



भारतीय पुनर्वास परिषद्

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(सामाजिक न्याय और अधिकारिता मंत्रालय, भारत सरकार के अधीन एक सांविधिक निकाय)
REHABILITATION COUNCIL OF INDIA
(A Statutory Body under the Ministry of Social Justice and Empowerment)

Major General (Retd.)
Ian Cardozo. AVSM, SM.

Chairman
To

3-2 / RCI-2013

67367 67438
Speed Post

9th April, 2013

All State/UT Secretaries
Health and Family Welfare / Medical Education
(as per the list enclosed)

Sub: State Mental Health Rules – Reg.

Dear Sir/Madam,

As per the mandate given in RCI Act (1992), the Rehabilitation Council of India is developing, monitoring, regulating skill-based Clinical Psychology training on the same lines as many other professional courses. Until now 18 institutes have been recognized across the country including NIMHANS, CIP, IHBAS, RINPAS and the recognition of four other centers funded by the Health Ministry under Human Resource Development in Mental Health is in the process for the conduct of 2-Yr. M.Phil Clinical Psychology professional degree course.

Each year approximately 250 Clinical Psychologists are being trained at the existing 18 recognized centers in order to meet the human resource required for effective implementation of the National Mental Health Program, and to provide the needed service to persons with mental illness and other related disabilities. Approximately 600 Clinical Psychologists have been enrolled already by the Council in the Central Rehabilitation Register (CRR) of RCI.

The substantial growth, from merely 2 training institutes and 20 professionals per annum to 20 training institutes and 250 professionals per annum was possible only because of the unstinted support and cooperation by various Central and State Ministries. The Council is thankful for this help and support.

As per the current legislation,

- 1) No individual without a valid registration as a clinical psychologist under CRR, issued by the Rehabilitation Council of India, under the provisions of RCI Act (1992) in any manner hold himself or herself out to the public as a clinical psychologist, or attach the title "clinical psychologist" or any other name or designation which would in any way imply that he or she is able to practice as a clinical psychologist as outlined in Para-3 (see below).
- 2) No University, Department, Hospital, Clinic, Association, Partnership, NGO, or Corporate Body without a valid recognition by the Rehabilitation Council of India, under the provisions of RCI Act (1992) can conduct, offer or offer to conduct any of the RCI monitored clinical psychology training courses unless these entities are recognized by the Council for the function stated.

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- 3) "Clinical Psychology" means the independent evaluation, classification, treatment and rehabilitation of mental, cognitive, perceptual, emotional, behavioral or nervous disorders or conditions, developmental disabilities, psychoactive substance abuse, disorders of habit or conduct, the psychological aspects of physical illness. The practice of clinical psychology includes psycho-educational evaluation, therapy, remediation and consultation, the use of psychological and neuropsychological testing, assessment, psychotherapy, psychoanalysis, hypnosis, biofeedback, and behavioral modification when any of these are used for the purpose of preventing or eliminating psychopathology, or for the amelioration of psychological disorders of individuals or groups, or rehabilitation of individuals with mental illness.
- 4) "Clinical Psychologist" means a person having –
- i) A Professional Qualification in Clinical Psychology recognized by the Rehabilitation Council of India (RCI), from time to time, obtained from an RCI approved institution and granted by an university recognized by the University Grant Commission as per Sections 11 and 12 of RCI Act (1992), and
 - ii) Registration in Central Rehabilitation Register (CRR) as per Section 13 of RCI Act (1992)
- 5) Currently, approved qualifications are: 2-yr M.Phil in Clinical Psychology, 1-yr. Professional Diploma in Clinical Psychology, and 4-yr Psy.D in Clinical Psychology. All of these are fulltime and regular mode courses. Only these qualifications are approved by the Council for registration of Clinical Psychologists in the Central Rehabilitation Register (CRR). These 1-yr., 2-yr. and 4-yr. training courses have been developed and introduced by the Council taking into consideration the acute shortage of human resources at various levels. In all these training courses, the skill-based curricula are built based on universally accepted standards of practice in order to facilitate professional development paths in the area of mental health.
- 6) Ph.D. degree in any branch of Psychology (Clinical/Counseling/Mental Health/ Health Psychology etc.) is not approved by the Council for registration, since Ph.D. degree is basically a research degree with no emphasis on clinical skills and practice guidelines. Hence, a Ph.D. holder, in any branch of psychology, is not eligible to work as clinical psychologist with responsibilities as defined in Para -3.
- 7) No person, other than one who possesses a recognized Clinical Psychology qualification and is enrolled on the Register (CRR) shall hold office as Clinical Psychologist or any such office (by whatever designation called) in Government or in any institution maintained by a local or other authority; and shall practice as Clinical Psychologist anywhere in India (13.2 of RCI Act, 1992).
- 8) These rules are applicable for the purpose of employment under State, Central, Local or Private-funded Institutes, Hospitals, Nursing Homes or in any such entities for indoor, outdoor and long-term residential care of persons with mental illness or any other disabilities mentioned in PWD Act (1995).

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9) In view of the above, the Council suggests that the definition of "Clinical Psychologist" in State Mental Health Rules for the purpose of recruitment for any office and/or practice in the field of clinical psychology, be amended and/or incorporated as,

"Clinical Psychologist" means a person having –

- i) A Professional Qualification in Clinical Psychology recognized by the Rehabilitation Council of India (RCI), from time to time, obtained from an RCI approved institution and granted by an university recognized by the University Grant Commission as per Sections 11 and 12 of RCI Act (1992) and,
- ii) Registration in Central Rehabilitation Register (CRR) as per Section 13 of RCI Act (1992)

Lack of clarity, rules that are inconsistent with the existing Act, definitions of professions in a perfunctory manner and such other inadequacies in State Mental Health Rules (and UTs) across the country have led to widespread quackery, public harm and several litigations (personal petition by aggrieved party as well as PIL) by registered professionals. It is therefore necessary to immediately amend and/or incorporate the definition of clinical psychologists in the state mental health rules to read as suggested above.

This may please be taken up by the State Ministry of Health and Family Welfare / Medical Education on priority basis as it concerns the welfare of persons with disability and the rights of qualified registered rehabilitation professionals.

Thanking you,

Yours faithfully



Maj. Gen. Ian Cardozo, AVSM, SM
Chairman

Cc to:

1. The Secretary
Department of Disability Affairs
Ministry of Social Justice & Empowerment
Shastri Bhawan, New Delhi
2. Dr. Keshav Desiraju
Special Secretary
Department of Health & Family Welfare
Government of India, New Delhi
3. Dr. Soumitra Pathare, M.D., MRC Psych
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