



**CPD requirements for psychologists providing  
clinical psychology Medicare items  
under the Better Access initiative**

**Frequently Asked Questions**

**Annual cycle ending 30 November 2011**

The APS has been delegated responsibility for monitoring the compliance of all psychology Medicare providers with the Medicare CPD requirements, so this information is provided for both APS members and non-APS psychologists.

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# Frequently Asked Questions

## CPD requirements for clinical psychology Medicare providers

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#### CPD for other Medicare services

- I also provide autism and pregnancy services under Medicare. Are there CPD requirements to provide these items?

## Deadlines and Medicare Australia notification

### 1. I have heard that FPS Medicare providers have to log their Medicare CPD by 30 June 2011. As a clinical psychology Medicare provider, do I have to log my Medicare CPD by that date too?

Clinical psychology providers must fulfil the requirements for providing clinical psychology items, which are different to those for psychologists providing Focused Psychological Strategies (FPS) items. Psychologists providing clinical psychology Medicare items are required to undertake 16 hours of clinical psychology-related CPD activities per annual cycle. For the current cycle, this requirement must be met by **30 November 2011** (as it is the same requirement as that to maintain eligibility for membership of the APS College of Clinical Psychologists and area of practice endorsement in clinical psychology). Clinical psychology providers do *NOT* have to also meet the FPS provider requirements unless they also provide FPS items under Medicare.

### 2. How long after 30 November 2011 will the online logging system remain open for me to log my CPD activities? When will the confirmation be sent to Medicare?

Clinical psychology Medicare providers must have undertaken their clinical psychology-related CPD by **30 November 2011**. Providers will have two months after the close of the annual cycle (30 November 2011), that is, 31 January 2012, to log their CPD. After that time the APS will notify Medicare Australia of those providers who have met the clinical psychology CPD requirements.

### 3. What if I don't have time to undertake CPD before the 30 November 2011 deadline?

If you do not comply with this requirement you will lose billing rights to provide clinical psychology items under Medicare and your clients will no longer be able to access a Medicare rebate for the services you provide. Psychologists who are removed from the approved clinical psychology provider list by Medicare Australia can be placed back on the list once they meet CPD requirements for the previous cycle (16 hours) and log these with the APS. This must be done within three months of being removed. Providers will still be required to meet the full requirements for the new cycle by the end of that cycle.

**4. I also provide other Medicare services under other government initiatives. If I lose my clinical psychology billing rights, will I lose my billing rights to provide these items as well?**

If you do not comply with the clinical psychology-related Medicare requirements you will only lose your billing rights to provide clinical psychology items. Your rights to provide other Medicare services such as those under the *Helping Children with Autism* initiative will not be affected. You will be able to provide FPS items as a psychologist even if your clinical psychology billing rights have been removed.

**5. Will I be notified that I have met the requirements and that Medicare has been notified?**

It is your responsibility to ensure that you meet the clinical psychology CPD requirement and electronically log your CPD with the APS. The APS will notify Medicare Australia of each psychologist who has fulfilled the CPD requirement and will send you an email to advise when this has been done.

**6. Will Medicare be sent details of the CPD I have undertaken?**

The APS will only be providing Medicare Australia with information that the psychologist has fulfilled the CPD requirement, and nothing further than this. The APS has been authorised to conduct random CPD audits to ensure that CPD requirements have been met and will notify Medicare Australia of the results of the audit only.

## **Auditing processes**

**7. Who will be auditing compliance with the CPD requirements?**

The APS has been delegated responsibility for conducting audits as part of its monitoring role, and will be conducting random audits of psychologist Medicare providers to ensure compliance with CPD requirements. You are required to retain supporting documentation for all Medicare-related CPD activities undertaken in case you are selected for a random audit. This includes documentation to verify proof of participation (such as receipts or workshop participation certificates, where appropriate). If you are selected for an audit you will also be required to justify the relevance of the CPD activities undertaken to providing clinical psychology Medicare items. If on audit you are found to have not satisfactorily fulfilled the Medicare requirements, Medicare Australia will be notified and you will lose your billing rights to provide clinical psychology Medicare items.

**8. When will audits take place?**

The audit process will commence two months after the close of the CPD cycle (30 November 2011), that is, after 31 January 2012.

**9. How long am I required to keep the CPD records in case of audit?**

You should retain proof of involvement in clinical psychology-related CPD for at least 18 months after the close of the annual cycle.

## **10. Am I more likely to be audited if I am not an APS member?**

The audit process is undertaken by the APS by a process of random selection and so your chance of being selected is not affected by whether or not you are an APS member.

## **Exemption and *pro rata* arrangements for CPD requirements**

### **11. Under what circumstances can psychologists receive a reduction in the number of hours of clinical psychology CPD they must undertake?**

If you have requested and been granted in writing an exemption from meeting the Psychology Board of Australia's CPD requirements for a period of the cycle due to special circumstances, this will be recognised for your clinical psychology CPD requirements. Your required clinical psychology CPD hours will be reduced to correspond with the *pro rata* reduction from the Psychology Board. If this situation applies to you, you must contact the CPD team at the APS ([cpd@psychology.org.au](mailto:cpd@psychology.org.au)) and provide a copy of the letter from the Psychology Board.

### **12. If I have gained an exemption from the Psychology Board for the entire cycle, do I still have to meet clinical psychology CPD requirements to maintain my Medicare billing rights?**

If you have requested and been granted in writing an exemption from meeting the Psychology Board of Australia's CPD requirements for the full year due to special circumstances, this will be recognised for your clinical psychology CPD requirements and you will not be required to complete any CPD to maintain your Medicare clinical psychology provider status. You must contact the CPD team at the APS ([cpd@psychology.org.au](mailto:cpd@psychology.org.au)) and provide a copy of the letter from the Psychology Board. The same arrangements would apply if you had taken out non-practising registration for the cycle because you were not practising.

### **13. I have only just obtained eligibility to provide clinical psychology Medicare items and the end of the annual CPD cycle is nearly here. Do I have to meet the CPD requirements in full?**

The CPD requirements for clinical psychology Medicare providers are the same as those for maintenance of membership of the APS College of Clinical Psychologists. If you have obtained eligibility for APS College membership partway through the CPD cycle, your CPD requirements for APS College will be adjusted on a *pro rata* basis according to the calculation of 1.25 hours per month. You will be notified at the time of obtaining eligibility what your CPD requirements are for the remainder of the cycle.

### **14. What CPD requirements do I have to meet if I was previously an FPS provider and became eligible to provide clinical psychology items partway through the cycle?**

The Medicare CPD requirements are to enable ongoing billing rights to provide particular Medicare items. As you will now be billing for clinical psychology Medicare items you only

have to fulfil the requirements for clinical psychology CPD. *Pro rata* arrangements will apply, as per the response to the previous question.

**15. As I only provide Medicare services on a part-time basis, am I eligible for a reduction in the required number of clinical psychology CPD hours?**

All psychologists who provide clinical psychology Medicare items must complete the 16 hours of clinical psychology-related CPD. There is no *pro rata* arrangement for psychologists practising on a part-time basis.

## Clinical psychology CPD requirements

**16. Can my 16 hours of clinical psychology CPD be counted towards the 30 hours required by the Psychology Board of Australia?**

The CPD requirements for clinical psychology Medicare providers are the same as those for maintenance of membership of the APS College of Clinical Psychologists and clinical psychology endorsement with the Psychology Board. Therefore, the same 16 hours of specialist clinical psychology CPD required for Medicare can be counted as the 16 hours of specialist CPD for the Psychology Board endorsement and the APS College. However, you must ensure you fulfil the other aspects of the Psychology Board CPD requirements (such as journal entry involving a half page reflection for each hour of CPD completed).

**17. Do I have to write a journal entry for clinical psychology CPD like that required by the Psychology Board of Australia for its mandatory CPD requirements?**

The CPD requirements for clinical psychology Medicare providers are the same as those for maintenance of membership of the APS College of Clinical Psychologists and Psychology Board endorsement in clinical psychology. Therefore, you will need to comply with the journal requirement. (APS members can complete this requirement online at the time of logging their CPD, but this facility is not available in the online CPD logging system for non-APS psychologists.)

## Types of CPD activities allowed

**18. What clinical psychology-related CPD activities are allowed?**

Specialist clinical psychology CPD activities do not need to be formally approved, but the relevance to the specialist area must be able to be justified. Acceptable CPD activities where the content is related to clinical psychology can include formal postgraduate education, workshops, seminars, lectures, journal reading, writing papers, receipt of supervision and peer consultation, and online training programs.

**19. Can the APS provide guidance about whether a particular activity would be deemed to be clinical psychology related?**

It is up to the judgement of the individual psychologist as to whether the content of a CPD activity is specialist clinical psychology in nature, and this will need to be justified if the psychologist is selected for an audit. The APS is not able to make this judgement on behalf of the psychologist to assist in choosing an activity. The merits of the justification for selecting the CPD activity as clinical psychology specialist content will be considered by the APS if the psychologist is audited.

**20. Do I have to send in documentation of participation in clinical psychology CPD activities?**

You are required to log the particulars of clinical psychology CPD activities using the APS online logging system. You need to retain evidence that substantiates your participation in clinical psychology CPD activities, but this will only need to be submitted if you are selected for a random audit.

## Logging CPD requirements

**21. I am not an APS member, so how do I provide the APS with information about my clinical psychology CPD?**

The APS already has your details through the Medicare assessment process, so a user ID has been automatically created for you. An email with information about your user ID was sent to you in late March 2011. Please contact the APS if you have not received this email ([cpd@psychology.org.au](mailto:cpd@psychology.org.au)).

**22. Can I send the APS paper records of clinical psychology CPD I have undertaken or email this information?**

Psychologists should make every effort to log their Medicare CPD using the APS online logging system, as this is by far the easiest and most failsafe way of ensuring the APS has your Medicare CPD information. If it is not possible for you to use the online logging system, you must contact the CPD team at the APS ([cpd@psychology.org.au](mailto:cpd@psychology.org.au)) to make a formal alternative arrangement.

***Please note that unsolicited emailed or mailed CPD information will NOT be accepted by the APS and will be returned with advice to log the information online before it can be processed.***

**23. Will it cost me anything to log my Medicare CPD activities with the APS?**

There is no cost for non-APS psychologists to log their clinical psychology CPD using the APS Medicare CPD logging system. There is a more sophisticated CPD logging system available to APS members that enables integrated logging of all Psychology Board and Medicare CPD requirements, but this cannot be accessed by non-members.

**24. I have chosen not to become a member of the APS, so why do I have to report to the APS to have my Medicare CPD requirements monitored? Can I report directly to Medicare?**

The Australian Government has delegated the responsibility for monitoring compliance with Medicare CPD requirements to the APS. It is not possible to report your CPD activities directly to Medicare.

**CPD for other Medicare services**

**25. I also provide autism and pregnancy services under Medicare. Are there CPD requirements to provide these items?**

At this stage there are no CPD requirements associated with providing Medicare services other than those under the Better Access initiative.