



# Consultation on the Scope of Practice for Neuropsychology

**18 March 2022**

The Board is seeking comment from relevant stakeholders on future directions for the neuropsychology scope of practice. In this round of consultation, we seek preliminary views on whether this scope should be retained, and if so, how eligibility for the scope should be determined including the potential for re-opening the grandparenting pathway.

## **SECTION 1: BACKGROUND**

### **Neuropsychology scope proposed in 2015, gazetted 2018**

The Health Practitioners Competence Assurance Act 2003 (the **Act**) (refer s 11) requires the Psychologists Board (the **Board**) to describe the profession in terms of one or more scopes of practice, which practitioners can then apply to be authorised to practise within. In line with the principal purpose of the legislation – to protect the public – the primary purpose of establishing a scope of practice is to highlight an area of practice that is perceived to represent significant risks to the public and to prescribe the particular competencies needed to practise safely in that area. Members of the public can then more readily identify practitioners who have been assessed by the Board as having the requisite competencies.

In December 2015 the Board consulted stakeholders on the question of whether or not a scope of practice for neuropsychology should be established, and whether or not the Clinical scope should be a prerequisite. There was strong support for the proposal of a stand-alone Neuropsychology scope, and further consultation led to a description of the scope and definition of what qualifications and core competencies should be required.

The Neuropsychology scope was gazetted on 11 January 2018, taking effect from 15 February 2018.

Qualifications prescribed for the scope, as gazetted:

*A minimum of a Master's degree in Psychology from an accredited educational organisation and an accredited Postgraduate Diploma in neuropsychology, or equivalent qualification. Eligibility for the Neuropsychologist scope of practice shall require a Board-approved practicum or internship involving no less than 1500 hours of supervised practice.*

### **Grandparenting**

At the time the neuropsychology scope was established, there was no New Zealand qualification available, although two universities had indicated that they were planning to establish an academic qualification that, when accredited by the Board, would provide entry into the scope. Despite the best efforts and intentions of the universities, a New Zealand qualification in neuropsychology remains elusive. One university is still actively working on establishing a qualification but there is no guarantee that this will eventuate and certainly no clear date by which it might be available.

As part of implementing a new vocational scope, the Board was obligated to provide a 'grandparenting' pathway to registration for practitioners who have already been competently and safely practising in the area described by the scope. Such a temporary, time-limited pathway has routinely been implemented by the Board for other newly established scopes of practice. In the case of this scope, it was proposed that a grandparenting pathway would also provide an interim mechanism for addressing the lack of an accredited training programme in New Zealand.

Grandparenting into the Neuropsychology scope requires psychologists who do not have a suitable Master's or Doctoral degree in neuropsychology to have practised neuropsychology for at least 4,000 hours over the last six years (2,000 hours is roughly equivalent to a year of full time practice).

The initial timeframe for grandparenting applications into the scope was February 2018 until March 2019. This was later extended until 31 March 2021. With the closing of the grandparenting pathway there is now no entry path into this scope other than by holding a suitable qualification obtained overseas. This leaves the Board in the position of having a scope of practice that does not have a local qualification and no guarantee that such a qualification will become available.

### Current state

Almost all of the holders of the Neuropsychologist scope also hold the Clinical scope; only 8% of psychologists with the Clinical scope also hold the Neuropsychology scope.

Registered psychologists, current practising certificate	3804
Total Neuropsychology Scope, current practising certificate	179
Clinical and Neuropsychology scopes	167
Psychology and Neuropsychology scopes	6
Neuropsychology scope only	5
Clinical Scope, current practising certificate	1987

### Potential Options

- Re-opening the grandparenting pathway with existing requirements
- Re-opening the grandparenting pathway in a different form
- Not re-opening the grandparenting pathway, with the expectation that a NZ neuropsychology training programme will become available in the near future
- Removing the Neuropsychology scope of practice entirely

The interim solution of re-opening the grandparenting pathway on a temporary basis would enable a solution for those applicants who were not able to achieve the required grandparenting hours by the 31 March 2021 deadline, but have done since then or will do so in the near future. This will give the Board more time to consider in depth the future of this scope.

### SECTION 2: How is the Neuropsychology Scope working in practice?

Since this scope was introduced there has been growing concern that rather than enhance protection of the public, this scope may be creating barriers to access for neuropsychology services by inadvertently downplaying the legitimate knowledge and expertise that clinical psychologists have in this area and causing uncertainty in the profession as to what, if any, neuropsychological work clinical psychologists can do. We note that ACC accepts scope of practice in either Clinical Psychology or Neuropsychology as a minimum requirement for a service provider for neuropsychology services. (Concussion Services Service Schedule 2021).

### SECTION 3: Interim Solution – Temporary reopening of grandparenting pathway

Re-opening the grandparenting pathway will restore access to this scope for people who do not hold a prescribed qualification but who have sufficient supervised experience to work competently in this area. The Board proposes that this could be for a period of five years. This would give the Board time to consider all options related to the Scope and the prescribed qualification. The existing criteria could be used, or these could be amended.

To make submissions, please complete our survey, by [clicking here](#).