



PSYCHOLOGY PRIVATE AUSTRALIA Inc.

THE FEDERATION OF ORGANISATIONS OF PRIVATELY PRACTISING PSYCHOLOGISTS OF AUSTRALIA

<http://www.psychologyprivate.org>

CONSTITUENT BODIES

Association of Private Practising Psychologists (NT)
Association of private Practising Psychologists (QLD)
Australian College of Private Consulting Psychologists (NSW)
Psychology Private Tasmania

Australian College of Psychologists in Clinical Private Practice (ACT)
Australian College of Psychologists in Clinical Private Practice (VIC)
Institute of Private Practising Psychologists (SA)

Information Sharing and Privacy Submission

Attention Practitioner Regulation Subcommittee

nraip@dhs.vic.gov.au

The submission of Psychology Private Australia Inc.(PPAI) concerns **Para 1.31 (b)** of this Consultation Paper - *Public identification and communication of recognized specialties, specialist titles and approved qualifications, identified through the public registers and via guidelines issued by the relevant board.* This relates to **Proposal 10.3.1** of the earlier Consultation Paper on Proposed Registration Arrangements which *proposes a mechanism through which a board may identify a sub-group of practitioners within the profession who have specific training and are considered qualified to deliver a particular type of service...*

For the profession of Psychology, it is necessary to outline a brief relevant history pertinent to this topic as a background to our submission.

As accredited training courses for the professions change over time, it is essential that registrants are not disadvantaged because their qualifications have been superseded by changed accreditation requirements. A doctor who has been trained in a particular specialty, and worked for many years in that specialty, should not lose that specialty status and his/her livelihood simply because accreditation standards have changed. There has always been a 'grandfather clause' to include older experienced practitioners into newer or changed specialty status.

A serious problem has arisen in the Psychology profession with the introduction of Medicare rebates for Psychology where a two-tier system has distinguished between Clinical and non Clinical practice. The previous government administration appointed a voluntary professional association to assess which Psychologists could be designated 'Clinical', and it was deemed that a 'Clinical Psychologist' was one who was a member, or eligible to be a member, of the Clinical College of that particular voluntary body (the APS). The eligibility criteria for this College has changed over the years so that older, clinically trained, more experienced practitioners are considered to be not eligible, and relatively less experienced Psychologists with a six year academic qualification are eligible. Older psychology training courses allowed for practical training courses to run concurrent with academic theory and research courses. The newer six year course takes the practical training out of the first 4 years and adds it in the two post graduate years. There is no training to be a specialist in Psychology along the lines of medical practitioner specialist training.

Given that fewer than half of the total registered Psychologists have chosen to join the APS, and many of those who have been in clinical practice for many years chose not to join at a time when

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they would have been eligible for the Clinical College, there has been major consternation and anger within the profession. Medical practitioners continue to refer patients to the experienced Clinical Psychologists they have found to be most helpful over many years. Patients who choose to consult very experienced Clinical Psychologists are disadvantaged as they receive a lower Medicare rebate than they would if they consulted with a new graduate member of the Clinical College of the APS. The system as it has been set up contravenes the national legislation on competition and disadvantages the consumer.

This situation was not the intention of the previous government. In consultation with the then Parliamentary Secretary for the Health Minister, Psychology Private members were informed that it was the intention of the Health Minister and the Prime Minister that rebates would apply to experienced practitioners who had been in private clinical practice for many years without the benefit of Medicare rebates for their patients, rather than inexperienced or newly registered Psychologists motivated by the Medicare scheme to set up a practice. He instructed his administration to consult with Psychology Private (PPAI) members in their development of Item Numbers for the new scheme. The person heading this department chose to ignore this instruction, repeatedly avoiding meetings.

At the time when many of the practising clinical psychologists were trained, and commenced work in the field, they were denoted "Clinical Psychologists". When registration of Psychologists commenced in the various states the legislation for Psychology did not allow for specialist status in some states. The current legislation does not allow specialist status or specialist titles in all states except WA. This created a problem for the public in trying to find the appropriate psychologist for their needs.

To overcome this problem the Queensland Psychologists Board has allowed the use of Descriptor Titles e.g. Clinical, Organisational, Educational etcetera. The Board developed a set of criteria required for practitioners wishing to use these titles to describe the area of Psychology where they had the appropriate training and experience.

In the shaping of the new National legislation, it is essential that registration boards, and not voluntary associations (i.e. unions with a bias towards their members and their own agendas) make the decisions as to what is required for a practitioner to advertise that they are trained and experienced in a particular area of the vast discipline of Psychology.

The policy devised by the Queensland Psychologists Board can be found on their website, and is attached to this submission for your consideration.

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Psychology Private Australia Inc. (PPAI) is the national umbrella organization for the associations of private practising clinical psychologists throughout Australia