



## Imago Dei Services

To: Senate Workforce Development Committee  
From: Rosalie Etherington, PhD, Licensed Psychologist  
Date: February 12, 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 Rosalie Etherington. I am a licensed psychologist and business owner in North Dakota. I am providing this written testimony in opposition to 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 and psychologists, for the reasons I describe below, do not belong in this proposed composite board.

Psychologists and psychiatrists are Tier 1a professionals in the legislatively established behavioral health professional Tier system. Psychologist and psychiatrist training is roughly equivalent and at a doctoral level. The other clinicians identified in the proposed mental health composite board are Tier 2 professionals. Composite boards for licensees with similar levels of education and autonomy may simplify licensing procedures. However, the fact that the education and autonomy of psychologists is different from the other professionals in the proposed board makes the psychologists ill-fit within this group.

Not all psychologists are mental health professionals. Licensed industrial-organization psychologists, and some experimental psychologists, are not clinical psychologists and do not offer mental health services.

Clinical psychologists are trained to diagnose and treat behavioral health disorders. These skills are roughly similar to the Tier 2 professionals in the proposed composite board. However, all psychologists possess additional expertise in the use of psychometric testing instruments to diagnose mental health conditions and measure a person's intelligence, aptitude, cognitive capacity, personality characteristics, and risk factors for violent behaviors. Specialty trained psychologists also use psychometric testing instruments to determine sexual dangerousness, criminal competency, criminal responsibility, and fitness for duty.

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. I ask the committee to consider voting no on SB2357. Thank you for your time and consideration.