

I am a registered psychologist with around 25 years' experience working in Mental Health in the ACT and NSW. I have worked in the areas of Foster Care, Child and Adolescent Mental Health (CAMHS), acute-care residential psychiatric (hospital) settings and have been in private practice for the last ten years. I have worked, and continue to work with clients struggling with severe mental illness.

I would like to express my concerns regarding the two-tiered rebate system of the Medicare Better Access Program.

I believe that the interests and needs of the users of psychological services, the wider community, the majority of psychologists and the profession of psychology in general would all be better served by a one-tier system than the current two-tier system.

Moving to a one-tiered system in my opinion would:

1. Decrease the cost to clients of private psychological services by reducing the gap payment for the majority of those clients. Given 75% of psychologists in private practice are not clinically endorsed*, it follows that about 75% of the clients of private psychologists are having to pay the higher gap
2. Significantly increase the number of Australians able to access psychological support. A higher single-tier will allow more psychologists to either fully bulk-bill or lower the amount of out-of-pocket costs for patients
3. Significantly increase the access to psychological services for people in rural and remote areas where clinical psychologists are difficult to find (more than 75% of registered psychologists anywhere are unable to offer the higher rebate rate to their clients* and this problem is even greater in rural, remote and regional Australia)
4. Redress the partisan bias that favours one group of psychologists over others – unprecedented in Western countries - and unsupported by any evidence of superior outcomes
5. Allow patients to choose psychologists on a therapeutic needs-basis rather than choosing a psychologist based on a higher rebate – there is no evidence that clinical qualifications produce better outcomes for patients
6. Remove an inherently illogical and confusing factor in the Mental Health system: I.e. clients of non-clinically endorsed psychologists (who by inference from the differential rebate are seen as 'less than' those who are clinically endorsed) end up paying *more* than do those who happen to see a clinically-endorsed psychologist. It makes no sense at all that the users of the purportedly superior service pay *less* than those receiving the purportedly inferior service.
7. Retain, utilise and value the extensive diversity, depth and breadth of clinical-practice expertise found within the broad community of psychologists registered to practise in this country. Anecdotally I know many non-clinically endorsed psychologists are considering leaving private practice. It is becoming increasingly difficult to make an adequate living in private practice as a psychologist if your pathway to registration did not happen to be via a qualification with "clinical" in its title.

8. Ensure an increased availability of affordable, effective psychological assistance and reduce numbers in the public health system
9. Bring psychology into line with the other allied professions who are all on a one-tier system
10. Recognise and reflect the fact that general registration in psychology is a licence to practice the full scope of psychology, including within clinical settings.
11. Recognise and reflect the fact that all psychologists are required to and do further develop their skills as they practice – through experience, continuing professional development and peer consultation
12. Recognise and reflect the fact that all psychologists experience advanced training with supervised practice - all registered psychologists are required to undertake Continuous Professional Development (CPD) that is relevant to the scope of their practise
13. Redress the inequitable situation that allows a newly graduated clinical psychologist, with no experience as a practicing psychologist, to attract a higher rate of rebate than a psychologist with decades of clinical experience
14. Redress the demonstrably inaccurate perception (both within and outside of the profession of Psychology) that some psychologists are of higher value than others based upon their particular route to registration.

In conclusion I strongly oppose the continuation of the two-tiered system of rebates for Psychological services and would like to see it replaced with a one-tiered system.

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4 March 2021

* Psychology Board of Australia *Registrant Data* Reporting period 1 July – 30 September 2018