

To: Members of House Committee: Business & Labor 20 March 2009
From: Drs. George Watson & Stuart Hall: MT Licensing Board for Psychologists

As we are likely not able to be present when **SB 235** (Murphy-Clarifying re Psychological Testing)) is presented to your committee (26 March), we would like to provide our thoughts in this memo re that Bill.

There are several key flaws with SB 235 (Murphy) that create serious potential harm for the public. An appropriately detailed analysis would take many pages. The following is a very simple list of the most salient problems.

Range of individuals allowed performing psychological testing, evaluation, and assessment under SB 235. In addition to various mental health professionals, physicians, lawyers, pastoral counselors and educators are allowed to perform psychological assessment. This is obviously nonsensical. These professions essentially have no training in psychology, psychological evaluation or psychological assessment. In terms of the mental health professionals included in the language, their training is inadequate for them to be engaged in psychological assessment (see below).

Psychological assessment is a complex process that takes extensive training and supervision to become competent to answer complex psychological questions. The results from a psychological assessment are not simply interpreted on the basis of the scores derived from a given test. If done in this manner, great inaccuracies in the conclusions result. IT IS NOT A SIMPLE PROCESS nor is SB 235 a "simple Bill."

Psychological assessment is a very complex task that involves the integration of information from multiple sources, only a part of which are the results of psychological tests, to answer complex clinical questions. "Multiple sources" would include gathering and interpreting clinical and behavioral history, mental status, and environmental information. Included as well are family, relational and educational impacts upon their development, the clinical interpretation of current and historical stressors as well as other sources.

In a psychology doctoral training program, students take at least 2-3 semester-long courses to develop an appropriate understanding of psychological assessment as well as up to 500 hours (or more) of supervised assessment experience. More over, they receive additional supervision in assessment for two more years during their pre-doctoral internship and post-doctoral year. This training meets guidelines established by the American Psychological Association (APA) for training in psychological assessment (see below). As one of the UM Counseling faculty (Professor and former Chair Cathy Jenni) has written, "Counseling Masters level students do not graduate with the full complement of psychological assessment skills sufficient to represent themselves to the public as providers of comprehensive psychological assessment..." Other UM faculty have written similarly. The reason psychologists insist on such extensive training is that it is not a simple process to learn or to do psychological assessment/evaluation.

Insufficiently trained non-doctoral Master level professionals will say "they have been doing it for years," Unfortunately, they have been doing something for which their faculty say they have not been adequately trained nor have they been assessed by a qualified licensing board.

No criteria are specified in SB 235 as to the training required to be qualified to conduct psychological assessment. As noted above, the APA has developed guidelines describing the training needed to conduct psychological assessment. These guidelines were developed over many decades of experience. There are reasons: it is a difficult process to master and the implications for those who are evaluated are weighty and often severe. It should not be taken lightly. To allow a variety of professions to engage in psychological assessment without proper criteria for training or competence is reckless at best.

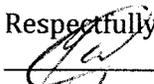
Decisions have lasting impact. The conclusions drawn from psychological evaluations can have a major impact upon people's lives. Your children can be taken away, compensation for damages may be wrongly given or not, your competency to stand trial can be mistakenly assessed, you can be wrongly incarcerated or wrongly not (e.g., with sex offenders), your ability to take care of yourself can be wrongly assessed. These are just a few possible consequences of inaccurate psychological assessment. The consequences can ruin a person's life or save them from a life of pain and suffering. **This is a significant public safety matter.**

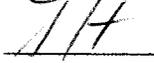
No assessment at board level for competency in psychological assessment. SB 235 does not include a provision for examination of psychological assessment skills by a qualified licensing board. The Board of Psychologists conducts an intensive oral examination of which a major part is assessing competency in psychological assessment utilizing the applicant's own work samples. **The Board of Social Workers and Professional Counselors (SWP) does not.** Notably, the Board of Social Workers and Professional Counselors (SWP) chose not to support the thrust of this Bill whereas the Board of Psychologists chose to oppose it. This is not a turf issue; it is a public safety issue. The SWP does not assess for psychological testing/evaluation competency of its licensees. Of course, there is no such examination of competency for physicians, lawyers, pastoral counselors and educators.

In closing, when proponents say "they have been doing psychological assessment for a number of years" that does not mean their work product meets acceptable standards. Who knows? Where are the safety checks? We cannot emphasize this enough: The severity of the consequences for those undergoing psychological assessment demands that those conducting those assessment be held to the highest standards. Those standards exist. Training guidelines have been developed. To open the flood gates and expose the public to psychological assessment by inadequately trained professionals is reckless and akin to playing with fire. When those terms are used by non-psychologists, they imply a level of expertise that is simply not there. The public deserves and needs better.

We provide our thoughts here as psychologists and private citizens because we have not yet received the Governor's permission to formally represent the Board of Psychologists before this committee. We wanted you, however, to be aware of our concerns.

Respectfully,


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