



North Dakota Psychological Association

To: Senate Workforce Development Committee

From: Sky Overbo, North Dakota Psychological Association President Elect

Date: 2/11/2025

Re: SB 2357 - a bill to create a composite mental health licensing board

Chairman Wobbema and Senate Workforce Development Committee members, my name is Dr. Sky Overbo. I represent the North Dakota Psychological Association (NDPA), a membership organization that provides advocacy and leadership for North Dakota psychologists. The **North Dakota Psychological Association opposes SB 2357**. SB2357 establishes a composite board for mental health professionals, eliminating the boards for psychologists, social workers, addiction counselors, professional counselors, and marriage and family therapists. It falls short in multiple ways.

The legislatively established behavioral health professional Tier system places psychologists with psychiatrists in Tier 1a. Psychologist and psychiatrist training is approximately equivalent and at the doctoral level. Clinical social workers, mental health professionals and addiction counselors are in Tier 2. Composite boards for licensees with similar levels of education and autonomy may simplify and streamline licensing procedures. However, psychologists, with their extensive and specialized training, do not fit within this proposed composite board.

Further, not all licensed psychologists are mental health professionals. Licensed industrial organization psychologists are not clinical psychologists and do not offer mental health services. Clinical psychologists are trained to diagnose and treat behavioral health disorders. However, all psychologists possess additional expertise in using psychometric testing instruments to diagnose mental health disorders and measure a person's intelligence, aptitude, cognitive capacity, personality characteristics, and risk factors for violent behaviors. Measuring the competence of these unique skills requires training specific to psychologists.

Psychologists' doctoral-level training and unique skills, only some of which are mental health-specific, make them ill-fit for this proposed mental health professional composite board. NDPA urges the committee to vote no on SB2357.

Dr. Sky Overbo, Licensed Psychologist