

Professor Brin Grenyer  
Chair of the Psychology Board of Australia  
PO Box 16085 Collins Street West  
Melbourne VIC 8007  
chair@psychologyboard.gov.au

10th September, 2010

Dear Professor Grenyer,

**Re: *Consultation Paper 5 - Proposed revisions to the Guidelines on Area of Practice Endorsements and Transition and grandparenting arrangements for higher degree students***

We write on behalf of students at Macquarie University, Sydney, NSW, who commenced a postgraduate degree in Clinical Neuropsychology during 2010. We would like to thank the Psychology Board of Australia (PBA) for inviting us to comment on this consultation paper. The following questions and comments are in regard to the *Consultation Paper 5, Proposed revisions to the Guidelines on Area of Practice Endorsements* (August 2010) and the document published 4 August 2010, entitled *Transition and grandparenting arrangements for higher degree students*.

**Re: *Transition and grandparenting arrangements for higher degree students, 4 August 2010*.**

We would like clarification on our status as “any student who was enrolled in a higher degree on 30 June 2010” regarding the extended grandparenting arrangements. Students in our cohort were initially enrolled in the Masters of Psychology (Clinical Neuropsychology) at Macquarie University in Semester 1 this year and have subsequently applied for and been accepted into a Doctor of Psychology (DPsy) or combined PhD/Masters program for commencement in Semester 2 (August 2010). These applications were submitted in May 2010, before the instatement of the new PBA guidelines. Due to routine administration procedures of the University, we were not formally enrolled in the DPsy or PhD/Masters until after 30 June 2010, however, we were all formally enrolled in our ‘upgraded’ programs by 7 August 2010. Moreover, it should be noted that it is a requirement of entry to the DPsy Clinical Neuropsychology program at Macquarie University that students must first complete Semester 1 (a full-time load of prerequisite subjects) of the Masters program before transition into the DPsy. We understand that one of the aims of the *Consultation Paper 5* was to reduce any disincentives for students to engage in research higher degrees. We therefore believe that it is fair and reasonable for the extended grandparenting arrangements to include students in our situation even though we were not yet formally enrolled in our *current* degrees (i.e. DPsy, PhD/Masters) before 30 June 2010.

We would like further clarification from the Board as to whether the extended grandparenting arrangements apply to students who were not yet registered with a psychology registration body (e.g. Psychology Registration Board NSW). As we have only commenced our higher degree in February 2010 and many of us will not commence clinical placements until later this year, several students had not obtained provisional registration prior to 30 June 2010. As we were not aware at the time that not obtaining registration earlier would prove a disadvantage in our transition to the new guidelines, we find it fair and reasonable that the extended grandparenting arrangements also include students that were not provisionally registered as of 30 June 2010.

***Re: Consultation Paper 5, Proposed revisions to the Guidelines on Area of Practice Endorsements, August 2010.***

We were concerned that the unrevised guidelines would lead to disincentives for students to engage in research higher degrees, potentially threatening the future development of our profession. We are pleased to see that the Board has taken steps towards addressing this concern in their proposed revisions in *Consultation Paper 5*, in order to allow Doctorate students (DPsy, PhD/Masters) to begin their registrar program after completion of coursework and practicum degree requirements but before completing their thesis.

However, it appears to remain the case that current and future DPsy and PhD/Masters students will not be eligible for general registration until completion of all degree requirements, including their thesis component. We are concerned that students who have not completed their thesis may be ineligible for many jobs that provide the clinical experience required by the registrar program because these positions may require general registration, despite them having completed the same coursework and practicum requirements as their peers who have completed a Masters program. We believe this concern has been explained in full in a letter to you from other Macquarie University students, so we will avoid repetition and simply highlight that we share the same concern with our colleagues.

In addition, we would like confirmation that the extended grandparenting arrangements (dated 4 August 2010) still apply to those who were enrolled in a higher degree on 30 June 2010 despite more recent revisions in *Consultation Paper 5* regarding the duration of the registrar program. Alternatively, do the revisions of *Consultation Paper 5*, requiring DPsy students and combined PhD/Masters students to complete a 1 year and 1.5years FTE registrar program respectively, supersede the extended grandparenting arrangements, which required 1 year FTE registrar program for PhD/Masters students and no further requirements for DPsy students in order to be eligible for endorsement?

We propose that, as we had enrolled in or applied for our postgraduate programs before being aware of the proposed changes, the most fair and reasonable transition

arrangements regarding eligibility for endorsement are those outlined in the extended grandparenting arrangements (i.e. reduced duration of the registrar program) in addition to the revisions of *Consultation Paper 5* allowing DPsy and PhD/Masters students to commence their registrar program after completion of coursework and practicum degree requirements but before completing their thesis.

We acknowledge that the Board may be concerned that allowing general registration prior to completion of theses may not encourage students to complete their degrees in a timely manner. We have also considered this and appreciate the need to complete postgraduate programs in a timely fashion to ensure that both clinical and research skills remain up to date. We therefore propose that although degree completion should not be required for DPsy and PhD/Masters students to gain general registration, degree completion should be required for eligibility for endorsement.

### **Summary of Clarifications Sought Regarding Endorsement Eligibility:**

In summary, we would like clarification that for our cohort of students who were enrolled in the Masters degree before 30 June 2010, regardless of provisional registration at that time, can undertake the following degree pathways under the new revisions to the PBA guidelines for practice endorsement:

- 1) *For those who have remained in the Masters degree:* After completion of all degree requirements, these students will be eligible for general registration and following completion of a 1 year FTE registrar program will be eligible to apply for an area of practice endorsement.
- 2) *For those who 'upgraded' from the Masters degree and commenced the DPsy in Semester 2, 2010:* After completion of coursework and practicum degree requirements but before completing their thesis, these students will be eligible for general registration and following completion of all degree requirements will be eligible to apply for an area of practice endorsement.
- 3) *For those who were already enrolled in, or 'upgraded' from the Masters degree and commenced the PhD/Masters in Semester 2, 2010:* After completion of coursework and practicum degree requirements but before completing their thesis, these students will be eligible for general registration and following completion of a 1 year FTE registrar program, as well as all degree requirements, will be eligible to apply for an area of practice endorsement.

Additionally, there are some students who have continued enrolment in the Master of Clinical Neuropsychology degree and who have not 'upgraded' to a DPsy or combined PhD/Masters, but who held the intention to later 'upgrade' to these programs in 2011. Again, these students were not aware of the proposed changes regarding endorsement and the apparent disincentives of the unrevised guidelines. We would like to seek clarification from the Board as to whether they will regard these students as 'students enrolled before 30 June 2010' if they do later enrol in the DPsy or PhD/Masters.

Lastly, as we do not find it clear from *Consultation Paper 5*, we seek to clarify the appropriate title for those who fall under the conditions of the proposed guidelines and who have been accepted into a registrar program prior to completion of their qualification but have not yet obtained general registration.

We thank you in advance for your time and consideration in addressing our concerns. If you have any questions, please contact Ms Vanessa Leung or Ms Jessica Massey (see details below).

Yours Sincerely,

Ms Vanessa Leung  
PhD/Masters (Clinical Neuropsychology) Candidate  
Macquarie University

Ms Jessica Massey  
Doctor of Psychology (Clinical Neuropsychology) Candidate  
Macquarie University

Mr Thomas Morris  
Doctor of Psychology (Clinical Neuropsychology) Candidate  
Macquarie University

Ms Erika Contini  
PhD/Masters (Clinical Neuropsychology) Candidate  
Macquarie University

Ms Alicia deVries  
Masters (Clinical Neuropsychology) Candidate  
Macquarie University

Mr Adam Bentvelzen  
PhD/Masters (Clinical Neuropsychology) Candidate  
Macquarie University

Mr Gaius Gorham  
Doctor of Psychology (Clinical Neuropsychology) Candidate  
Macquarie University 9

Ms Jacqueline Richards  
Masters (Clinical Neuropsychology) Candidate  
Macquarie University

Ms Jillian Attewell  
Masters (Clinical Neuropsychology) Candidate  
Macquarie University

Ms Louise Barrett  
Doctor of Psychology (Clinical Neuropsychology) Candidate  
Macquarie University

Ms Nicole Ridley  
Doctor of Psychology (Clinical Neuropsychology) Candidate  
Macquarie University

Ms Samantha Bzishvili  
Masters (Clinical Neuropsychology) Candidate  
Macquarie University

Dr Karen Croot  
Doctor of Psychology (Clinical Neuropsychology) Candidate  
Macquarie University