Dear Professor Grenyer

I am a long standing member of the College of Clinical Psychology. I hold a combined Masters and PhD in Clinical Psychology, as part of which I trained in Clinical Neuropsychology. I have 28 years experience in the practice of Clinical Psychology and Clinical Neuropsychology and I have conducted more than 3000 neuropsychological assessments within clinical, forensic and medicolegal settings.

I am concerned that the document entitled 'Exposure Draft: Guidelines on area of practice endorsements' does not adequately reflect the neuropsychological expertise of the many Clinical Psychology endorsed professionals who like me have extensive expertise in Clinical Neuropsychology and that adoption of the Exposure Draft as it currently stands conveys an incomplete and biased message as to who can conduct neuropsychological assessments and that this will not only disadvantage Clinical Psychology endorsed professionals, but referrers and health consumers.

While there is a long background history regarding the issue of 'who allegedly owns the expertise to conduct neuropsychological assessments', I will not detail this here. However, I would like to make the following points:

1) There are many members of the College of Clinical Psychologists that have extensive training, expertise and experience in the area of neuropsychological assessment and who have exactly the same or greater qualifications than members of the College of Clinical Neuropsychologists.

2) As you are probably aware, in leading countries such as the U.S. and U.K. neuropsychology has been treated as a branch of Clinical Psychology and in order to practice in neuropsychology there was the requirement/expectation that psychologists would be trained Clinical Psychologists.

3) There are many valid reasons for point 2 above. One of these is that assessment often involves very complex issues and the ability to differentiate between organic and reactive conditions, something that is an intrinsic aspect of post graduate Clinical Psychology training (of which training in neuropsychology is a part).

4) The 'Guidelines to conducting neuropsychological assessments' issued by the Motor Accidents Authority of NSW includes reference to the fact that there are many members of the College of Clinical Psychologist that are trained, experienced and qualified to conduct neuropsychological assessments.

5) When describing the 'Skills and Competencies of Clinical Psychologists', under the sub-heading of 'Psychological Assessment and Diagnosis', the website of the Australian Psychological Society reads in part: "Some clinical psychologists also specialise in particular types of assessment such as neuropsychological, forensic and educational assessment".

Given the above, I would like to suggest the following changes (in red) to the 'Exposure Draft - Guidelines on area of practice endorsement':

i. The opening paragraph, under the heading of 'Competencies Required For Clinical Psychology Endorsement' (page 22) to read: 'Clinical psychologists specialise in the assessment, diagnosis, formulation and treatment of psychological and cognitive problems and mental illness caused by organic and reactive factors, using evidence based therapies and assessment tools (including psychometric and neuropsychological tests of personality, emotional, behavioural, intellectual and cognitive functioning ...)'

ii. Point C) 1. iii. (page 22) to read:
'Tests of intellectual and social functioning'.

iii. Point C) 1. iv. (page 22) to read:
'Assessment of cognitive/neuropsychological functioning (including memory, attention/concentration, language, executive processes, behaviour and academic ability)'.

iv. Point f) iii. (page 24) to read:
'Ability to write adequate clinical psychological reports for a range of audiences'.

vi. Point f) iv. (page 24) to read: 'Ability to write adequate clinical psychological reports for the legal system'.

Kind Regards

Dr F. Roldan
B.A.Psych.(UNSW), B.A.Hons.Psych.(UNE)
Cert.Neuroanat.Neuropsych.(UNSW)
Ph.D.Clin.Psych.(ANU)
M.A.P.S., M.C.C.P., M.I.N.S.
M.U.S.Nat.Acad.Neuropsych.