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Ms. Barbara Millar
Senior Policy Analyst
Legislative Unit
Manitoba Health and Healthy Living
300 Carlton Street
Winnipeg, Manitoba
R3B 3M9

Re: Use of the title “doctor” in Part Six of the Regulated Health Professionals Act.

Dear Ms. Millar,

Thank you for providing the January 2009 draft of the proposed *Regulated Health Professions Act* for comment. I am writing on behalf of the Manitoba Association for Behaviour Analysis (MABA) to express our concern with respect to the section outlined in the proposed *Act* which deals with titling. Specifically, we are concerned about the restricted use of the title “doctor” in Part Six of the document (page 44) and how it may apply to doctoral trained psychologists.

Since 1966, under the *Psychologists Registration Act*, enacted as a doctoral level practice, Psychologists have been regulated as health professionals in Manitoba. Use of the title “doctor” to depict the level of academic training obtained by doctoral level psychologists occurs not only within academic and educational settings (as suggested in the Exception clause [68(2)] of the proposed *Act*) but across multiple related settings, including clinical health settings, a practice which is considered standard throughout North America. In fact, the American Medical Association resolved a similar issue in June, 2008, by stating that professionals in a clinical health care setting should clearly and accurately identify to patients their qualifications and degree(s) attained. Further, they support state legislation that would make it a felony to misrepresent oneself as a physician. This highlights the importance of psychologists’ use of the term “doctor” in conjunction with their title as a psychologist in order to distinguish their practice from that of a medical doctor’s in health care professions.

Since it has always been an ethical obligation for psychologists, when articulating their credentials, to advise the public when they have earned a doctoral degree in psychology, it certainly must also be appropriate for them to use the title when working with the public in the provision of health services.

Our primary concern lies with the explicit identification of professional groups permitted to use the title “doctor” in Part six of the proposed *Act*. The exclusion of psychologists from the list suggests a threat to the use of the title “doctor” among



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doctoral psychologists. It is unclear as to whether section 68(2) which outlines the *Exception for academic or educational designations* permits use of the term “doctor” for psychologists practicing in health services. This ambiguity has the potential to negatively impact the recruitment of doctoral level psychologists and graduate students in the field of psychology to the province of Manitoba. This is of specific concern to MABA as Applied Behaviour Analysis (ABA) is highly recognized for treatment of challenging behaviours in children and adults with autism and developmental disabilities. To date, ABA is the only empirically supported treatment for children with autism. Given the increased prevalence of autism (approximately 110 children were diagnosed with autism last year in Manitoba alone) the demand for our services is expected to increase. Manitoba has an extremely successful ABA program for children with autism through St. Amant. However, as this is a highly specialized field we must continue to recruit behavioural psychologists from other regions, and students to University of Manitoba’s graduate program.

Finally, the title “doctor” assists the public in differentiating among the levels of training and experience of practicing psychologists, as not all psychology independent practitioners hold doctoral degrees in psychology. It is important for the public to be aware that doctoral psychologists possess an expertise in both assessment and treatment that exceeds that of health professionals with less training.

We urge you to consider amending this draft legislation to permit psychologists to use the title “doctor” in the *Act*. Please let us know if we can be of any further assistance.

Sincerely,

Kirsten Wirth, Ph.D., C. Psych. Candidate
President, Manitoba Association for Behaviour Analysis

- cc. Dr. Harvey Keselman, Head of Psychology, University of Manitoba
- Dr. John Arnett, Director of Clinical Psychology Training, University of Manitoba
- Theresa Oswald, Minister of Health
- Dr. Alan Slusky, Registrar, Psychological Association of Manitoba
- Dr. Nancy Prober, President, Manitoba Psychological Society