

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

Senate Community Affairs Reference Committee.

**Re: Inquiry into Commonwealth Funding and Administration of
Mental Health Services**

We would like to address the following Term of Reference item:

Mental health workforce issues, including:

(i) the two-tiered Medicare rebate system for psychologists

Clinical Psychology is a health service provider **speciality** in applied psychology. Clinical Psychologists assess, diagnose, prevent, and treat psychopathology and mental disorders. What distinguishes Clinical Psychology as a **speciality** is the breadth of problems addressed and of the populations serviced. Clinical Psychologists must be recognised as distinct from psychologists who are not clinically trained because they have far greater knowledge in the assessment and treatment of psychiatric disorders. Clinical Psychologists and Psychiatrists often see people with similar problems. Psychologists who are not clinically-trained do not have the same level of knowledge in the assessment and treatment of these populations. Therefore, the two-tiered Medicare rebate system must remain in place to reflect the expertise of the Clinical Psychologist and ensure the most efficient servicing of clients with mental disorders, particularly those with more severe mental health disorders.

The greater expertise that Clinical Psychologists have stem from extensive training. It is irresponsible to understate the speciality that Clinical Psychologists have in the assessment and treatment of psychiatric disorders.

Clinical Psychologists have **extensive training** in assessing a range of psychological difficulties and determining the most appropriate form of help, as well as being trained in providing more than one type of intervention. Fourth-year trained psychologists and non-clinically trained psychologists often do not have any significant training and experience in delivering effective, evidence-based interventions.

Endorsed Clinical Psychologists have an undergraduate degree in psychology plus an honours fourth year qualification in addition to three to five years of postgraduate experience and university training in applying the science of psychology to clinical problems. It therefore takes **seven to nine years** to qualify as an endorsed Clinical Psychologist.

Psychologists who are not clinically trained on the other hand, might specialise in providing one particular type of therapy and fail to adequately apply the science of psychology using evidence-based practice to client problems. In addition, due to the extensive training Clinical Psychologists receive, they are more likely to provide an accurate diagnosis and conceptualisation of client presenting problems, which means that the effectiveness and efficiency of treatment is maximised.

In 1989, the Management Advisory Service to the NHS differentiated the health care professions according to skill levels. Skills in this sense referred to knowledge, attitudes and values, as well as discrete activities in performing tasks. The group defined three levels of skills as follows:

Level 1- "Basic" Psychology - activities such as establishing, maintaining and supporting relationships; use of simple techniques (relaxation, counselling, stress management).

Level 2 - undertaking circumscribed psychological activities (e.g. behavioural modification). These activities can be described by protocol.

Level 3 - Activities that 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, sophisticated, and evidence-based understanding of the various psychological theories.

The group argued that Clinical Psychologists are **the only professionals** who operated at all three levels and that it is the skills required for level 3 activities, entailing flexible and generic knowledge and application of psychology, **which distinguishes Clinical Psychologists**.

This is consistent with other reviews, which suggest that what is unique about Clinical Psychologists is their ability to use theories and concepts from the discipline of psychology in a creative way to solve problems in clinical settings.

Clinical Psychology is recognised as a **specialisation in the United States and Britain, and Clinical Psychologists are actively sought out by patients seeking effective intervention**.

The two-tiered Medicare rebate system must remain in place to reflect the expertise of the Clinical Psychologist.

Yours sincerely,