

is a phrase which can be compared to the practice of medicine. We indicate that by subsequently introducing the term "complaints and/or symptoms", which is what we feel patients generally have.

Mr. SISK. I appreciate your comments. Your proposed Section 3(E) reads:

For the purposes of this Act, the 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.

Of course, that is really not a definition, because it uses the same terms to define terms. You are not really defining the meaning of counseling and psychotherapy. You are actually attempting to make a definition as it applies in a particular medical case. Is that not what you are saying? You cannot in stating a definition of any given word use the same word to define it. Do you see what I mean?

Mr. KUDER. Perhaps I can answer that, Mr. Chairman. I am Armin U. Kuder. I have been assisting the Psychoanalytic organization in the drafting of this language.

I think the purpose of this section is not so much to define psychotherapy—that is the reason that Dr. Legault can so readily adopt the language of the North Carolina bill—but to define the practice, which is, (1) offering certain services to the public (individual counseling and psychotherapy and group counseling and psychotherapy), and (2) identifying the individual who would be receiving it. This defines not so much the technique but the activity of the psychologist. If psychotherapy were being done in a university setting for teaching purposes or something like that, that would not constitute the "practice" of counseling and psychotherapy.

Mr. SISK. Thank you.

The gentleman from Ohio had a question.

Mr. HARSHA. I just wondered if the North Carolina definition does not at least imply counseling. It says "to modify feelings, attitudes, and behavior which are intellectually, socially, or emotionally maladjustive or ineffectual." Are you not in fact counseling?

Dr. CUMMINGS. Certainly, when trying to define it, it is broader. I think possibly it might be said that psychotherapy is one particular form of counseling. I am not sure of myself here, but I think it is a possibility.

Mr. HARSHA. Does the North Carolina definition meet your objection?

Dr. LEGAULT. I have no objection to that. I generally felt the North Carolina Act is a very good Act all around, including the definition of psychotherapy.

Mr. SISK. I agree with that.

Dr. CUMMINGS. I might say, parenthetically, it represents a couple or three other very good statutes which have actually used this definition. We could have cited a couple of other States, too. North Carolina is one of them.

Mr. SISK. Go ahead, Doctor.