From: ann ann

Sent: Wednesday, 1 September 2010 11:47 AM

To: NationalBoards

Subject: Attention Chair, Professor Brin Grenyer

Re: Guidelines on Psychology Area of Practice Endorsements

Dear Professor Grenyer,

The recently published guidelines for PBA endorsements for "areas of practice" in psychology have been of deep concern to me from their inception. The pre-existing descriptions given to Counselling Psychology by the APS have also been of concern to me.

The description of Counselling Psychology that is given by PBA actually outlines the work of a counsellor (professional or otherwise) and ignores the practice of psychology which is hallmarked by the practice of intervention for mental health problems and disorders and also the practice of diagnosis and assessment of mental health disorders as described in the DSM and ICD standardized texts/codes for mental health disorders.

Counselling Psychology is an accepted and accredited international educational standard for the practice of psychology.

The international practice of psychology is generally described as training in the treatment or intervention of mental health problems and/or mental health disorders. Descriptors usually indicate that "Psychologists are also trained to administer and interpret a number of tests and assessments that can help diagnose a condition or tell more about the way a person thinks, feels, and behaves. These tests may evaluate intellectual skills, cognitive strengths and weaknesses, vocational aptitude and preference, personality characteristics, and neuropsychological functioning" (American Psychological Association 2010).

In keeping with this standard, the definition of Counselling Psychology in Australia will provide a description that involves assessment, diagnosis and treatment of mental health disorders. Counselling psychologists do specialise in training in clinical skills that include psychological therapy and advanced-level skills in diagnosis. Every credible source of information about Counselling Psychology in Australia reinforces this reality.

I am registered as a psychologist with the specialty of Counselling Psychology with the Western Australian Board. Under this description of psychology, I was approved to do assessment, treatment and diagnosis of mental health problems. As I understand it, this registration and its full practice will be "grandfathered" into the PBA. I have the expectation that this process will continue to allow me to practice my clinical profession. If you have a different assumption or plan regarding the practical applications of my profession, I would appreciate being advised of this as soon as possible.

In turn, I request that you define my Counselling Psychology registration title and practice on your website to align with this pre-existing registration, training and practice so that it is honestly and congruently described to the general public and any future clients.

In addition, I would like to add that the Australian Psychological Society has recognized the training I have received in Counselling Psychology as being more than sufficient training in clinical skills and practice to be eligible for the title of "Clinical Psychologist." My credentials in Counselling Psychology were scrutinized by APS in order for my clients to receive a Medicare Australia rebate comparable to that being obtained by the clients of clinical psychologists. I sought this approval because I felt that my clients were being discriminated against with regards to the value of their rebate from Medicare when compared to rebates being received for services from clinical psychologists. I understand from APS that they have forwarded my name to PBA indicating eligibility for the grade of Member of the APS College of Clinical Psychologists. They indicated to me in writing that this means that I will receive automatic area of practice endorsement in the field of Clinical Psychology with the Psychology Board of Australia. If this is not the case, I ask you to advise me.

I emphasize again and I ask that fair and reasonable descriptors for Counselling Psychology be given by PBA immediately and that they align with the accepted training and practice for Counselling Psychology. An appropriate description would align with the international meaning and also be in accordance with the advice you have already received from those who are responsible for the education and training of counselling psychologists in Australia and other representatives and registration groups that have up until now defined the specialty of Counselling Psychology in Australia. In the past, the APS executives themselves provided the definition of Counselling Psychology for the APS College of Counselling Psychology and this definition has always been contrary to the requests of Counselling Psychology educators and practitioners and even members of the APS Counselling Psychology College Committees as it does not reflect the training and practice of Counselling Psychology.

Kind Regard

D. Ann Spafford Ph.D.