

“Specialist Arrangements, Attention: Practitioner Regulation Subcommittee”

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Practitioner Regulation Sub-Committee

Health Workforce Principal Committee

Australian Health ministers Advisory Council (AHMAC)

Dear Sir / Madam,

Re: “Specialist Arrangements,

Attention: Practitioner Regulation Subcommittee”

Specialist Registration for Clinical Psychology

Thank you for inviting submissions regarding the Consultation Paper, ‘Proposed Arrangements for Specialists within the National Registration and Accreditation Scheme for the Health Professions’. This brief individual-based submission advises that there is a strong case for Specialist Registration of Clinical Psychologists throughout Australia, based upon at least four salient precedents within current legislative and accreditation Australian processes, as follows –

- **industry-wide accepted accreditation and specialist professional postgraduate (at Clinical Masters/Doctorate minimum entry level) training standards for Clinical Psychology in Australia, as opposed to a minimum four year degree for general (non-specialist) Psychology,**
- **current Specialist Registration for Clinical Psychology within Western Australia under the auspices of The Psychologists Board of Western Australia (the State registration authority),**
- **2001 Industrial Relations Commission (Full Bench) determination of ‘Work Value’ for Clinical Psychology as distinct and higher than general (non-specialist) Psychology, and**
- **2006 Commonwealth Medicare legislation which defined a Clinical Psychologist and Specialist Clinical Psychology Medicare Rebates**

My name is Anthony Michael-John Cichello. I am a registered Psychologist in the State of Victoria and a Registered Specialist Clinical Psychologist in Western Australia; I completed my undergraduate B.Sc(Hons.) degree with a major in Psychology at the University of Melbourne in 1984, then a professional postgraduate Masters of Clinical Psychology degree at the University of Western Australia in 1989 followed by two additional years of mandatory professional supervision under the auspices of The Psychologists Board of Western Australia in order to satisfy requirements for Specialist Clinical Psychology Registration in W.A. (a total of eight years training).

I have practiced as a Senior Clinical Psychologist since 1993 and have since held professional senior and leadership positions within both the West Australian and Victorian Health Sectors. I am currently engaged in full-time independent private practice as a Clinical Psychologist and am an accredited 'Specialist Clinical Psychology' service provider as defined under Commonwealth Medicare legislation.

I also currently serve in the voluntary position of Secretary of the Australian Psychological Society's (APS) College of Clinical Psychologists National Executive Committee. It is important to note that, unlike other organisations such as the AMA, the APS College of Clinical Psychologists is not a union. It coordinates the speciality of Clinical Psychology within the APS, Psychology's pre-ordinate Professional Association in Australia, and serves to maintain the highest standards of training and practice of Clinical Psychology within Australia based upon internationally recognised benchmarks of best practice.

Clinical Psychology is an internationally industry-recognised specialisation of Psychology in its body of knowledge and practice of assessment, diagnosis, evidence-based and scientifically-informed psychological treatments of the full spectrum of mental health disorders across the total lifespan and across the widest range of complexity and severity.

There are currently around 2,500 members of the APS College of Clinical Psychologists and a further 500 who have been assessed as demonstrating the training- and experience-based eligibility criteria for this APS College and who practice as 'Specialist Clinical Psychology' providers under Medicare. The number of registered Psychologists in Australia is around 22,000 and, by far, the majority are general (or non-specialist) psychologists.

- **This means that only 10 percent to possibly 15 percent of Registered Psychologists in Australia currently practice with demonstrated competencies in Clinical Psychology**
- **However, apart from within Western Australia, there is little way for the public to be clearly informed as to from whom they would receive a Clinical Psychology service**
- **Furthermore, nor are there clearly defined dissuaders and penalties for non-Clinical Psychology providers to claim that that they provide the same services.**
- **I understand that it is the public interest that is the stated primary driver for National Registration and Accreditation.**

The practice of Clinical Psychology is subject to Specialist Registration provisions within Western Australia which enables the public to be clearly informed in their decision-making regarding how to access clinical psychology service provision. Penalties exist to deter others from misrepresenting that they provide Clinical Psychology services.

In considering the transition to National Registration and Accreditation of Health Professionals, it would seem that removing Specialist Registration for Clinical Psychologists would make it much more difficult for consumers, GPs and other professionals to clearly identify from whom they should seek professional clinical psychology service provision. It

would also be more difficult to prevent others from misrepresenting themselves as providing the same services as a Clinical Psychologist.

I have worked within Western Australia and Victoria, where there is no Specialist Clinical Psychology registration, and wish to advise that in Victoria there is widespread confusion and disempowerment amongst the consumer community as a result of the ambiguity in identification of an accredited Clinical Psychologist.

In 2001 the Full Bench of the Industrial Relations Commission of Western Australia determined that there was a higher “Work Value” of the “Calling” of Clinical Psychology over that of general, or non-specialist Clinical, Psychology¹. I quote the following section on Pages 23 – 24 of this document, which differentially defines the Clinical Psychology profession from Psychology and allied health, with acknowledgement and gratitude to all listed authors and co-editors involved in compiling this document -

“...Clinical Psychologists are often grouped with “allied health” for administrative purposes and this has led to a mistaken belief that there is sufficient commonality between this profession and other allied health professions to treat all groups similarly. Clinical Psychologists differ markedly from other allied health professions.

The training of Clinical Psychologists differs in many ways from other allied health professionals. 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 training of allied health professions is geared towards general medical, general health or general community problems, with a short elective in mental health.

No other allied mental health professional receives as high a degree of education and training in mental health as the Clinical Psychologist. Other than psychiatry, Clinical Psychology is the only mental health profession whose complete post-graduate training is in the area of mental health.

Clinical Psychologists are trained as scientist-practitioners. This added emphasis on the scientific in university training enables the profession of Clinical Psychologist to bring research and empiricism to human service delivery and thus increase accountability. The formal scientific training of Clinical Psychologists does not make research the end in itself, but is applied to the delivery of psychological services and to contribute to the knowledge upon which mental health services are based. Empirical training equips the Clinical Psychologist with the skills to understand and contribute to new research, evaluate interventions and apply these empirical skills to their own treatment of patients and that of the mental health services themselves. This formal training also carries with it the obligation to provide to the betterment of the wider society within which the Clinical Psychologist works.

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 Psychologists Board of Western Australia (the State registration authority). Within the last few years more and more students are completing either a Doctorate of Psychology with an additional formal year of training at the university, or a PhD in Clinical Psychology and thus adding a further two years to their formal university training.

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. This very high level of specialist competence of Clinical Psychologists is acknowledged by all private insurance companies who recognise Clinical Psychologists as providers of mental health services.

Post-graduate university level training programmes for Clinical Psychology must be accredited by the Australian Psychological Society. This requirement insures uniform standards of excellence in Clinical Psychology training throughout Australia. Once the graduate has completed an accredited programme of studies, s/he must register with The Psychologists Board of Western Australia to undertake a further two years of additional clinical work in supervision. When the individual has completed this period of supervised practice, and only when this has subsequently been accepted by The Psychologists Board of Western Australia, is the individual accredited with the specialist title, "Clinical Psychologist". To further ensure quality of care, it is a mandatory requirement of the Australian Psychological Society and The Psychologists Board of Western Australia that all Clinical Psychologists adopt the ethical code of professional standards of conduct.

Clinical Psychologists are senior staff in the health system with a high degree of professionalism and expertise in the mental health area. Clinical Psychologists have specialist psychological training relevant to the treatment of mental health patients and are able to take a senior role in organisational activities. Clinical Psychologists are key service providers in mental health service delivery..."

Finally, in 2006 the Commonwealth passed Medicare Legislation that enables Clinical Psychologists and other non-Clinical Psychologists to provision Medicare-rebated mental health service provision.

Significantly, the definition of a Clinical Psychologist is articulated in this Commonwealth Medicare Legislation and incorporates the internationally recognised standard of specialised post-graduate professional training in Clinical Psychology (a minimum of seven years' training in total) and the requirement for demonstrated ongoing specialised Professional Development to maintain Specialist Clinical Psychology accreditation. The Specialist Medicare Rebate is set at 150 percent of the generalist/non-clinical Psychology Rebate, which reflects the recognised differentiation between Clinical Psychology and other Psychology in the field of Mental Health.

In conclusion, there are at least four precedents in current Australian legislative and professional accreditation processes that provide a very strong argument for the clear delineation of a Clinical Psychologist in the public interest within National Registration and Accreditation. They include –

- **industry-wide accepted accreditation and specialist professional postgraduate (at Clinical Masters/Doctorate minimum entry level) training standards for Clinical Psychology in Australia, as opposed to a minimum four year degree for general (non-specialist) Psychology,**

- **current Specialist Registration for Clinical Psychology within Western Australia under the auspices of The Psychologists Board of Western Australia (the State registration authority),**
- **2001 Industrial Relations Commission (Full Bench) determination of ‘Work Value’ for Clinical Psychology as distinct and higher than general (non-specialist) Psychology, and**
- **2006 Commonwealth Medicare legislation which defined a Clinical Psychologist and Specialist Clinical Psychology Medicare Rebates**

Again thank you for your invitation for submission, and please do not hesitate to contact me should it be deemed helpful for the work of the Committee.

Yours faithfully,

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ⁱ *The document submitted is entitled “Increased Work Value: The Case of Clinical Psychology”, prepared by the HSOA Clinical psychology Negotiating Committee in support of Application No P39 of 1997 HSOA vs. Royal Perth Hospital & Others. The IRC determination was released in 2001. I wish to express my acknowledgement and gratitude to all authors and co-editors involved in compiling this document*