

themselves, on a private fee-for-service basis, under some title or other that implies training or expertise in the field.

A reference was made at the previous session of the hearings to the classified telephone listings, under psychologists.

May I point out there is an equally mixed assortment under marriage and family counselors also in the classified section.

STANDARDS

The present legislation will set standards for psychologists but those who are not qualified as psychologists may continue "business as usual" by designating themselves as Family Counselors, Marriage Counselors, Counselor in Personal and Emotional Problems, Therapist or Lay Analyst to name a few possibilities. Unfortunately, there is no clear or practicable line that can be drawn between counseling and psychotherapy and there is no clear or practicable line that can be drawn between adjustment problems or behavior problems and mental or emotional illness. There are trained individuals of many backgrounds who are competent to administer this particular treatment modality in appropriate cases and altho psychotherapy is only one among many treatments in use, it is the most time consuming. Because of this, the public interest would be much better served by the licensure of all therapists and counselors who offer themselves *on a private fee-for-service basis* as competent to understand, predict or alter personal, emotional, behavioral, adjustment or family problems. I think that each of the many disciplines involved—social workers, nurses, marriage counselors and others—can, as the psychologists have, outline the educational and experiential standards necessary for competence in the independent practitioner.

I stress the therapist-counselor in private practice because public and private non-profit agencies have many built in safeguards of the clients interest in their own standards, their selection policies, their supervisory structure and the use and availability of medical consultation. Of course, the counseling offered by a clergyman in the pursuit of his usual pastoral duties is excluded unless he goes into the business of counseling on a fee-for-service basis, in which case, he too should meet standards as a therapist-counselor. The statutory standards for each group must be sufficiently high to eliminate the unqualified but obviously would vary. They should explicitly require that the individual therapist-counselor be aware of and accept his own limitations in regard to the type of case he is qualified to work with and the scope of treatment he can provide. There should be severe penalties, e.g. loss of licensure, fines, etc., for the therapist-counselor who presumes to offer or presents himself as offering other treatment modalities or evaluation beyond his competence. Further, the standards should require that the therapist-counselor must seek proper consultation or make appropriate referral to a physician, a psychiatrist or a hospital when such might be indicated or beneficial. In my experience, competent non-medical therapists use discretion and judgment in declining to treat individuals who need other therapies, or hospital care or who are suicidal or potentially dangerous. The effect of such legislation as I am suggesting would be to rid the field of the unscrupulous