

11th April 2011

Open Senate Inquiry into the Australian Health Practitioners Regulation Agency AHPRA
PO Box 6100
Parliament House Canberra
ACT 2600

To Whom It May Concern,

I wish to advise that I have been very dissatisfied with the Australian Health Practitioners Regulation Agency AHPRA on a number of levels. These are as follows:

1. **AHPRA's time wasting and poor telephone access.** When I try and phone them it takes an extraordinary amount of time to get through, anything from 20-40 minutes.
2. **AHPRA's lack of knowledge and understanding.** When you do get through often the people you are speaking to do not have the in depth knowledge and understanding about your specific area. It is obvious the expectation that you can have one central area and that the people in this area can provide advice to a whole range of different allied health professionals is untenable. Therefore the information is often incorrect or inaccurate and overly beaurocatic.
3. **AHPRA's expensive and discriminatory fee generation.** AHPRA processing fees are exorbitant and discriminatory. I have been a Member Australian Psychological Society (MAPS) since 1989, [REDACTED] and the Psychologist's Registration Board since 1991 [REDACTED]. The following example highlights my concern. Obviously being a Psychologist and APS member of over 20 years I could have joined the APS Colleges and therefore been endorsed but it was not an issue. However with the advent of National Registration and endorsement I scrambled to become endorsed into the APS colleges like many of my colleagues. I applied and went through the APS rigorous endorsement process incurring an APS processing fee of approximately \$155.00 for each college endorsement. During this period the APS was inundated with many applications for endorsement and was having difficulty processing these applications by the 26th June 2010

deadline when National Registration was introduced. The APS was granted a 3 month grace period to process these applications [REDACTED]. Psychologists who were processed before the 26th June were transitioned for endorsement to AHPRA with no additional fees. Those Psychologists who were processed by the APS for endorsement during this extended grace period and were successful had then to apply to AHPRA for endorsement incurring another \$200.00 application fee (per college). As I am endorsed into 2 colleges this meant an additional \$400.00. I make the point that I believe this additional application fee to AHPRA is exorbitant and unnecessary since the APS had done all the work and I simply had to fill out a form to AHPRA and attach the letter that the APS provided. It is also discriminatory because my colleagues who were endorsed by the APS by the 26th June did not incur an additional fee to AHPRA.

4. **AHPRA's non- existent and poor 'Complaint Handling Process'.** When I sent letters of complaint into AHPRA with my application fee for endorsement it was ignored until a clerk who was trying to process my payment and learnt of my concerns escalated it to a [REDACTED] [REDACTED] sent me a very terse and high handed email [REDACTED] to which I responded. By the tone of his email he was obviously irritated that he had to deal with this at all.
5. **The Current Discrimination between 'Generalist' and 'Specialist' Psychologists.** Since National Registration was introduced the majority of psychologists are now unendorsed which means overnight their qualifications have been eroded and many consider that this puts them at a disadvantage in the eyes of the public they service. While I am pleased that my endorsement has been recognised by AHPRA I remain dissatisfied with incurring another fee and the lack of a satisfactory complaint handling process.
6. **The unjust and discriminatory two tiered 'Medicare System'** which promotes clinical psychologists above counselling psychologists because clinical psychologists attract a higher fee. Evidence has proven this has no justification in terms of patient/client outcome or expertise of the provider. It is also detrimental to clients since it limits the counselling psychologist's ability to deliver a full range of psychological treatment options and benefits to their clients.
7. **General Practitioners are now the 'gatekeepers' regarding psychological referrals.** This has resulted in Medical Centres demanding between 25% - 30% of the psychologists takings in lieu of referrals made to them which far exceeds the cost of rent and administration services. This amounts to doctors taking a 'kick back' from the psychologist for referring clients to them and is unconscionable. This practice has been outlawed in other industries like finance but is now thriving in medicine.

All these concerns have not instilled confidence in AHPRA and a thorough review is warranted.

Yours sincerely

Carin Swaddling BA (NSW) ~~MA~~ (Psych) Dip Ed (SYD) MBA (UTS) MAPS