

son not certified under the Healing Arts Practice Act of the District of Columbia, approved Feb. 27, 1929 (45 Stat. 1326), as amended.

Note that we have included the Subcommittee's (particularly Mr. Whitener's) suggestion to replace the somewhat weaker "is expected to" with the word "shall", before the word "assist" in the first sentence of Sec. 4.

SEC. 5. Throughout this and other sections of their proposed bill, the psychiatrists have separated psychotherapy and counseling from the remainder of the practice of psychology. We understand their concern with psychotherapy, since it represents an area of overlap and mutual concern to both professions. But there are a number of problems here. For one thing, we rigorously reject the notion that all psychotherapy by definition involves the idea of disease and illness. Some, indeed, does; in such instances we would hope that Sec. 4 would clearly show the psychologist's responsibility to maintain genuine collaboration with a physician when he participates in the treatment process here. In other cases, however, it is widely felt (by psychiatrists, psychologists, and others, as evidenced in the psychologists' licensing bills passed in the other states) that the psychologist is well prepared to independently assist the client in exploration of attitudes, re-learning more adaptive behavior patterns, improvement of interpersonal relationships, development of more effective means of dealing with the stresses of living, and so forth.

Where the term "counseling" is concerned, we would voice a heartfelt, friendly warning to the psychiatrists that they may well be bringing down a torrent of objections from a host of other precincts by attempting to bring "counseling" into the practice of medicine. The activities of vocational advisers, various educational personnel, and advisers on marital problems—not to mention the activities of lawyers, ministers, and many others—sit squarely in the middle of this term without having anything remotely to do with medicine.

One more point. Psychotherapy and counseling, important though they may be in the practice of psychology, are only part of that practice. We view such other activities as employee selection, industrial consulting, consumer analysis, human factors engineering, manned systems analysis, and advising on experimental design (to name but a few) as being just as significant as counseling and psychotherapy. No suggestions have been put forth by these other groups to regulate or treat them separately, and we would suggest that the protective controls for the public which are built into HR. 10407 as amended are sufficient for psychotherapy and counseling also.

Thus we recommend that special references to these two activities be taken from Sec. 5 and from the remainder of the bill, *with one exception*. We thank our psychiatrist colleagues for the suggestion that the psychological "assistants" referred to in Sec. 5(C) be prevented from engaging in psychotherapy. We accept this suggestion.

We also accept with thanks their somewhat expanded wording of the first sentence of Sec. 5 (through the word "Act" (page 4 of their proposed draft)).

To summarize our reactions to suggestions concerning Sec. 5, we would recommend that the section be returned to its S. 1864 form, with the following two exceptions: (1) the psychiatrists' superior wording of the first part of the first sentence of the section be retained; and (2) the suggested enjoining of psychotherapy by unlicensed persons in the employ of licensed psychologists (Sec. 5(C)) be retained.

SEC. 6. No differences.

SEC. 7. The psychiatrists have suggested the addition of a subsection applying specifically to counseling and psychotherapy, where examinations are concerned. For reasons stated above, we reject this subsection. We would respectfully observe that Sec. 7(C) allows for the tailoring of examinations to the various types of specialties within the practice of psychology.

SEC. 8. We would reject the reference to counseling and psychotherapy in the opening sentence of the section. We would also reject the proposed added 8(C). However, we accept with thanks the very good suggestions by the psychiatrists pertaining to the experience requirements: from one to two years in (A) and from five to seven years in (B).

SEC. 9. We would return to the original wording, eliminating special reference to counseling and psychotherapy.

SEC. 10. Return to original wording, for same reason.

SEC. 11. We accept the psychiatrists' suggestion to remove the "eminence" clause (Sec. 11 (1)), retaining the remainder of the original.