

Dear Sir/Madam,

I am writing to express deep concern regarding the developments in the administration of health practitioner registration by AHPRA.

Our organisation is a small not-for-profit community-based specialist-psychology service. All of our seven staff are highly experienced and skilled psychologists with combined experience of over 100 years practice. The team consists of six clinical neuropsychologists and one behavioural psychologist, all working at a senior level, and providing mentoring and training to other psychologists and service providers. Our staff are routinely asked to deliver workshops or provide services interstate and overseas. Our area of expertise is working with people with acquired brain injury who present with behavioural and emotional difficulties. We provide neuropsychological assessment, behaviour intervention, psycho-education, counselling, rehabilitation and cognitive-behaviour therapy. To date we have been offering bulk billing for psychology services under the Medicare Better Access initiative.

Our primary concerns regarding the new regulations applied to the psychology profession are that:

- Clinical neuropsychologists and general psychologists practicing at a senior level are funded at a lower rate than new graduate clinical psychologists under the two-tiered Medicare system.
- Experienced, registered psychologists who are not members of an APS college are formally “un-endorsed”.
- We are starting to hear stories in the community and the media that only “clinical psychologists” are viewed as “real” psychologists in the public eye.
- Continuing professional development (CPD) requirements have not been communicated and coordinated by respective bodies in a timely manner, creating much confusion and uncertainty across the sector.
- The newly introduced CPD requirements to ensure continued provider status with Medicare will place a great burden on practitioners, and the looming deadline in June is unrealistic. A longer planning and transition time is required.
- Our organisation will have to review its capacity to continue offering services under Medicare. The new regulations may mean we are no longer able to offer a valuable service to the community. We currently offer specialised intervention for mental health problems in individuals with acquired brain injury, as many psychologists, including clinical psychologists, are often not able to accommodate the particular needs of this client group. It is foreseeable that the two-tier system could potentially disadvantage people in accessing the specialist psychological support that they need.
- It has been widely acknowledged that psychologists are leaving the profession, and that the potential to access services under Medicare will be reduced in response to the management of these changes.

In terms of addressing these areas of difficulty, I would suggest:

- Equity for all suitably qualified and experienced psychologists and abandonment of the two-tiered system.
- Review of the endorsed/un-endorsed status for psychologists.
- An education campaign for the public regarding psychology services.
- An independent body (not the APS) manage CPD requirements.

Yours sincerely,