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October 3, 2018

Thank you for the opportunity to participate in the discussion regarding House Bill No. 5776, which would amend the language regarding "Clinical Counseling principles, methods, or procedures."

I am submitting this statement on behalf of the Michigan Psychiatric Society. We oppose House Bill No. 5776 in regards to the use of words "diagnosis" and "diagnose."

Our opposition stems from the concern that behavioral health diagnoses can mimic medical disorders. Diagnosis is the basis of treatment. Without good diagnosis, conditions go untreated or are mistreated, leading to ongoing illness, worsening illness, loss of functioning, and/or even death.

A few examples of unintended consequences of non-medical professionals making medical/psychiatric diagnoses without medical training include:

- 1) Children given diagnoses of Attention Deficit Hyperactivity Disorder without reviewing the possible medical causes for symptoms of Attention Deficit Hyperactivity Disorder.
- 2) Adults being diagnosed with dementia without a medical/neurologic evaluation could result in individuals not getting the appropriate treatment and/or placement.
- 3) Individuals diagnosed with a chronic mental health diagnosis without a medical evaluation could inadvertently preclude them from receiving future health insurance, life insurance, or disability insurance.
- 4) Individuals incorrectly diagnosed with a neurocognitive diagnosis could be precluded from receiving necessary mental health treatment through community mental health.

We recommend amendments to the bill including:

- 1) Removal or modification of section (a)(i).
- 2) "Diagnosis" and "diagnose" should be removed because "diagnose and identify the problem" (same language as LARA) is already included in (iv) and it is more in context.
- 3) Add the following clarifying bolded language under section (E)- "the practice of counseling does not include the practice of medicine or osteopathic medicine and surgery, such as, **BUT NOT LIMITED TO, MEDICAL DIAGNOSES (including psychiatric diagnosis), MEDICAL MANAGEMENT AND TREATMENT, DIFFERENTIAL DIAGNOSING**, prescribing drugs or administering electroconvulsive therapy."
- 4) Finally we request the addition of "(iv) a physician" under section (E).

Thank you for your consideration and we respectfully ask for your support.

Respectfully, submitted on behalf of the Michigan Psychiatric Society.

Sincerely,

William J. Sanders, DO, MS  
MSU/Pine Rest Psychiatry Residency Director