychologists who are not members of the APS is 450, giving a total of 1100 applicants.

In the first twelve months, this would translate into approximately 23 applications per week at 45 minutes each, totally 17 hours per week. It is estimated this would entail approximately 10 hours per week of administrative time and approximately 7 hours per week of expert clinical psychology time.

Administrative position time: 10 hours per week or 0.3EFT

Experienced clinical psychology position time: 7 hours per week or 0.2EFT

### Category 2 applications

(E.g. psychologists with postgraduate clinically-oriented degrees)

Based upon an analysis of the current membership of the clinically-oriented APS Colleges (some 2000 full members), it is estimated that 530 of these would be eligible and immediately available in primary care private practice. The current estimated number of similarly qualified and available psychologists who are not members of the APS would be added to this to give a total estimate of approximately 800 applications.

In the first twelve months of the Register, this would translate into 17 applications per week at 75 minutes each, totally 21 hours per week. It is estimated this would entail approximately 7 hours per week of administrative time and approximately 14 hours per week of expert clinical psychology time.

Administrative position time: 7 hours per week or 0.2EFT

Experienced clinical psychology position time: 14 hours per week or 0.4EFT

### Category 3 applications

(E.g. registered psychologists with extraordinary experience in mental health service provision)

The group not identified in Categories 1 and 2 are experienced practitioners with many years experience in mental health settings. They will have completed a four-year qualification with two years supervised experience in a mental health setting and then an additional five years in a mental health setting. Based upon an analysis of the registered psychologists in Australia (APS and non-APS psychologists), it is estimated that of this group, 1000 would be eligible and immediately available in primary care private practice.

In the first twelve months of the Register, this would translate into 21 applications per week at 90 minutes each, totally 32 hours per week. It is estimated this would entail approximately 7 hours per week of administrative time and approximately 25 hours per week of expert clinical psychology time.

Administrative position time: 7 hours per week or 0.2EFT

Experienced clinical psychology position time: 25 hours per week or 0.7EFT

### Total application processing times for Categories 1, 2 and 3 applications

Administrative position time: 0.7EFT

Experienced clinical psychology position time: 1.3EFT

### Total application processing costs (Categories 1, 2 and 3)

Administrative position: 0.7EFT

Experienced clinical psychology position: 1.3EFT

Administration costs (10% of total costs) =

Total costs =

### Costs for Review Panel (initial 12 months)

It is envisaged that the Review Panel would consist of three members: one member of the APS College of Clinical Psychologists, one APS College member who is approved for (or eligible for approval for) the Register of Clinical Practice Psychologists, and one non-APS psychologist who is approved for (or eligible for approval for) the Register of Clinical Practice Psychologists. This Review Panel

<sup>1</sup> Estimated full-time salary is (inclusive of super) plus 15% on-costs =

<sup>2</sup> Estimated full-time salary is (inclusive of super) plus 15% on-costs =

would only meet as necessary and would be paid on an hourly rate of [REDACTED] per hour per member

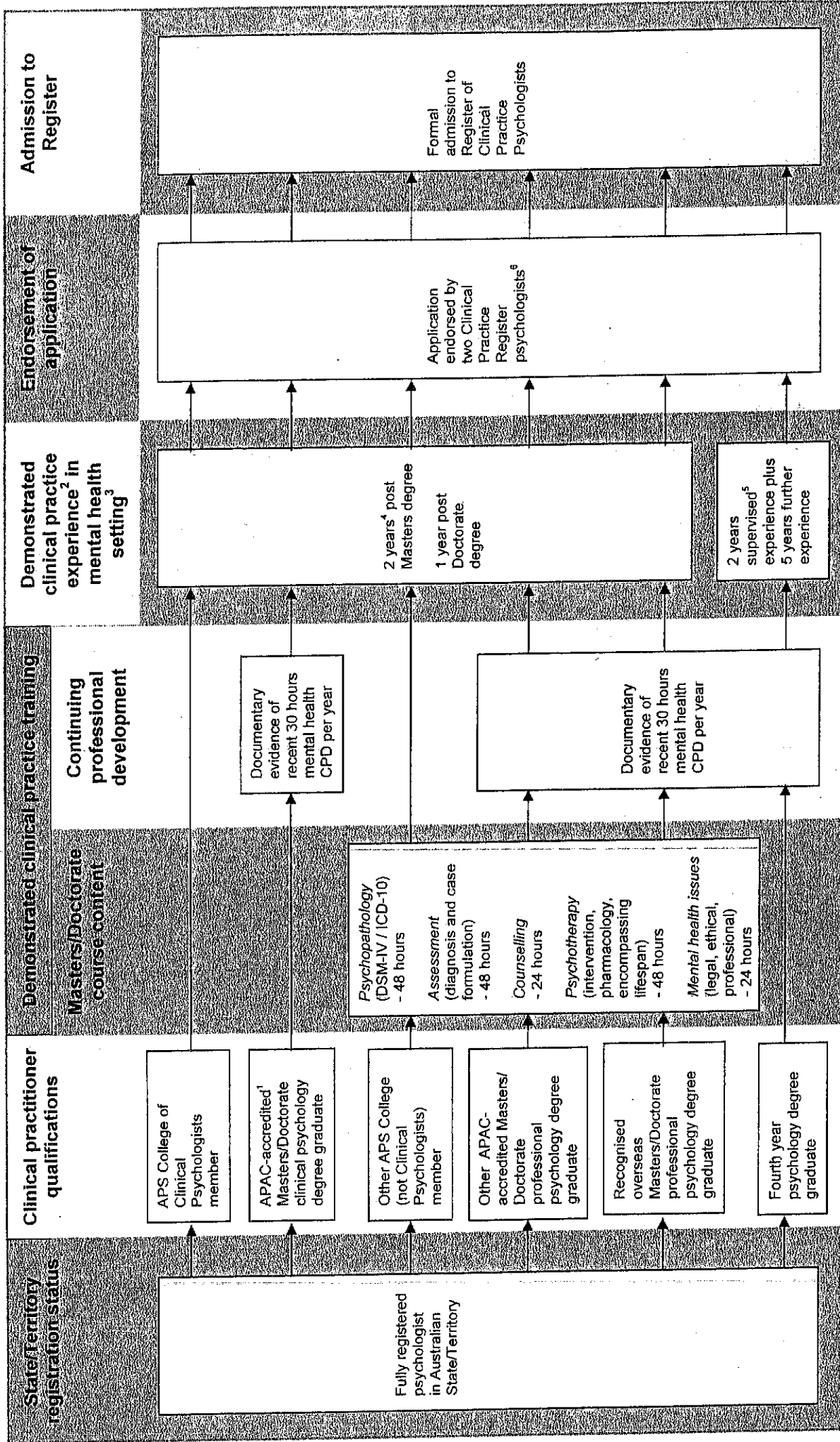
On the basis of their meeting once a month for five hours, the estimated cost would be [REDACTED] in the first year.

**Total costs (application processing and Panel review) for first 12 months of Register = [REDACTED]**

**Costs for administration of Register in subsequent years**

This is a 12-month budget with an anticipated high demand in the first 5 months. The expectation is that the demand and costs would significantly decrease in subsequent years to probably about 30 per cent of the workload in Year 2 and about 20 per cent ongoing.

# Criteria and flow chart for admission to Register of Clinical Practice Psychologists



(Footnotes over page)



## Footnotes

<sup>1</sup> The Australian Psychology Accreditation Council (APAC) is the accrediting body for all Australian university psychology courses. APAC is comprised of representatives of the Council of Psychologists Registration Boards of Australia (CPRB) and the Australian Psychological Society (APS).

<sup>2</sup> Experience includes clinical assessment, treatment and management, supervision, teaching clinical practice, managing a clinical service, consultancy

<sup>3</sup> A mental health setting is one where the majority of services are being provided to clients with mental health problems either as a primary or secondary diagnosis. The following classifications are advisory only and not exhaustive. Applicants should put forward their case for consideration where uncertainty exists.

### Approved mental health settings

Mental health units in acute, community or dedicated public mental health facilities

Private psychiatric hospitals or clinics

Specialist child, family, youth mental health services

Crisis Assessment Team (CAT)

Drug and alcohol services

Possible mental health settings (in all cases the provision of percentage of mental health clients is essential)

University/school counselling

Public sector general health services (hospitals etc)

Private practice (majority of clients classified with mental health disorders)

Community health

Trauma/sexual assault clinics

Intellectual Disability Units

Aged care

Correctional services

Employee Assistance Programs (EAP)

Lifeline

Centrelink

Commonwealth Rehabilitation Service (CRS)

Excluded from definition of recognised mental health settings

Relationship counselling

Coaching

Performance enhancement

Human resources

<sup>4</sup> A year is defined as a minimum of 0.6 EFT

<sup>5</sup> Supervised experience is defined as formal supervision by a registered psychologist in a recognised mental health setting

<sup>6</sup> Until the Register is fully established, this endorsement will need to be undertaken by two members of the APS College of Clinical Psychologists or other recognised mental health specialist psychologists

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Appendix 2:

*APS 'Clinical and Mental Health Specialist' document (May 2006)*

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Copies to Bill, Kara  
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## Clinical and mental health specialist psychologists

This paper provides guidelines for competencies in terms of essential qualifications and experience for the role of a clinical and mental health specialist psychologist. In addition to specifying the criteria for this title, the paper attempts to predict numbers of psychologists in Australia who could meet these criteria based on APS membership data.

In order to assist in understanding the context for these guidelines, some background information on specialist psychologist training in Australia and criteria for registration as a psychologist and membership of the APS is provided.

For more details on these guidelines, contact Professor Lyn Littlefield, APS Executive Director.

### Registration to practise and specialist psychologist training in Australia

In order to practise as a psychologist in Australia, registration with a State or Territory Registration Board is required. Minimum requirements for registration as a psychologist are a four year degree in psychology plus two years' supervised experience. There are currently approximately 19,000 registered psychologists in Australia. In recent years, the majority of psychologists registering have postgraduate qualifications in psychology totalling six years of training, which incorporates the two years' supervised experience to enable registration. Most postgraduate professional psychological programs involve some general training in mental health, although some specialise solely in other areas of psychology such as organisational psychology. A very conservative estimate of the number of registered psychologists in Australia with skills in mental health would be 10,000.

The Australian Psychological Society (APS) is the professional association for psychologists in Australia. Approximately two-thirds of all registered psychologists in Australia are members of the APS. The APS now requires a six-year degree (four years of undergraduate psychology plus a masters degree in psychology) for full membership of the Society. There are nine specialist Colleges within the APS: the Colleges of Clinical Psychologists, Clinical Neuropsychologists, Community Psychologists, Counselling Psychologists, Educational and Developmental Psychologists, Forensic Psychologists, Health Psychologists, Organisational Psychologists, and Sport Psychologists. Membership of the APS specialist Colleges requires a masters degree (two-year postgraduate degree) in that speciality plus one year's supervised experience, or a professional doctorate degree in the speciality (three-year postgraduate degree).

Members of the College of Clinical Psychologists are specialised mental health psychologists, with postgraduate training in clinical masters or doctorate degrees and supervised experience in mental health settings. Many of the other postgraduate professional training programs contain units and practical placements equivalent to those in clinical masters degrees, although they may have a specialist focus in other areas. Hence their graduates would qualify as mental health specialists although they may not be called clinical psychologists.

## Criteria for competency as a clinical and mental health specialist psychologist

Competency to be considered a clinical and mental health specialist psychologist may be met by two groups of psychologists via different pathways.

**Group 1:** All psychologists with professional masters degrees (or professional doctorate degrees) with the specific training and experience to meet the criteria for a clinical and mental health specialist set out below.

Training (automatically met by membership of the College of Clinical Psychologists)

- Specified training<sup>1</sup> in the following areas:

Psychopathology (including assessment and diagnosis)	50 hours
Counselling skills	25 hours
Psychotherapy/psychological interventions	50 hours

### Experience

- Two years' clinical experience post-registration in a mental health setting

Group 1 would include the following:

- all members of the APS College of Clinical Psychology
- members of other APS Colleges who meet the training and experience criteria
- other psychologists with specialist postgraduate training who meet the training and experience criteria above.

**Group 2:** All psychologists who have completed a four-year undergraduate degree in psychology, plus two years of supervised practice, are registered and have met, by a variety of means, the specific training and experience criteria below.

### Training

- Specified professional training in the following areas:

Psychopathology (including assessment and diagnosis)	50 hours
Counselling skills	25 hours
Psychotherapy/psychological interventions	50 hours

### Experience

- Five years' clinical experience in a mental health setting after full registration as a psychologist.

<sup>1</sup> Based upon specified tertiary course hours normally completed over a 13-week term.

<sup>2</sup> Includes members of APS College of Clinical Psychology and an estimated number of other APS members (including members of other Colleges) who would be likely to meet the clinical and mental health specialist psychologist criteria

<sup>3</sup> Based on the just over a third of Australian Psychologists who are not APS members. A profile based on APS members has been projected onto this group to gain an estimated figure for masters graduates who might meet the clinical and mental health specialist criteria.

<sup>4</sup> This estimation is a much more difficult figure to predict. However, we are confident that it is not greater than this.

<sup>5</sup> It has been estimated that of psychologists currently practising in a specialist area, 40% were in private practice and an additional 60% in the public sector. However, 39% of the latter group also offer some private practice work.

<sup>6</sup> 70% of our APS members are located in metropolitan regions and some 30% in the regional and rural areas. For the specialist groups nominated above, it is estimated that some 75% are in metropolitan areas and 25% in regional and rural areas

## Estimated numbers of clinical and mental health specialist psychologists

The estimated numbers of psychologists (members of the APS and non-members) who meet the competency criteria for a clinical and mental health specialist psychologist are set out below.

### **Group 1**

Psychologists with professional masters degrees who meet the training and experience criteria

APS members <sup>2</sup>	1875
Non-APS members <sup>3</sup>	<u>1250</u>
<b>Total</b>	<b>3125</b>

### **Group 2**

Four-year trained psychologists who meet the training and experience criteria

APS members <sup>4</sup>	1500
Non-APS members <sup>3</sup>	<u>1000</u>
<b>Total</b>	<b>2500</b>

**TOTAL** (Groups 1 and 2) **5625**

## The location of psychologists practising in Australia

The tables below identify some estimates for the location and settings of clinical and mental health specialist psychologists.

**Table 1: Location and type of practice for Group 1**

Zone/Sector	Private practice <sup>5</sup>	Public sector only	Public sector plus PP	
Metropolitan <sup>6</sup>	938	914	493	2345
Regional/rural	312	304	164	780
<b>TOTAL</b>	<b>1250</b>	<b>1218</b>	<b>657</b>	<b>3125</b>

PP = Private Practice

**Table 2: Location and type of practice for Group 1 and 2 combined**

Zone/Sector	Private practice	Public sector only	Public sector plus PP	
Metropolitan	1688	1518	1013	4219
Regional/rural	562	507	337	1406
<b>TOTAL</b>	<b>2250</b>	<b>2025</b>	<b>1350</b>	<b>5625</b>

PP = Private practice