

Psychology Board of Australia  
Professor Brin Grenyer, Chair  
GPO Box 9958  
Melbourne, VIC 3001

Dear Professor Grenyer and members of the Psychology Board of Australia,

**Re: Consultation Paper 5: Proposed Revisions to the Guidelines on Area of Practice Endorsements**

We write to acknowledge the Board's response to earlier feedback regarding the guidelines on Area of Practice Endorsements. We wish to express our appreciation for the Board's statements regarding the value of university-based professional training and the need to alter the guidelines as they stand to avoid deterring current and future students. We feel the Board's proposed revisions are a significant step forward in protecting the interests of current and future members of the profession as we transition to the national system.

We wish to note the following proposed revisions in particular:

1. To allow doctoral students (enrolled in both DPpsych and Masters/PhD programs) to enter the Registrar program prior to thesis submission but after completing practicum and coursework degree requirements.

We applaud this proposal. It recognises that students often have considerable lag between completion of clinical training and of research requirements, and acknowledges the importance of completing clinical training requirements.

2. To allow doctoral students in the Registrar program to use the title "registrar" prior to completion of their degree and, thereby, prior to gaining general registration.

Limiting general registration to those who have graduated, but permitting those who have not graduated to act as Registrars, may mean confusion as to what qualification, and therefore salary range, the title Registrar actually reflects. In addition, Registrars who have and who have not graduated will be required to meet the same considerable expenses as part of the Registrar program (e.g. private indemnity insurance, CPD attendance, PBA registration, and, in some cases, private supervision). The Board wishes to recognise students who have completed clinical training but not research requirements as eligible for the Registrar program, however it seems likely that these individuals will be disadvantaged in the workforce. The Board's

proposals to limit the Registrar program to five years and to limit full endorsement to those who have graduated are likely to provide sufficient incentive to ensure completion of research requirements.

3. To set a minimum number of hours of client contact at 176 hours per annum in the Registrar program, removing the requirement for 17.5 hours per week of work, but capping the Registrar program at five years' duration.

This is an important change which reflects the part-time nature of most neuropsychology positions. It will provide a vital avenue for students to maintain their clinical skills whilst allowing time for research or, for instance, thesis completion.

4. To adopt the Australian Health Practitioner Agency definition of practice.

We agree with this definition of practice.

5. To limit the duration of the Registrar program to 18 months for Masters/PhD students, reflecting the contribution of applied research studies to the students' training.

This is a welcome proposal which considers the significant workload for Masters/PhD students.

6. Description of areas of practice

We feel that clinical neuropsychology, a specialist area of expertise, requires a definition that reflects the scope of neuropsychological practice. The distinction between this scope and popular notions of psychology is often not well understood by non-psychology clinicians and lay people. We agree with our colleagues that the definition below encompasses the focus of neuropsychologists.

**"Clinical neuropsychologists are specialists in the assessment, diagnosis, and treatment of cognitive, emotional, and behavioural consequences of brain disorders, and their broader psychological and social precursors and effects".**

### **Further Issues for the Board's Consideration**

We reiterate our appreciation of the Board's willingness to respond to the feedback of students and clinicians. In that spirit, we also wish to raise the following issues in order to promote the equity and stability of the new framework.

1. PBA Registration Costs

At present, the PBA requires the same registration fee for all registrants. We feel that this will be a substantial increase in registration costs for provisionally registered students (\$410 initial fee, \$390 ongoing in comparison with \$180 in Victoria). We request that the Board reconsiders this decision.

## 2. Active CPD Requirements for Registrar Program

At present, we do not believe that professional development infrastructure exists to support this requirement. Scarcity of “active” CPD opportunities will impose further costs on Registrars, who will be salaried at a graduate level. Potential solutions to this issue include the following:

- a) Require a smaller number of CPD hours for Registrars
- b) Provide financial and systemic support for bodies that provide PD events
- c) Alter the definition of “active” CPD to include more flexibly-styled events

## **Conclusion**

We thank you for considering our feedback to these latest proposals. We feel that many of the revisions you suggest will benefit students and the wider profession, and it is heartening that the Board has so willingly developed earlier recommendations from such key stakeholders. We agree with the Board that higher degree students deserve to be supported by the profession as they transition into the workforce and that providers of and students in higher degree programs should not be disadvantaged by the new governance framework. We hope that our contributions to these issues are of assistance to the Board.

Yours sincerely,

Neuropsychology Students' Society Committee  
The University of Melbourne