



8th September 2010

Prof Brin Grenyer
Psychology Board of Australia
By Email chair@psychologyboard.gov.au

Dear Prof Grenyer,

Re: Consultation Paper No 5 Revisions to the Guidelines on Area of Practice Endorsements

Thank you for the opportunity to submit comments about the Guidelines on Area of Practice Endorsement. We would like to thank the board for their work over the past two months and for their 30 July responses to concerns about periods of grace for registration and endorsement.

One group of students appears to remain disadvantaged despite the proposals in the consultation paper and the 30th July decisions. Those students who were enrolled in a Professional Masters at 30 June 2010 and then transfer or articulate to a DPsych or a Combined PhD/Masters would not be included in the latest transition arrangements. As the DPsych or Combined PhD/Masters would be a new enrolment they would appear to have enrolled after 30 June. Some students who were offered places in our recent mid-year intake into DPsych or Combined PhD/Masters elected to remain in the Masters because of concerns about the length of time to achieve professional accreditation. We don't believe the board intended its changes to make more advanced qualifications to be less attractive to current students. So we propose that the extended transition arrangements from the 30 July board meeting should apply to those enrolled in any professional degree at 30th June. Such a change would also cover the occasional student who drops back to a Masters from a DPsych.

We are concerned that the proposed requirement for 176 hours per annum of client contact during the registrar program is insufficient. 176 hours could be accommodated within one day of client contact per week. If 400 hours of client contact are required over 18 months within a Masters program we suggest that 400 hours per annum during the registrar program is a more reasonable expectation. 400 hours per year is less than 10 clients per week.

We are also concerned about the timing of the beginning of a registrar program for specialist endorsement within a DPsych program. The current Board position appears to be that a one year registrar program could begin after

undertaking the equivalent of Masters coursework and placements (1000hours). We submit that the board either return to a 2 year registrar program beginning at this point or require those in DPsych programs to complete all their coursework and placements (1500 hours) before beginning a one year registrar program. We believe these proposals will help to keep a balance between Masters and DPsych Programs.

The five year limit to the registration program may impact on some part time students in DPsych and PhD programs if they take the full amount of time available within University rules (6 or more years). Those in this situation will be able to work as Provisional Psychologists which goes some way to reduce the impact.

We note that the Board has resuscitated the possibility of bridging programs (2.3 page 8) in the consultation paper. Our experience with applicants for non-award enrolment in individual units from our professional programs under Individual Bridging Programs was very unsatisfactory and we are not offering any further such enrolment. We would prefer to devote our limited educational resources to those seeking a complete qualification which maintains the synergy of coursework, placements and research. A preferable option is for people seeking a new endorsement is to enrol in an accredited postgraduate program of study and apply for credit for previous studies for their existing qualifications.

Thank you again for the opportunity to make comments and for your work over the last months – the Board has made significant changes that will improve to the quality of psychological services provided to the Australian public.

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