

June 24, 2020

The Hon Dan Tehan MP
Minister for Education
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

By post and email: dan.tehan.mp@aph.gov.au

RE: Changes to university fees for Clinical Psychology

Dear Minister Tehan,

I refer to the recent announcement made by the Federal Government of fee changes in university courses, including the reduction in fees of clinical psychology degrees by 46% from 2021.

While we applaud government support for the education of future psychologists, we are deeply disappointed that at this stage only a small proportion of psychology education, clinical psychology courses, will attract a fee reduction while other psychology courses are likely to attract fee increases or remain the same.

We are on the cusp of a mental health crisis in Australia. Suicide rates in Australia are forecast to rise by up to 50 per cent due to the impacts of the coronavirus and predicted to outstrip deaths from the pandemic by up to 10 times. As Australians are dealing with a heightened need to access mental health support, we want to take the opportunity to highlight a disparity suggested in the fee changes.

I represent the Australian Association of Psychologists (AAPi), a not-for-profit peak body for psychologists that aims to preserve the rich diversity of psychological practice in Australia. Formed in 2010, by a group of passionate grassroots psychologists, the AAPi's primary goal is to increase access to psychologists by addressing inequality in the profession. The AAPi represents all psychologists and their clients equally to government and funding bodies. This includes our mission to lobby for equitable access for the Australian public to professional psychological services funded under Medicare.

Registered psychologists make up around 70% of the psychology practitioners in Australia, with 30% endorsed as clinical psychologists. Due to the existing Medicare two-tier rebate system, psychology appointments are rebated based on the endorsements status of the practitioner so the majority of clients receive a lower rebate when consulting the majority of psychologists.

Australia's growing mental health burden needs a whole of industry approach that considers and acknowledges all branches of psychology, rather than concentrating on just one niche segment.

Clinical psychology is consistently given preference in terms of funding and now educational advantage.

The distinction of a 'clinical' psychologist stems from an historical unfounded claim of inherent superiority of 'clinical' psychologists, in order to create a niche within the profession. This has created an unfair disadvantage today to the clients of all other registered psychologists who only qualify for the lower Medicare rebate. If you choose to lower the fees for clinical psychology degrees, this reduces the likelihood of future psychologists electing to study other very important areas of psychology including but not limited to:

- clinical neuropsychology
- community psychology
- counselling psychology
- educational and developmental psychology
- forensic psychology
- health psychology
- organisational psychology, and
- sport and exercise psychology.

The current endorsement system is significantly flawed and was further distorted by a loophole whereby members of the Australian Psychological Society's colleges were 'grandfathered' into endorsement. This means that a significant number of psychologists, particularly clinical psychologists, were granted clinical endorsement despite not completing the espoused required academic qualifications. Registered psychologists complete no less study or practice than clinical psychologists. In fact, a large portion of registered psychologists hold postgraduate qualifications such as masters, PhDs or specific training in particular techniques such as EMDR. Additionally, our membership consists of many psychologists with many decades experience in clinical settings, who have been deemed ineligible for clinical endorsement and therefore the higher Medicare rebate, for no logical reason.

Research¹ demonstrates that both registered psychologists and clinical psychologists achieve beneficial outcomes. At the same time, there is no evidence to support that clinical psychologists are better skilled or provide better outcomes than other psychologists. There is simply no evidence to warrant a difference in funding or endorsement.

Clinically endorsed psychologists primarily operate in urban areas, while the majority of psychologists operating in rural areas do not operate in the niche of clinical psychology. Data from the Psychology Board of Australia's 'Area of practice endorsement data tables: January 2014', shows that only 23 clinical psychologists work in remote communities across Australia; 212 in outer regional; while 7969 work in metropolitan/capital cities. This means that Australians in rural areas are forced to pay more out-of-pocket because of this administrative loophole.

The dual Medicare rebate system has caused nothing but divisiveness in the profession, and sadly now this announcement preferencing clinical psychology programs over all other psychology

¹ Pirkis, Ftanou, Williamson, Machlin, Spittal & Bassilios (2011a). Australia's Better Access initiative: An evaluation. Australian and New Zealand Journal of Psychiatry, 45:726-73

programs will further destroy our profession. Ultimately, it is the community members in need who are missing out. Australians need all types of psychologists, now and into the future. Isolating clinical psychology as an in-demand field for the university fee reduction will only contribute further to the discord in the industry and add to the burden of the community, who are already penalised and pay more out-of-pocket to see any psychologist who does not hold clinical endorsement.

Minister, we wish to request for a time to speak over the phone or video conference to provide a comprehensive briefing of the issue. We want to ensure that changes to psychology education are well-thought out and will meet the needs of the Australian public into the future. We need to remove the ongoing misperceptions of the superiority of clinical psychologists over registered psychologists, and we need to remove barriers to the access and provision of mental health services and enable individuals to get the help they need from ALL psychologists. Failing to do will cause an even greater decline in the nation's mental health, now and into the future.

I hope you will be able to assist our members who are working very hard to deliver the critical treatment to Australians in need, and yet continue to be made less available to the community, and find themselves discriminated against by the system due to a flawed and inconsistent endorsement system.

We appreciate you taking the time to consider this important request as soon as possible and we are committed to working with the Government to navigate this exceptional challenge together.

Yours sincerely,



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