Psychology Board of Australia

AHPRA

psychconsultation@ahpra.gov.au

29 February 2016

Dear Chair and Board members,

**CONSULTATION ON REVIEW OF AREA OF PRACTICE ENDORSEMENTS REGISTRATION STANDARD AND GUIDELINES.**

Thank you for the opportunity to make a submission to the public consultation on the review of Area of Practice Endorsements Registration Standard and Guidelines.

I wish to state my dissatisfaction with the competencies required for counselling psychology endorsement, as outlined in Appendix B of the guidelines. I believe that these competencies do not match those I attained through my Master of Psychology (Counselling Psychology) at Curtin University and completing my registrar-ship to obtain endorsement: namely, they omit knowledge of psychopathology and psychopharmacology, and competence in psychological assessment, formulation and diagnosis of mental disorders, and couple therapy.

The current and proposed guidelines do not depict the work I’ve previously been employed to do with a Medicare Local/Division of General Practice, which employed both Counselling and Clinical Psychologists and registrars. Nor do the guidelines reflect the work I do now in private practice as a Counselling Psychologist, with children and adults at all stages of the lifespan. I do not presently work with couples, but should I choose to do so in future, it concerns me that the guidelines do not reflect my post-graduate training in couple therapy.

Most clients are referred to me by local GPs who provide Mental Health Treatment Plans under Medicare. The referring GPs are usually seeking assessment, diagnosis and treatment for clients with mental health disorders. I occasionally see clients whose treatment is authorised and paid for by the Insurance Commission of WA, and they are also seeking assessment, diagnosis and treatment for clients with workers’ compensation or transport accident insurance claims. To effectively assess, diagnose and treat clients such as those with depressive disorders, anxiety disorders, obsessive-compulsive disorders, trauma and stressor-related disorders, and personality disorders, requires a sound knowledge of psychopathology, competence in psychological assessment, and familiarity with DSM-5 diagnostic criteria and the ability to apply these. It concerns me that the current guidelines give a misleading impression to clients, referring GPs, and other health professionals that I have some *knowledge of* how assessment and diagnosis of mental disorders is done, but am not *competent* to do it.

For these reasons, I support the attached revisions to the guidelines submitted to you in this consultation by the Association of Counselling Psychologists (of which I am currently the Chair) and the APS College of Counselling Psychologists, and urge the Board to give proper consideration to submitting these to the Ministerial Council for approval.

Yours sincerely,

Fiona Carberry.