> Clinical Psychology will lead to imposition of training requirements in universities' I-O Psychology graduate programs. The resulting costs are very high in clinical psychology, so significant cost increases for I-O Psychology programs are predictable as well. These costs will be borne at least in part by taxpayers. Given that the supposed beneficiaries of licensing—businesses—actually will not benefit but, instead, will incur pointless cost—taxpayers, too, will incur pointless cost.

Considered in conjunction, the survey findings indicate that there is a clear sentiment against mandatory registration/licensure of I-O psychology in Canada.

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Licensure of Consulting and I-O Psychologists (LCIOP) Joint Task Force. (2017). The licensure issue in consulting and I-O psychology: A discussion paper. *Industrial and Organizational Psychology: Perspectives on Science and Practice*, *10*(2), 144–181.

Licensing Organizational Psychologists: The Australian Experience

John O'Gorman and Peter Macqueen
Griffith University and Compass Consulting

We comment on the focal article (LCIOP Joint Task Force, 2017) from the perspective of practitioners and academics in industrial and organizational (I-O) psychology, who have been involved for some years in debates about the regulation of psychology in Australia.

Our perception is that the regulation of psychology in Australia has had an adverse impact on industrial and organizational psychology (organizational psychology is the common term in Australia) by constricting curriculum requirements to emphasize health professional training. There are problems with supervision and requirements for continuing professional development (CPD) that affect organizational psychologists and further constrain their supply. There is a basic failure to appreciate that not all branches of psychology are based on a model of one-on-one work with individuals, as the authors of the focal article note in citing Sackett (1986). Some areas of practice, such as individual assessment and coaching, for example, may engage one-on-one with individuals, but the practice of psychology is more diverse than this.

John O'Gorman, Griffith University and Compass Consulting; Peter Macqueen, Griffith University and Compass Consulting.

Correspondence concerning this article should be addressed to Peter Macqueen, Compass Consulting, PO Box 1191, Toowong, Queensland, 4066 Australia. E-mail: p.macqueen@compassconsulting.com.au

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Central to the poor outcome for Australian organizational psychologists is that registration in Australia is conducted by what the authors of the focal article describe as "statutory certification" or a "title act." It is the title "psychologist" that is protected and not any psychological practice, which means that a practitioner may do whatever a psychologist does but cannot call themselves such. This has been the case in Australia since the first psychologists registration act was legislated in 1965 and is unlikely to change, given the difficulties in describing psychological practice sufficiently for the purposes of legislative drafting. Unfortunately Australia did not have the benefit of the work of the American Psychological Association (APA, 2011) on titles, because the distinction between health service provider (HSP) and general applied psychologist (GAP) would have been helpful. It is probably too late in the day for Australia to benefit from this distinction, and it may not solve all the problems in seeking to regulate a profession as diverse as psychology, but it is likely to provide a better outcome than regulation by the single title "psychologist" has in Australia.

In what follows, we first present the legislative and administrative framework that regulates the psychology profession in the Australian context. Then we outline the effects as we see them that this regulation has had on the practice of I-O psychology in the country, before offering some conclusions.

The Australian Context

Australia has a national system for determining who may legally use the title "psychologist." It is part of a national registration and accreditation scheme (NRAS) for health professionals that commenced in 2010 and replaced state-based systems of registration for different types of health providers. Registration (licensing) of psychologists began in Australia in 1965 in the state of Victoria, following an inquiry into Scientology, and was progressively introduced across the county. As a profession registered in all Australian states and territories at the time, psychology became one of the 10 professions initially covered by the NRAS. As of June 2016, just under 34,000 psychologists are registered, about 5% of all registrants in the national scheme. The NRAS now covers 14 health professions, in effect 5% of Australia's work force.

To implement and manage the NRAS, a body termed the Australian Health Professionals Regulatory Agency (AHPRA) was established, as well as boards with lay and professional membership for each profession. For psychologists, it was the Psychology Board of Australia (PsyBA).

As part of the accommodations that were made to put the NRAS in place, specialist titles were allowed for some professions. This was refused for psychology, but a system of "endorsement" was accepted, which allowed a practitioner to claim expertise in a particular field of psychology. The system finally agreed to was based on the college structure of the major

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professional body representing psychologists, the Australian Psychological Society (APS). Those who were members of an APS College at the time were eligible for endorsement, but subsequent eligibility required a postgraduate qualification in the specialist area and 2 years of supervised experience. (In Australia "postgraduate" means study beyond the first or "undergraduate" degree, which for psychology translates to a 2-year program undertaken following the equivalent of 4 years of undergraduate study of the subject.)

With the advent of the NRAS, psychologists working in industrial and organizational psychology in Australia were faced with the choice of seeking registration as health professionals or forgoing the use of the title psychologist. If registered, they could also seek "endorsement" in organizational psychology. It is not possible to determine how many practitioners in organizational psychology opted for registration. We do know from the APS annual report for 2015–2016 that there are currently 790 members of the APS College of Organizational Psychologists, which is about 8% of total membership of the nine Colleges and 4% of the APS membership (about 22,500 currently). We know from the AHPRA annual report for 2015–2016 that currently there are 492 psychologists endorsed in organizational psychology of the 10,314 endorsed psychologists on the register. Although a simple comparison of these two statistics is problematic, it appears that only about 60% of those registerable as organizational psychologists are in fact currently endorsed.

Impact of the Australian Scheme of Regulation on I-O Psychologists

Initially, a number of organizational psychologists welcomed the NRAS because they saw it as a way of restricting the activities of charlatans and nonpsychologists who were offering services that were essentially psychological. Some expected that the new scheme could maintain boundaries between psychologists on the one hand and HR professionals and management consultants on the other. There were, however, concerns about the costs of the new scheme and the bureaucracy that it introduced. Supposedly, there was some offset in the streamlining of procedures and standardization of requirements across the country, and in the benefit of being eligible to practice in any Australian state or territory once registered, although this had been possible under "mutual recognition" arrangements previously. As well as inefficiencies, there were concerns about restrictions on advertising (e.g., the use of testimonials was no longer allowed) and the need for ongoing peer consultation as part of the requirements for CPD. To meet these requirements, psychologists must undertake 30 hours of CPD, at least 10 of which involve discussion of one's practice with a peer. Given the small numbers involved and their geographical location, this appeared to raise the prospect of disclosing information that would otherwise be thought of as

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commercial in confidence to a colleague who may at some stage be a commercial competitor. Evasion of CPD requirements runs the risk of being caught in the yearly audit conducted by AHPRA of 1% of all registered practitioners and possible deregistration. Those randomly selected for audit must supply appropriate documentation, including signed summaries of their peer consultation sessions.

The concerns about cost and bureaucracy have been borne out in the 6 years the scheme has been running, whereas the possible gains of boundary control have not, at least for organizational psychologists. Independent reviews of the operation of the NRAS point to increased costs to practitioners under the scheme and the proliferation of committees. A Parliamentary Committee of the Victorian State Government noted that regulation was cheaper under the system in the UK than under the NRAS, and a recent review commissioned by AHPRA itself noted that there were 60 committees supporting the boards, 20 state and territory or regional boards, and 78 supporting committees (Snowball, 2014). A recommendation for consolidation has yet to be acted on. More seriously, however, the impact of the NRAS for organizational psychologists has been seen by many in the profession, at least those who were members of the APS College, as much more significant than just cost and bureaucracy—nothing less than a loss of professional identity.

The NRAS by intent and design makes all psychologists think of themselves as health professionals, although this is not the self-perception of the majority of organizational psychologists. Some may be involved in dealing with workplace stress or with occupational safety, but the tasks routinely engaged in are not to do with health and well-being but with performance and effectiveness of individuals, groups, and organizations, and involve selection, training, coaching, and development. These functions are not clinical or therapeutic, and it is difficult to cast those who exercise them in the role of health professional. If, however, the only collateral damage done by the regulation of psychological services was to personal perceptions for one branch of the profession, one might argue that the gain to consumers regarding the safeguards that regulation confers has been worth the price. There is reason to argue that the damage is more tangible.

The NRAS in establishing the PsyBA as the regulator of the psychology profession gave it broad powers to control who is admitted to the register of psychologists, what programs of tertiary instruction are recognized for registration, and how complaints of misconduct or malpractice against psychologists are to be dealt with. Of these, control of the register poses the greatest threat to the professional identity of organizational psychologists. In practice, the accreditation of tertiary programs is a function of the Australian Psychology Accreditation Council (APAC), a body in existence at the

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time of the NRAS and given delegated authority by the PsyBA, at least until 2018. The PsyBA can overrule decisions of APAC, but it must give reasons for this. APAC has a broader representation of psychologists than the PsyBA, and to date the major criticism of APAC has been that it relies too heavily on judging the value of programs on inputs rather than on outcomes. A review is currently ongoing, and this may see some of the thinking regarding competencies of psychologists begin to influence accreditation in Australia.

Admission to the register of psychologists requires that the applicant has satisfactorily completed, as well as an APAC accredited program in psychology, a series of other requirements. Some of these are sensible, such as a criminal history check and demonstrated proficiency in English. Others are contentious. For example, there are requirements for the supervised practice of new graduates. What must be included in such a supervision program and who may supervise are controlled by the PsyBA. The content of the program reflects the concern to safeguard members of the public from clinical or therapeutic malpractice and necessarily involves areas irrelevant to the practice of organizational psychology. Supervisors must undertake formal training in supervision with an organization accredited by the PsyBA for this purpose. This means that otherwise good field supervisors in organizational psychology (always in short supply) who have not completed the training requirement are disqualified from supervision, which limits the registration of organizational psychologists.

Even more contentious has been the introduction of a formal written examination for registration, the National Psychology Examination (NPE). To quote Pelling (2017): "Ultimately, the goal of the General Registration standard and the NPE is to protect the public by ensuring that psychologists can demonstrate an appropriate level of professional knowledge and competence for applied practice" (p. xvi). Initially applied to only some categories of graduates seeking registration it is now being extended to all, although an exemption has been granted until 2019 for those who have completed an accredited postgraduate psychology program of study.

This generic multiple choice examination seeks to test the candidate's knowledge base in a number of areas of psychology relevant to psychology as a health profession. This means that those not seeking to practice in clinical areas must prepare themselves as if they were. Specifically, for example, an organizational psychologist in training must be competent in the administration and interpretation of the Wechsler tests (both Adult and Child), the Personality Assessment Inventory, the Depression Anxiety Stress Scales (DASS), the Kessler-10, and the SDI (all clinical tests). Of the 24 additional tests requiring at least familiarity, only four are tests that would be employed by organizational psychologists. The organizational psychologist must as well know how to conduct a mental status examination and a suicide risk

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assessment, and be familiar with the *Diagnostic and Statistical Manual of Mental Disorders* (DSM), including 19 specific disorders. The time and resources consumed in learning about these clinical tests and procedures means a reduced opportunity in an already crowded curriculum to acquire knowledge and skills more relevant to organizational psychology. The PsyBA does not sufficiently recognize that relevant psychometric and testing skills can be developed via the study and use of instruments and techniques pertinent to the area of practice endorsement. A similar clinical bias can be shown for other domains of the examination. The PsyBA is only one of 3 of the 14 registration boards established under the NRAS that uses an examination and is the only one to use an examination as an admission hurdle for all applicants. The wisdom of the examination has been questioned by APAC itself on a number of grounds.

The supervision program and the examination for new graduates constrain preparation for a professional career in psychology to a clinical model of essentially one-on-one interaction with a patient or client. It is not an overreach to claim that in the approach of the PsyBA, there is an indifference to specialist practice that does not involve clinical psychology or cognate areas. Professional socialization in this way is no doubt viewed by the architects of these registration requirements as good for consumers of psychology and a way of advancing the public reputation of the profession. It fails to recognize, however, the diversity of psychology and the benefit that a wider scope of practice can bring. As revealed by Boyack, Klavans, and Börner (2005), psychology is a diverse discipline and is inappropriately confined to the health model as implemented in Australia.

The NRAS has helped to reshape the profession of psychology in Australia, although it is not the only force at work. One indication of its influence is that clinical psychology is the only area of practice endorsement to show an increase over the years, and university programs in organizational psychology are in decline.

Lessons Learned

The Australian experience with national registration of psychologists may provide some pointers for those engaged in considering professional regulation of psychology and the place of I-O psychology in this.

- The question of title is crucial. Adoption of a one-size-fits-all approach will ensure that some sections of the profession feel the pinch. The distinction between HSPs and GAPs is an important one that should be advocated for strongly.
- Education of legislators and bureaucrats in the diversity of the profession is essential and needs to be ongoing. The public stereotype of psychologist as

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therapist/counselor is as pervasive as it is false. Such advocacy may not be welcomed by some sections of the psychology profession who see benefit in minimizing the diversity.
- Broad representation of psychology in forums and committees considering regulation is necessary. Silence is readily taken as assent.
- Once in place, legislation is difficult to remake, particularly when a number of jurisdictions are involved and there are established bureaucracies with career paths to protect.

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The Role of Values in Professional Licensing: The Resistance to Regulation

Joel Lefkowitz
Baruch College and The Graduate Center (Emeritus)

A Fable

One day, a well-dressed, mature gentleman—one might be tempted to describe him as elderly, except he appears extremely vital and alert—walks into a psychotherapist's office for a first visit. After just a few brief exchanges, the therapist

Joel Lefkowitz, Baruch College and The Graduate Center (Emeritus).
Correspondence concerning this aticle should be addressed to Joel Lefkowitz, P.O. Box 2332, East Hampton, NY 11937. E-mail: Joel.Lefkowitz@Baruch.cuny.edu

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