

Psychology Board of Australia  
Professor Brin Grenyer, Chair

Dear Professor Grenyer,

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

I am writing as current postgraduate psychology student at Monash University to express my support for the changes proposed in the consultation paper on Area of Practice Endorsement.

Specifically, I believe that allowing students to enter into the registrar program, and use the title registrar before thesis submission, is a positive step towards minimising any potential deskilling which could occur between finishing placement and working clinically.

I also support the proposal to remove the minimum EFT from the registrar program, as well as increasing the scope of practice to include research, administration, management, and other positions, promotes students continual enrollment in Doctoral level programs.

I would like to recommend the following issues to be considered by the board, in order to promote the sustainability of the new system:

**1. The ability to be registered as a generalist psychologist before thesis submission while part of the registrar program.**

I believe that it is in the interest of the students and the profession to be able to gain full registration once completing coursework and placement requirements as it promotes the following:

- Minimises confusion for employers and the public in understating a clinicians level of training
- Creates equality in remuneration, which is necessary to balance out the outgoing costs of being a registrar (e.g. 40 hours of 'active' CPD hours pa, 40 hours of Supervision pa, insurance, PBA and APS membership fees, etc...)

**2. Costs of being registered with the PBA**

The current costs for being registered with the PBA is equal for provisional psychologists, registrars, and fully endorsed psychologists (i.e., \$410 initial fee, \$390 ongoing) despite the difference in incomes for these different groups. I would like to see a sliding scale implemented to accommodate the different income levels.

**3. Requirements for CPD points**

There is a required 40 hours of 'active' CPD as part of the registrar program, which is currently unavailable for smaller areas of endorsement such as clinical neuropsychologists. I would like the PBA to either support colleges of the APS such as the College of Clinical Neuropsychologists to provide these hours, or reduce the amount of hours required to be similar to those required by fully endorsed psychologists, or change the nature of the 'active' CPD hours to be achievable by registrars independently.

Overall, I feel that the changes proposed by the PBA will have a positive impact on the psychology profession. I thank you for your consideration of these additional concerns.

Yours sincerely,

Kim Trezise  
Doctor of Psychology (Clinical Neuropsychology) Candidate  
Monash University