

PROFESSOR BRIN GRENYER

CHAIR

PSYCHOLOGY BOARD OF AUSTRALIA

GPO BOX 9958

MELBOURNE VIC 3000

Dear Professor Grenyer

Re: *Submission to Exposure Draft: Guidelines on area of practice endorsement*

APS College of Clinical Psychologists

Please find attached an APS National College of Clinical Psychologists submission to the above paper. I wish to thank the PBA for agreeing to an extension for this submission. As there are many detailed comments on the paper, it seemed best to utilise the ‘track changes’ option to easily enable to Board to identify and consider our feedback.

Generally speaking, the Clinical College wishes to advise the Board on several domains of the paper, as follows –

1. It urges the Board to qualify that generalist psychologists may undertake the work of a generalist psychologist rather than ***any work*** of a psychologist upon registration;
2. It strongly advocates for the several hundred W.A. trained clinical psychologists throughout Australia who – as at 17 October 2010 - either held W.A. Specialist Registration or were undertaking a W.A. Specialist Registrar program or were enrolled into an accredited and approved degrees that made them eligible to pursue the W.A. Specialist Registrar program: the college asserts that these clinical psychologists should retain Specialist Registration as a Clinical Psychologist under legally permissible grandfathering clauses, and that there is precedent for such arrangements within the history of Registration Acts within Australia;
3. It strongly urges the Board to be cognizant that, in order to qualify for membership of the APS College of Clinical Psychologists as well as for Medicare endorsed Specialist Clinical Psychologist status, the Doctorate or Masters degree must be ***both accredited*** by the Australian Postgraduate Accreditation Council (APAC) ***and approved*** by the APS College of Clinical Psychologists. Where

the program is accredited but not approved, it does not qualify the applicant for either college membership or Medicare Specialist provider status. Therefore the term **accredited and approved** should be utilized when referring to PBA approved programs leading to eligibility to undertake a registrarship in clinical psychology;

4. It advises that the required stated minimum amount of psychological work undertaken throughout the clinical psychology registrar program must be face to face client work, and work directly related to face to face client work, rather than other psychological work such as administration, management and other duties that do not specifically integrate specialist clinical psychological theories, knowledge and skills with practice;
5. Notes that the stated minimum amount of face to face work (4 hours) stipulated in the paper is insufficient to promote the required systematic integration of specialist clinical psychological theory, knowledge and skills into practice that is assessed and supervised by a Board approved clinical psychology supervisor. It should be noted that the minimum full time equivalent face to face hours is 20 hours (adult and older adult populations) and 16 hours (child and adolescent populations). Therefore, the stated minimum face to face hours for a registrar period in clinical psychology should be restated as 20 or 16 (FTE requiring at least two years registrar program) with a lower limit of 8 or 6.4 (on a 0.4 FTE basis requiring no greater than a five year part time registrar program);
6. Apart from the generous concessions already granted by the PBA in relation to multiple endorsements, the clinical college advises that a period of practice as a registrar in one area of endorsement, as well as the supervision undertaken therein, should be deemed to satisfy the requirements for only one area of practice endorsement only and is ineligible for satisfying the practice period and supervision requirements for a second or subsequent area of endorsement. This ensures that the period of practice is a systematic and integrated integration of the specialist theories, knowledge and skills of one area of endorsement into practice under a focused goal directed and assessed PBA approved supervision process. Therefore, should a registrar be eligible to undertake a registrarship in more than one area of endorsed practice, the registrar must satisfy requirements for areas of practice serially rather than in parallel;
7. Notes that exceptions from the principle of face to face supervision on a one to one basis with a supervisor who is eligible to practice in the same area of endorsed practice would only be approved by the PBA under exceptional circumstances and should not be more generally permissible;
8. The college wishes to advise that the 'Competencies' document is more a document of 'Domains of Knowledge and Skills of Endorsed Areas of Practice' and that competencies will be developed by the college and provided to the PBA as soon as possible in 2011. That being said, the Clinical College is alarmed that these 'Domains of Knowledge and Skill' may be construed as a contemporary reflection of training and supervision in Clinical Psychology in the year 2011, as

they appear to be outdated by at least 20 years. There are critical further developments to this outdated list of Clinical Psychology's 'Domains of Knowledge and Skills' pertaining to knowledge, domains, assessment, intervention, research and evaluation, consultation and clinical leadership, and psychopharmacology that is required to be incorporated. However, the college is reassured that some of the other college's listed knowledge and skills are not so outdated and may indeed even be reflective of their recently elaborated domains of knowledge and skills. The Clinical College considers it reasonable and fair that our Domains of Knowledge and Skill be similarly updated, and we wish to repeat that **these are not to be conceptualised as Competencies.**

The clinical college wishes to thank the PBA for this opportunity for peer review and comment. Please consider an open invitation to contact me for further comment with this seminal work by the Board.

Yours Faithfully,

A handwritten signature in black ink that reads "Anthony". The signature is written in a cursive, flowing style with a large initial 'A' and a long, sweeping tail.

Anthony M Cichello, M.Psych (Clinical), B.Sc (Hons)

Specialist Clinical Psychologist

Chair

National College of Clinical Psychologists

Australian Psychological Society

22/01/11