

Regarding Dual Credentialing

Introduction

The State Board of Examiners of Psychology ("Board") recognizes that individuals who obtain graduate degrees in psychology and become credentialed by the Board may also meet the professional requirements for certification and/or licensing by other mental health boards, such as those regulating professional counselors, marriage and family therapists, or fee-based pastoral counselors.

This document is in response to general inquiries to the Board regarding an opinion from the Board on several issues regarding dual credentialing by various mental health professional boards in Kentucky.

Please keep in mind that this is an opinion of the Board based solely on the facts set forth here. The Board has authorized this opinion as an Opinion and Declaratory Ruling pursuant to KRS 13A.130(3) and KRS 13A.010(2)(b) as the agency with jurisdiction to interpret the statutes and regulations governing the practice of psychology in the Commonwealth of Kentucky.

I. Whether dually credentialed individuals must comply with Board laws.

Mental health providers who pursue and obtain dual credentials that include certification or licensing by the State Board of Psychology fall under the regulation of this Board, as well as under the regulation of the other board. Such individuals must comply with all the laws governing the practice of psychology in Kentucky as established by statute and by regulation, for example, the Code of Conduct, 201 KAR 26:145, and the Requirements for Supervision, 201 KAR 26:171.

II. Whether dually credentialed individuals may refer to themselves as "psychologists."

Individuals with any credentials are cautioned that only individuals certified or licensed by the State Board of Psychology are allowed to refer to themselves as psychologists or psychological associates. See KRS 319.005. Only such individuals may refer to and bill their services as "psychological" services. Therefore, if an individual wishes to practice as a psychologist, one of that individual's credentials must be issued by the State Board of Psychology.

Only individuals certified or licensed by the State Board of Psychology are permitted to administer or interpret psychological tests and to prepare psychological reports. See KRS 319.010 and 201 KAR 26:115.

III. Whether dually credentialed individuals may be employed under job titles and descriptions including the terms "psychology."

Individuals licensed or certified by the State Board of Psychology are the only individuals who can be employed under job titles or descriptions using the word "psychology" or any derivation of the word. Any such employment description or duties using the word "psychology" or any of its derivations would imply the practice of psychology, which can be practiced only by individuals credentialed by the State Board of Psychology.

IV. Dual credentialing but practicing under a non-psychology mental health credential.

If an individual holds both a psychology credential from the State Board of Psychology as well as a mental health credential from some other board and yet chooses not to practice psychology, that individual may make no representations as to psychology. This could be the case, for example, if a psychological associate who also was credentialed as a professional counselor, wanted to practice counseling and psychotherapy but did not want to follow the supervision requirements of KRS 319. That individual would have to assure that all office letterhead, signs, billing invoices, advertisements, and telephone book listings or "yellow pages" referred only to that individual's practice of the other mental health profession and not to psychology, or psychological services.

From a practice standpoint, the individual could not perform psychological testing and could not bill for "psychological" services. Again, the State Board of Psychology requires compliance with its law and thus looks to the individual to show that despite the educational background and credential in psychology, that individual's practice is a practice of some other mental health field under some other board's credential that does not imply or is not represented as the practice of psychology as defined by KRS 319.010.

V. Dual credentialing and practicing under psychology and another credential.

Using both credentials in an individual's mental health practice presents complex problems of complying with separate boards' unique laws. An individual credentialed by the State Board of Psychology must follow the laws of KRS 319 and the accompanying regulations.

When an individual is credentialed by both the State Board of Psychology and by some other mental health board, and wishes to practice sometimes under one board and at times under the other, then that individual must have separate and distinct practices and make such distinctions very clear to the public. In these situations, it is the responsibility of the psychologists or psychological associates to fully inform the public and his or her clients under which credential the service is being provided.

Also, upon request, the individual must be able to demonstrate to the State Board of Psychology how his or her practice of psychology and practice of the other mental health discipline are separate and distinct. Specifically, the individual must show how the marketing of the practice, office space, and public notices are maintained so that the public is not misled. Again, it is the responsibility of the individual to show that clients are clearly informed as to the nature and scope of the mental health services being provided to that client.

VI. Conclusion.

As the agency authorized by the Kentucky General Assembly to regulate the practice of psychology in this state, the Board is empowered to interpret its statutes and regulations. In summary, individuals who hold dual mental health credentials, with one of them being from this Board, must keep separate the practice of psychology and the other mental health field. Only individuals licensed or certified by this Board may practice psychology, perform psychological testing, or refer to themselves as "psychologists." Also, any individual who is in fact practicing psychology or who leads the public in any way to believe that the individual is practicing psychology, must conform to the statutes as found in KRS Chapter 319 and the regulations made by the State Board of Psychology thereunder.

This the 4th day of September, 1998.

Chair, State Board of Psychology