

Developing a model: Key questions for consideration

We are seeking your feedback about our proposed option to [redesign the psychology higher degree pathway](#) in Australia. There are 16 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. In light of the project's current stage, the questions focus on the proposed model, and alternative training models will not be considered.

Please submit your response by emailing psychconsultation@ahpra.gov.au by COB Wednesday 10 June 2026. Kindly note due to project timeframes, late submissions will not be accepted.

Initial Questions
To help us better understand your situation and the context of your feedback, please provide us with some details about you.
<p>Question A: Are you completing this submission on behalf of an organisation or as an individual?</p> <p><input checked="" type="checkbox"/> Organisation Name of organisation: Australian Psychology Accreditation Council (APAC) Contact email: ceo@apac.au</p> <p><input type="checkbox"/> Individual Name: <i>Click or tap here to enter text.</i> Contact email: <i>Click or tap here to enter text.</i></p>
<p>Question B: If you are completing this submission as an individual, which stakeholder group best describes you:</p> <p><input type="checkbox"/> Registered psychologist Area of Practice Endorsement (if applicable): <i>Click or tap here to enter text.</i></p> <p><input type="checkbox"/> Provisional psychologist</p> <p><input type="checkbox"/> Consumer / client / carer</p> <p><input type="checkbox"/> Psychology student</p> <p><input type="checkbox"/> Employer of provisional psychologists and/or psychologists</p> <p><input type="checkbox"/> Supervisor</p> <p><input type="checkbox"/> Academic</p> <p><input type="checkbox"/> Health professional</p> <p><input type="checkbox"/> Prefer not to say</p> <p><input type="checkbox"/> Other – please describe: <i>Click or tap here to enter text.</i></p>
<p>Question C: If you are completing this submission as an individual, do you identify as:</p> <p><input type="checkbox"/> An Aboriginal and/or Torres Strait Islander person</p> <p><input type="checkbox"/> Culturally and Linguistically Diverse</p> <p><input type="checkbox"/> Neurodiverse</p> <p><input type="checkbox"/> Person with a disability</p> <p><input type="checkbox"/> None of the above</p> <p><input type="checkbox"/> Prefer not to say</p>
General questions
<p>1. Which of the following reasons for redesign are the most important for you or your sector (choose as many as are relevant)?</p> <p><input checked="" type="checkbox"/> <i>Increasing community need/demand for psychological services</i></p> <p><input checked="" type="checkbox"/> <i>Workforce supply and demand pressures</i></p> <p><input checked="" type="checkbox"/> <i>Complexity of the training pathways to general registration</i></p> <p><input checked="" type="checkbox"/> <i>Lack of opportunities for prospective psychologists to progress to general registration</i></p>

Australian Health Practitioner Regulation Agency
National Boards

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Ahpra and the National Boards regulate these registered health professions: Aboriginal and Torres Strait Islander health practice, Chinese medicine, chiropractic, dental, medical, medical radiation practice, midwifery, nursing, occupational therapy, optometry, osteopathy, paramedicine, pharmacy, physiotherapy, podiatry and psychology.

- Current requirement to undertake multiple qualifications (i.e. undergraduate, Honours/equivalent, Masters degree)*
- Duration of training (minimum of six years)*
- Limited places at critical points in the training sequence*
- Content of training (i.e. 1.5 years+ of non-accredited training in undergraduate degree)*
- Practical training occurring only in the final years*
- Lack of integration between theory and practical learning*
- Inequities in access to training*
- Cost of training for students*
- Inequities in current student funding arrangements*
- Cost of training for Higher Education Providers*
- Supervision burden for Board Approved Supervisors*
- Need for increased equity and diversity in the psychology profession*
- Opportunity to separate Area of Practice Endorsement from general registration training*
- Misalignment of training pathways and registration categories*
- Complexity of assessing international qualifications*
- Opportunities to streamline and gain efficiencies in accreditation processes*
- Australia is out-of-step with international psychology programs that provide a clear and consistent pathway to registration*
- Psychology training is out-of-step with other health professions in Australia*
- None – do not support the redesign*
- Other (please specify)*

Design Principles

2. Do you support the Board's design principles for redesigning the psychology training pathway? Please provide reasons for your view.

Australian Psychology Accreditation Council (APAC) supports the design principles of the proposed psychology training pathway.

The principles are well-founded and align with the objectives of the National Law and the needs of the Australian public. They balance protection of the public with accessibility and recognise that engaging in practical learning early in training improves competence. The proposal seeks to address the tension between workforce supply and public safety.

We support the move to a single pathway to general registration, enabling a longer and deeper pedagogical integration of theory and practice, separation of general registration from AoPE, and focus on equity, access and public protection.

Those principles are consistent with the consultation paper's suggestions that the current system is fragmented, inefficient, inequitable and burdensome to accredit and regulate.

International best practice is based on coherent competency frameworks with developmental or staged thresholds.

System will continue to support undergraduate psychological science occupational outcomes

There is value in psychological science education for a broad range of occupations beyond the registered psychologist workforce. Maintaining pathways that support outcomes for the wider psychological science workforce and other professions, including the proposed psychology assistant, provides broader community and workforce benefits.

The qualifications for the different registration categories are aligned to the Australian Qualification Framework (AQF)

Approaches should maintain educational quality, support safe practice outcomes and improve clarity within the pathway, but the implications of aligning AQF Levels 8 and 9 within the redesigned model may require additional review. The proposed changes from AQF 9 to 8 may impact the research competencies we currently specify in Level 3 Professional Competencies. Required research capability should be based on what is required by a registered psychologist entering practice.

The pathway to general registration is the same for every student

A single and shorter pathway to general registration supports improved consistency, clearer student progression, enhanced data capture and greater opportunities for continuous quality improvement across the education and training continuum.

It is important to maintain flexibility within the redesigned pathway, including continued Recognition of Prior Learning (RPL) arrangements and graduate-entry opportunities for students entering psychology through non-traditional or alternative pathways.

Practical skill development follows a pedagogical model

There are benefits to integrating practical learning and professional skill development earlier within the pathway along a continuum of practical experience that is sequential and aligned to theoretical learning. Earlier and scaffolded practical learning should support competency development, placement readiness and integration of theory and practice when implemented within a quality assurance framework.

Industry drives the demand for advanced qualifications

Areas of Practice Endorsement (AoPE) should remain responsive to current and emerging community and workforce needs. The proposed shift toward stronger alignment between AoPE and workforce demand supports broader national workforce planning objectives.

Further clarification is needed regarding how “industry” is defined within the redesign context, how workforce demand will be identified and monitored and how supply across AoPE’s will be managed to ensure balanced workforce outcomes across regions and practice areas.

Psychology assistant competencies are further scoped

From APAC’s point of view, we are ready to accredit if the resulting profession becomes regulated under NRAS, otherwise benefit may accrue from quality assurance against relevant standards.

3. Select all principles you support (if applicable):

- System will continue to support undergraduate psychological science occupational outcomes
- The qualifications for the different registration categories are aligned to the Australian Qualification Framework (AQF)
- The pathway to general registration is the same for every student
- Practical skill development follows a pedagogical model
- Industry drives the demand for advanced qualifications
- Psychology assistant competencies are further scoped

4. Are there any design principles you believe are missing or not sufficiently addressed? If so, what should be added or strengthened?

Additional design principles would support the proposed redesign and provide greater assurance regarding the quality of education, public safety, equity, and workforce outcomes.

Placements:

- **Placement learning opportunities are sustainable, accessible and of high quality**
 - Professional placement is an essential component of psychology education and training to ensure graduates are capable of practicing safely and consistently with the Practice standards and public expectation. The future model must be supported by high-quality professional placement, including supervision to enable students to achieve the required competencies.
 - Promoting shared responsibility between education providers, employers and the accreditation authority to ensure access to placement opportunities across metropolitan, regional and rural and remote settings. Professional placement models should be scalable, educationally sound and designed to minimise burden on

supervisors and students while maintaining the quality of student learning and the safety of the public.

- The reform should not create training requirements that exceed the sector's capacity to provide appropriate professional placement and supervision. Workforce planning, placement governance and supervision must be considered as core components of pathway design rather than being seen solely as an aspect for implementation.
- A review of existing approaches to placement and a nationally consistent professional placement quality framework will support the proposal.
- **Placement poverty** has been a significant burden on Master programs.
- **Placement governance and site quality:** if employers and service settings are to play a larger role, quality assurance of placement environments and supervision capacity should be explicit. A single placement quality framework with standards for supervision, site accreditation and student safety will support the proposal.

The system will support a psychology workforce that is reflective of the diversity of the Australian community:

While the proposed pathway's reduced duration, lower barriers to entry, and cost savings are expected to improve equity and accessibility for students from diverse backgrounds, these may not, on their own, be sufficiently targeted to address the specific barriers experienced by underrepresented groups.

Equity targets should be set and be subject to annual monitoring and public reporting on, for example, participation by Aboriginal and Torres Strait Islander students, low-SES and rural cohorts and other marginalised groups, to enable further development of strategies that enhance access.

Additional strategies may be required to scaffold and strengthen the equity objectives of the redesign, including the key issue of workforce maldistribution, strategies may include but are not limited to:

- financial support mechanisms for disadvantaged and underrepresented groups
- purposeful and evidence-based selection criteria and entry requirements that complement ATAR (which if considered alone will reinforce privileged access to the pathway)
- increased regional and online delivery capacity for education and placement supervision
- initiatives supporting regional student recruitment and retention
- incentives for rural, regional, remote and public sector placement experiences

Support should be directed to contemporary "regional universities and campuses" being those with "bricks and mortar" in the region AND ALSO those with large regional and rural impact through well-served digital or block mode enrolments. This is especially important when so many students need to choose flexible (often digital) delivery to accommodate work, distance, agricultural season and family responsibilities and challenges.

Graduate-entry flexibility: a proposal should permit and even encourage accelerated entry for students with prior psychology or health science study that meets the necessary RPL. This will support career-changers, mature-age students and support diversity.

Title clarity and public protection for any psychology assistant role: this should be a core design principle, not a later implementation detail. This, in turn, supports student mobility, opportunities for enriched experiences, and increased access for students who choose or need to exit and re-enter the pathway.

Preferred Option

5. (a) Do you support the proposed five-year professional psychology pathway leading to general registration? All graduates will continue to meet the current [Professional Competencies for Psychologists](#). Please provide reasons for your view.

(b) If you do support this option, what aspects of the proposed model are most compelling?

The proposed five-year professional psychology pathway leading to general registration is supported, subject to the considerations, risks and requests for further clarification outlined throughout this submission.

As an accrediting authority, APAC seeks to be both an enabler of, and contributor to, sustainable workforce solutions while continuing to prioritise public safety, educational quality, and graduate competency outcomes.

From an accreditation perspective, the proposal presents several potentially positive features, although some components, as outlined, will require additional scoping and sector engagement.

A single approved pathway to general registration will strengthen sector-wide data collection, monitoring and evidence-informed decision-making. A more unified pathway will support improved longitudinal data capture across the education and placement continuum, enabling stronger workforce planning, quality improvement, accreditation development and future planning across psychology education systems.

The proposed redesign will improve affordability and accessibility for students through a reduced pathway duration. While APAC considers that further work is required to strengthen the equity dimensions of the redesign, the intention to reduce barriers to participation is supported.

A significant strength of the proposed redesign is that the full education and training continuum, including Areas of Practice Endorsement (AoPE), would be subject to accreditation and quality assurance processes. This approach aligns closely with APAC's core purpose of assuring the quality of psychology education and training in the interests of public safety. It also supports APAC's strategic priorities relating to delivering responsive and effective accreditation services, strengthening collaboration across the sector, remaining future focused and contributing to systems that respond to current and emerging community needs.

6. Do you foresee any risks or unintended consequences with a single, integrated five-year pathway? How could these risks be mitigated?

Identified Risk	Mitigation / Considerations
<p>Insufficient placement and supervision capacity Existing workforce and placement systems may not have the capacity to support increased demands associated with earlier practical training experiences and potential growth in student numbers. (as system transitions to greater use of alternative models)</p>	<p>Immediately review current practical training, professional placement and supervision models. Establish quality-assurance mechanisms for practical training appropriate to the proposed pathway, including a staged practicum continuum of observation, simulation, early-exposure experiences, and progressively complex placements, rather than relying solely on traditional placement models. Diversify supervision approaches through team-based, preceptorship, peer-assisted and remote supervision models. Leverage technology and rural supervision networks to expand placement capacity. Invest in supervisor workforce development and incentives for participation.</p>
<p>Public safety risks associated with earlier placements, simulated placements and variable quality of practical training Possible skill gaps between students with widespread implementation of mostly simulated placement experiences and those with more traditional placement exposure. Improper design of simulation, or poorly designed innovative placement models, may compromise readiness for practice and risk public safety if not carefully governed.</p>	<p>Review existing practical training, placement, supervision, and simulated and innovative training models to inform the development of robust quality-assurance mechanisms appropriate to the redesigned pathway. Develop nationally consistent definitions and expectations regarding simulation and innovative placement models. Design, develop and implement a robust, competency-based standardised assessment tool that can be monitored through accreditation processes to support assessment reliability and consistency across providers.</p>

	Accreditation standards, evidence guides and accreditation processes to further support oversight of practical training quality.
<p>Strain on higher education providers Providers may experience significant financial, staffing, operational and curriculum redesign pressures associated with implementing the new model.</p>	<p>Implement phased transition arrangements with clear timelines, transition planning, and sector-wide implementation support.</p> <p>Consider transition funding and workforce development initiatives to support sustainable implementation across the higher education sector.</p>
<p>The proposed pathway may reduce accessibility for graduate-entry and mature-age students Many students entering current pathways to general registration are mature-age students or individuals with diverse professional and lived experience backgrounds that contribute positively to workforce diversity. A more streamlined school-leaver-focused pathway may unintentionally reduce access for these cohorts.</p>	<p>Maintain and encourage flexible entry pathways and Recognition of Prior Learning (RPL) arrangements. Consider accelerated entry options for students with prior psychology, health science, or related study, while ensuring that competency and educational requirements continue to be met.</p> <p>Allow for quality assurance models to ease student mobility and RPL.</p>
<p>Equity and diversity risks Greater emphasis on school-leaver entry and ATAR-based selection may unintentionally disadvantage students from diverse backgrounds.</p>	<p>Introduce clear, transparent, and evidence-based selection criteria for admission to the proposed Bachelor of Professional Psychology degree, with a focus on behaviour and suitability beyond academic performance alone.</p> <p>Expand scholarships, financial support mechanisms, regional delivery models, online learning opportunities and rural and remote student recruitment and retention initiatives.</p> <p>Monitor program entry data through accreditation processes.</p>
<p>Undefined and insufficiently scoped Psychology Assistant role may interfere with pathway redesign objectives The proposed Psychology Assistant role remains insufficiently defined and may create uncertainty regarding the workforce's purpose, supervision expectations, public protection considerations, and professional identity within the psychology workforce.</p>	<p>Clearly define the scope of practice, supervision requirements, workforce purpose and regulatory expectations associated with the Psychology Assistant role before progressing with the role included in the pathway design.</p>
<p>Potential exploitation and workforce substitution risks associated with the Psychology Assistant role Students working as Psychology Assistants while completing their studies may be exposed to understaffed or poorly supervised environments or placed in situations beyond their competence. Potential workforce substitution effects if assistant roles are used in lower-intensity service settings.</p>	<p>As above, further scoping and consultation may be beneficial to ensure that the Psychology Assistant role will complement rather than hinder psychology workforce development.</p>
<p>Devaluation of the profession and reduced public confidence A shorter pathway and earlier practical exposure may create perceptions that professional standards have been lowered,</p>	<p>Strengthen quality-assurance mechanisms and accreditation processes throughout the redesigned pathway.</p> <p>Implement clear communication and stakeholder engagement strategies regarding competency</p>

potentially reducing public trust and confidence in the profession.	standards, public safety safeguards and the quality of psychology education and training under the redesigned model.
Industry-driven demand for advanced qualifications may not align with broader public need	Provide further clarification on the rationale, governance arrangements, implementation approach, workforce planning mechanisms, funding responsibilities, and stakeholder roles associated with the proposed changes to the Areas of Practice Endorsement (AoPE).
Short-term workforce disruption during transition During the initial implementation period, workforce supply may temporarily decline as providers redesign curriculum, transition programs and develop new placement and practical training structures.	Stage implementation carefully and provide transition funding, sector support and implementation guidance. Monitor workforce impacts, provider sustainability, placement capacity and student progression outcomes throughout the transition period.
Insufficient detail on skill development including placement quantity/quality	A clear sequence of benchmarks and assessments need to be established collaboratively between APAC and providers. (including but not limited to, minimum practicum hours and clear micro/competencies which APAC could co-develop)
Inadequate CSP funding	Following a full mapping of the proposed training pathway, undertake a cost analysis to determine the viability of relevant CSP cluster funding.

Impacts of the preferred option

7. What do you see as the potential benefits of the preferred option?

Benefits include:

- a single pathway to general registration rather than the current fragmented model
- improved clarity, continuity and consistency for students across the psychology education and training continuum
- earlier and scaffolded practical learning integrated throughout the pathway
- reduced duration and cost for students, with potential to improve accessibility
- clearer separation between general registration and Areas of Practice Endorsement (AoPE) training
- improved opportunities for workforce planning, graduate supply forecasting and evidence-informed decision-making through stronger sector-wide data collection mechanisms
- stronger longitudinal data capture relating to student enrolment, progression, retention, attrition, placements and graduate outcomes
- full accreditation of the entire education and training pathway, supporting stronger quality assurance
- opportunities to develop more diverse placement and training models, including regional, remote and community-based environments
- improved mechanisms to support continuous quality improvement and future reform within the psychology education and training system.

8. What do you see as the potential costs/impacts of the preferred option?

The proposed redesign may result in several significant operational, regulatory and resourcing impacts across the accreditation and higher education sectors. While APAC recognises the potential long-term benefits of a more integrated and fully accredited pathway, the successful implementation of the proposed pathway would depend heavily on appropriate transition and appropriate levels of ongoing funding, staffing, infrastructure and sector-wide support.

From an accreditation perspective, an important implication of the proposed model is that the full education and training continuum, including components currently overseen directly by the Psychology Board of Australia, would become subject to APAC accreditation. In addition, the proposed introduction

of accredited training sites for AoPE may require the development of new accreditation standards, governance arrangements, operational processes and monitoring activities. Collectively, these changes would substantially expand APAC's accreditation responsibilities and operational scope. APAC also considers that a significant transitional implementation period would be necessary to support the redesign of accreditation standards, evidence requirements, operational systems, provider transition arrangements and broader workforce adjustments across the sector.

APAC acknowledges that the redesign project remains at a consultation and model development stage and recognises that further information regarding implementation, governance, funding and resourcing arrangements is likely to be developed shortly. APAC looks forward to continued consultation and further analysis regarding the operational and resourcing implications associated with the proposed pathway.

9. Does the proposed redesign improve equity and access for students from diverse backgrounds?

The proposed redesign has the potential to improve equity and accessibility for students from diverse backgrounds. At the same time, the extent to which the redesign achieves these outcomes will depend significantly on how the model is implemented and supported. As outlined elsewhere in this submission, there is currently limited evidence within the consultation paper demonstrating that pathway complexity and duration are the primary barriers experienced by students from diverse backgrounds, or that the proposed redesign alone will substantially improve participation outcomes for these groups.

The proposed model may create unintended equity risks if not carefully considered. For example, greater reliance on school-leaver entry and ATAR-based selection processes may unintentionally disadvantage students from low socio-economic backgrounds, students from diverse backgrounds, including those from lower socioeconomic backgrounds, rural and remote students, carers, and Aboriginal and Torres Strait Islander students, and students entering through non-traditional pathways.

Achieving meaningful equity and accessibility outcomes will likely require additional targeted strategies alongside pathway redesign. Equity gains will depend on implementation. If the five-year program becomes highly selective at entry, placement-heavy without adequate financial support, or concentrated in metropolitan campuses, some inequities may simply move earlier in the pipeline.

Pathways issues may help address some of this, but broader government initiatives need to address workforce distribution. Equity should therefore be strengthened through funded placements, flexible delivery, regional models, student supports and explicit monitoring of access and completion by cohort.

Further strengthening recommended for consideration:

- Specific scholarships and financial support for disadvantaged groups.
- Regional and online delivery capacity building and approach to maldistribution (e.g., regional student selection advantages and financial support). Ongoing partnership with the Australian Indigenous Psychologists Association and Australian Indigenous Psychology Education Project AIPEP to embed culturally safe education.
- Rural, regional, and public sector placements, WIL and careers need to be incentivised.
- Technology and virtual care options should be supported and incentivised in education placement and practice.

10. To what extent would the proposed pathway support future psychology workforce needs?

The redesign has the potential to positively contribute to future workforce sustainability if implemented alongside appropriate quality assurance mechanisms and the listed risk mitigation measures.

Consolidating pathways may increase annual graduate output, reduce attrition, and enable earlier workforce contribution through the proposed Bachelor of Psychological Assistant exit.

Workforce modelling should continue to guide student load and specialty distribution.

The proposed pathway is not sufficient on its own. Workforce outcomes will depend on placement capacity, supply of supervision, funded student places, geographic distribution, and employer absorption.

The model should therefore be amended so that the workforce planning model considers the breadth of the psychology workforce (general, AoPE and supervisors in public and private health settings across metro, regional and rural geographic locations). Further articulation of how workforce needs will be assessed, measured and monitored over time could be added. Workforce needs could fluctuate, so flexibility in this area should be embedded.

11. From your perspective, would graduates of the proposed pathway be better prepared for entry-level practice?

Graduates of the proposed pathway would continue to be prepared for entry-level practice provided they are required to meet the current Professional Competencies for Psychologists prior to registration and courses that align with APAC Standards, PsyBA Professional Practice Standards and registration requirements. Embedding case simulation, problem-based learning and structured reflection is consistent with strong international pedagogical models.

The model should include explicitly defined thresholds before client contact and before more complex placements, with clear developmental gates and competency assessment for students with robust supervised practice requirements with a clear placement continuum. Longitudinal skills development, simulated practice, observation, and scaffolded work-integrated learning are likely to improve entry-level readiness relative to a model where practical learning is concentrated later. Student competence should guide the complexity and concentration of practical training. The paper's emphasis on phased skills development, interprofessional learning and placement readiness is supported. APAC's accreditation processes would continue to assure achievement of these competencies regardless of changes to pathway structure.

Additional considerations – Bachelor of Psychological Assistance

12. Further research and analysis are required to clearly define the psychology assistant role. However, the proposed model provides scope for a psychology assistant role to be incorporated into the training pathway in the future.

If the proposed 3-year *Bachelor of Psychological Assistance* degree was to be established, should this be a standalone degree? (i.e. available as its own degree to obtain in 3 years).

Alternatively, should the psychology assistant pathway only be available as an early exit point degree from the proposed 5-year *Bachelor of Professional Psychology*? (i.e. only students who wish to exit the 5-year degree early can obtain a *Bachelor Psychology Assistant* after 3 years).

Please provide reasons for your view.

There is currently limited clarity regarding the intended workforce purpose, scope of practice, supervision requirements, regulatory oversight and evidence base supporting the introduction of the Psychology Assistant role within the healthcare workforce.

There are potential workforce substitution effects, public understanding of the role and impacts on professional identity within the psychology profession.

Without specifying the Psychology Assistant role, it cannot be determined what degree structure or course would be appropriate. It is recommended that this be offered as both an exit award and standalone degree, although this could be staged. An exit award is also safer for students and education providers because it ensures the award sits within the professional pathway and is grounded in the same curriculum architecture. It also reduces the risk of market confusion and misaligned expectations. Once the role is properly scoped, a standalone option could be reconsidered as well.

Depending on scope, skills, knowledge and workforce functions associated with the Psychology Assistant role may differ from the competencies and curriculum focus required within the first three years of psychologist training.

A standalone AQF 7 award broadens access for paraprofessional roles and creates flexible entry points.

The exit option provides recognition for students opting not to complete the five-year program. (It is important to define scope of practice, supervision requirements and regulatory protections to maintain public safety.) There is however a risk of creating a “professional” pathway before scope, supervision, employment settings, title protection and student/employer/public understanding are settled

Additional considerations - Area of Practice Endorsement (AoPE)

13. What impacts might the proposed redesign have on AoPE training, supply, and demand?

The separation of AoPE training from general registration mirrors the structure of most international jurisdictions. It will improve clarity and mobility. Based on employment demand, new AoPEs will be developed, augmenting and possibly replacing existing AoPEs which may no longer be fit for purpose. Community need alongside industry demand should be drivers for determining the need for AoPEs.

It should make the structure of the profession clearer, reinforce general registration as the threshold for autonomous practice, and allow advanced practice training to be planned more deliberately against service need.

The current requirement for Board Approved Supervisors (BAS) within registrar pathways can create workforce and supervision capacity constraints, particularly in regional and specialised practice settings. The redesign may therefore provide opportunities to review supervision models, strengthen the sustainability of supervision, and improve access to AoPE programs.

The proposal for accredited training sites may create opportunities for more structured workplace-based training environments and improved alignment between workforce demand and advanced practice training supply.

Further clarification is required regarding how workforce demand for AoPE areas will be identified, monitored and balanced across regions and practice areas. Additional detail regarding governance arrangements, funding responsibilities, supervision models, accreditation requirements and implementation expectations would assist stakeholders in evaluating the likely impacts of the redesign on AoPE supply.

14. What benefits or impacts do you see with having one qualification for general registration (the five-year professional psychology pathway) and a second qualification for area of practice endorsement (the current stand-alone degree pathway)?

There are several potential benefits associated with having one qualification pathway leading to general registration, followed by a separate qualification pathway for Areas of Practice Endorsement (AoPE).

A single qualification for general registration and a separate qualification for AoPE better reflects the difference between threshold competence and advanced practice. This is clearer for students, employers, the public and overseas assessors. It also aligns more closely with international norms, where advanced specialist development generally occurs after initial qualification or registration, not intertwined with entry-level training.

From an accreditation perspective, the proposed model will support stronger quality assurance across both general registration and advanced practice training through clearer educational boundaries, accreditation requirements and competency expectations.

Further clarification would be beneficial regarding how workforce demand for AoPE pathways will be identified and managed, how accredited training sites would operate and how equitable access to advanced practice training would be supported across regions and practice areas.

Early considerations for implementation

15. While this project focuses on developing an agreed option for redesign only (and not actually implementing the change), it is important to look ahead and consider possible implementation/transition concerns.

What key challenges do you foresee in implementing the proposed redesign? (Consider impacts on current students, higher education providers and educators, supervisors and employers, accreditation and regulation).

Placement governance, supervision capacity, public safety and the quality assurance of simulated and other innovative placement models require further development and clarification as the redesign progresses.

Given the scale of the proposed reform, successful implementation will depend on staged transition planning, clear governance arrangements, sustainable funding and ongoing sector-wide consultation and collaboration.

A significant implementation challenge for higher education providers would be redesigning and redeveloping psychology programs to align with accreditation standards and the proposed pathway structure. This may include substantial curriculum redevelopment, integration of earlier and scaffolded practical learning experiences, review of staffing profiles and student-to-staff ratios, and redevelopment of operational systems and student support processes. These changes would require significant lead-in time, resourcing and carefully managed transition arrangements to minimise impacts on provider staff and current students.

From an accreditation perspective, the implementation of the proposed model would also require revisions to accreditation standards, staff profiles, evidence requirements, accreditation processes, guidance materials, and operational systems. The proposed redesign would significantly expand accreditation oversight responsibilities, including accreditation across the full education and training continuum and the potential introduction of accredited AoPE training sites and new placement governance arrangements. These changes would likely require additional staffing, funding, and operational system capacity to support transition activities and ongoing program monitoring.

APAC looks forward to continued consultation and collaboration regarding implementation planning, transition arrangements and sector-wide resourcing considerations associated with the proposed redesign.

Some specific impacts:

Area	Challenge	Recommended response
Students	Managing transition from existing programs and across current pathways	Clear timeline, information campaign, teach-out flexibility
Universities	Course/curriculum redesign, staff profiles and staff-to-student ratios	Transitional government and Commonwealth support funding
Supervisors	Availability of supervisors, placements and training	Expand supervisor training programs; incentives for rural supervision
Accreditation	Revising standards, information system, monitoring processes and evidence guides	Phased APAC updates to Standards, Evidence Guides and assessor training.
Regulation	Category realignment	Early legislative updates and IT system readiness planning
Employers	Understanding of the redesign. Employer and education provider collaboration regarding AoPE programs.	public and employer communication about the new pathway, any assistant role, and AoPE programs.

Government	Funding	Funding alignment, including CSP and placement support.
Final comments		
16. Do you have any additional feedback, concerns or suggestions that have not been addressed in the questions above?		
<p>Your answer:</p> <p>Evaluation requirement: APAC could support PsyBA with ongoing monitoring and with the review of outcomes in the 3 and 5 years post-implementation to ensure competency and workforce objectives are being met. The proposed changes would have a large impact on accreditation, and early discussions regarding the implementation and transition would be welcomed.</p> <p>Enhancements for consideration in future proposals could include:</p> <ul style="list-style-type: none"> - a balance between hours (for orientation and clinic-based exposure to cross professional practice, etc) and clear micro competencies and competencies - a continuum between education-based training placement and employment to ensure embedding of cultural safety, interprofessional practice etc <p>APAC is committed to support the development and implementation of this reform.</p>		

Reference list:

- Psychology Board of Australia. (2026). Redesigning the psychology higher degree program: Consultation paper. Australian Health Practitioner Regulation Agency.
- Department of Health, Disability and Ageing. (2026). Psychology supply and demand compendium report. Australian Government. <https://hwd.health.gov.au/resources/primary/psychology-compendium-report-april-2026.pdf>
- Saunders, P., Mercer, N., Mackay, M., Lee, I., Hudson-Buhagiar, M., Cavanagh, M., Milliss, E., Muscat, M., Martin, K., Shipp, A., Johnson, M., & Gibb, B. (2025). Fulfilling First Nations health, cultural safety and equity accreditation standards in primary medical education: Reflections from a First Nations desktop review team. Medical Journal of Australia. <https://www.mja.com.au/>