Psychology Board of Australia Professor Brin Grenyer, Chair

Dear Professor Grenyer,

Re: Consultation Paper 5: Proposed Revisions to the Guidelines on Area of Practice Endorsements

We are writing as current postgraduate psychology students at the University of Melbourne, to show our gratitude and support to the changes proposed in the consultation paper on Area of Practice Endorsement.

Specifically, we believe that allowing students to enter into the registrar program, and use the title registrar before thesis submission, is a positive step towards minimising the potential deskilling which occurs between finishing placement and working clinically.

We also believe that removing the minimum EFT from the registrar program, as well as increasing the scope of practice to include research, administration, management, and other positions, promotes students continual enrollment in Doctoral level programs.

We would like to recommend the following issues to be consider by the board, in order to promote the sustainability of the new system:

1. The ability to be registered as a generalist psychologist before thesis submission while part of the registrar program.

We believe that it is in the interest of the students and the profession to be able to gain full registration once completing coursework and placement requirements as it promotes the following:

- Minimises confusion for employers and the public in understating a clinicians level of training
- Creates equality on the amount of remuneration, which is necessary to balance out the
  outgoing costs of being a registrar (e.g. 40 hours of 'active' CPD hours pa, 40 hours of
  Supervision p.a., insurance, PBA and APS membership fees, etc.)

## 2. Costs of being registered with the PBA

The current costs for being registered with the PBA is equal for provisional psychologists, registrars, and fully endorsed psychologists (i.e., \$410 initial fee, \$390 ongoing) despite the difference in pay scales. We would like to see a sliding scale implemented to accommodate the different income levels.

## 3. Requirements for CPD points

There is a required 40 hours of 'active' CPD as part of the registrar program, which is currently unavailable for smaller areas of endorsement such as clinical neuropsychologists. We would like the PBA to either support colleges of the APS such as the College of Clinical Neuropsychologists to provide these hours, or reduce the amount of hours required to be similar to those required by fully endorsed psychologists, or change the nature of the 'active' CPD hours to be achievable by registrars independently.

Overall, we feel that the changes proposed by the PBA will have a positive impact on the psychology profession. We thank you for your consideration of these additional concerns.

Yours sincerely,

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