



Australian College
of Mental Health Nurses

**Regulatory Options for
Implementation of the
National Standards for
Counsellors and
Psychotherapists**

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About the Australian College of Mental Health Nurses

The Australian College of Mental Health Nurses (ACMHN) is the peak professional body representing mental health nurses in Australia. The College represents a national workforce of specialist nurses working across public mental health services, community and primary care services, private practice, digital mental health services and specialist programs.

ACMHN has a long-standing national role in advancing the quality and capability of the mental health nursing workforce. For over two decades the College has administered the **Credentialed Mental Health Nurse (CMHN)** program, the only national credential recognising specialist mental health nursing practice in Australia.

The College also plays a significant role in **accreditation, workforce capability development and professional standards**, supporting postgraduate mental health nursing education programs across Australian universities.

Credentialed mental health nurses are registered nurses who have completed postgraduate mental health nursing qualifications and demonstrated advanced practice capability in:

- comprehensive mental health assessment
- therapeutic engagement
- delivery of psychotherapeutic and psychosocial interventions
- recovery-oriented mental health care
- multidisciplinary clinical leadership.

Mental health nurses represent one of the largest professional groups delivering therapeutic interventions across Australia's mental health system. This includes the delivery of evidence-based psychotherapies in public mental health services, primary care, community programs and private practice settings.

ACMHN welcomes the opportunity to contribute to this consultation on regulatory options for the implementation of national standards for counsellors and psychotherapists.

General Position

ACMHN supports national efforts to strengthen consumer protection, quality and transparency in the provision of counselling and psychotherapy services.

However, it is essential that any regulatory framework recognises the **existing multidisciplinary mental health workforce delivering psychotherapeutic interventions**, including credentialed mental health nurses.

Credentialed mental health nurses routinely deliver structured psychotherapeutic interventions across a wide range of service settings. Regulatory arrangements that do not explicitly recognise this workforce risk unintentionally narrowing the recognised psychotherapy workforce and reducing access to care.

ACMHN also encourages regulatory approaches that align with **contemporary health workforce models based on professional capability and demonstrated competence**, rather than relying solely on traditional standards frameworks or time-based training requirements.

Recognition of Credentialed Mental Health Nurses

Mental health nurses are a major provider of therapeutic mental health care across Australia's public mental health system.

Credentialed mental health nurses:

- hold postgraduate mental health nursing qualifications
- demonstrate advanced practice capability through the ACMHN credentialling program
- maintain ongoing professional development and practice review.

In many services, CMHNs deliver structured psychotherapeutic interventions including, but not limited to, cognitive behavioural therapies, trauma-informed therapies, interpersonal therapies and recovery-oriented therapeutic approaches.

Despite this, the consultation materials do not clearly recognise **credentialed mental health nurses as members of the psychotherapy workforce**.

ACMHN recommends that any regulatory framework explicitly recognise:

- Credentialed mental health nurses
- other registered health practitioners who deliver psychotherapeutic interventions within their scope of practice.

Recognition of the multidisciplinary psychotherapy workforce is essential to maintaining access to therapeutic care within Australia's mental health system.

Alignment With Existing National Health Practitioner Regulation

Mental health nurses are regulated through their licence to practice as a registered nurses with the **National Registration and Accreditation Scheme (NRAS)** under the Nursing and Midwifery Board of Australia.

Any regulatory arrangements for counsellors and psychotherapists must therefore clearly articulate how they will interact with existing registered health professions.

ACMHN recommends that regulatory models:

- recognise psychotherapeutic practice delivered within the scope of existing regulated professions
- avoid duplication of regulation for registered health practitioners
- ensure alignment with Australia's broader health workforce regulatory frameworks.

Moving Beyond Time-Based Measures of Competence

The consultation materials place considerable emphasis on **clinical hours and placement requirements** as indicators of readiness for practice.

International health workforce research increasingly demonstrates that **time-based measures are weak predictors of professional competence**. The number of hours completed does not reliably reflect clinical capability, therapeutic skill or readiness for independent practice.

Contemporary professional education and regulation are increasingly moving toward **competency-based and capability-based frameworks**.

ACMHN encourages regulatory models that focus on **demonstrated therapeutic competence**, supported by structured supervision and professional development, rather than relying predominantly on hours-based thresholds.

Capability-Based Professional Frameworks

ACMHN is currently undertaking a significant review of its **Standards of Practice for Australian Mental Health Nurses**, with the intention of transitioning toward a **capabilities-based professional framework**.

This work reflects a broader shift across health professions toward frameworks that:

- emphasise adaptive professional capability
- recognise the complexity of contemporary practice environments
- support practitioners to work to their full scope of practice.

Capabilities frameworks recognise that professional competence involves the integration of knowledge, clinical skill, professional judgement, ethical practice and therapeutic relationship capacity.

ACMHN believes that national regulatory approaches to psychotherapy should align with these contemporary professional models.

Entrustable Professional Activities

Modern professional education and regulation increasingly incorporate **Entrustable Professional Activities (EPAs)** to assess practitioner competence.

EPAs provide a structured way to assess whether practitioners can safely and independently perform specific professional activities, such as:

- conducting comprehensive psychosocial and mental health assessments
- delivering structured psychotherapeutic interventions
- managing complex therapeutic relationships
- practising safely within multidisciplinary mental health teams.

Incorporating EPA-based approaches within national standards could strengthen the assessment of practitioner readiness and provide clearer pathways for professional development.

Workforce Capability and Scope of Practice

Australia's mental health system faces ongoing workforce shortages and increasing demand for therapeutic care.

Regulatory frameworks should therefore support **workforce capability and scope of practice**, enabling qualified practitioners to work to the full extent of their professional training.

Credentialed mental health nurses represent a highly skilled workforce capable of contributing significantly to the delivery of psychotherapeutic care across diverse settings.

Ensuring this workforce is recognised within national psychotherapy frameworks will strengthen service capacity and improve access to care.

Alignment With National Mental Health Workforce Policy

Access to psychotherapy in Australia is strongly influenced by national funding arrangements, including Medicare-supported psychological therapies.

Workforce regulatory arrangements should therefore be developed with awareness of broader national mental health workforce policy and service delivery structures.

Recognising multidisciplinary psychotherapy providers, including credentialed mental health nurses, may support expanded access to therapeutic interventions in community and primary care settings.

Conclusion

ACMHN supports efforts to strengthen national frameworks governing counselling and psychotherapy services in Australia.

However, regulatory reform must ensure that **existing mental health professionals delivering psychotherapeutic interventions are appropriately recognised within any new framework.**

ACMHN recommends that implementation of the national standards:

- **explicitly recognise credentialed mental health nurses as psychotherapy providers**
- **align with contemporary capability-based professional frameworks**
- **avoid reliance solely on hours-based measures of competence**
- **consider the integration of Entrustable Professional Activities to assess practitioner capability**
- **support workforce capability and scope of practice across multidisciplinary mental health teams.**

ACMHN welcomes further engagement with the Department of Health and would be pleased to contribute to the development of regulatory models that strengthen Australia's mental health workforce and improve access to therapeutic care.



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