

Senate Finance and Public Administration Committees
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Inquiry into the administration of health practitioner registration by the Australian Health Practitioner Regulation Agency (AHPRA)

Re: Administration of the Psychology Board of Australia; registration fees for Postgraduate Students

This submission is made by the Australian Psychological Society (APS) College of Clinical Psychologists on behalf of students enrolled in professional psychology programs throughout Australia. This submission refers in particular to the Psychology Board of Australia (PsyBA) and is relevant to point (c) in the inquiry terms of reference: *The impact of AHPRA processes and administration on health practitioners.*

The APS College of Clinical Psychologists recognises the essential role played by both the PsyBA, and AHPRA in protecting the public and ensuring members of the psychology profession adhere to the highest standards of practice. However, the APS College of Clinical Psychologists is nonetheless concerned about the current fee structure for psychology postgraduate students who are undertaking professional training programs.

Registration as a Provisional Psychologist is a requirement for students who are enrolled in professional postgraduate psychology training programs. At present, the annual registration fee for Provisional Psychologists is \$390. This is equivalent to the fee charged for general registration as a Psychologist. In addition, the PsyBA requires an initial application fee of \$410, although this application fee is currently waived. It is unclear how long the PsyBA will continue in waiving this application fee. These fees were recently reviewed (March, 2011) by the PsyBA's finance and management committee and AHPRA, and were left unaltered.

The Australian Vice-Chancellors' Committee (AVCC, 2007) reported that 'postgraduate coursework students in particular are struggling to complete their programs due to financial pressure and other commitments'. A recent survey commissioned by the APS College of Clinical Psychologists reported on data from 153 students enrolled in clinical postgraduate training programs throughout Australia and highlighted that financial hardship was a significant ongoing issue for postgraduate students. It is most unfortunate that AHPRA registration fees are exacerbating this financial pressure for psychology postgraduate students. The current Provisional Registration fee constitutes a significant proportion of the average annual income for a postgraduate student, and is financially burdensome for a group who are already under significant financial pressure.

There are several degree pathways for students undertaking professional postgraduate training in Australia. While most students opt for the 2 year full time Masters degree, others undertake higher qualifications (which are highly sought after in the mental health sector) such as the 3 year Doctor of Psychology or the 5 year Master of Psychology / PhD. As psychology postgraduate students are required to have Provisional Registration whilst enrolled in all years of their course, for those undertaking higher degrees the annual \$390 fee for Provisional Registration impacts even more significantly as it must be paid repeatedly. This effectively acts as a penalty and disincentive for students to pursue higher postgraduate psychology qualifications. This has negative implications for the health workforce as it will likely discourage the attainment of the advanced skills training provided by these higher professional degrees.

There are limited opportunities for postgraduate psychology students to supplement their income and thereby offset the burden of the Provisional Registration fee. This is because of the restrictions placed upon students by universities regarding the number of paid hours of employment students can engage in (usually within the range of 10 hours per week). This places significant restriction on the income of students and further highlights the imposition of the \$390 fee.

Many Provisional Psychologists who undertake the alternative professional training route of 4 years undergraduate study and 2 years supervised practice are able to derive income from their work as a Provisional Psychologist. This is generally not the case for postgraduate students. In fact, many universities forbid students from using paid employment as part of their placement hours as such work is not designed to meet learning objectives for postgraduate training.

The Provisional Registration fee for postgraduate psychology students is also out of kilter with other allied health professions. Students of other allied health professions are at present not required to pay any fee for registration during their training period.

We acknowledge that the PsyBA utilises the registration fees of Psychologists and Provisional Psychologists to undertake its business. Further, we believe it is appropriate that postgraduate students contribute to the administrative costs of Provisional Registration. However, we believe it inequitable that postgraduate students are charged the same registration fee as fully registered general psychologists. Further, in some cases the PsyBA fee for Provisional Registration is more than double the registration fee charged under the previous state based system. For example, prior to the implementation of the National Registration and Accreditation Scheme the now disbanded Victorian Psychologists Registration Board charged postgraduate students an annual registration of fee of \$180. Accordingly, we seek a fee of this (e.g. \$180), or similar magnitude, for postgraduate students.

In sum, the current registration fee for Provisional Registration impacts significantly on the financial situation of psychology postgraduate students. It is our hope that AHPRA and the PsyBA may see it appropriate to reduce this fee. Thank you for the opportunity to provide this submission in relation to administration of health practitioner registration by the Australian Health Practitioner Regulation Agency (AHPRA).

Thank you for consideration of this submission.

Sincerely,

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