I submit my concerns re: the Commonwealth Funding and Administration of Mental Health Services

Inquiry point e) mental health workforce issues, including:
   (i) the two-tiered Medicare rebate system for psychologists

The current two tiered rebate system reflects the very real difference in training and skills between clinical psychologists and generalist psychologists. Generalist psychologists who have not completed this additional clinical training, do not necessarily appreciate the additional knowledge and specialist skills that a clinical psychologist possesses.

The rigorous and lengthy postgraduate clinical psychology training builds a knowledge base and clinical skills well above those of a generalist psychologist. The clinical training my peers and I received during our specialist training included coursework, research and clinical placements offering specialist training in the clinical applications of psychological theory - in understanding and treating psychological difficulties with the application of psychological theories. Specifically:

- a solid knowledge of mental health disorders and psychological presentations, including diagnosis, differential diagnosis and understanding of co-morbidity as well as the assessment of severity
- study of emotional wellbeing and application of psychological theory to promote this well being
- training in psychometric assessments
- training across key areas of mental health including learning difficulties, older adults, child and family
- specialist skills in assessing and formulating complex and enduring cases – using psychological models with a strong evidence base
- specialist skills in more than one evidence based psychotherapy – including cognitive behavioural, behavioural, systemic therapies
- training in evaluating psychological therapy by not only understanding its theoretical underpinnings, but by discerning its effectiveness based on peer reviewed research.

Training in applying psychological theory to devise and adapt treatment plans for specific mental health presentations

- training in research design and statistics – we can not only design our own research effectively, but more importantly are qualified to interpret and evaluate research findings, thus choosing the most appropriate psychological treatment for each presentation. Not all treatments are the same and even treatments with a strong evidence base are not equally effective for every presentation. Our ability to determine the most appropriate treatment for a mental health disorder and to review progress and outcome during treatment, is strongly dependent on this specialist training and from my experience, unique to clinical psychologists as opposed to generalist psychologists.

This combination of skills enables Clinical Psychologist to assess and treat a wide range of mental health difficulties, targeting treatment to address each presentation and to have a unique responsibility for outcome and evidence base.
Notably, the specialist skills of clinical psychologists are internationally recognised. Clinical Psychology is a specialism in the UK, North America, Western and Eastern Europe. In terms of international comparison, Psychology is a doctoral level profession in The United States and in Canada a Masters or Doctoral level of study is required for a clinical psychologist, taking between 6 and 10 years. In the UK a four year, generalist psychologist is not eligible for registration, as postgraduate study is required, currently of a doctoral level.

Retaining the current two-tiered rebate scheme recognises the substantially different skills of generalist and clinical psychologists. Further, it enables the public to make an informed choice as to psychological treatment, clearly highlighting the different skills and training between generalist and clinical psychologists. To abolish this two tiered system would disadvantage clients, not only would the distinction between services be less apparent, but the more expensive skills of a specialist, clinical psychologist would become less affordable to those who most need them, those with chronic and enduring mental health difficulties, whom clinical psychologists are best trained to treat. In the longer term, it would threaten the quality of psychological practitioners. If clinical psychology is not distinct from generalist psychology in terms of skills and training, less psychology graduates are likely to pursue clinical psychology as a worthwhile career– both economically and in terms of professional recognition. This would reduce the skills base of Australian psychologists as a whole.

In the interest of those who use psychological services, the practitioners who devote years of postgraduate study to their specialism and the ongoing provision of clinical psychological services to those in highest need, I ask that you maintain the two tiered level of service.

Yours faithfully

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