December 31, 2018

Dr Hon Pierre Chan
Chairman of Panel on Health Services
Legislative Council
Legislative Council Complex
1 Legislative Council Road
Central, Hong Kong

Dear Chairman Chan,

RE: Accredited Registers Scheme for Clinical Psychologists

The American Chamber of Commerce in Hong Kong appreciates the opportunity to express its views on the Food & Health Bureau's proposed Pilot Accredited Registers Scheme for Healthcare Professions, specifically for the Clinical Psychologist profession.

AmCham is pleased to acknowledge the HKSAR Government's effort in upholding the professional competence of healthcare professionals and providing information for the public to make informed decisions about the provision of healthcare services. However, the proposals by the Division of Clinical Psychology (DCP) to become the accredited professional body of clinical psychology in Hong Kong would **indirectly exclude non-Cantonese psychologists from practicing under an official title**. This exclusion and discrimination would cause the 6.1% of Hong Kong's population who does not speak Cantonese, Mandarin, or any other Chinese dialect to **lose access to quality and effective psychological care**.

Clinical psychologists provide psychotherapeutic treatment to assist patients in identifying emotional, mental, and behavioral problems in their lives. It is in the nature of this profession that there is transparent psychologist-patient exchange. Any communication barriers could become a source of error in diagnosing and providing effective psychological treatment. This area of patient-care relies heavily on proficient verbal exchanges as well as a comprehensive shared cultural competency.

AmCham also views that the proposals by the DCP jeopardizes **the job security of overseas trained clinical psychologists with overseas license or registration**. According to the proposals, there are 6 routes to become a registered clinical psychologist in Hong Kong. Though the routes appear to account for both locally- and internationally-licensed practitioners, the regulations indirectly exclude overseas licensed clinical psychologists as follow:

1. All arrangements for internationally trained clinical psychologists are on a case-by-case assessment by the Hong Kong Institute of Clinical Psychologists (HKICP), but HKICP only has locally-trained clinical psychologists;

2. Criteria to meet education and competency standards of the local accreditation is not compatible with overseas training;

3. For U.S licensed clinical psychologists, only those accredited by the American Psychological Association (APA) are recognized;

4. Remedial Training can cost up to $90,000 per person;

5. Transitional arrangements that involve working in local settings are not feasible for non-Cantonese speaking clinical psychologists.

AmCham, therefore, strongly advises against approval of the current proposals by the DCP, and urges for additional review and adjustments of the criteria to address the abovementioned issues.

It is AmCham's mission to maintain Hong Kong's international stature and as such, the regulations of the Hong Kong Institute of Clinical Psychologists should not in any way discriminate against overseas trained psychologists practicing in Hong Kong. In this age of globalization and regional integration where international workforce mobility is not uncommon, unfair exclusion such as the proposed regulations would significantly impact Hong Kong's reputation as a welcoming international city, in which a large non-Cantonese /-Chinese speaking population of professionals, executives and talents choose to live and work.

AmCham would be very pleased to provide further feedback. Should you have any questions, please contact Ms. Agnes Tsang, Director of Government Relations & Public Affairs at atsang@amcham.org.hk, or by phone: 2530 6927.

Yours faithfully,
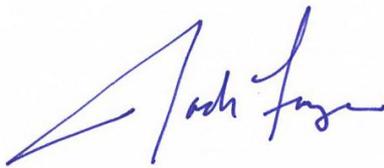
Jack Lange   Tara Joseph
2018 Chairman   President

CC   Secretary for Food & Health