

# Position Paper of the Psychological Association of the Philippines on the Philippine Psychology Act of 2009 (RA 10029)

August 23, 2012

## 1. Overview

This position paper seeks to clarify the Professional Regulation Commission's (PRC) interpretation of the definition of "psychologist" as defined in Article III, Section 3(c) for purposes of the finalizing of the Implementing Rules and Regulations of the Philippine Psychology Act.

- 1.1. For people who are not familiar with the nature of psychology as a scientific and professional discipline, it would be tempting to define psychology with reference to other professions such as medicine and law, among others, where all professional psychologists are presumed to have the same basic competencies, functions, and practices. This is a very reasonable assumption on the part of the PRC if it simply assumes that all professions are the same.
- 1.2. However, we invite the PRC to understand the nature of psychology as a profession (a) as it is practiced globally, (b) as it is practiced in the Philippines, and (c) as it was conceptualized in the Philippine Psychology Act. In doing so, we hope the PRC appreciates that ***the Philippine Psychology Act was intended to regulate a specific subset of professional psychologists who engage in specific forms of practice as defined in the Act, but not other types of psychologists who do not engage in these specific forms of practice.***

## 2. Defining the scope of psychology as a science and as a profession

- 2.1. Article III, Section 3(a) defines psychology as "the scientific study of human behavior. It involves the application of scientific methods to inquire into the biological, cognitive, affective, developmental, personality, social, cultural and individual difference dimensions of human behavior." As a scientific and professional discipline, and as implied in the said definition, psychology is extremely broad. Indeed, some recent scholars consider psychology as a multidisciplinary hub comprised of several distinct but related disciplines and professions<sup>1</sup>. For example, it is commonly recognized that the field of clinical psychology is a distinct discipline compared to social psychology, which in turn is a distinct discipline compared to experimental psychology, and so on.

---

<sup>1</sup> Boyack, K. W., Klavans, R., & Borner, K. (2005). Mapping the backbone of science. *Scientometrics*, 64(3), 351-374, and <http://www.psychologicalscience.org/observer/getArticle.cfm?id=2203>

- 2.2. Each discipline within psychology involves a scientific knowledge base that is fairly independent of those in the other disciplines. Thus for example, the competencies and functions of a clinical psychologist are quite distinct from the competencies and functions of the social psychologist, whose competencies in turn are distinct from those of an experimental psychologist.
- 2.3. The distinction among the disciplines within psychology are recognized and formalized in many different forms. For example, the International Association of Applied Psychology, which is the largest international association that receives individual psychologists as members, recognizes at least 15 divisions of applied psychological practice<sup>2</sup>; whereas the American Psychological Association, the largest national association that receives individual psychologists as members, maintains at least 56 divisions of psychological science and practice<sup>3</sup>.
- 2.4. The distinction among the sub-disciplines within psychology is also reflected in the curricula that prepares psychologists for these sub-specialty areas. The most concrete example is that the subjects required to be a clinical psychologist are very different from the subjects required to become a social psychologist, which in turn are very different from the subjects required to become an experimental psychologist, and so on. Thus, ***unlike in the medical profession and legal profession where all professionals take the same sets of subjects, psychologists in the different sub-disciplines undergo distinct curricular programs, with distinct subject requirements that target different sets of competencies.***
- 2.5. ***Within the variety of sub-disciplines within psychology, there is a recognition that the definition of the competencies and practices within each specific sub-discipline is distinct from those in other sub-disciplines.***
- 2.5. In the Philippines, there is also a recognition of the different sub-disciplines within psychology, and that the competencies and functions of each of the sub-disciplines are distinct. For example, the Psychological Association of the Philippines currently recognizes seven sub-specialty areas of practice: assessment psychology, clinical psychology, counseling psychology, developmental psychology, educational psychology, industrial/organizational psychology, and social psychology, and clearly defines the competencies and functions of these sub-specialty disciplines<sup>4</sup>. The primer on these sub-specialty disciplines indicates, for example, that the competencies and functions of the clinical psychologist overlap with those of the counseling and assessment psychologist but are very distinct from the competencies and functions of a developmental and social psychologist.

---

<sup>2</sup> <http://www.iaapsy.org/index.php?page=Divisions>.

<sup>3</sup> <http://www.apa.org/about/division/index.aspx>

<sup>4</sup> [http://www.pap.org.ph/includes/view/default/uploads/pap\\_certification\\_of\\_psychology\\_specialists\\_primer\\_pdf.pdf](http://www.pap.org.ph/includes/view/default/uploads/pap_certification_of_psychology_specialists_primer_pdf.pdf) and <http://www.pap.org.ph/?ctr=page&action=specialist>

2.6. Finally, this recognition is actually enshrined in the Article II, Section 2 of the Philippine Psychology Act, which states, "It also acknowledges the diverse specializations of psychologists and the diverse functions specific to the varied specializations."

### **3. The Regulation of Professional Psychology in the Rest of the World**

3.1. The Philippines is one of the few developing countries that have successfully adopted a national law that regulates the practice of professional psychology. But there are numerous countries that already have a system of regulating psychology as a profession, and in ALL cases, the regulation of psychology professionals covers only those practicing in the fields related to counseling, clinical, assessment psychology and closely related sub-specializations.

3.2. For example, in the United States, only clinical psychologists, counseling psychologists, and school psychologists are licensed by different state boards<sup>5</sup> and all other types of psychologists are not required to be licensed.

3.3. In the United Kingdom, the British Psychological Society has been authorized by the Crown to maintain the Registry of Chartered Psychologists to protect the public<sup>6</sup> and their Registry only covers psychologists who provide direct services to individuals or groups. It only includes clinical, counseling, forensic, sport, educational, and health psychologists. Again, psychologists in other sub-disciplines are not required to be part of the registry.

3.4. The same requirements are in place in Australia, where the professional practice of psychology is regulated by the Psychology Board of Australia, and their standards cover those who do clinical psychology and related functions<sup>7</sup>. Again, psychologists in other sub-disciplines are not covered by the regulatory body. In practice, "psychologist" in Australia is understood to mean a clinical psychologist, so other psychologists call themselves as "social psychologist," "developmental psychologist," "organizational psychologist," among others.

3.5. In 2005, all member countries of the European Union adopted common guidelines for the European Certificate of Psychology which regulates the practice of applied psychologists who render the following six basic services: goal specification, assessment, development, intervention, evaluation, and communication<sup>8</sup>. Again, all other psychologists are not included in the certification system.

3.6. ***Thus, in most parts of the world where the professional practice of psychology is***

---

<sup>5</sup>[www.asppb.org](http://www.asppb.org), [www.psychologyinfo.com/license.html](http://www.psychologyinfo.com/license.html), and [www.psychologyinfo.com/psych.htm](http://www.psychologyinfo.com/psych.htm)

<sup>6</sup>[http://www.bps.org.uk/membership/grades/chartered\\_psy.cfm](http://www.bps.org.uk/membership/grades/chartered_psy.cfm)

<sup>7</sup><http://www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx>

<sup>8</sup>[www.europsy.eu.com/register](http://www.europsy.eu.com/register) and <http://www.europsy-efpa.eu/>

***regulated, the regulation covers psychologists who engage in psychological practice that covers a specific subset of functions typically associated with clinical, counseling, and assessment psychologists.***

***3.7. Moreover, in most parts of the world where the professional practice of psychology is regulated, the regulation does NOT cover psychologists who do not engage in these functions in their practice.***

#### ***4. The Scope of Psychology Practice in the Philippine Psychology Act***

4.1. Article III, Section 3(b) of the Philippine Psychology Act carefully defines the practice of psychology with reference to the delivery of psychological services in relation to three broad functions: psychological interventions, psychological assessment, and psychological programs. The Act actually clearly defines the specific functions under each broad function.

4.2. In this regard, the qualifications for licensed psychologists defined in Article V, Section 12 as well as the examinations subjects defined in Article V, Section 14 have been aligned with these functions defined within the practice of psychology.

4.3. It is quite clear from these provisions of the law that the competencies and functions defined refer to those who practice in the sub-disciplines of counseling psychology, clinical psychology, assessment psychology and closely related sub-disciplines of psychology. It would also be clear that the competencies and functions defined reflect the competencies and functions regulated in similar policies in the countries cited above.

4.4. It would also be very clear for those who know the diverse nature of psychology as a scientific and professional discipline that the same provisions of the law do not make reference to the core competencies and functions of those psychologists who practice in the other sub-disciplines such as developmental psychology, educational psychology, industrial psychology, organizational psychology, social psychology, and other smaller sub-disciplines in the Philippine context such as cultural psychology, cross-cultural psychology, indigenous psychology, cognitive psychology, experimental psychology, biopsychology, environmental psychology, among others, although it is possible that someone who practices in these fields may also acquire competencies in the areas defined in the Psychology Act and may choose to practice in the areas defined in the Psychology Act.

4.5. It should be noted that the competencies and educational requirements stipulated in the Psychology Act are not aligned with the competencies and educational requirements in these other sub-disciplines of psychology.

4.6 We thus argue against the expansion of the RA10029 to include psychological consultation defined as "*providing extensive knowledge, specialized technical assistance and expertise in an advisory capacity to consultees - individuals and professionals or organizations, agencies and corporations in regard to complex human behavior problems and psychological events, for the purpose of helping the consultees improve the management and handling of people/client systems and resources they are working with.*" (Rule 3, h.1b)

The above clauses was not in the original bill and encompasses non-clinical and assessment fields (Development, Educational, Social, Industrial Organizational (IO), etc). We believe that this expansion should not be included in the IRR for the following reasons:

- The original bill covered clinical, counseling & assessment whose work is covered by therapist-client privilege. Therefore, licensure provides a means of quality assurance for prospective clients. In contrast, consulting work for policy and programs done by those in development, educational, social and industrial organizations psychology is very public. Organizations and institutions have mechanisms to vet the quality of recommendations and programs. In addition, PAP already provides certification for these fields.
- There are a number of non-clinical psychologists who provide do consulting work for policy and programs of government and organizations on the basis of their technical expertise in social psychology, developmental psychology, cognitive psychology, industrial-organizational psychology, educational psychology and the like. These areas are not covered in the scope of the required qualifications and credentials. To prevent these psychologists from contributing their expertise will be a disservice to national development.
- Requiring licensure for those in non-clinical, counseling and assessment is prejudicial to individuals in these field because they will be required to take an additional 18 units of graduate education that are irrelevant to the practice in their sub-discipline. This is an additional 3 semesters and will cost an additional (P30,000 to 45,000) per individual.
- There is nothing in the current bill that prevents those in non-clinical, counseling and assessment psychology who wish to be licensed from seeking licensure as long as they comply with the requirements. However, the inclusion of this section forces the licensure of people that the original bill did not intend to cover.
- The expansion has grave impact on the curriculum of graduate programs in the said disciplines. The additional 18 units will discourage individuals from going into social, developmental, educational, IO and other fields because their programs will be longer than that of clinical, counseling and assessment psychology. In the end, this will kill these sub-disciplines.

- Universities may respond by bringing down the number of major courses to accommodate the licensure courses. If this happens, this will blur the alignment between existing curricular programs and target competencies and weaken the training of Psychologist in the Philippines. It would also obscure the globally accepted distinctions between the various sub-disciplines in psychology making Psychology in the Philippines less globally competitive.

#### 4.7 We also argue against IRR Rule 3.1

*“Gathering and integration of psychology related data... accomplished through a variety of tools or measures” shall include the development, standardization and publication of psychological tests which measure/determine cognitive ability and general intellectual functioning; aptitude and special abilities; personality characteristics, attitudes, values and interests; emotions and motivations; inner functioning, needs and conflicts, adjustment and psychopathology; regardless of the type of test, whether pen and paper, computer aided, or objective or projective.*

- The highlighted section is an addition to what is stated in the law. The definition in the law seems to refer only to the use of the various tools for psychological assessment for the purpose of psychological evaluation and does not refer to the "development, standardization and publication" of psychological tests. Although IRR Rule 3.1 echoes the wording of the law in stating that psychological assessment so defined is "in support of psychological counseling, psychotherapy, and other psychological interventions," the inclusion of these expanded functions will also encroach on the work of non-clinical and assessment fields such as Personality, Educational, Social Psychology from which measures of personality traits, emotions, motivations, attitudes, values, etc. are developed, evaluated, standardized, etc. prior to being made available to clinicians and assessment practitioners.

In view of the various points raised above, we invite the Honorable Commissioners of the PRC to adopt a definition of “psychologist” that is restricted to those who engage in the range of psychological services as defined in the Psychology Act, and that excludes other types of psychologists who do not engage in said practice and who are not trained to engage in said practices.

Adopting such a definition is most consistent with (a) the intent of the law, and the specific provisions of the law as regards the definition of the scope of practice, the academic and professional requirements, among others, (b) the diverse practice of psychologists in the Philippines as currently recognized by the professional psychology societies, and (c) practices of regulating the practice of professional psychologists in most parts of the world.

***Most problematic of all, adopting an inclusive definition would result in licensing psychologists who are not prepared nor qualified to engage in the delivery of psychological***

***services as provided by law, because they have been prepared for other competencies and other forms of psychological practices not covered by the law.***

To avoid confusion and in the light of the above points, we suggest that upon enactment of the IRR, the label “psychologist” **be used only by individuals whose psychological practice is covered by law**. Those **not** covered in the law may continue using the specific labels of their discipline (i.e. developmental psychology, educational psychology, industrial psychology, organizational psychology, social psychology, cognitive psychology, experimental psychology, biopsychology, environmental psychology, etc) **with the understanding that they can never represent themselves as licensed psychologists nor engage in the practice as specified in the law**. However, those whose degrees are not clinical, counseling and assessment psychology are welcome to seek licensure as long as they meet the specified experience, educational qualifications and competency requirements. This is consistent with the practice in other countries.

In closing, Article II, Section 2 expresses the goal of protecting the public from inexperienced and untrained individuals offering psychological services. The restrictive definition of “psychologist” as proposed in this position paper ensures that all those who will be licensed psychologists have that training and experience. In contrast, the alternative inclusive definition of “psychologist” opens the licensure to other types of psychologists who do not have the appropriate training and experience. In the future, this may lead to malpractice and cause greater harm than good. It will defeat the purpose of enacting a law that seeks to professionalize the discipline and protect clients whom we serve.

*Prepared by the Psychological Association of the Philippines Board Members and Division Chairs*  
Signed by:

Allan Bernardo, Chair of CHED Technical Committee in Psychology  
Claudette Alvarez-Agnes, CHED Technical Panel in Psychology & Chair, UST Department of Psychology  
Aurora Corpuz-Mendoza, CHED Technical Panel in Psychology  
Regina Hechanova, CHED Technical Panel in Psychology  
Caridad Tarroja, President Psychological Association of the Philippines  
Ronaldo Motilla – Chair, Miriam College Department of Psychology  
Seann Tan-Mansukhani - Chair, DLSU Department of Psychology  
Angela Regala – Chair, Assumption College Department of Psychology  
Grace Aguilung-Dalisay – Chair, UP Department of Psychology  
Jay A. Yacat, President, Pambansang Samahan sa Sikolohiyang Pilipino  
Cristina Montiel, Division of Social Psychology, Professor, Ateneo de Manila University  
Delia Belleza, PAP Board Member, USC  
Amelia Macapagal,  
Antonio Siy, Assessment Division,