

Submission to the Productivity Commission

In Australia, psychologists are required to be registered with the Psychology Board of Australia (PBA) to provide mental health services. Since the introduction of the Better Access program the

Australian Psychological Society (APS) has advocated and successfully achieved a 2-tier system of Medicare rebates not based on severity of mental health issues i.e moderate to severe presentations but based on the claim that clinical psychologists are more qualified than all other psychologists, despite all psychologists completing approved pathways of training and meeting the requirements of the PBA to be registered psychologists.

Clinical psychologists complete a master's in clinical psychology (5th and 6th years of training); some psychologists choose to complete masters in psychology (5th and 6th years of training) in different disciplines such as forensic, counselling, education and development etc. Most psychologists (approximately 60%) choose to complete their 5th and 6th years of training via an APS and PBA approved internship program within a community environment under strict supervision and assessment of skills.

This 2-tiered system has disadvantaged both psychologists and their clients as all non-clinical psychologists can only provide a medicare rebate of \$84.80 to their clients where a clinical psychologist is able to provide a medicare rebate of \$124.50. In both circumstances the clients will receive the same evidence-based interventions however one is substantially disadvantaged over the other.

To support the above statement, I refer to researchers from Melbourne University (Pirkis et al 2011) who evaluated the Better Access program and provided evidence that registered and clinical psychologists all provide the same psychological services to people in the moderate to high need categories and achieve outcomes that are comparable with international standards. The research was unable to find evidence that there was a significant difference between clinical and non-clinical psychologists. Why then does the Australian Government waste much valued funds for psychological care on a 2-tiered rebate scheme that has not been found to produce substantial differences in outcomes for the higher rebate paid to clinical psychologists?

What is even more concerning is that 42% of current clinical psychologists did not complete a masters in clinical psychology but were "grandfathered" into the title of clinical psychologist as they had chosen to be members of the APS College of Clinical Psychologists. At that time the college was an interest group and not based on actual qualifications other than being a psychologist or clinical psychologist. The result is that the Australian Government is currently permitting and paying non-clinical psychologists to mis-represent themselves to GP's and the general public. This is ethically unacceptable.

The on-going push by the APS to advocate that the Australian Government favour clinical psychologists over all other psychologists in the provision of mental health services – particularly in the severe range, is not in the best interests of the general public. It ignores/

devalues the training required to be registered as a psychologist and the on-going training and experience of said psychologists. Does the Australian Government wish to lose these valued skills and if so how are all these distressed people in the severe category going to receive care if 60% of the currently registered psychologists can no longer provide services. Please refer to the above cited research that found no evidence in differentiated outcomes between clinical and non-clinical.

I would propose that a one-tier system is implemented that includes all PBA registered psychologists and that there is an increase in the provision of medicare rebated sessions to 20 with a further 8 being available under exceptional circumstances negotiated/ agreed with the treating GP and psychiatrist. This I believe would be in the best interests of the general public and would address the divisive nature of the current APS psychological debate. We are all here to service our clients not destroy the profession.

Thank you for your time

Current practising psychologist