Professor Brin Grenyer Chairperson, Psychology Board of Australia

Dear Professor Grenyer,

## *Re: Consultation Paper 5, proposed revision to the Guidelines on Area of Practice Endorsements*

Thank you for the opportunity to comment on the PBA's Consultation Paper 5, Proposed revision to the Guidelines on Area of Practice Endorsements (August 2010); I wish to submit the following comments -

- I support the proposal that, in order to facilitate the development of minimum training standards of the profession at the professional doctorate level, encouragement and provisions be made that enable DPsych (Clinical), PhD (Clinical) and MPsych (Clinical)/PhD students to gain general registration as a psychologist, on completion of the following course components, as officially assessed and documented to the PBA, by the Director of the Clinical Training Program -
  - Completion of a minimum 2-year FTE period of enrolment in their specialist clinical doctoral degree, and
  - Completion of all coursework and practicum requirements prescribed for the specialist clinical masters degree, and
  - Completion of research deemed equivalent to requirements of the specialist clinical masters degree,
- I further support the PBA's proposal permitting DPsych (Clinical), PhD (Clinical) and MPsych (Clinical)/PhD students to commence their registrar programs before completion of the research component of their specialist clinical doctoral degrees on completion of the following, as officially assessed and documented to the PBA, by the Director of the Clinical Training Program -
  - For students enrolled in combined MPsych (Clinical)/PhD degrees, the 2-year (FTE) registrar term (or part time equivalent) apply, commencing after general registration
  - For professional clinical doctoral students, the one-year (FTE) registrar term commences following their attainment of general registration and completion of advanced coursework and advanced practicum associated with the professional clinical doctorate degrees.
- I strongly disagree with the prescription of a mere 176 hours per annum of client contact for a registrar program (4 hours a week). This amount of post-degree client exposure is very low and inadequate and equates to around a light work load of two months' FTE

clinical practice. This undermines the intended conceptualisation of a registrar training program as a developmental process towards an endorsed area of practice, contradicts the notion of endorsed area of practice being an equivalent or superior model to specialist registration (refer current Psychology Board of Western Australia guidelines for minimum client contact hours within their registrar programs), and would be inadequate to provide these registrars with the appropriate reflective learning opportunities within which to integrate specialist competencies with specialist clinical practice in the workplace. I strongly urge that these hours be raised to 800 hours per annum (or 18 contact hours a week).

Thank you, again, for the opportunity to submit. I would be most pleased to provide further comment as required.

Best wishes,

Anthony M Cichello Clinical Psychologist

05.09.10