

"3. Nothing in this act shall be construed to prevent qualified members of other professional groups such as ———, ———, or ——— from doing work of a psychological nature consistent with their training and consistent with any code of ethics of their respective professions, provided, however, they do not hold themselves out to the public by any title or description incorporating the words 'psychological,' 'psychologist,' or 'psychology.'"

Medical disclaimer clause. The 1955 policy statement recommended that laws regulating the practice of psychology should include a disclaimer clause stating that certification or licensing under the act does not confer the right to practice medicine. In one form or another, all of the state laws passed to date do contain such a provision. It is the Committee's judgment, however, that since psychologists do not represent themselves as other than psychologists, to disclaim the right to practice other professions is inappropriate. Here again, however, the Committee does not feel that inclusion or exclusion of such a provision should be made a crucial issue.

B. *Level of Certification or Licensure*

The 1955 policy statement made three recommendations with respect to levels. Although a preference was expressed for a one-level law, the recommendations were relatively permissive. Experience with laws leads the Committee in 1967 to recommend that:

"4. Legislation regulating the practice of psychology should be restricted to one level, requiring the doctoral degree from an accredited university or college in a program that is primarily psychological, and no less than 2 years of supervised experience, one of which is subsequent to the granting of the doctoral degree. This level should be designated by the title of "psychologist." Psychology should depend on the profession itself for higher level certification or licensure (of which ABEPP is an example)."

However, in some states it has been necessary to certify or license at more than one level. When this occurs, the legislation should reflect the following recommendations:

"5. If a state desires legislation *below* the psychologist level, this level should be designated by a title which includes the adjective "psychological" followed by a noun such as "examiner," "assistant," "technician," etc. It should require a defined program of at least 1 year of graduate training in an accredited university or college, plus experience leading to qualifications in the practice of certain defined psychological functions, under the supervision of a psychologist. In addition, the law should contain a provision prohibiting independent practice by such individuals.

"6. If a state desires legislation *beyond* the psychologist level, this level should be designated by the title of "consulting psychologist." It should require competence and experience equivalent to that of the ABEPP diploma."

That the 1955 recommendations have had an effect is shown by the fact that out of 41 laws now in existence, 32 certify or license at one level, 1 (Michigan) certifies at three levels, with 8 providing for two levels. In 2 (Kentucky and Washington) of these 8, provisions for the nondoctoral person is via a certificate of qualification for specified functions, rather than a specific title. The Committee on Legislation feels that this provision is in accord with Recommendation 5 above.

C. *Specialty*

As to specialty legislation, in its 1955 report, the Committee did not favor legislation which permits differentiation of specialties within psychology, regardless of whether these specialties are defined by the functions carried out or by the locale where the work is done. These matters are best dealt with by intraprofessional controls. None of the current laws is specialty legislation. We reaffirm the 1955 policy statement against specialty legislation, and recommend that:

"7. Legislation regulating the practice of psychology at the "psychologist" or "consulting psychologist" level should not attempt to differentiate psychological specialties either by function or by locale."

This policy still permits, in those states having *certification* laws, any person who has been trained as a psychologist to call himself by any other name without being certified. In those states with *licensing* laws, titles are not relevant.