

11 July 2011

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

Dear Senate Standing Committees on Community Affairs

**Re: Commonwealth Funding and Administration of Mental Health Services,
Terms of Reference e) mental health workforce issues, including: (i) the two-
tiered Medicare rebate system for psychologists**

Thank you for the opportunity to respond to the Commonwealth Funding and Administration of Mental Health Services. Overall, it was encouraging to see the Government's 2011-12 Budget changes relating to mental health. However, I am concerned about the inclusion of *e) mental health workforce issues* and more specifically, *(i) the two-tiered Medicare rebate system for psychologists* in the Commonwealth Funding and Administration of Mental Health Services inquiry Terms of Reference.

As it now stands, the two-tiered system reflects the vast difference in training, knowledge and specialisation between Clinical Psychologists and psychologists. Initial selection for training in Clinical Psychology at the postgraduate level is rigorous and highly competitive. Preparation for entry into the specialty begins at the postgraduate masters level and serves as a basis for advanced postgraduate training in Clinical Psychology that builds on its knowledge and application bases. Clinical Psychologists have a minimum of six years full time university training with two additional years of mandatory professional supervision under the auspices of The Psychology Board of Australia. Further, more and more students are completing either a Doctorate of Psychology with an additional formal year of training at university, or a PhD in Clinical Psychology thus adding a further two years to their formal university training.

The training of Clinical Psychologists differs in many ways from psychologists. During the minimum of eight years of training, the emphasis of Clinical Psychology is on severe mental health problems. Clinical Psychologists have extensive training in the theoretical and conceptual understanding of mental health problems, the correct diagnosis and clinical evaluation of these problems and on effective management and treatment. The four-year undergraduate degree of psychologists is geared towards general psychology subjects such as social psychology, organisational psychology and abnormal psychology. Clinical Psychology is the only profession, apart from Psychiatry, whose entire accredited and integrated postgraduate training is specifically in the field of lifespan and advanced evidence-based psychopathology, assessment, diagnosis, case formulation, psychotherapy, evaluation and research across the full range of severity and complexity.

The substantive areas of basic psychology in which Clinical Psychologists must have both theoretical and scientific knowledge include the biological, social, cognitive, and

affective bases of behaviour and individual differences. 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. This emphasis includes the full span of psychopathological disorders and conditions, aetiologies, environments, degrees of severity, developmental levels, and the appropriate assessments, interventions, and treatments that are associated with these conditions. Understanding of ethical principles, of diversity and of cultural context are integral components of the knowledge base of all aspects of Clinical Psychology.

The Work Value Document prepared by the HSOA Clinical Psychology Negotiating Committee in support of Application No P39 of 1997 HSOA v Royal Perth Hospital & Others stated that:

As a result of their training, Clinical Psychologists have a thorough understanding of varied and complex psychological theories and have the ability to formulate and respond to both complex disorders and to novel problems, generating interventions based on this solid knowledge base.

And further:

The findings of the Human Rights and Equal Opportunity Commission of 1993 (the Burdekin Commission) with respect to Clinical Psychology were also clear cut. The Commission (pages 178-182), found that *Clinical Psychologists have distinctive skills which differ from those of other types of psychologists* and differ from those of other allied health professions (emphasis added).

It is of particular concern that Australia is the only English speaking country in the OECD which allows someone with an undergraduate degree to fully practice within the profession of psychology – making Australia the country with the lowest standards for professional practice, and being out of step with the rest of the world. The Division of Clinical Psychology, The British Psychological Society, states that “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 therapy. Therapists and counsellors, on the other hand, usually specialise in providing one particular type of therapy, like psychodynamic psychotherapy, or counselling, or cognitive behaviour therapy.” Further, the American Psychological Association states that “what distinguishes Clinical Psychology as a general practice specialty is the breadth of problems addressed and of populations served”.

Thankyou for the opportunity to make comment. I look forward to hearing a response from the Inquiry on these vital issues.

Kind regards,

Dr Melanie Newton
Clinical Psychologist