

To Whom It May Concern:

**Re: Commonwealth Funding and Administration of Mental Health Services:  
The two-tiered Medicare rebate system for psychologists.**

As clinical academics co-ordinating and implementing the clinical postgraduate degrees at Flinders University, we would like to express our strong advocacy for retaining the 2-tiered system for clinical psychology as part of Medicare's rebate system for psychologists.

We strongly disagree with the Senate Community Affairs Reference Committee's conclusion that there are "*no grounds for the two-tiered Medicare rebate system for psychologists*", and believe the Committee is ill advised of the distinction between a Psychologist providing "Focussed Psychological Strategies" and a Clinical Psychologist providing "Psychological Therapy".

The first qualification needed to practice psychology is a 4-year undergraduate degree in psychology, which includes a significant research project in the final year. Thus, at the outset there is an emphasis on the value of research in informing psychological practice (i.e., the psychologist as a scientist-practitioner). However, after the initial 4-year degree, people can either obtain 2-years fulltime supervision primarily under one psychologist, or enter into a clinical postgraduate degree of at least 2 years fulltime (via competitive entry) which is accredited by the Australian Psychology Accreditation Council (APAC). After completion of either 2-year time commitment, each individual may register as a Psychologist. However, there are already several clear distinctions between the two pathways at this point, with the Psychologist undertaking postgraduate study having:

- A broader knowledge base of contemporary theories and scientific evidence in clinical psychology,
- Greater breadth of skill attainment in various evidence-based psychological treatments,
- More experience in the practice of clinical psychology in a greater variety of settings and populations,
- More experience accessing and critically analysing current scientific literature that informs their clinical psychology practice, and
- More experience in the practice of research applied to the clinical psychology field.

As a result, the 2-year postgraduate training creates a psychologist who uses a broad and contemporary knowledge base and skillset to effectively treat a range of complex psychological conditions. This is the major limitation of the psychologist undergoing 2-years supervision primarily under *one* psychologist in *one* setting with *one* population.

A further critical difference is that the postgraduate-qualified psychologist undertakes further training in order to become a Clinical Psychologist. This requires (i) fulltime practice of

psychology over a 2-year period, (ii) supervision during this time under another Clinical Psychologist, and (ii) 80 hours of Continuing Professional Development to maintain and further promote their current evidence-based practice. This systemic process further develops their knowledge base and consolidates and extends their clinical skills. Thus, a Clinical Psychologist is the result of more years of tertiary education, and 2 years of fine-tuned clinical practice. This allows them to deal effectively not only with a range of psychological conditions which can co-occur in the same individual, but to deal with such issues that have been chronic, and where other complex factors contribute to their condition.

Our view, which is aligned to that of the Clinical College of the Australian Psychological Society (APS), the American Psychological Association (APA), and the British Psychological Society (BPS) is that Clinical Psychologists are better trained and experienced to deal with more complex and chronic psychological issues than a Psychologist. This is the clear distinction between the two types of psychologists, and hence justifies the use of the 2-tiered system where a Psychologist uses 'Strategies' and a Clinical Psychologist uses 'Therapy'. Although a single study has found little difference between the two types of psychologists in Australia, this study has several significant limitations (e.g., non-randomisation, etc.) and thus has little scientific value to inform the Senate Community Affairs Reference Committee's decision to remove the two-tiered rebate system. Sound scientific principles require that more independent studies are required to support the position that a Clinical Psychologist's training and experience better prepares them to treat more complex and chronic psychological conditions than a Psychologist. We would support the conduct of further such studies before any changes are made to the existing two-tier system.

Yours sincerely,

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