

Public consultation: Draft guidelines for the national psychology exam

The Psychology Board of Australia (the Board) is seeking your feedback about our proposal to adopt the *Draft guidelines for the national psychology exam* (the draft exam guidelines). There are ten specific questions we would like you to address below. All questions are optional and you are welcome to respond to any that you find relevant, or that you have a view on.

Providing feedback

Please email your submission to: psychconsultation@ahpra.gov.au. The submission deadline is close of business on **Monday 24 March 2025**.

Initial questions: To help us better understand your situation and the context of your feedback, please provide us with some details about you.

Question A: Are you completing this submission on behalf of an organisation or as an individual?

Organisation

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

Individual

Name: Dr Helen Stallman

Name of organisation: [REDACTED]

Contact email: [REDACTED]

Question B: If you are completing this submission as an individual, are you:

A registered health practitioner?

Profession: Clinical Psychology [or tap here to enter text.](#)

A consumer / client?

Other – please describe: [Click or tap here to enter text.](#)

Prefer not to say.

Questions for consideration – Updating the Guidelines for the national psychology exam

Preferred option

Question 1: Do you support updating the exam guidelines (Option 2)? Please provide a rationale for your view.

Your answer:
Yes

Question 2: Do you support including the updated general registration competencies as outlined in the [Professional competencies for psychologists](#) into the draft exam guidelines? Please provide a rationale for your view.

Your answer:
Yes

Question 3: Do you support an exemption from sitting the exam for international applicants for general registration who hold a qualification that is substantially equivalent, or based on similar competencies, to a Board-approved fifth and sixth year qualification? Please provide a rationale for your view.

Your answer:

Not unless it has been demonstrated that all such people would pass the exam. If there is no evidence to date, but an assumption, why not considering having these people sit the exam, and then add the exemption once it has been proven that 100% of them pass the exam?

Content of the draft exam guidelines

Question 4: Is there any content that needs to be changed, deleted, or added into the draft exam guidelines?

Your answer:

I believe a review is necessary to ensure the exam is aligned with a contemporary, consumer-centered framework.

1. "Working with people from diverse groups" Competency:
 - The current phrasing, "working with people from diverse groups," risks perpetuating a stigmatising model. This approach leads to clinicians making generalisations based on single or limited characteristics of healthcare consumers (e.g., race, sex, gender, religion, country of birth, financial status), rather than acknowledging the individual's unique self, made mostly of similarities with all other humans and a unique combination of a vast number of characteristics.
2. Assessment Measures: "Case studies/case reports":
 - The term "case" can be perceived as impersonal and pathologising. It reduces individuals to their diagnoses or presenting problems.

- To promote a more respectful consumer-centred approach, I suggest replacing "case studies/case reports" with:
 - "Clinical reports"
 - "Clinical studies"
- This shift in language reflects a focus on the individual's holistically, rather than solely on their "case" or diagnosis.

I believe these changes will contribute to a more ethical, inclusive, and effective psychology profession.

Question 5: Is the language and structure of the proposed draft exam guidelines helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?

Your answer:

The guidelines require revision to align with a contemporary, consumer-centered framework. Unintended consequences of clinician-centered models include: reinforcing power imbalances, pathologising people, stigmatising people based on single characteristics, and promoting outdated practices.

Consumer-centered language promotes: collaborative healthcare partnerships, holistic understanding of problems, respect and dignity for every consumer, and best practice.

Moving from clinician- to consumer-centred language may include replacing:

"client" with "healthcare consumer."

"risk" with "need"

"case studies" with "clinical reports" or "clinical reports"

"working with people from diverse groups" with "conducts consumer-centred assessments and delivers consumer-centred interventions"

Proposed implementation of the draft exam guidelines

Question 6: The Board proposes to publish the draft exam guidelines when they are approved, but to have a future date for when it comes into effect (1 December 2025), to allow enough time for exam candidates to prepare. The first exam including the updated professional competencies will not be until the February 2026 sitting of the exam. Do you support this transition and implementation plan?

Your answer:

Yes

Question 7: Are there specific impacts for higher education providers, accreditation agencies, international regulators, governments, employers, psychologists, supervisors, exam candidates, clients/consumers or other stakeholders that the Board should be aware of, if the draft exam guidelines were to be approved? Please consider positive impacts and any potential negative or unintended effects in your answer.

Your answer:

Question 8: Would the proposed changes to the draft exam guidelines result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community? If so, please describe them.

Your answer:

The current draft's medicalised approach risks treating Aboriginal and Torres Strait Islander people as a homogenous group, ignoring individual uniqueness and diverse needs, leading to further stigmatisation.

- "Diverse groups" perpetuates harmful stereotypes.
- "Client" implies ownership, damaging trust.
- "Risk" leads to deficit-based approaches.
- Assumptions about race and culture of an individual can cause assessment and treatment bias and deter access to care.
- Consumer-centered language and practice would ensure individual understanding and respect, addressing these risks.
- Therefore, the guidelines must prioritise humility, consumer-centered language, and individually responsive assessments and treatment to avoid negative impacts.

Question 9: Would the proposed changes to the draft exam guidelines result in any adverse cost implications for practitioners, clients/consumers or other stakeholders? If yes, please describe.

Your answer:

Other

Question 10: Do you have any other feedback or comments about the draft exam guidelines?

Your answer:

Public consultation: Draft guidelines for the national psychology exam

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Organisation

Name of organisation:

Contact email:

Individual

Name: Dr Naomi Malone

Name of organisation: Dr Naomi Malone Consulting

Contact email:

Question B: If you are completing this submission as an individual, are you:

A registered health practitioner?

Profession: Counselling Psychologist

A consumer / client?

Other – please describe: [Click or tap here to enter text.](#)

Prefer not to say.

Questions for consideration – Updating the Guidelines for the national psychology exam

Preferred option

Question 1: Do you support updating the exam guidelines (Option 2)? Please provide a rationale for your view.

Your answer:

Yes.

As an experienced psychology internship supervisor, I see several key reasons why AHPRA should update the National Psychology Exam guidelines to better reflect contemporary psychology practice, enhance the quality of training, and ensure the exam serves as a meaningful assessment tool.

The exam should align with contemporary psychological practice by reflecting current, evidence-based psychological theories and interventions. The field is shifting towards process-based therapy models, neurodiversity-affirming approaches, and integrated care frameworks. Ensuring that the exam assesses these developments would help graduates transition more effectively into professional practice.

It is also crucial for the exam to integrate trauma-informed and neurodiversity-affirming approaches. Given the growing awareness of trauma's impact on mental health and the importance of affirming neurodivergent individuals, psychologists must demonstrate competency in these areas. The exam should evaluate understanding of these frameworks to ensure that newly registered psychologists provide ethical and effective care.

Psychologists working in rural and remote areas face distinct challenges, including service shortages, interdisciplinary collaboration, and the need for flexible treatment models. The exam should assess competencies relevant to these practice settings, ensuring that graduates are prepared to provide quality care in diverse geographic and systemic contexts.

Cultural competency and responsiveness must be a priority in psychology education and assessment. The current guidelines should be updated to incorporate robust evaluation of psychologists' ability to work with First Nations clients and diverse cultural communities. Cultural safety is essential to ethical practice, and this should be reflected in the exam's content and structure.

The structure of the national exam creates disparities in training pathways, particularly disadvantaging those completing shorter university pathways such as the 5+1 internship. Despite these interns undertaking rigorous supervision and casework, they often face additional barriers compared to those in longer higher-degree pathways. Updating the guidelines could create a fairer and more equitable assessment system that recognizes diverse routes to professional competence.

Rather than emphasizing rote learning, the exam should assess psychological flexibility and critical thinking. Effective clinical practice requires nuanced decision-making, ethical reasoning, and the ability to tailor interventions to individual client needs. The exam should shift towards assessing these applied skills to ensure graduates can navigate complex clinical situations.

In my experience as a supervisor, the exam does not always align with the core competencies required for effective practice. Many supervisors find that their interns are well-prepared for real-world work but struggle with the exam's format or emphasis on theoretical content over practical decision-making. Incorporating supervisor insights into the guidelines would improve the relevance of the exam.

Psychologists increasingly engage in systemic work and advocacy, particularly in areas such as disability support, social justice, and service navigation. The exam should evaluate competencies related to these aspects of practice, as they are critical in multidisciplinary and community-based settings, particularly for those working with the NDIS and other funding systems.

The rapid expansion of telehealth and digital mental health services requires psychologists to develop competencies in online therapeutic engagement, risk management in virtual settings, and ethical considerations specific to digital practice. The current exam does not adequately assess these skills, despite their growing importance in service delivery.

Finally, the exam presents significant stress and accessibility barriers, particularly for those from marginalized backgrounds. The financial cost, preparation time, and high-stakes nature of the exam can disproportionately impact candidates from disadvantaged backgrounds. Reviewing and updating the guidelines to enhance accessibility while maintaining rigorous professional standards would help ensure a fairer system for all aspiring psychologists.

Question 2: Do you support including the updated general registration competencies as outlined in the [Professional competencies for psychologists](#) into the draft exam guidelines? Please provide a rationale for your view.

Your answer:

Yes

Integrating the new competencies into the exam would align training, supervision, and assessment, ensuring consistency in how psychology graduates are prepared and evaluated. Currently, discrepancies exist between what supervisors assess during internships and what the national exam evaluates. Updating the exam to reflect these competencies would create a more seamless transition from supervised practice to full registration, allowing trainees to develop the skills directly relevant to safe and effective practice.

The new competencies emphasize cultural responsiveness, ethical decision-making, and reflective practice, which are essential for working safely and respectfully with diverse populations, including Aboriginal and Torres Strait Islander peoples. Updating the exam to assess these areas would support a profession-wide shift toward more inclusive and socially responsive practice.

Another key consideration is the evolving nature of service delivery, including rural and remote practice, telehealth, and engagement with complex service systems such as the NDIS. The new competencies recognize these challenges, and incorporating them into the exam would ensure

that candidates are assessed on their ability to navigate contemporary practice settings rather than focusing solely on traditional face-to-face models.

Question 3: Do you support an exemption from sitting the exam for international applicants for general registration who hold a qualification that is substantially equivalent, or based on similar competencies, to a Board-approved fifth and sixth year qualification? Please provide a rationale for your view.

Your answer:

No.

In my opinion, applicants for general registration should be required to sit the National Psychology Exam, ensuring that Australian psychological practice remains consistent, competent, and aligned with national standards.

Firstly, while an international qualification may be comparable in structure and content, it does not guarantee that the applicant has been trained in line with Australia's specific regulatory, ethical, and legal frameworks. The National Psychology Exam serves as a standardized assessment to ensure that all practitioners, regardless of their training origin, have a clear understanding of the ethical and legal responsibilities unique to Australian psychological practice. Given the complexities of Australian healthcare laws, privacy regulations, and mandatory reporting obligations, it is critical that all psychologists demonstrate competency in these areas before being granted registration.

Secondly, psychology practice is deeply influenced by cultural and contextual factors, including the expectations of clients, the role of psychologists in multidisciplinary settings, and engagement with diverse populations. Australian psychology places a strong emphasis on culturally responsive and trauma-informed care, particularly in working with Aboriginal and Torres Strait Islander peoples. International training programs may not adequately prepare psychologists for the cultural, systemic, and professional expectations unique to the Australian context. The exam helps to assess whether an applicant has the necessary knowledge to work effectively within this environment.

Additionally, ensuring equity and fairness among all pathways to general registration is essential. Australian-trained psychologists, including those completing the 5+1 internship pathway, are required to pass the National Psychology Exam despite having undergone rigorous training and supervision. Exempting international applicants from this requirement could create inconsistencies in assessment standards, potentially allowing some individuals to gain registration without demonstrating the same level of competence required of locally trained psychologists. Maintaining the exam requirement ensures that all applicants—regardless of their training background—are assessed using a standardized, objective measure.

Furthermore, even if an international qualification is considered substantially equivalent in terms of coursework and supervised practice, there is still variability in the quality of training programs across different countries. Some programs may place greater emphasis on theoretical knowledge

while others focus more on applied clinical skills. The National Psychology Exam provides an additional quality control measure to ensure that all practitioners meet the same minimum standards of competence before being granted full registration.

Finally, maintaining the exam requirement supports public confidence in the profession. Clients should be assured that any registered psychologist in Australia—regardless of their training origin—has met a nationally consistent standard. Allowing exemptions could introduce variability in practitioner preparedness, which may undermine trust in the profession and increase risks to public safety.

Content of the draft exam guidelines

Question 4: Is there any content that needs to be changed, deleted, or added into the draft exam guidelines?

Your answer:

Only the options to sit the exam in person or online.

Question 5: Is the language and structure of the proposed draft exam guidelines helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?

Your answer:

Yes

Not that I can see.

Proposed implementation of the draft exam guidelines

Question 6: The Board proposes to publish the draft exam guidelines when they are approved, but to have a future date for when it comes into effect (1 December 2025), to allow enough time for exam candidates to prepare. The first exam including the updated professional competencies will not be until the February 2026 sitting of the exam. Do you support this transition and implementation plan?

Your answer:

Yes.

Question 7: Are there specific impacts for higher education providers, accreditation agencies, international regulators, governments, employers, psychologists, supervisors, exam candidates, clients/consumers or other stakeholders that the Board should be aware of, if the draft exam guidelines were to be approved? Please consider positive impacts and any potential negative or unintended effects in your answer.

Your answer:

Updating the National Psychology Exam guidelines to align with the new professional competencies would have several positive impacts on fifth-year Master's course providers, enhancing the quality, consistency, and relevance of psychology training in Australia. These updates would encourage curriculum refinement, strengthen competency-based education, and ensure graduates are better prepared for professional practice as outlined in the revised competency framework.

One key benefit would be greater alignment between coursework and nationally recognized competencies, ensuring that graduates are trained in accordance with the most current expectations for psychological practice. By refining exam guidelines to better reflect the new professional competencies, Master's programs would be encouraged to structure their content around the core areas assessed in the exam, such as ethical decision-making, psychological assessment, intervention strategies, and reflective practice. This would help universities create more cohesive and standardized training experiences, reducing variability across different institutions and ensuring all graduates are equally well-prepared for practice.

Another advantage would be an increased emphasis on applied learning and clinical reasoning. The new professional competencies highlight the importance of psychologists being able to apply knowledge flexibly across diverse contexts, requiring Master's courses to integrate more interactive and practice-oriented teaching methods. This could include greater use of simulated clinical scenarios, structured problem-solving exercises, and objective structured clinical examinations (OSCEs), which would improve students' ability to think critically and apply theoretical knowledge in real-world settings.

Revised exam guidelines that align with the new professional competencies would also drive Master's programs to enhance training in cultural responsiveness, trauma-informed care, and working within complex systems. The competencies emphasize the need for psychologists to provide safe, effective, and ethical services for diverse populations, including Aboriginal and Torres Strait Islander peoples, neurodivergent clients, and individuals with complex trauma histories. Universities would be encouraged to integrate more robust cultural safety training, reflective practice exercises, and interdisciplinary collaboration opportunities into their curriculum, strengthening students' ability to work in diverse practice settings.

Updating the guidelines could also lead to more structured exam preparation support within Master's programs. Universities would have clearer expectations about the knowledge and skills their students need to demonstrate, allowing them to design targeted exam-readiness activities such as mock exams, competency-based assessments, and structured revision sessions. This would help students approach the exam with greater confidence and a clearer understanding of how their training connects to professional registration requirements.

Furthermore, aligning the exam guidelines with the new professional competencies would encourage Master's courses to integrate training in digital and telehealth competencies, which are becoming increasingly relevant in psychological practice. The new competencies recognize the importance of psychologists being able to provide effective and ethical care in digital environments, meaning courses would be incentivized to incorporate training in online psychological service delivery, ethical telehealth practice, and digital mental health tools.

The introduction of new exam guidelines would have significant implications for interns, affecting both their preparation process and overall learning experience. A benefit is that clearer alignment between the exam and the new professional competencies would provide a more structured and relevant assessment, ensuring that interns develop the skills required for psychological practice. Improved exam preparation resources and more competency-based training could also help reduce uncertainty around exam expectations. However, the transition period may pose challenges, particularly for interns already in the system, who may need to adapt to new content and expectations while balancing supervised practice and workload pressures. Increased demands for applied clinical reasoning and ethical decision-making assessments may also heighten stress levels if adequate support is not provided.

For supervisors, the revised guidelines could enhance the consistency between supervision and exam requirements, allowing them to better prepare interns for registration. With a clearer framework based on the new professional competencies, supervisors would be better equipped to guide interns through practical skill development and ethical decision-making in alignment with the exam's expectations. This could lead to more meaningful supervision experiences, reducing the gap between training and assessment. However, supervisors may also face challenges in adjusting to new expectations, particularly if additional training or resources are required to support interns effectively. There may also be an increased time commitment if supervisors need to integrate new competency assessments or structured exam preparation into supervision sessions.

For organizations, the updated exam guidelines could lead to stronger workforce readiness, ensuring that newly registered psychologists have demonstrated competence in areas such as cultural responsiveness, trauma-informed care, and interdisciplinary collaboration. This could enhance service quality and client outcomes, as psychologists entering the workforce would have clearer, standardized preparation aligned with the new professional competencies. However, organizations that host interns may experience some logistical challenges, particularly if changes to the exam require adjustments in training programs, additional supervision hours, or modifications to existing professional development frameworks. Smaller or rural organizations with limited resources may need extra support to integrate these changes effectively while maintaining high-quality supervision and service delivery.

Question 8: Would the proposed changes to the draft exam guidelines result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community? If so, please describe them.

Your answer:

The proposed changes to the draft exam guidelines could enhance cultural responsiveness and improve psychological care for Aboriginal and Torres Strait Islander peoples, neurodivergent individuals, people with disabilities, and other priority groups. However, there are potential unintended negative effects that must be carefully considered to ensure equitable access to registration and psychological services. If the revised exam structure increases complexity, cognitive load, or financial burden without adequate support, it may disproportionately impact trainees from diverse backgrounds, including those from culturally and linguistically diverse (CALD) communities, lower socioeconomic groups, and those with disabilities or neurodivergent profiles. Standardized exams have historically created barriers for individuals who experience challenges with traditional testing formats, such as those with dyslexia, ADHD, or sensory sensitivities. Without appropriate accommodations, such as alternative assessment formats, extended time, or access to assistive technology, the changes could unintentionally exclude skilful future psychologists from registration pathways.

To prevent these unintended effects, the implementation of the new guidelines must include consultation with Aboriginal and Torres Strait Islander psychologists, disability advocates, neurodivergent professionals, and representatives from other priority communities. Ensuring that exam content and structure reflect diverse psychological perspectives will be essential for maintaining accessibility and fairness. Additionally, the introduction of flexible assessment methods, enhanced accommodations for neurodivergent and disabled trainees, and targeted preparation resources for underrepresented groups will be necessary to foster a more inclusive and equitable psychology workforce.

Question 9: Would the proposed changes to the draft exam guidelines result in any adverse cost implications for practitioners, clients/consumers or other stakeholders? If yes, please describe.

Your answer:

The introduction of new exam guidelines could lead to increased costs for interns, universities, supervisors, organizations, and regulatory bodies. Interns may face higher expenses for study materials, exam preparation, and potential retakes, while universities may need to invest in curriculum revisions, new teaching resources, and enhanced assessment methods. Supervisors and organizations may incur additional costs for training, competency assessments, and administrative support to align with new exam requirements. To prevent financial strain and ensure equity, cost-mitigation strategies such as government subsidies, employer-supported funding, and accessible preparation resources could be considered.

Other

Question 10: Do you have any other feedback or comments about the draft exam guidelines?

Your answer:

Updating the National Psychology Exam guidelines to reflect the new professional competencies is an important step in ensuring psychologists are well-prepared for real-world practice. These changes will help align training with current expectations, strengthen competency-based learning in fifth-year Master's programs, and create a clearer connection between supervision and assessment. While there are potential challenges, such as additional costs and the need to ensure accessibility for priority groups, these can be managed with thoughtful implementation, inclusive assessment approaches, and targeted support. Ultimately, refining the exam to better reflect the skills and knowledge needed for ethical, culturally responsive, and effective practice will benefit both the profession and the communities we serve.

Public consultation: Draft guidelines for the national psychology exam

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Organisation

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

Individual

Name: Oriane Landry

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

Question B: If you are completing this submission as an individual, are you:

A registered health practitioner?

Profession: Psychologist

A consumer / client?

Other – please describe: [Click or tap here to enter text.](#)

Prefer not to say.

Questions for consideration – Updating the Guidelines for the national psychology exam

Preferred option

Question 1: Do you support updating the exam guidelines (Option 2)? Please provide a rationale for your view.

Your answer: I am in favour of updating the content. I am not in favour of exemptions. I myself am an overseas-trained psychologist. The exam in and of itself should have demonstrated my competency. The assessment of my overseas qualifications was a traumatic experience; I contend that the assessment panel charged with that job were fundamentally incompetent and the lack of support very discouraging. I could pass the exam with ease, but I could not seem to explain to someone that my degrees and experience were substantially equivalent.

Question 2: Do you support including the updated general registration competencies as outlined in the [Professional competencies for psychologists](#) into the draft exam guidelines? Please provide a rationale for your view.

Your answer: Yes, so long as you can construct meaningful and clear questions. As it stands, the Ethics questions are the most “challenging” simply because they are typically presentations of oversimplified scenarios and ambiguous. The revised competencies need to be tied to SMART goals and demonstrable skills, otherwise I fear it’s not suited to multiple-choice questions.

Question 3: Do you support an exemption from sitting the exam for international applicants for general registration who hold a qualification that is substantially equivalent, or based on similar competencies, to a Board-approved fifth and sixth year qualification? Please provide a rationale for your view.

Your answer: No. Sitting the exam should be a way to facilitate the demonstration of equivalent knowledge. There are many ways in which assessment of overseas qualifications should be improved; exam exemption isn’t one I support. I make this statement as an overseas qualified psychologist who sat the exam in 2018. Overseas applicants should be invited to sit the exam immediately and then practice with a modified supervision arrangement geared towards local legislations, Medicare and other forms of funding.

Content of the draft exam guidelines

Question 4: Is there any content that needs to be changed, deleted, or added into the draft exam guidelines?

Your answer:

Ethics questions would benefit from expanding the questions to include more details, context, and information.

Question 5: Is the language and structure of the proposed draft exam guidelines helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?

Your answer: No, it's too vague.

Proposed implementation of the draft exam guidelines

Question 6: The Board proposes to publish the draft exam guidelines when they are approved, but to have a future date for when it comes into effect (1 December 2025), to allow enough time for exam candidates to prepare. The first exam including the updated professional competencies will not be until the February 2026 sitting of the exam. Do you support this transition and implementation plan?

Your answer: That should be an adequate timeline to transition provisional psychs. With the closure of the 4+2 pathway, this should only impact students completing Masters programs and the changes can be communicated to them in their programs.

Question 7: Are there specific impacts for higher education providers, accreditation agencies, international regulators, governments, employers, psychologists, supervisors, exam candidates, clients/consumers or other stakeholders that the Board should be aware of, if the draft exam guidelines were to be approved? Please consider positive impacts and any potential negative or unintended effects in your answer.

Your answer:

There are independent contractors who sell Exam Prep courses and the onus is on them to stay apprised of the changes. Students who may seek them out could inadvertently waste money on a prep course that misleads them. I encourage my provisional psychs not to waste their time or money and to complete the official practice exam once they've registered. My opinion is that the exam is incredibly easy [REDACTED]

Question 8: Would the proposed changes to the draft exam guidelines result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community? If so, please describe them.
Your answer: This I do not know, as I do not know the extent to which the 5+1 and higher degree programs have succeeded in attracting them to this profession. I recently contacted a 5+1 program (I take two placement students each year from this pathway) and they identified only 5% of their students self-identified as ATSI.
Question 9: Would the proposed changes to the draft exam guidelines result in any adverse cost implications for practitioners, clients/consumers or other stakeholders? If yes, please describe.
Your answer: No, so long as there is not an astronomical rise in the exam fee
Other
Question 10: Do you have any other feedback or comments about the draft exam guidelines?
Your answer: No, I just feel very strongly about retaining exams for overseas applicants. This and other professions do not make enough use of that tool to aid in the assessment of overseas applicants.

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A registered health practitioner?

Profession: [Click or tap here to enter text.](#)

A consumer / client?

Other – please describe: [Click or tap here to enter text.](#)

Prefer not to say.

Questions for consideration – Updating the Guidelines for the national psychology exam

Preferred option

Question 1: Do you support updating the exam guidelines (Option 2)? Please provide a rationale for your view.

Your answer: Yes. I am more than happy to give extensive reviews of option two. The details I found in your documentation did not clearly show me how to assess what that is. I may be missing something. But that's part of it. Finding the avenue to understand even what you're addressing specifically is sometimes convoluted for the reader. But yes, the exam guidelines need to be reviewed extensively.

Question 2: Do you support including the updated general registration competencies as outlined in the [Professional competencies for psychologists](#) into the draft exam guidelines? Please provide a rationale for your view.

Your answer: Yes. Excuse the analogy. There's a diagnosis called obsessive compulsive personality disorder. Where the client has a pervasive pattern of preoccupation with orderliness, perfectionism, and mental and interpersonal control at the expense of flexibility, openness, and inefficiency, essentially, they are so focused on rules, lists, order, and the structure of what they're doing. Still, they miss the content and the purpose of what they're trying to create.

Even your documentation to find out how to answer this question is so cumbersome and time-consuming that it becomes difficult even to know how to respond.

Being a psychologist is not about the details. It's hard to work with clients. In the book I'm working on, one of the phrases I like is that theory without application has no purpose. It's purposeless. Application without theory is meaningless. Understanding measures or instrumentation does not mean understanding how they are designed and what you're really trying to work with. Understanding a handful of theories without knowing how they work together is the point of how they can develop into something more significant. Memorizing details, cut-off scores for an IQ test, or any other measure completely invalidates the utilization of why that measure is actually helpful or not. Cut-off scores, for example, could be googled or put through AI. In a matter of seconds, you can have an answer. Memorization is irrelevant at that point. What's important is knowing how and why that instrument has value.

The areas of competency are fine. What you're missing is the pragmatic application. And the absurdity of how it's being tested and the NPE exam.

Question 3: Do you support an exemption from sitting the exam for international applicants for general registration who hold a qualification that is substantially equivalent, or based on similar competencies, to a Board-approved fifth and sixth year qualification? Please provide a rationale for your view.

Your answer: Yes. I have just gone through this process. I have significant credentials in the US with two masters, a doctorate, and a post-doctorate. I've been practicing for 30 years. I hold multiple licenses in multiple states. I was a professor who taught the subjects and a supervisor who supervised hundreds of students and provisional clinicians. In my current practice, a combination of seven practices that I've started, I have well over 100 clinicians, from psychiatrists to social workers, who work under me. And still, it took over nine months to make it through Ahpra so I could even get to the next stage. It took many months because everybody wanted to hire me, and no one could figure out how to make it work as both a provisional psychologist who could not bill insurance and objectively being overly qualified or significantly more qualified than anyone at the hundreds of places I applied for.

Taking the exam, with the emphasis on the exam, made little sense to me. I've studied diligently for months, yet the exam itself, the scenarios, the multiple-choice questions, and the content validity, as I have mentioned before, made no sense to someone significantly qualified, such as myself. However, I often saw most of the questions as irrelevant when assessing a new student's qualifications as a clinician to make a difference and serve their communities.

I say that as someone again who was a professor and supervised dozens of students currently in the past hundreds. So it's a simple yes for me. That does not mean that people who are not qualified should not have to go through the process to prove their qualifications. On the other hand, having lots of degrees, possessing lots of knowledge, and having a big ego about it means absolutely nothing in the field of being able to actually make a difference for the people that you're trying to work with. So yes, people need to be qualified. Really qualified. But having the qualifications, even assessing deeply for those qualifications, is not the same as someone possessing the ability to be a psychologist and make the kind of impact society needs now.

From what I've heard from many other colleagues who have come to Australia from the US and Europe, who are also eminently qualified, and had to start their life again in the most absurd difficulties, such as trying to get qualification hours to see people when no one would hire, you make no sense.

Content of the draft exam guidelines

Question 4: Is there any content that needs to be changed, deleted, or added into the draft exam guidelines?

Your answer: Yes. Significant portions of the task have serious content, validity issues. It does not measure what it's reporting to measure. Below is a bit of the write up that I composed for some clinicians asking me about issues on the test. I am sorry for the extensive length.

There is a massive problem with your content validity. If your target audience is to assess the competency of a new psychologist, and there is to be a clinical psychologist, you're missing what is needed to show that competency. If it's to show anything for an overseas, incredibly experienced psychologist, to show that they're competent, and Australian psychological issues, he also failed in providing an avenue to demonstrate that competency.

Context, how I know this: I have practiced for 30 years at the highest levels in the US. I have set up and run several companies. My current company has over 100 clinicians, from psychiatrists to social workers, and everyone in between. It's a more eYes. Significant portions of the task have serious content and validity issues. It does not measure what it's reporting to measure. Below is a bit of the write-up I composed for some clinicians asking me about problems on the test. I am sorry for the extensive length.

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Context, how I know this: I have practiced for 30 years at the highest levels in the US. I have set up and run several companies. My current company has over 100 clinicians, from psychiatrists to social workers, and everyone in between. It's a more extensive private practice than most anything in Australia. I've been in Australia for two years and still can't get licensed here.

Specifics regarding the NPE test:

Memorizing cut-off scores for IQ scales does not show competency and understanding of what that test measures and, more importantly, how it can be utilized to show crystallized intelligence in a way that serves clients.

Context, how I know this: One of my dissertations focused on adults who are gifted and learning disabled. I developed measures that went across the US. I understand the history, development, and application of intelligence tests. Memorizing scores, something I could look up in a book or Ask my ChatGPT in a matter of seconds for a response does not show competency.

Another problem with measures is that they were validated on DSM-IV, some so antiquated and out of common usage that I've never heard of them being utilized in the US.

Context, how I know this: For context, I developed and implemented studies on measures that went across the US.

Questions on family therapy were so convoluted that they made very little sense. The emphasis and solution-focused brief therapy also misses the point of its application.

Context, how I know this: My post-doctor work is in family therapy. I have trained and supervised other supervisors at the highest level, let alone the subject among others at university. And I had no idea how to answer those questions. How about someone here Who is taking one class in family therapy? How would they put together how to answer those questions and, more importantly, why they are essential for understanding the field of family therapy they need to implement?

There was even a question that was so fundamental, so absurd that my 93-year-old mother, with no background, could answer. On the other hand, understanding the role, not the names that could be looked up, but the implementation of those medications and how they might affect clients from a psychological perspective, was completely missing. There were some points of knowing the details, the most elementary details of Pharmacodynamics and Pharmacokinetics. Still, again, it does not have anything to do with understanding the ramifications of medication on the body or what the body does with those medications that can cause side effects or misappropriated diagnoses and medications with substantial side effects.

Context, how I know this: I am not a medication expert. I have had rudimentary classes, and that's it. However, I have consulted, through my practice, where I supervise well over 15 current psychiatrists and medical providers, regarding the ramifications in the utilization of medications and diagnosis with clients.

I have many more points that I am more than happy to share regarding issues of ethics and understanding of theory (a passion of mine since I'm writing a new book on theory and application from an integrative perspective). And the incredible difficulties I had over 10 hours; yes, I am not exaggerating about taking this online proctor exam, and I am more than happy to send this if there's someplace to do that

Question 5: Is the language and structure of the proposed draft exam guidelines helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?

Your answer: Sorry, I'm not sure which draft guideline you are referring to. I'm trying to rush to get this done, and I could only devote so many hours to this search and response. I'm more than happy to respond later if you'd like.

Proposed implementation of the draft exam guidelines

Question 6: The Board proposes to publish the draft exam guidelines when they are approved, but to have a future date for when it comes into effect (1 December 2025), to allow enough time for exam candidates to prepare. The first exam including the updated professional competencies will not be until the February 2026 sitting of the exam. Do you support this transition and implementation plan?

Your answer: Same answer: difficulty finding your draft guidelines and how to respond. I am happy to respond later if you allow me to serve you.

Question 7: Are there specific impacts for higher education providers, accreditation agencies, international regulators, governments, employers, psychologists, supervisors, exam candidates, clients/ consumers or other stakeholders that the Board should be aware of, if the draft exam guidelines were to be approved? Please consider positive impacts and any potential negative or unintended effects in your answer.

Your answer: I'm sure there are. Higher education in this country, from my fellow clinicians and professors working in the field here, has indicated great difficulty. Again, I'm missing the point of what you're trying to create. Being good at statistics, research, and understanding measurements, the question of how I use those instruments lies in what the research and statistics are designed for and, more importantly, how I would implement them. There is the substance of change from what I've seen in the US. Not the US is a shining beacon on the hill. There are undoubtedly significant issues in the states. However, there are an extensive number of topics that the board should look to encompass. This is a much longer discussion than a quick answer in a little box. Each one of the issues that you talk about specifically impacts on higher education providers, accreditation agencies, etc., deserves more time and energy than could be provided here. I believe opening up this process to all the stakeholders you mentioned is warranted in the bigger picture and needs to be considered and implemented.

I look forward to engaging in this process if I can be of any service. My background is extensive, but it's only one voice.

Question 8: Would the proposed changes to the draft exam guidelines result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community? If so, please describe them.

Your answer: I hope that there will be a positive outcome. These communities you mentioned have been so negatively impacted that they deserve a more extraordinary voice and find additional support than what's currently offered them. I do not believe you're going far enough. The potential negative and unintended effects are not being implemented sufficiently to allow a greater understanding of these communities and cultural diversity. How to bridge that gap, as well as finding avenues to support younger clinicians coming into the field with a greater depth of understanding, implementation of the practice, not cut-off scores, statistical issues, or implementation of instrumentation but avenues to more outstanding support these communities are genuinely needed. The potential adverse effects would be due to not acting significantly enough to create the kind of changes that are now required. These cultural communities are specific, but there is generalizability to understanding diversity issues and how to approach diversity concerns in a much larger spectrum while maintaining the core skills of implementing change for clients in diverse settings.

Question 9: Would the proposed changes to the draft exam guidelines result in any adverse cost implications for practitioners, clients/consumers or other stakeholders? If yes, please describe.

Your answer: Possibly. However, some of those costs need to be offset by government support so that agencies and practices can flourish and newer practitioners can enter the field and make a more significant impact.

Other

Question 10: Do you have any other feedback or comments about the draft exam guidelines?

Your answer: The question isn't whether I would have any more feedback, as you can see from what I've already explained. It's more regarding what kind of system you would want to have to hear from clinicians like me who are desperate to make a difference here. As I've said before, if there is anything I can do to support the work you're trying to do, please let me know, Dr. Scott Terry.

Public consultation: Draft guidelines for the national psychology exam

The Psychology Board of Australia (the Board) is seeking your feedback about our proposal to adopt the *Draft guidelines for the national psychology exam* (the draft exam guidelines). There are ten specific questions we would like you to address below. All questions are optional and you are welcome to respond to any that you find relevant, or that you have a view on.

Providing feedback

Please email your submission to: psychconsultation@ahpra.gov.au. The submission deadline is close of business on **Monday 24 March 2025**.

Initial questions: To help us better understand your situation and the context of your feedback, please provide us with some details about you.

Question A: Are you completing this submission on behalf of an organisation or as an individual?

Organisation

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

Individual

Name: Simon Milton

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

Question B: If you are completing this submission as an individual, are you:

A registered health practitioner?

Profession: Psychology

A consumer / client?

Other – please describe: [Click or tap here to enter text.](#)

Prefer not to say.

Questions for consideration – Updating the Guidelines for the national psychology exam

Preferred option

Question 1: Do you support updating the exam guidelines (Option 2)? Please provide a rationale for your view.

Your answer:

Question 2: Do you support including the updated general registration competencies as outlined in the [Professional competencies for psychologists](#) into the draft exam guidelines? Please provide a rationale for your view.

Your answer:

Question 3: Do you support an exemption from sitting the exam for international applicants for general registration who hold a qualification that is substantially equivalent, or based on similar competencies, to a Board-approved fifth and sixth year qualification? Please provide a rationale for your view.

Your answer:

Content of the draft exam guidelines

Question 4: Is there any content that needs to be changed, deleted, or added into the draft exam guidelines?

Question 5: Is the language and structure of the proposed draft exam guidelines helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?

Your answer:

Proposed implementation of the draft exam guidelines

Question 6: The Board proposes to publish the draft exam guidelines when they are approved, but to have a future date for when it comes into effect (1 December 2025), to allow enough time for exam candidates to prepare. The first exam including the updated professional competencies will not be until the February 2026 sitting of the exam. Do you support this transition and implementation plan?

Your answer:

Question 7: Are there specific impacts for higher education providers, accreditation agencies, international regulators, governments, employers, psychologists, supervisors, exam candidates, clients/consumers or other stakeholders that the Board should be aware of, if the draft exam guidelines were to be approved? Please consider positive impacts and any potential negative or unintended effects in your answer.

Your answer:

Question 8: Would the proposed changes to the draft exam guidelines result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community? If so, please describe them.

Your answer:

Question 9: Would the proposed changes to the draft exam guidelines result in any adverse cost implications for practitioners, clients/consumers or other stakeholders? If yes, please describe.

Your answer:

Other

Question 10: Do you have any other feedback or comments about the draft exam guidelines?

Your answer:

Yes.

The Board need to change the Guidelines in regard to feedback provided to candidates after completing the exam.

All examination candidates must be given specific feedback regarding the questions they answered correctly and incorrectly.

With a pass mark of 70%, a candidate can pass the exam despite answering 30% of the questions incorrectly. Without feedback, the candidate may mistakenly believe they are competent in a specific area because they passed the exam when in fact they are not. This appears to be reckless regulatory practice on the Board's part. Imagine a situation where a learner's permit is granted to a driver when they have answered 29 of the 30 questions correctly, as is the case in NSW, but the driver is not informed about the question they got wrong. This would pose a significant risk to the public, for example, if the question answered incorrectly was "What do you do at a red light?", and so they are informed. I see no reason why candidates should not be informed of the questions that they answered incorrectly.

Section 3.1 (a) of the Health Practitioner Regulation National Law states:

The objectives of the national registration and accreditation scheme (is): to provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered.

The failure of the Board to provide appropriate feedback to candidates who pass the exam seems to fail the Board's obligation to ensure psychologists are suitably trained to practice in a competent and ethical manner.

Further, when candidates fail the exam, they are given general feedback stating only which of any of the four areas which were not passed. However, the candidate is not told which specific questions they got wrong. They are simply told to study the set readings and consult with their supervisor. However, if neither the supervisor nor the candidate know what questions were answered incorrectly, it is unclear what of the many readings should be covered or in fact whether extra reading or professional development is required.

Section 3.3 (a) of the Health Practitioner Regulation National Law states:

The guiding principles of the national registration and accreditation scheme are as follows: the scheme is to operate in a transparent, accountable, efficient, effective and fair way.

The failure of the Board to provide appropriate feedback to candidates who fail the exam seems to fail both the transparency and fairness requirements of this section of the National Law.

Public consultation: Draft guidelines for the national psychology exam

The Psychology Board of Australia (the Board) is seeking your feedback about our proposal to adopt the *Draft guidelines for the national psychology exam* (the draft exam guidelines). There are ten specific questions we would like you to address below. All questions are optional and you are welcome to respond to any that you find relevant, or that you have a view on.

Providing feedback

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Initial questions: To help us better understand your situation and the context of your feedback, please provide us with some details about you.

Question A: Are you completing this submission on behalf of an organisation or as an individual?

Organisation

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

Individual

Name: Dr Yu-Chi Chen

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [REDACTED]

Question B: If you are completing this submission as an individual, are you:

A registered health practitioner?

Profession: Psychology

A consumer / client?

Other – please describe: [Click or tap here to enter text.](#)

Prefer not to say.

Questions for consideration – Updating the Guidelines for the national psychology exam

Preferred option

Question 1: Do you support updating the exam guidelines (Option 2)? Please provide a rationale for your view.

Your answer:

Conditional Support.

I support modernising the exam guidelines to incorporate updated competencies. However, I **strongly object to the proposed exemption for certain internationally-trained psychologists** (those with qualifications equivalent to an accredited fifth and sixth year of study) from sitting the NPE, for reasons detailed in my response to Question 3. In summary, I believe removing the NPE requirement for this cohort would undermine the Board's public-protection mandate, as the NPE is explicitly designed to ensure all practitioners meet Australian standards of competent and ethical practice. I would only support updating the guidelines if the exemption for some overseas-trained applicants is not implemented.

Question 2: Do you support including the updated general registration competencies as outlined in the [Professional competencies for psychologists](#) into the draft exam guidelines? Please provide a rationale for your view.

Your answer:

Yes. I fully support incorporating the recently updated general registration competencies into the NPE guidelines. Aligning the exam with the new Professional Competencies for Psychologists (2025) is prudent and necessary to ensure the NPE continues to assess the most up-to-date standards for safe and effective practice.

Question 3: Do you support an exemption from sitting the exam for international applicants for general registration who hold a qualification that is substantially equivalent, or based on similar competencies, to a Board-approved fifth and sixth year qualification? Please provide a rationale for your view.

Your answer:

No – I do not support the proposed exemption. As an overseas-qualified psychologist who was assessed as substantially equivalent to the 5th and 6th year of study in Australia, my strong opposition to the exemption is based on the following points:

1. Differences in Ethical and Cultural Training: Psychological practice in Australia requires a deep understanding of specific ethical standards, legal responsibilities, and cultural competencies, including a focus on cultural safety and responsiveness, particularly with Aboriginal and Torres Strait Islander peoples, LGBTQ+ clients, and other diverse communities. **Overseas training programs often focus on the cultural and legal context of their own countries.** In my home country, for example, the clinical psychologist licensure exam is centred on clinical theory and skills, with no dedicated components on professional ethics or multicultural practice as practised in Australia. This discrepancy highlights the importance of the NPE in ensuring all practitioners understand and can apply Australian ethical codes, guidelines, and culturally safe practices.

2. Comprehensive Coverage of Core Knowledge: The NPE's curriculum covers essential domains that might not be emphasized in overseas programs. For instance, the exam requires familiarity with

at least six core assessment tools widely used in Australia. While my training provided a strong foundation in some assessments like the WAIS and WISC, I had no exposure to four other key tools commonly used in Australia. Additionally, many other tools that are commonly used in Australia were also not part of my overseas curriculum. Instead, my training included several questionnaires that were specifically developed within my home country, which differ significantly from those employed in Australian psychological assessments. The NPE ensures that internationally trained psychologists acquire this broader knowledge base, which their original programs may not cover.

3. Insufficiency of the Transitional Program: The transitional program, though beneficial, may not comprehensively cover all competencies due to its limited scope—only 210 hours of practice and 6 hours of supervision. This duration is often inadequate to cover all competencies in detail, especially since the content varies with the supervisor and client cases encountered. The NPE acts as an essential complement to the transitional program, providing a structured review of Australian practice standards and ensuring no important topic is overlooked.

4. Upholding Public Safety and Uniform Standards: The primary purpose of the NPE is to ensure public protection by maintaining a high standard of knowledge and practice among all psychologists, particularly those trained overseas. Allowing registration without the NPE introduces uncertainty about a candidate's readiness for practice in Australia, potentially compromising the quality of care expected by the public. The NPE provides a consistent standard for evaluating the competence of overseas-trained psychologists, ensuring fairness and maintaining public safety.

5. Achievability and Benefits of the NPE: Having personally prepared for and passed the NPE while working full-time as a postdoctoral scientist, I can confirm that the exam, while challenging, is achievable with proper preparation. The process was not merely a bureaucratic requirement but a valuable educational experience that enhanced my understanding of the APS Code of Ethics and improved my clinical knowledge in the Australian context. The time and effort invested in preparing for the NPE are reasonable and yield significant benefits, ensuring that psychologists are well-prepared to provide high-quality care.

Content of the draft exam guidelines

Question 4: Is there any content that needs to be changed, deleted, or added into the draft exam guidelines?

Your answer:

Yes – the exemption of the National Psychology Exam for certain overseas-trained psychologists should be eliminated, for the reasons detailed in Question 3.

Question 5: Is the language and structure of the proposed draft exam guidelines helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?

Your answer:

Yes, the language and structure of the draft guidelines are clear and user-friendly.

Proposed implementation of the draft exam guidelines

Question 6: The Board proposes to publish the draft exam guidelines when they are approved, but to have a future date for when it comes into effect (1 December 2025), to allow enough time for exam candidates to prepare. The first exam including the updated professional competencies will not be until the February 2026 sitting of the exam. Do you support this transition and implementation plan?

Your answer:

Yes, the proposed implementation timeline appears reasonable and considerate. Publishing the updated guidelines well ahead (with an effective date of 1 December 2025) gives candidates and training institutions ample time to prepare for the changes.

Question 7: Are there specific impacts for higher education providers, accreditation agencies, international regulators, governments, employers, psychologists, supervisors, exam candidates, clients/consumers or other stakeholders that the Board should be aware of, if the draft exam guidelines were to be approved? Please consider positive impacts and any potential negative or unintended effects in your answer.

Your answer:

Potential impacts are detailed below:

1. Overseas-trained psychologists (candidates): The proposed removal of the NPE requirement for some will obviously benefit those individuals by simplifying their path to registration. However, I worry that this “fast-tracking” could inadvertently set up some candidates for challenges once practising. Without the exam as a forcing function to study Australian practice nuances, an overseas-trained psychologist might begin work and then encounter ethical or cultural scenarios they were not fully prepared for. This could lead to stress for the practitioner and potential performance issues. On the flip side, if the exemption is not adopted (status quo kept), there’s no new negative impact on overseas candidates – the process remains for a long time, which many have navigated successfully (if I could do it, others can too). **In fact, some international candidates might prefer having the exam as an objective way to prove their competence**, rather than relying solely on case-by-case assessments of their credentials.

2. Supervisors and employers: If the exam is waived, more weight falls on the transitional program supervisor to ensure the candidate is truly competent in all areas. This could increase the supervisory burden. Every supervisor might interpret the requirements a bit differently, and without an external exam, employers hiring these new psychologists would need to trust that the supervision and assessment were thorough. There could be variability – **one unintended consequence is that employers might start favoring candidates who trained domestically or overseas psychologists who passed the NPE.** This could subtly affect hiring or supervision practices.

3. Clients/Consumers: This is the group that most concerns me. Clients generally assume that a “registered psychologist” in Australia has been vetted to a high standard. The NPE has been one tool to uphold that standard. If certain psychologists begin practising without having passed the NPE, clients won’t know who did or didn’t – they will expect the same level of competence. I fear a possible negative impact on **public confidence or safety** if an exempted psychologist were to make a serious error attributable to lack of familiarity with Australian-specific knowledge. Even if such an event is rare, it could harm the reputation of the profession. Conversely, maintaining the exam for all provides a uniform guarantee, which is a positive for consumers. While the number of overseas-trained psychologists is relatively small, every psychologist potentially serves hundreds of clients. Thus, any policy change affecting practitioner readiness can have a multiplier effect on the community. I would rather err on the side of caution and keep robust checks (like the NPE) in place to ensure each practitioner can deliver safe, culturally competent care from day one.

4. Psychology workforce considerations: The Board’s intention behind the exemption is to reduce barriers and bolster workforce numbers. However, I would note that the exam itself has not been the main bottleneck in my observation. From a policy perspective, I think **maintaining high standards is ultimately in the best interest of the profession’s reputation and, by extension, its attractiveness.** People move here to practice partly because Australia is known for rigorous professional standards. We should be careful about changing that balance.

Question 8: Would the proposed changes to the draft exam guidelines result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community? If so, please describe them.

Your answer:

Yes, the proposed exemption of the National Psychology Exam could have negative unintended effects on Aboriginal and Torres Strait Islander (ATSI) peoples and other priority communities, whereas retaining the NPE requirement is more protective of these groups’ interests. One of my biggest concerns is that an overseas-trained psychologist who is exempt from the exam might not have adequate knowledge or awareness of ATSI cultural issues and trauma-informed

practice. These topics are often unique to the Australian context. Such knowledge usually isn't part of psychology training overseas. **My prior training overseas did not cover anything about Indigenous communities.** The NPE currently acts as a mechanism to assess at least a baseline understanding of cultural responsiveness. By removing the exam requirement, we lose a checkpoint that ensures incoming practitioners have engaged with this material.

Question 9: Would the proposed changes to the draft exam guidelines result in any adverse cost implications for practitioners, clients/consumers or other stakeholders? If yes, please describe.

Your answer:

Yes. Potential adverse cost implications related to the proposed exemption of the National Psychology Exam have been detailed in my response to Question 7. In summary, while the direct financial savings for exempted overseas-trained psychologists would be minimal, indirect costs—such as increased supervision burdens and risks to public safety due to inconsistent standards—could significantly outweigh these savings.

Other

Question 10: Do you have any other feedback or comments about the draft exam guidelines?

Your answer:

I appreciate the Board's ongoing efforts to ensure the National Psychology Exam remains aligned with current professional standards and competencies. The proposed updates to competencies, particularly those emphasizing cultural responsiveness, ethical practices, and inclusivity, are commendable and essential. However, I reiterate my concerns regarding the proposed exemption for certain overseas-trained psychologists. Maintaining the requirement for all overseas-trained psychologists to pass the NPE is crucial to uphold consistent, high-quality psychological care and public safety in Australia.