

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

24 July 2011

Dear Secretary,

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

I wish to make a submission to the senate regarding the recent proposed changes to the funding and administration of mental health services. As a postgraduate student in the final stages of a professional doctorate in Clinical Psychology, I am very concerned about the likely detrimental impact these changes will have on both the field of clinical psychology and members of the community seeking to access psychological services. The two-tier system that applies to sessions that can be claimed by clients under the Better Access Scheme currently recognises the specialist training and knowledge of those endorsed as 'clinical' psychologists. The proposal to remove this distinction underestimates the complexity of mental health issues, and the resources, skill, time and knowledge that it takes to address them.

Clinical psychology is a specialist field. Undergraduate courses provide the basis and grounding for further training and development, but undergraduate training alone is not adequate to provide psychologists with the fundamental skills and knowledge necessary to practice clinically in an evidence-based and ethical manner. Clinical psychology has a special focus on personality and psychopathology, including psychopathological etiologies, environments, degrees of severity, developmental levels, as well as appropriate assessments, interventions, and treatments. Poor delivery of psychological assessment and treatment is likely to result where this is done by psychologists who lack the knowledge and skill to give effective, evidence-based treatment. Removal of the two tiered system, therefore, would result in poorer mental health care and even exacerbation of some conditions that require specialist treatment. Importantly, such a move would significantly reduce the number of postgraduate level qualified psychologists, as there will be little incentive to students sacrifice the ability to work full time for several years in order to develop their expertise in the field of clinical psychology. Consequently, a negative impact on Australia's reputation as a world leader in research and education and a less qualified workforce of psychologists will result.

For many years in Australia, training of psychologists has been moving away from the undergraduate plus two years of supervised practice model, with a greater emphasis on the importance of post-graduate training consistent with a scientist practitioner model. This approach is

in keeping with international counterparts and is based on a considerable amount of research evidence supporting the view that postgraduate qualifications are associated with more highly skilled psychologists. Many countries currently recognise clinical psychology as an area of specialisation, and the importance of post-graduate training for psychologists. In the United Kingdom, for example, recognition as a registered psychologist requires professional doctoral level qualifications involving three to five years postgraduate training to be completed (<http://www.clinicalpsychology.org.uk/> ; [http://www.isdscotland.org/wf\\_psychology/clinicalpsychologywfp.pdf](http://www.isdscotland.org/wf_psychology/clinicalpsychologywfp.pdf)). Similarly, in the United States, four to six years post-graduate training is typically required. Indeed, most psychologists in the United States hold doctoral level training, with Masters level training in psychology associated only with the title of a Licensed Professional Counsellor (<http://www.apa.org/ed/graduate/specialize/clinical.aspx>).

Many significant methodological issues have been identified that diminish the credibility of data supplied by generalist psychologists to support their argument for discontinuing the two tiered system. The research provided does not meet fundamental standards of research design, including supporting evidence of reliability and validity, and follow-up data. Further, the sample used was not representative and the research was not peer reviewed. These circumstances go to highlight the disparity in understanding of the principles of psychological research and practice between generalist psychologists and clinical psychologists, further supporting the argument to maintain the distinction within the profession of psychology.

In summary, the proposed changes will negatively impact the standard of mental health care provided to Australians and the educational standards underlying the practice of clinical psychology.

Yours sincerely,

Psychologist (Provisional Registration)