From: Amanda Richdale [mailto:A.Richdale@latrobe.edu.au]
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To: NationalBoards
Subject: Limited Registration

It is not clear how this limited registration relates to currently registered psychologists who work in an academic position, how it will be determined who in an academic position is eligible for full versus limited registration in the future, or indeed why all researchers and teachers should be registered.

Many who were in teaching and research prior to the advent of the PBA were registered psychologists in their state, particularly when the research and teaching they were engaged in was of a clinical nature, and they have transferred to the new National registration system. In this regard, one of the issues that has struck me regarding the new PBA registration regulations for psychologists is the lack of clarity regarding prior experience or expertise for those who have been registered psychologists for many years and have a PhD but not an accredited coursework Masters or Doctorate, though perhaps I have not read carefully enough?

Many who work primarily in research and teaching conduct clinically relevant research and supervise students who conduct clinically relevant research, in particular assessment and diagnosis, and intervention research and evaluation, which then informs clinical practice. This may or may not involve the academic in face-to-face client contact on a regular basis. This is an important area of work that is clearly related to, and important for clinical practice, and which if not undertaken appropriately has the potential to cause harm to those who participate, or as a result of poor student training. Limited registration does not appear appropriate for academics involved in this type of work, rather these academics are involved in work related to clinical practice and should be fully registered.

As well, Psychology is a fundamental science that attempts to understand human behaviour and brain structure and function, not just a clinical science that trains people for clinical practice. This sense of Psychology as a fundamental Science seems to have been lost by the PBA. Why should an academic who is engaged in research and teaching that relates to Psychology as a fundamental science need to be registered with the PBA even within a limited registration category? It is not clear to me that they are delivering services to the profession in the sense that seems to be encompassed by the current definition, they are first and foremost, scientists. We do not ask other scientists to pay registration to a federal registration board in order to conduct their research or to teach in their area of expertise.

Thus I believe the Board needs to consider both prior experience for existing psychologists, and research and teaching i.e., the type of work the academic is primarily engaged in, with regard to the question of registration. One size will not fit all who are in teaching and research positions. At present there is no clarity regarding how eligibility decisions will be made by the PBA, nor indeed any clear justification as to why all those who conduct research or teach within the area of Psychology need to be registered with the PBA. In conclusion it appears to me that there is no need to introduce a limited registration category for researchers and teachers. What is needed is clarity around determining when these people might need to be registered psychologists because their work is primarily of a clinical nature.

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Note I am part-time and available Wednesday-Friday

