Dr. Schultz. With your permission, I would like to read it. It is relatively brief and sums up, I think, our thinking. I express here my thinking on behalf of the Department of Public Health of the District.

Mr. Walker. Proceed.

Dr. Schultz. I am Dr. John D. Schultz, Associate Director of Mental Health and Retardation, Department of Public Health.

Mr. Chairman, at the hearings on this proposed legislation June 3, 1968, I submitted a prepared statement which was entered in the record. This indicated our support of the intent of the Bill, which is designed to regulate the practice of psychology in the District of Columbia. In the same statement I reaffirmed the need for clarification of some of the language, particularly with reference to Section 4.

## PROPOSED AMENDMENTS

A draft of a proposed amended Bill submitted to the Subcommittee by the D.C. Medical Society, the D.C. Medico-Chirurgical Society, the Washington Psychiatric Society and the Washington Psychoanalytic Society, has been referred to us for comment. This draft has been examined in this Department and, while generally acceptable and desirable in the changes that it makes, there are one or two areas where the Department has some doubt as to the desirability of the proposed changes.

Section 3(E) of the proposed amendments does not seem to us to be particularly meaningful. It would read (see p. 150) as follows:

(E) For purposes of this Act, references herein to "the practice of counseling and psychotherapy" mean the offering by an individual of services involving the application of the principles and techniques of counseling and psychotherapy, individually and in groups, to individuals with personal complaints and/or symptoms.

I do not understand why this definition was added. It apparently is added to make clear that counseling as used here is essentially synonymous with psychoterapy. They define the practice of counseling and psychotherapy. I would modify my statement to the extent that I think that Section 3(E) does add something of significance and should be included.

The changes in Section 4 are acceptable and appear to clarify without substantially changing the intent of this section. There are certain minor changes in Section 5 which the Department thinks are not

controversial and these are supported.

There is an important change in Section 6(B) which provides for the Commissioner to appoint a Board of Psychology Examiners without the requirement that they be recommended by any specific group. The Department concurs in this change as it believes that the Commissioner should not be limited in his selection of Board Members, if

he determines they are qualified.

Section 7(B) makes additional requirements of a licensee who intends to "practice consultation and psychotherapy," both in the examination and training requirements. While this seems to be, at this time, a novel division of what has been generally considered the practice of psychology, the Department sees no reason to object. Neither is this enthusiastically supported as it would seem that all psychologists should be subject to the same requirements insofar as the examination given and the training required.